



# Stonestreet Green Solar

## Outline Operational Management Plan

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# 1 Introduction

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## 1.1 Introduction

- 1.1.1 This Outline Operational Management Plan ('Outline OMP') has been prepared by EPL 001 Limited (the 'Applicant') in relation to an application (the 'Application') for a Development Consent Order ('DCO') for the construction, operation and maintenance, and decommissioning of Stonestreet Green Solar (the 'Project').
- 1.1.2 The Project is situated wholly within the administrative boundaries of Ashford Borough Council ('ABC') and Kent County Council ('KCC').

## 1.2 The Project

- 1.2.1 The Project comprises the construction, operation and maintenance, and decommissioning of solar photovoltaic ('PV') arrays and energy storage, together with associated infrastructure and an underground cable connection to the existing National Grid Sellindge Substation.
- 1.2.2 The Project will include a generating station (incorporating solar arrays) with a total capacity exceeding 50 megawatts ('MW'). The agreed grid connection for the Project will allow the export and import of up to 99.9 MW of electricity to the grid. The Project will connect to the existing National Grid Sellindge Substation via a new 132 kilovolt ('kV') substation constructed as part of the Project and cable connection under the Network Rail and High Speed 1 ('HS1') railway.
- 1.2.3 The Project will be operational for up to 40 years.
- 1.2.4 The location of the Project is shown on **ES Volume 3, Figure 1.1: Site Location Plan (Doc Ref. 5.3)**. The Project will be located within the Order limits (the land shown on the **Works Plans (Doc Ref. 2.3)** within which the Project can be carried out). The Order limits plan is provided as **ES Volume 3, Figure 1.2: Order Limits (Doc Ref. 5.3)**. Land within the Order limits is known as the 'Site'.
- 1.2.5 Areas where infrastructure development is proposed are identified by field numbers, which are shown on **ES Volume 3, Figure 2.1: Field Boundaries and Site Area Plan (Doc Ref. 5.3)**. The areas of the Site where infrastructure development is proposed are referred to as follows:
- South Western Area (Fields 1 to 9);
  - Central Area (Fields 10 to 19 and 23 to 25);
  - South Eastern Area (Fields 20 to 22);
  - Northern Area (Fields 26 to 29);
  - Project Substation (location of the Project Substation, in the north western section of Field 26);

- 'Cable Route Corridor' (export of electricity from the Project at 132kV via underground cables (the 'Grid Connection Cable') to the Sellindge Substation) and 'Cable Route Crossing' (use of an existing cable duct under the HS1 railway or through Horizontal Directional Drilling ('HDD') beneath HS1 for the Grid Connection Cable); and
- Sellindge Substation (location of the existing Sellindge Substation).

### 1.3 Purpose of this Outline OMP

- 1.3.1 The purpose of this Outline OMP is to outline the overarching details and principles to manage the Project during the operational stage. It has been prepared to enable the Secretary of State, the Planning Inspectorate, KCC, ABC and third parties to understand the nature of the standard environmental management, operation, maintenance, control measures and safety procedures to be implemented during the operational phase of the Project.
- 1.3.2 This Outline OMP seeks to ensure that the effects of the operation of the Project are mitigated appropriately. More specifically, the Outline OMP aims to:
- Ensure that relevant mitigation measures set out in the **Environmental Statement ('ES') (Doc Ref. 5.1-5.4)** submitted as part of the DCO Application are secured and implemented during operational activities; and
  - Ensure that relevant legislation and Government and industry standards are implemented.
- 1.3.3 The **Draft Development Consent Order ('Draft DCO') (Doc Ref. 3.1)** includes a requirement which provides that prior to the operation of the authorised development, an operational management plan ('OMP') must be submitted to and approved by ABC, which must be in accordance with this Outline OMP.
- 1.3.4 The appointed operational contractor will be responsible for working in accordance with the environmental controls documented in the detailed OMP. The overall responsibility for implementation of the detailed OMP will lie with the appointed operational contractor as a contractual responsibility to the undertaker (as defined in the **Draft DCO (Doc Ref. 3.1)**), as the undertaker is ultimately responsible for compliance with the DCO.

