



# SUNNICA ENERGY FARM

EN010106

Volume 6

Environmental Statement

6.2 Appendix 16F: Framework Operation Environmental  
Management Plan

APFP Regulation 5(2)(a)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and  
Procedure) Regulations 2009



Planning Act 2008

**The Infrastructure Planning  
(Applications: Prescribed Forms and  
Procedure) Regulations 2009**

**Sunnica Energy Farm**

**Environmental Statement**

**Appendix 16F: Framework Operation Environmental Management Plan**

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# 1 Introduction

- 1.1.1 This document provides a framework for the Operational Environmental Management Plan (OEMP) for Sunnica Energy Farm (hereafter referred to as 'the Scheme'). An OEMP will be produced for the Scheme following the appointment of a contractor, prior to the date of final commissioning of the Scheme. The OEMP will be prepared in accordance with this Framework OEMP, as a Requirement of the Development Consent Order.
- 1.1.2 As the Scheme is split across four main areas (i.e. Sunnica East Sites A and B and Sunnica West Sites A and B) (see section 1.3 below) and may commence operation in phases, there may be more than one OEMP prepared for the Scheme. This will be determined by the appointed contractor once the detailed operational programme is known.
- 1.1.3 This document does not address construction or decommissioning activities, which are subject to separate environmental management plans and procedures, secured as necessary through the DCO. A Framework Construction Environmental Management Plan (CEMP) and a Framework Decommissioning Environmental Management Plan (DEMP) have been submitted as part of the DCO Application, presented in **Appendices 16C** and **16E** of this Environmental Statement [**EN010106/APP/6.2**] respectively.
- 1.1.4 An Environmental Impact Assessment (EIA) has been undertaken for the Scheme and an ES has been prepared, in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) (Ref. 1). In accordance with the requirements of the EIA Regulations, the ES contains the assessment of potential impacts on the environment that may be caused during the operation of the Scheme and describes proposed mitigation measures.
- 1.1.5 This Framework OEMP demonstrates how the mitigation measures included within the ES will be implemented. It also sets out the monitoring and auditing activities designed to ensure that such mitigation measures are carried out, and that they are effective.
- 1.1.6 This document provides the likely structure of the OEMP(s) and some outline information relevant to the OEMP(s). It indicates what additional information might be included under each sub-section within the OEMP(s).
- 1.1.7 The OEMP(s) will be produced in line with this Framework OEMP prior to the date of final commissioning. The OEMP(s) will be approved by the relevant planning authority for that phase, and where the OEMP relates to an area within the administrative areas of both the District of West Suffolk and the District of East Cambridgeshire, approval will be required from both planning authorities. Approval is to be in consultation with the relevant highway authority and the Environment Agency.
- 1.1.8 The key elements of this Framework OEMP include:
- a. An overview of the Scheme and associated operation programme;
  - b. Prior assessment of environmental impacts (through the EIA);

- c. Reduction of potential adverse impacts through design and other mitigation measures;
  - d. Monitoring of effectiveness of mitigation measures;
  - e. Corrective action procedure; and
  - f. Links to other complementary plans and procedures.
- 1.1.9 In summary, this Framework OEMP will identify how commitments made in the EIA will be translated into actions during Scheme operation and includes a process from implementing the actions through allocation of key roles and responsibilities.
- 1.1.10 The Applicant will be responsible for working in accordance with the environmental controls documented in the OEMP which is required to be substantially in accordance with this Framework OEMP, pursuant to the DCO.
- 1.1.11 This Framework OEMP has been designed with the objective of compliance with the relevant environmental legislation and the mitigation measures set out within the ES. Any additional licences, permits or approvals that are required will be listed in the OEMP(s), including any environmental information submitted in respect of them.

## **1.2 The Applicant**

- 1.2.1 Sunnica Ltd (hereafter referred to as 'the Applicant') has submitted the DCO Application for the construction, operation, and decommissioning of the Scheme. The Application is submitted to the Planning Inspectorate, with the decision of whether to grant a DCO being made by the Secretary of State pursuant to the Planning Act 2008 (Ref. 2).