### 1.4 Complementary Plans

- 1.4.1 This Outline OMP is part of a suite of Management Plans, contained within **Book 7** of the DCO Application documents, which have been produced to outline the various management strategies that will be implemented as part of the construction, operation and decommissioning of the Project. The **Guide to the Application (Doc Ref. 1.5)** outlines the management plans that have been submitted as part of the DCO Application.

### 1.5 Document Structure

- 1.5.1 Following this introduction, this Outline OMP includes the following:

- **Section 2:** Operational Management;
- **Section 3:** Mitigation, Management and Monitoring;
- **Section 4:** Implementation and Operation; and
- **Section 5:** Monitoring and Reporting.

## 2 Operational Management

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### 2.1 Introduction

- 2.1.1 This section sets out the general management arrangements for the 40-year operational phase of the Project.

### 2.2 Operational Phase Activities

- 2.2.1 During the operational phase, the activities on-Site are expected to amount to limited maintenance and servicing of plant and equipment (including fire mitigation infrastructure), habitat and vegetation management, security activities and monitoring to ensure effective operation of the Project. Access for emergency vehicles will always be available.
- 2.2.2 There will be a need for periodic replacement of some of the electrical equipment over the operating lifetime of the Project, with old equipment removed from Site. The PV panels are not expected to need to be replaced on a Site-wide basis, however PV panels that fail or are damaged over the operating lifetime of the Project would be replaced.
- 2.2.3 The Project Substation includes a connection to Sellindge Substation via an underground cable. Along the Cable Route Corridor operational activity will include routine inspections (schedule to be determined), routine vegetation clearance along the length of the Cable Route Corridor and any reactive maintenance (e.g., repairing of any damaged to the cable). The Grid Connection Cable will be maintained by UKPN. Sellindge Substation is maintained by National Grid and UKPN and this will continue to be the case throughout the operation of the Project.
- 2.2.4 Welfare facilities will be included within the Project Substation, including toilets and wash/changing room. Spare parts storage containers will also be included. The control room will be served by a cess tank system with foul water tankered off-Site for disposal at a licenced facility outside of the hydrological catchment that feeds Stodmarsh (the Stour catchment).

### 2.3 Operational Management

#### Working Hours

- 2.3.1 Operational phase activities will typically be undertaken Monday to Friday 08:00 – 18:00 and Saturday 08:00 – 13:00. Emergency maintenance would be carried out as and when needed.

#### Parking and Access Provisions

- 2.3.2 Operational staff will travel to the Site by 4x4 vehicles (pick-up trucks) or Light Goods Vehicles ('LGVs'). Heavy Goods Vehicles ('HGVs') will only require access to the

Site to remove any damaged infrastructure, to deliver infrastructure replacements, empty the cess tank, and provide water to the water storage tanks across the lifetime of the Project. The vehicle movements associated with these HGVs will be limited and infrequent.

- 2.3.3 During operation, parking for vehicles will be available for use by workers in the Project Substation area.
- 2.3.4 Access to the Site during operation will be from the public highway. The layout of the internal access tracks and operational access points is subject to detailed design approval but is expected to be in general accordance with that shown on the **Illustrative Project Layout** provided within the **Illustrative Project Drawings – Not for Approval (Doc Ref. 2.6)**.
- 2.3.5 Both the Station Road access for the Project Substation and the South Eastern Area access will be left-in and right-out only. Swept path analysis of both accesses has been undertaken and is provided in **ES Volume 4, Appendix 13.7: Access Drawings (Doc Ref. 5.4)**. This demonstrates that the longest vehicle expected to regularly access the Site (16.5m long articulated vehicle) can safely turn left in and right out at both access points from the public highway.
- 2.3.6 At limited times during the operation temporary bridges may be required to be reinstated to provide access for repair and replacement activities. The temporary bank to bank bridges will be pre-engineered modular steel bridges which means that no construction work is required within the watercourse as the bridges span the width of the watercourse.

### Control of Light (excluding the Sellindge Substation Extension)

- 2.3.7 During operation, no part of the Project will be continuously lit (excluding the Sellindge Substation Extension). The Sellindge Substation already has artificial lighting within its compound and will continue to operate for the operational life of the Project. The Sellindge Substation Extension is expected to be consistent with the approach that is currently applied to the existing infrastructure at Sellindge Substation.
- 2.3.8 The use of lighting across the Project, including for the Project Substation, Inverter Stations and Intermediate Substations (but excluding Sellindge Substation), will be limited to emergencies or in the event that maintenance is being undertaken in hours of darkness as secured by the **Design Principals (Doc Ref. 7.5)**.

### Security

- 2.3.9 The PV panels will be set within security fencing comprising deer-proof fencing (wooden post and metal fencing), with a maximum height of 2.5m Above Ground Level ('AGL'). Security fence gates will be provided for maintenance, habitat management, passage of mammals, security purposes and fire response access. Mammal gates will be installed at regular intervals in appropriate locations used by species such as badger and brown hare.

- 2.3.10 Security fencing in Fields 19, 23 and 24 (downstream of the Aldington Flood Storage Area ('AFSA')) will have a minimum clearance space of 0.2m between the bottom of the security fence and the ground to prevent build-up of debris in a flood event with a minimum mesh spacing of 0.1m.
- 2.3.11 The Project Substation compound, located in Field 26, will be enclosed by a palisade fencing with a maximum height of 3m AGL to prevent ingress to high voltage equipment from both people and animals. Detailed design approval of fencing and other means of enclosure for each phase of the Project is secured by Requirement in the **Draft DCO (Doc Ref. 3.1)**.
- 2.3.12 The Project will also be monitored through the use of Closed-Circuit Television ('CCTV') cameras. The Applicant estimates approximately 160 CCTV cameras will be required to monitor the Project.
- 2.3.13 Other potential security measures are expected to include:
- The security fence is expected to be lined with a series of wires that detect vibration within the fence. These wires are expected to be connected to a non-audible alarm that is finely tuned so as not to trigger alarms in the wind but to detect the movement of somebody climbing the fence, and upon detection the alarm system alerts the security company of the intrusion via the Site's communication equipment;
  - Audio announcement when intruder detected to warn alarm triggered and police notified;
  - Barriers/locked gates at main Site entrances;
  - Steel doors on substation buildings;
  - Buried cables as much as possible;
  - Remote monitoring; and
  - Alarm response contract with keyholder/security company.
- 2.3.14 Details of security measures chosen will form part of the detailed OMP submitted prior to operation, as secured by Requirement in the **Draft DCO (Doc Ref. 3.1)**. The detailed OMP will be prepared in accordance with this Outline OMP.

## 2.4 Advanced notification of maintenance activities

- 2.4.1 Prior to carrying out any material maintenance activities on the Site that could give rise to disturbance on or disruption to local residents and businesses, notification will be given to the local planning authority and Aldington and Bonnington Parish Council, save in respect of any emergency works.

## 2.5 Emergencies

- 2.5.1 The likelihood of a major accident or disaster has been considered in **ES Volume 2, Chapter 16: Other Topics (Doc Ref. 5.2)** and is considered to be very low.



- 2.5.2 The following additional plans are secured by this Outline OMP and will be prepared as part of the detailed OMP prior to the operation of the Project:
- Emergency Response Plan ('ERP') (including Flood Risk<sup>1</sup>);
  - Emergency Spillage Action Plan ('ESAP'); and
  - Health and Safety Plan ('H&SP') (including Flood Risk and climate change).
- 2.5.3 The **Outline Battery Safety Management Plan ('Outline BSMP') (Doc Ref. 7.16)** has been prepared for the Project and outlines the procedures and infrastructure included within the Project to safely reduce and manage the risk of fire during operation. A detailed BSMP will be produced in accordance with the Outline BSMP following the grant of the DCO, to be approved by the local planning authority in consultation with Kent Fire and Rescue prior to the commencement of the battery energy storage system ('BESS') within Work No. 2 (as secured by Requirement in the **Draft DCO (Doc Ref. 3.1)**).