## **1.3 The Order limits**

- 1.3.1 The Order limits comprises the Sites (the Sunnica East Site A, Sunnica East Site B, Sunnica West Site A and Sunnica West Site B). The Order limits include the associated electrical infrastructure for connection to the national transmission system, comprising Grid Connection Route A, Grid Connection Route B and an extension to the Burwell National Grid Substation.
- 1.3.2 Grid Connection Route A will run from Sunnica East Site A to Sunnica East Site B, and from there to Sunnica West Site A. Grid Connection Route B will run from Sunnica West Site A to Sunnica West Site B, and from there to Burwell National Grid Substation Extension. Each is located within the following administrative areas:
- a. Sunnica East Site A: both East Cambridgeshire District Council (ECDC) and West Suffolk Council (WSC);
  - b. Sunnica East Site B: WSC;
  - c. Sunnica West Site A: ECDC;
  - d. Sunnica West Site B: ECDC;
  - e. Grid Connection Route A: WSC and ECDC;

- f. Grid Connection Route B: ECDC; and
  - g. Burwell National Grid Substation Extension: ECDC.
- 1.3.3 The maximum area of land potentially required for the operation and maintenance of the Scheme, which includes land required for permanent and temporary purposes, is shown on Figure 2-1: The Order limits of this Environmental Statement [EN010106/APP/6.3].
- 1.3.4 The OEMP(s) will include (as relevant for the phase covered by the OEMP) plans showing the land within each administrative area, plans illustrating the Scheme, and the Works Areas and Schedule 1 of the DCO.

## 1.4 The Scheme

- 1.4.1 The Sunnica East Site A, Sunnica East Site B, Sunnica West Site A and Sunnica West Site B will consist of the same principal infrastructure. The principal infrastructure for the Sites, the cable route, and Burwell National Grid Substation Extension are presented in **Chapter 3: Scheme Description** of this Environmental Statement [EN010106/APP/6.1].

# 2 Operation Environmental Management

## 2.1 Operation Activities

- 2.1.1 During the operational phase, activity within the Scheme will be minimal and will be restricted principally to vegetation management, equipment maintenance and servicing, replacement of any components that fail, and monitoring. It is anticipated that maintenance and servicing would include the inspection, removal, reconstruction, refurbishment or replacement of faulty or broken equipment to ensure the continued effective operation of the Scheme and improve its efficiency.
- 2.1.2 Along the cable route, operational activity will consist of routine inspections (schedule to be determined) and any reactive maintenance such as where a cable has been damaged.
- 2.1.3 It is anticipated that there will be up to 17 permanent staff onsite during the operational phase during a single shift, with staff working a three shift pattern. There will also be a requirement for additional staff to attend the Sites when required for maintenance and cleaning activities. Based on an occupancy of 1.5 persons per car as outlined in **Chapter 13: Transport and Access** of this Environmental Statement [EN010106/APP/6.1], it is expected that there will be approximately 11 vehicles travelling to the Sites on a daily basis.
- 2.1.4 A Community Liaison Group will be set up prior to construction and continued through operation as a formal forum for local issues to be raised. A Community Liaison Officer will be appointed to lead these discussions with local communities during operation. A display board will be installed at the site entrance(s), where contact details for the Community Liaison Officer will be available should anyone wish to make contact.



2.1.5 An Environmental Manager will be appointed prior to operation. This could be the same person as the Community Liaison Officer or could be a separate position. The Environmental Manager would be responsible for regularly monitoring the Scheme and checking against the OEMP.

## **2.2 Operation Programme**

2.2.1 Operation of the Scheme is expected to start following construction, no earlier than summer 2025. The Scheme will operate for not more than 40 years, with decommissioning assumed for the purposes of environmental assessment to be 2065.

## **2.3 Working Hours**

2.3.1 The Scheme will be continuously manned during operation. This will be undertaken in three daily consecutive 8-hour long shifts.

## **2.4 Control of Light**

2.4.1 During operation, permanent lighting with motion sensors will be installed within the substations and BESS compounds, providing a maximum of 50 lux. Any night works required on the solar panels during operation will use mobile lighting towers.

## **2.5 Parking Provisions**

2.5.1 The two central car parks provided during construction will be removed following construction and replaced with solar infrastructure for the operation phase. During operation, parking will be provided within the substation and Battery Energy Storage System (BESS) areas for permanent staff.

## **2.6 Management of Vegetation Planting**

2.6.1 An Outline Landscape and Ecology Management Plan (OLEMP) has been prepared and submitted as part of the DCO Application (**Appendix 10I** of this Environmental Statement [**EN010106/APP/6.2**]). This sets out the measures proposed to mitigate the potential impacts and effects of the Scheme on biodiversity (and landscape) features, and to enhance the biodiversity, landscape and green infrastructure value of the Order limits.