## 2.6 Management of Landscaping, Vegetation Planting and Biodiversity

- 2.6.1 The **Outline Landscape and Ecological Management Plan ('Outline LEMP') (Doc Ref. 7.10)** provides the overarching approach for delivering the landscape strategy and the successful establishment management and maintenance of landscaping and planting associated with the Project, as well as management and monitoring of habitats and species. A Requirement in the **Draft DCO (Doc Ref. 3.1)** secures approval of detailed LEMP(s) for the Project.
- 2.6.2 The detailed LEMP(s) will be prepared in accordance with the **Outline LEMP (Doc Ref. 7.10)** and will be submitted to and approved by the local planning authority prior to commencement of the relevant phase. The detailed LEMP(s) will include provisions in respect of ongoing maintenance, management and monitoring of the landscape, vegetation, habitats and species during the operational phase of the Project.

### Grazing Management

- 2.6.3 Provision of any grazing areas will be confirmed in the detailed LEMP(s).
- 2.6.4 Any grazing would occur at a grazing intensity that does not result in visual damage to the grass sward from poaching (trampling) but will be sufficient to maintain the grassland in its projected Biodiversity Net Gain ('BNG') condition. Should grazing not occur, other measures (for example, cutting or mowing) will be employed to manage the grassland in order to maintain the grassland in its projected BNG condition as set out in the **Outline LEMP (Doc Ref. 7.10)**.

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<sup>1</sup> In relation to flood risk, the ERP will include: (1) Details of roles and responsibility for maintaining, updating and implementing the plan; (2) Overview of the local flood risk; (3) Details of the local Environment Agency flood warning service; (4) Specific action that will be undertaken in response to the issuing of a flood alert or flood warning; and (5) Details of access and egress routes onto the Site for the period in advance of and during a flood event.

### 3 Mitigation, Management and Monitoring

Table 3.1: Cultural Heritage

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
Impacts to the setting of surrounding Listed Buildings	<p>The <b>Outline LEMP (Doc Ref. 7.10)</b> describes how existing and new vegetation will be maintained following implementation and managed in the long-term until decommissioning, including hedgerows and planting which will provide screening to nearby heritage assets.</p> <p>Measures to minimise impacts from traffic and noise during operation are provided in <b>Tables 3.7</b> and <b>3.8</b> of this Outline OMP.</p>	Detailed LEMP(s) will detail frequency.

Table 3.2: Landscape and Visual Amenity

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
<p>Loss of existing landscape features (e.g. vegetation).</p> <p>Visibility of operational activities.</p>	<p>The <b>Outline LEMP (Doc Ref. 7.10)</b> sets out the measures proposed to mitigate the potential impacts and effects on landscape features, and to enhance landscape features within the Order limits.</p> <p>Existing vegetation will be retained and managed in accordance with the detailed LEMP(s) to ensure its continued presence and to aid the screening of low-level views into the Project.</p> <p>During operation, no part of the Project will be continuously lit (excluding the Sellindge Substation Extension). Lighting will be utilised for emergency and overnight maintenance purposes where required.</p>	Detailed LEMP(s) will detail frequency.

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
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Table 3.3: Biodiversity

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
<p>Impacts on biodiversity during the operation of the Project.</p> <p>Disturbance to wildlife from artificial lighting.</p>	<p>The <b>Outline LEMP (Doc Ref. 7.10)</b> secures measures for the management and maintenance of areas of biodiversity.</p> <p>During operation, no part of the Project will be continuously lit (excluding the Sellindge Substation Extension). Lighting will be utilised for emergency and overnight maintenance purposes where required.</p>	Detailed LEMP(s) will detail frequency.

Table 3.4: Water Environment

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
<p>Impacts on water quality in waterbodies that may receive surface water runoff or be at risk of chemical spillages from supporting infrastructure for the Project and maintenance activities.</p>	<p>The detailed OMP will include:</p> <ul style="list-style-type: none"> <li>▪ An Emergency Flood Response Plans ('EFRP');</li> <li>▪ An ESAP which will set out spillage response procedures, including containment and reporting.</li> <li>▪ Details on hazardous materials including chemicals and cleaning agents, and storage of these.</li> <li>▪ Regular inspections and maintenance of equipment to identify leaks or damage and procedures to address these.</li> </ul>	The detailed OMP will detail frequency.
<p>Potential impacts on hydrology and flood risk by changing the way</p>	<p>The <b>Outline OSWDS (Doc. Ref. 7.15)</b> sets out the management of surface water and drainage during the operational phase of Project through a</p>	The detailed OSWDS will detail frequency.

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
water infiltrates into the ground and from increased runoff from new impervious areas across the Site.	<p>maintenance programme. It includes detail on:</p> <ul style="list-style-type: none"> <li>▪ Operation and management of drainage infrastructure; and</li> <li>▪ Management of firewater.</li> </ul>	

Table 3.5: Land Contamination and Ground Conditions

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
Potential for pollutants to enter the ground.	<p>The design of the Project (including the Project Substation) will include 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>▪ Regular inspections and maintenance of all equipment to identify any leaks or damage, and procedures to address these.</li> <li>▪ Key electrical plant (e.g., inverters, transformers and switchgear) will be installed with suitable bunding where appropriate.</li> <li>▪ Fuels and any chemicals used on the Site will be stored appropriately.</li> <li>▪ Confined space entry control including gas monitoring and respiratory protection equipment will be adopted for works entering and working in confined spaces.</li> <li>▪ A marker membrane will be installed within service trenches if the presence of contaminated ground beneath is confirmed.</li> </ul>	<p>The Site or Operations Manager will regularly record compliance in a logbook.</p> <p>The detailed OMP will detail the frequency.</p>

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
Pollution prevention (human health)	Maintenance workers will be required to wear appropriate PPE that are suitable for the activities undertaken.	Not required.

Table 3.6: Socio-Economics

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
Disruption to local residents, businesses and community facilities, amenity and human health.	<p>Measures to mitigate the effects of visual impacts from operation are outlined in <b>Table 3.2</b>.</p> <p>Measures to mitigate the effects of operational traffic are outlined in <b>Table 3.7</b>.</p> <p>Measures to mitigate the effects of operational noise are outlined in <b>Table 3.8</b>.</p> <p>A H&amp;SP will be prepared to ensure the safe operation of the Project and included within the detailed OMP.</p>	<p>Regular recording of compliance in a logbook.</p> <p>The detailed OMP will detail the frequency.</p>
Management of public rights of way ('PRoW') within the Site.	All existing as well as new or diverted PRoWs proposed by the Project within the Site will be retained and managed throughout the operational phase by the undertaker / operator of the Site in accordance with the <b>Outline RoWAS (Doc Ref. 7.15)</b> and detailed RoWAS.	<p>The overall responsibility will be with the undertaker / operator of the Site.</p> <p>To be included in the detailed RoWAS.</p>

Table 3.7: Traffic and Access

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
Vehicle movements during operation and effects on access/PRoW users.	The Site access points to be used during the operational phase are to be the same as those used during the construction phase as shown on the <b>Streets, Rights of Way and Access Plans (Doc Ref. 2.5)</b> . These access points will provide operational access	<p>The overall responsibility will be with the undertaker / operator of the Site.</p> <p>To be included in the detailed OMP.</p>