2.6.2 An updated Landscape and Ecology Management Plan (LEMP) will be prepared in accordance with the principles of the OLEMP and will be submitted to and approved by the relevant local planning authority prior to construction. This will include provisions in respect of on-going maintenance and management of the landscape and ecology measures to be put in place.

## 3 Management and Mitigation Plan

### 3.1 Purpose

3.1.1 This section of the Framework OEMP sets out the mitigation and management measures to be included as a minimum in the OEMP(s). It also sets out monitoring requirements and the responsible party identified for each mitigation/enhancement measures or monitoring requirement. This section will be updated and expanded upon as part of the preparation of the OEMP(s).

**Table 3-1 Climate Change**

Potential Impact	Mitigation measure and monitoring requirements	Responsibility
<p>Greenhouse gas emissions from the operational maintenance activities required during operation of Scheme.</p> <p>Increased ambient temperature due to climate change.</p>	<p>Regular planned maintenance of the Scheme will be conducted to optimise efficiency of the Scheme infrastructure.</p> <p>To embed resilience to projected increases in temperature, inverters will have a cooling system installed to control the temperature and continue to operate efficiently in warmer conditions. As the PV modules and transformers have a wide range of acceptable operational temperatures, it has been determined that increasing temperatures will not adversely affect their operation.</p>	<p>The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP(s).</p>

**Table 3-2 Cultural Heritage**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
<p>Impacts on the setting of built heritage assets associated with increased visual and noise intrusion.</p>	<p>With regard to built heritage and historic landscape assets, appropriate and sensitive screening has been developed and will be implemented to minimise the visual intrusion of the Scheme, while avoiding obscuring or intruding upon views and relationships between heritage assets. Mitigation planting has taken into consideration the surrounding landscape character and focuses on the enhancement of existing vegetation. Where new planting is proposed, hedge planting has been favoured over tree planting where appropriate. Planting as mitigation to screen views is limited to avoid the creation of new impacts; however, it has been used to enhance existing screening and/ or futureproof against the loss of existing planting as appropriate.</p>	<p>The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed</p>



Potential Impact	Mitigation measures and monitoring requirements	Responsibility
	<p>Additional planting has been incorporated along the Avenue of Chippenham Park to enhance and reinstate the historic tree lined avenue. The purpose of this is to recreate the physical structure of 'an avenue', whilst retaining and reinforcing all other vegetation via positive management, in accordance with ecological requirements.</p> <p>Flexibility remains in the Scheme design, allowing options for alterations to construction methodology or placement of panels and infrastructure where significant archaeology is identified and requires preservation in situ, or where significant effects are anticipated on the setting of assets.</p> <p>Details of the vegetation and planting management during operation of the Scheme are provided in the OLEMP in <b>Appendix 10I</b> of this Environmental Statement [EN010106/APP/6.2]. This will be updated prior to operation to produce the detailed LEMP, which will be followed and referred to during operation of the Scheme to ensure suitable management of the vegetation planting to achieve the objectives for which the planting design is intended (i.e. screening of views, landscape enhancement, mitigation for impacts on built heritage, and ecological habitat improvements).</p>	in the OEMP(s) and the LEMP.

**Table 3-3 Biodiversity**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
<p>Potential habitat loss.</p> <p>Disturbance to rare and scarce arable plants within Sunnica Site.</p> <p>Disturbance to designated sites within the Sunnica Site.</p> <p>Disturbance to wildlife and</p>	<p>The Scheme has been designed so that impacts upon important habitats (comprising woodland, grassland, hedgerow and ponds) are avoided or reduced, where reasonably practicable, and compensated for where not, through the retention of existing habitat and the creation of replacement habitat. The design of the Scheme complies with industry good practice and environmental protection legislation during both construction and operation e.g. prevention of surface and ground water pollution, fugitive dust management, noise prevention or amelioration.</p> <p>The Ecology and Landscape assessments (presented in <b>Chapters 8: Ecology and Nature Conservation and Chapter 10: Landscape and Visual Amenity</b> of this Environmental Statement [EN010106/APP/6.1] respectively) has informed the iterative design process, via design principles which respond to the policy requirements, published landscape character assessments and field work analysis, in order to mitigate the likely adverse effects of the Scheme.</p> <p>The OLEMP will be used to manage the areas of planting to maximise the benefits for biodiversity. The OLEMP includes monitoring requirements to ensure the successful establishment of the proposed planting.</p>	<p>The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in LEMP.</p>