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
	<p>to the PV panels, Inverter Stations, Project Substation, Sellindge Substation and associated infrastructure for the purposes of management and maintenance.</p> <p>A series of internal access tracks are proposed within the Project for emergency response purposes, in line with NFCC guidance<sup>1</sup>.</p> <p>The <b>Outline RoWAS (Doc Ref. 7.15)</b> sets out the management of PRowS traversing the Site during the operational phase of Project. Management of landscaping adjacent to PRowS is secured by the <b>Outline LEMP (Doc Ref. 7.10)</b>.</p> <p>Operational traffic will give-way to other users. Visibility will be maximised between operational vehicles and other users, with warning signage provided if required.</p>	

Table 3.8: Noise

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
Noise from operational equipment.	The <b>Draft DCO (Doc Ref. 3.1)</b> includes an Operational Noise Mitigation and Monitoring Scheme ('ONMMS') that requires demonstration that the authorised development is not likely to result in any materially new or materially different noise effects from those assessed in <b>ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)</b> .	<p>The overall responsibility will be with the undertaker / operator of the Site.</p> <p>Noise monitoring will be completed following commissioning and during operations as included in the detailed OMP.</p>
Reduction in performance of acoustic barriers.	The OMP will ensure maintenance of the acoustic barriers is undertaken as required to ensure the barriers remain free from defects and continue to function as designed.	The overall responsibility will be with the undertaker / operator of the Site.

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
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Table 3.9: Climate Change

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
Greenhouse gas emissions from the operational maintenance activities required during operation of Project.	<p>Climate change mitigation measures include:</p> <ul style="list-style-type: none"> <li>▪ Regular planned maintenance of the Project to optimise efficiency of Project infrastructure.</li> <li>▪ Increasing recyclability by segregating waste to be re-used and recycled where reasonably practicable.</li> <li>▪ Operating the Project in such a way as to minimise the creation of waste.</li> <li>▪ Maximising the use of alternative materials with lower embodied carbon such as locally sourced products and materials with a higher recycled content.</li> <li>▪ Encouraging the use of lower carbon modes of transport by identifying and communicating local bus connections and pedestrian and cycle access routes to/from the Project to all staff.</li> <li>▪ Switching off vehicles and plant when not in use and ensuring vehicles conform to emissions standards.</li> <li>▪ Monitoring of weather forecasts to anticipate extreme temperatures for infrastructure to ensure resilience against extreme weather events.</li> </ul> <p>The following measures are required to ensure safety of staff from</p>	<p>The overall responsibility will be with the undertaker / operator of the Site.</p> <p>To be included in the detailed OMP.</p>

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
	<p>increased flood risk onsite due to climate change:</p> <ul style="list-style-type: none"> <li>▪ Any H&amp;SP will be required to account for potential climate change impacts on workers, such as flooding and heatwaves; and</li> <li>▪ Storing materials outside of flood extent as far as reasonably practicable.</li> </ul>	

Table 3.10: Major Accidents and Disasters

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
Risk of major accidents during operation.	<p>All maintenance 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.</p> <p>An <b>Outline BSMP (Doc Ref. 7.16)</b> has been produced for the Project and will be referred to during operation to safely reduce and manage the risk of fire during operation.</p> <p>Further risks of major accidents and disasters are covered within <b>Tables 3.1 to 3.9</b> above.</p>	<p>Regular recording of compliance in a logbook.</p> <p>The detailed OMP will detail the frequency of maintenance works.</p> <p>The detailed BSMP will provide details on operational procedures for BESS.</p>

Table 3.11: Waste

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
<p>Impacts of waste to the surrounding environment.</p> <p>Potential to impact on</p>	<p>Waste will be managed in line with the waste hierarchy.</p> <p>Materials requiring removal from the Order limits during operation will be transported using licensed carriers and records kept, detailing the types</p>	<p>The detailed OMP will detail frequency.</p>



sensitive receptors (humans, wildlife, and controlled waters) if not stored and managed appropriately.	<p>and quantities of waste moved and the destinations of this waste, in accordance with the relevant regulations.</p> <p>Infrastructure that needs to be replaced during the operational phase will be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time, or if more suitable at the time, sold for refurbishment and reuse.</p>
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Table 3.12: Agriculture and Land Use

Potential Impact	Mitigation / Enhancement Measure	Monitoring Requirements
Potential for surface soil compaction in some areas.	<p>When travelling across the Order limits all machinery and vehicles will keep to internal access tracks where possible to minimise the risk of soil compaction.</p> <p>The management of trafficking on Site and traversing the land when the soil is in a suitable dry condition is key to managing the risk of soil compaction.</p>	Not required.

## 4 Implementation and Operation

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### 4.1 Overview

4.1.1 As set out in Section 1 of this Outline OMP, a detailed OMP is to be submitted to the local planning authority for approval prior to the operation of the Project. This is secured by Requirement in the **Draft DCO (Doc Ref. 3.1)**.

### 4.2 General Requirements

4.2.1 The detailed OMP will set out all roles, responsibilities and actions required in respect of the implementation of the measures described in this Outline OMP, including:

- An organogram showing team roles, names, and responsibilities;
- Training requirements for relevant personnel on environmental topics;
- Information on Site briefings to equip relevant staff with the necessary level of knowledge to follow environmental control procedures;
- Measures to advise employees of changing circumstances;
- Communication methods and document control;
- Monitoring, inspections and audits of Site operations; and
- Environmental emergency procedures.

### 4.3 Operational Phase Requirements

4.3.1 The detailed OMP will also include information on the following:

- Spillage response and reporting procedures;
- Frequency of inspections and maintenance of equipment;
- Management of on-Site traffic and operational access;
- Measures for infrastructure replacement, waste disposal and monitoring;
- Measures to lower greenhouse gas emissions;
- Measures to allow the Environment Agency appropriate access to the AFSA; and
- Measures for the monitoring of weather events and of climate change resilience.

### 4.4 Emergencies

4.4.1 The following plans will be prepared as part of the detailed OMP:

- ERP (including Flood Risk<sup>1</sup>);

- ESAP; and
- H&SP (including Flood Risk and climate change).

## 5 Monitoring and Reporting

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### 5.1 Monitoring

- 5.1.1 Monitoring and reporting will be undertaken for the duration of the operational phase in order to demonstrate the effectiveness of the measures set out in the detailed OMP.
- 5.1.2 Monitoring will be the responsibility of the Site or Operations Manager, who will observe Site activities and report any deviations from the detailed OMP in a logbook, along with the action taken and general conditions at the time.
- 5.1.3 If required alongside remote monitoring, the Site Manager, or appointed party/parties, will conduct walkover surveys which will be documented and arrange regular formal inspections to ensure the requirements of the detailed OMP are being met. The Site Manager, or appointed party/parties, will also act as day-to-day contact with relevant local authorities and other regulatory agencies such as the Environment Agency.

### 5.2 Record keeping

- 5.2.1 Monitoring records will be retained for all monitoring and implementation of the detailed OMP which will provide the evidence that the detailed OMP is being implemented effectively. These records will include:
- Results of routine Site inspections by Environmental Manager/ Operation Manager;
  - Environmental surveys and investigations;
  - Equipment test records;
  - Licences and approvals; and
  - Corrective actions taken in response to incidents or complaints received from a third party.
- 5.2.2 The detailed OMP will be updated if it is necessary to add additional control measures. Existing control measures and mitigation will not be materially amended without prior agreement with the local planning authority.

## References

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<sup>1</sup> Grid Scale Battery Energy Storage System planning – Guidance for FRS (2023) NFCC Knowledge Base. Available at: <https://nfcc.org.uk/wp-content/uploads/2023/10/Grid-Scale-Battery-Energy-Storage-System-planning-Guidance-for-FRS.pdf> (Accessed: 26 April 2024).