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
<p>habitats surrounding the Sunnica Site.</p> <p>Disturbance to wildlife from artificial lighting.</p>	<p>All operational staff working within 500m of the offsetting areas created for breeding Stone Curlew will be given a toolbox talk regarding the sensitivity of the species and the works undertaken will be controlled. Where possible, any operational maintenance within 500m of the offsetting areas will be scheduled between November and February.</p> <p>An Ecological Clerk of Works will monitor the use of the Stone-curlew offsetting areas annually for the lifetime of the Scheme. Monitoring will include both the occupancy of the offsetting habitats by Stone-curlew and the condition of these habitats, in the context of providing optimal nesting and foraging habitat. Annual monitoring reports will be submitted for review and consultation with stakeholders, to allow any remedial actions to be identified and agreed. Operational monitoring of Stone Curlew plots will also be undertaken prior to herbicide spraying to establish nesting locations. This will inform the process for the application of any herbicides to Stone Curlew plots.</p> <p>Operational monitoring will also be undertaken within areas occupied by solar arrays to determine whether any Stone Curlews are nesting in these areas. If this is found to be the case then the same requirements, with regard to briefing operational staff and controlling works, will be applied to any locations within the operational areas. Given the low likelihood that Stone Curlew will nest in operational areas, seasonal restrictions with regards to operational maintenance are not required throughout the Scheme.</p> <p>The newly created badger sett and planting will be monitored and managed, the aim of which will be to ensure that it is appropriate and functional in the short-, medium and long-term and that the mitigation fulfils the objectives of ensuring the avoidance of impacts</p> <p><b>Lighting</b></p> <p>Throughout the Scheme, the use of motion detection security lighting to avoid permanent lighting is embedded in the Scheme design and the inward distribution of light will avoid light spill on to existing boundary features. The lighting will be designed to be aligned with Bat Conservation Trust guidance as far as is reasonably practicable. CCTV camera's will use infra-red technology removing the need for security lighting along the perimeter of the Sites.</p>	

**Table 3-4 Flood Risk, Drainage and Water Resources**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
<p>Impacts on water quality in watercourses from run-off and spillages (including use of fire-fighting water) from new permanent hardstanding and maintenance activities;</p> <p>Potential impacts on hydrology as a result of the Scheme. This may include alterations to natural flow pathways from runoff from areas of hardstanding. This may also have a subsequent effect on aquatic habitats and water-dependant nature</p>	<p><b>Pollution Controls</b></p> <p>The design of the Scheme has included measures to avoid and minimise the risk of water pollution during its operation. These include:</p> <ul style="list-style-type: none"> <li>• All hazardous materials including chemicals, cleaning agents and solvent containing products to be properly sealed in sealed containers at the end of each day prior to storage in appropriately protected and bunded storage areas;</li> <li>• Regular inspections and maintenance of all equipment will be undertaken in order to identify any leaks or damage early. Any panels which require maintenance / replacement will be removed before there is any leakage of chemicals from the sealed units. Any leaks will be dealt with in a way that is compliant with the prevailing environmental legislation. The OEMP(s) will include a regular schedule for visual inspection of the panels and all other solar;</li> <li>• During the operational phase there would be surface water runoff from the permanent structures, roofs, solar PV panels and access roads. A surface water drainage strategy (see Annex F of the FRA, <b>Appendix 9C</b> of this Environmental Statement [EN010106/APP/6.2]) has been prepared and includes a water quality risk assessment;</li> <li>• Battery sites and solar PV panels are to be located away from watercourses, with surface water drainage controlled by swales and small infiltration basins;</li> <li>• In the case of the battery sites, each is enclosed with an isolated drainage system and internal fire suppression system;</li> <li>• Solar PV panels to be constructed and installed to accepted industry standards and appropriately maintained to mitigate the risk of escape of liquid substances into the water environment; and</li> <li>• Any areas of the site containing oils, such as transformers, are to be bunded or have self-contained drainage systems. This would ensure that any leaks are contained and do not enter the surface water drainage system.</li> </ul> <p>There is also a pollution risk from emergency situations. Although unlikely, should a fire occur at one of the BESS compounds, water will be stored on site for use to contain the fire (rather than douse it). To prevent this fire-fighting water from potentially contaminating the SuDS based surface water drainage system, and from potentially being discharged from the site to a local watercourse, a dedicated storage basin for fire water has</p>	<p>The overall responsibility will be with the Applicant. Specific responsibilities to be confirmed in OEMP(s).</p>

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
<p>conservation sites; and</p>	<p>been included within the design. The capacity of the storage basin (400m<sup>2</sup>) will be greater than the volume of stored water (228m<sup>2</sup>) for fire-fighting activities, and if necessary, the basin can be lined to prevent the infiltration of any chemical pollutants if it is used. The fire-fighting water can then be safely stored until the emergency event is over before being pumped out to a tanker for off-site disposal at a licenced wastewater facility.</p> <p><b>Resilience to Flooding</b></p> <ul style="list-style-type: none"> <li>• Staff on site will undertake regular weather checks to forecast any heavy rain events and to prepare for flooding where necessary;</li> <li>• SuDS features will be utilised to ensure the surface water drainage strategy adequately attenuates and treats runoff from the Scheme, whilst minimising flood risk to the Sites and surrounding areas;</li> <li>• PV sites and grid connection routes are to be designed to ensure no floodplain storage is lost. Some PV cells within areas of Flood Zone 3a and 2, but these are to be raised so as to not materially reduce floodplain storage;</li> <li>• Individual solar PV panels will be held above the ground surface on struts. This will avoid sealing the ground with impermeable surfaces. As a result the Sites' impermeable area will remain consistent with its pre-development state. However, runoff from the solar PV panels will alter the existing routing of runoff. To prevent ponding occurring round the panels, a series of boundary (and some routing) swales will be constructed to convey surface water runoff to detention basins in accordance with the Drainage Strategy, which is included in <b>Appendix 9C: Flood Risk Assessment and Drainage Strategy</b> of this Environmental Statement [EN010106/APP/6.2];</li> <li>• Attenuation in the form of detention basins and swales has been incorporated to control any increase in the rate of flow towards the receiving watercourses. The rate of runoff from each development location within the Sites would ensure nil detriment in terms of no increase in runoff rate from the Sites to the receiving watercourses. Details of the drainage design are included in <b>Appendix 9C: Flood Risk Assessment and Drainage Strategy</b> of this Environmental Statement [EN010106/APP/6.2]; and</li> <li>• Flood resistance and resilience measures would be included within the design of the Burwell Substation Extension, for whichever of the two potential sites is chosen. National Grid has its own design guidelines which include flood resistance and resilience measures which would be complied with.</li> <li>• No storage of material will be permitted under the PV modules.</li> </ul> <p><b>Disposal of foul water</b></p>	

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
	Wastewater from the on-site welfare facilities would be managed by a self-contained independent non-mains domestic storage and / or treatment system.	

**Table 3-5 Landscape and Visual Amenity**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
<p>Loss of existing landscape features, e.g. vegetation</p> <p>Visibility of the Scheme.</p>	<p>The OLEMP in <b>Appendix 10I</b> of this Environmental Statement [EN010106/APP/6.2] sets out the measures proposed to mitigate the potential impacts and effects on landscape (and biodiversity) features, and to enhance the landscape and biodiversity value of the Sites (i.e. the green infrastructure).</p> <p>Detail on monitoring and maintenance is required in the OLEMP.</p> <p><b>Screening</b></p> <p>Existing vegetation along the boundary of the Order limits will be retained and managed where practicable to ensure its continued presence and to aid the screening of low-level views of the Scheme.</p>	<p>The overall responsibility will be with the Applicant. The LEMP and the OEMP(s) will set out roles and responsibilities for implementation.</p>

**Table 3-6 Socio-Economics and Land Use**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
<p>Loss and/or degradation of the soil resource.</p>	<p>A Soil Management Plan (SMP) will be prepared by the Scheme operator. The SMP will include measures specific to the soils present and operational activity, to minimise any loss of soil material or degradation of its functional capacity. This will include activities related to the management of livestock grazing the site as well as vehicle use off the access track network.</p> <p>Little or no movement of soil material will occur during the operational life of the solar energy farm. Some maintenance activities may take place such as the replacement/resetting of a solar module or fence post. Where such activity does occur it should comply with the direction given in the Framework CEMP and a Framework DEMP which have been submitted as part of the DCO Application, presented in Appendices 16C and 16E of this Environmental Statement [EN010106/APP/6.2] respectively.</p> <p>The grassed soil surface will be trafficked during the operational phase of the Scheme. Sheep or other small livestock will be used for intermittent grazing of the site and vehicles will be used on site for inspection and maintenance activities. As for construction and decommissioning, vehicles should avoid leaving the access tracks within the site while the soil surface is wet following rainfall.</p>	<p>The overall responsibility will be with the Applicant. Responsibilities will be included in the SMP.</p>



Potential Impact	Mitigation measures and monitoring requirements	Responsibility
	<p>Grazing livestock will be encouraged to move across the site to manage grass growth. The programme of movement should take into account areas of prolonged wetness following rainfall. Mobile feed and water troughs can be relocated to avoid loss of vegetation and build-up of compaction for the surrounding area.</p> <p>It should be noted that the effects of vehicles and livestock in the operational site will be low compared to routine agricultural land management. The site will be managed as low input grassland and will carry less weight of stock than is standard for outdoor pigs commonly included in arable rotations in the vicinity of the Scheme. Vehicles used within the site for inspection and maintenance will be considerably smaller than those used for arable cultivation and harvest.</p>	

**Table 3-7 Noise and Vibration**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
Noise and vibration from operational equipment.	<p>As the plant design is progressed, the specification of plant machinery with low noise emission and properly attenuated supply and extract terminations will help to minimise noise emissions. The use of enclosures, local screening, mufflers, and silencers will also be used as appropriate. Should the noise exhibit any such acoustic features then the relevant penalty/ correction should be applied in accordance with BS 4142. Plant such as the substation and batteries will be designed to have minimal tonal, impulsive or intermittent features</p> <p>The OEMP will also set out how the scheme design and operational plant levels have been developed to mitigate and reduce effects to a minimum. This will include consideration of sound output levels, the noise from inverters and cooling fans during lower modes of operation, positioning of plant and, if necessary and practicable, implementation of acoustic barriers.</p> <p>Site staff will carry out regular monitoring and maintenance of equipment. This will include identifying any changes in sound pitches or volume early and carrying out the relevant maintenance. Further details are to be confirmed in the OEMP(s).</p>	<p>The overall responsibility will be with the Applicant. To be confirmed in the detailed OEMP(s).</p>

**Table 3-8 Transport and Access**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
Road trips during operation	<p>No potential impacts related to transport and access are anticipated during operation, due to the low number of anticipated vehicle movements and nature of the Scheme.</p> <p>No mitigation measures or monitoring requirements during operation are required.</p>	N/A

**Table 3-9 Ground Conditions**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
Potential for pollutants to enter the ground.	<p>The design of the Scheme has included measures to avoid and minimise the risk of pollution to the ground and water during its operation. These include:</p> <ul style="list-style-type: none"> <li>All hazardous materials including chemicals, cleaning agents and solvent containing products to be properly sealed in sealed containers at the end of each day prior to storage in appropriately protected and bunded storage areas;</li> <li>Regular inspections and maintenance of all equipment will be undertaken in order to identify any leaks or damage early. Any panels which require maintenance / replacement will be removed before there is any leakage of chemicals from the sealed units. Any leaks will be dealt with in a way that is compliant with the prevailing environmental legislation. The OEMP(s) will include a regular schedule for visual inspection of the panels and all other solar;</li> <li>During the operational phase there would be surface water runoff from the permanent structures, roofs, solar PV panels and access roads. A surface water drainage strategy (see Annex F of the <b>Flood Risk Assessment and Drainage Strategy, Appendix 9C</b> of this Environmental Statement [EN010106/APP/6.2]) has been prepared and includes a water quality risk assessment, and a requirement to the DCO secure approval and compliance of the strategy during construction and operation;</li> <li>Battery sites and solar PV panels are to be located at least 10m away from watercourses, with surface water drainage controlled by swales and small infiltration basins;</li> <li>In the case of the battery sites, each is enclosed with an isolated drainage system and internal fire suppression system; and</li> </ul>	The overall responsibility will be with the Applicant. To be included in the OEMP(s).

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
	<ul style="list-style-type: none"> <li>Any areas of the site containing oils, such as transformers, would be bunded or have self-contained drainage systems. This would ensure that any leaks are contained and do not enter the surface water drainage system.</li> </ul> <p>There is also a pollution risk from emergency situations. Although unlikely, should a fire occur at one of the BESS compounds, water will be stored on site for use to contain the fire (rather than douse it). To prevent this fire-fighting water from potentially contaminating the SuDS based surface water drainage system, and from potentially being discharged from the site to a local watercourse, a dedicated storage basin for fire water has been included within the design. The capacity of the storage basin (400m<sup>2</sup>) will be greater than the volume of stored water (228m<sup>2</sup>) for fire-fighting activities, and if necessary, the basin can be lined to prevent the infiltration of any chemical pollutants if it is used. The fire-fighting water can then be safely stored until the emergency event is over before being pumped out to a tanker for off-site disposal at a licenced wastewater facility.</p> <p>All plant (i.e. inverters, transformers and switchgear) will be installed on concrete bases and / or a thick levelling layer of sand with suitable bunding where appropriate.</p>	

**Table 3-10 Major Accidents and Disasters**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
Risk of battery fire. Risks to health and safety.	<ul style="list-style-type: none"> <li>An '<b>Outline Battery Fire Safety Management Plan</b>' has been produced [EN010106/APP/7.6] and will be referred to during operation to safely reduce and manage the risk of fire during operation. A full version will be produced prior to commissioning;</li> <li>All works will be undertaken in accordance with relevant Health and Safety legislation and guidance. Details of fire, police, emergency services and hospitals will be publicised and included in the site induction; and</li> <li>Further risks of major accidents and disasters are covered in the following tables: <b>Table 3-4</b> Flood Risk, Drainage and Water Resources,</li> <li><b>Table 3-8</b> Transport and <b>Access</b>, and <b>Table 3-9</b> Ground Conditions.</li> </ul>	The overall responsibility will be with the Applicant. To be included in the OEMP(s).

**Table 3-11 Waste**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
Impacts of waste to the surrounding environment.	Materials requiring removal from the Order limits during operation would be transported using licensed carriers and records kept, detailing the types and quantities of waste moved and the destinations of this waste, in accordance with the relevant regulations.	The overall responsibility will be with the Applicant. To be included in the OEMP(s).

**Table 3-12 Glint and Glare**

Potential Impact	Mitigation measures and monitoring requirements	Responsibility
Glint and glare from the infrastructure on receptors.	<ul style="list-style-type: none"> <li>The existing vegetation and landscape planting which is embedded in the Scheme design as part of the landscape and visual mitigation will screen the majority of glint and glare receptors. The proposed planting and existing vegetation will be managed in accordance with the LEMP and OEMP(s) (see <b>Table 3-3</b> and <b>Table 3-5</b> for further details); and</li> <li>Mitigation will be provided for the road users travelling in a south-westerly direction in the form of a temporary solid hoarding that will be a maximum of 2m in height. The hoarding would be located on a short section, approximately 300m, along the Sunnica West Site A boundary with a high percentage of evergreen (native and non-native) species, planted adjacent to the temporary hoarding in line with the indicative planting strategy shown on Figure 3-2 of this Environmental Statement <b>[EN010106/APP/6.3]</b>. The temporary hoarding will be removed once the density of vegetation is sufficient to screen the views. The hoarding will be secured through the OLEMP.</li> </ul>	The overall responsibility will be with the Applicant. To be included in the LEMP and OEMP(s).

## 4 Complementary Plans and Procedures

- 4.1.1 A suite of complementary environmental plans and procedures for the operational phase will be developed alongside the OEMP, including a LEMP, as discussed in Section 2.5 and the tables above. These plans and procedures will build on the principles and procedures set out in this Framework OEMP and described in the ES. These supporting and supplementary plans and procedures will be clearly set out in the OEMP(s) and cross referenced.

## 5 Implementation and Operation

- 5.1.1 The OEMP(s) will set out all roles, responsibilities and actions required in respect of implementation of the measures described in this Framework OEMP, including:
- a. An organogram showing team roles, names and responsibilities;
  - b. Training requirements for relevant personnel on environmental topics;
  - c. Information on-site briefings and toolbox talks that will be used to equip relevant staff with the necessary level of knowledge to follow environmental control procedures;
  - d. Measures to advise employees of changing circumstances as work progresses;
  - e. Communication methods;
  - f. Document control; and
  - g. Environmental emergency procedures.

### 5.2 Management Review

- 5.2.1 The OEMP(s) will be reviewed on a six-monthly basis or more regularly if there is a significant change in operational procedure. The review will be signed off by competent person(s). The responsibilities for this role will be set out within the OEMP(s).

## 6 References

- Ref. 1 The Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2017).
- Ref. 2 HMSO (2008) The Planning Act 2008