ECO POWER
SUFFOLK

EcoPower Suffolk Solar

Draft Outline Construction Environmental Management Plan

June 2026

econergy

Contents

1. Introduction 3
2. Draft Order Limits and Proposed Development 5
3. Construction environmental management 6
4. Mitigation and management 12
5. References 51

Tables

Table 4-1 Summary of mitigation and management measures, and monitoring requirements – Agricultural Land and Soils 13
Table 4-2 Summary of mitigation and management measures, and monitoring requirements – Air Quality 14
Table 4-3 Summary of mitigation and management measures, and monitoring requirements – Biodiversity and Ecology 21
Table 4-4 Summary of mitigation and management measures, and monitoring requirements – Cultural Heritage 26
Table 4-5 Summary of mitigation and management measures, and monitoring requirements – Climate Change Resilience 28
Table 4-6 Summary of mitigation and management measures, and monitoring requirements – Greenhouse Gas 30
Table 4-7 Summary of mitigation and management measures, and monitoring requirements – Landscape and Visual Amenity 32
Table 4-8 Summary of mitigation and management measures, and monitoring requirements – Noise and Vibration 33
Table 4-9 Summary of mitigation and management measures, and monitoring requirements – Socio-economics 39
Table 4-10 Summary of mitigation and management measures, and monitoring requirements – Transport and Access 40
Table 4-11 Summary of mitigation and management measures, and monitoring requirements – Water Resources and Flood Risk 41
Table 4-12 Summary of mitigation and management measures, and monitoring requirements – Ground Conditions 50
Table 5-1 Abbreviations 52
Table 5-2 Glossary 53

Executive Summary

Ex. 1 This draft Outline Construction Environmental Management Plan (oCEMP) has been prepared on behalf of EcoPower Suffolk Limited (the 'Applicant') as part of the Preliminary Environmental Information being consulted upon to support a Development Consent Order (DCO) application for EcoPower Suffolk Solar (the 'Proposed Development').

Ex. 2 The oCEMP sets out how construction-phase mitigation and monitoring including that identified through the Environmental Impact Assessment (EIA) process, and reported in the Preliminary Environmental Information, will be implemented to achieve compliance with relevant environmental legislation and DCO Requirements.

Ex. 3 The Proposed Development comprises a new solar farm (>100 megawatts (MW)) with Battery Energy Storage Systems (BESS) and Associated Development, including underground cabling and grid connection to the Yaxley 400 kilovolt (kV) National Grid Substation being constructed by another developer.

Ex. 4 Subject to receiving consent, one or more detailed CEMP(s) will be prepared by the appointed Contractor(s) in accordance with the final oCEMP submitted for approval by Babergh and Mid Suffolk District Council (BMSDC) before work commences.

Ex. 5 The oCEMP combines embedded design measures, good practice, and topic-specific controls, and cross refers to complementary plans to be submitted with the draft DCO such as the Outline Construction Traffic Management Plan (oCTMP), and the Site Waste Management Plan.

Ex. 6 Mitigation, management and monitoring requirements will be integrated into the detailed CEMP(s), with procedures for environmental inspections, stakeholder communications and complaint handling, and response to incidents and emergencies to support compliance and continual improvement during construction. The detailed CEMP(s) will be secured through the DCO.

Ex. 7 Comments on the management measures proposed within this draft oCEMP are invited as part of this consultation.

1. Introduction

1.1. Overview

1.1.1 This draft outline Construction Environmental Management Plan (oCEMP) has been prepared on behalf of EcoPower Suffolk Limited (the 'Applicant') as part of the consultation process relating to a Development Consent Order (DCO) application for the construction, operation and decommissioning of EcoPower Suffolk Solar (the 'Proposed Development').

1.1.2 An Environmental Impact Assessment (EIA) is being undertaken of the Proposed Development, and Preliminary Environmental Information has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref.1-1).

1.1.3 The oCEMP incorporates embedded and good practice measures, as well as any further mitigation that arises from the EIA process. A final version of the oCEMP will be submitted alongside the Environmental Statement (ES) as part of the DCO application to secure the commitments relied upon within each technical assessment. A Requirement will be included in the draft DCO to secure the preparation of detailed CEMP(s) by the appointed Contractor(s), substantially in accordance with the oCEMP to be submitted for approval by Babergh and Mid Suffolk District Council (BMSDC) in advance of construction.

1.1.4 It is recognised that there could be multiple detailed CEMPs prepared which relate to different parts of the Proposed Development, depending on the detailed construction and contracting strategy undertaken. Where this is the case, each detailed CEMP would set out how the management of construction impacts would be co-ordinated across areas covered by the other detailed CEMPs.

1.1.5 The oCEMP is designed with the objective of ensuring compliance with the relevant environmental legislation and mitigation measures to be set out within the ES. This oCEMP provides the likely structure of the detailed CEMP(s) (as set out in Section 1.2) and relevant preliminary information. It also indicates what additional information or controls might be included under each sub-section within each detailed CEMP.

1.1.6 The key elements of the oCEMP include:

a. an overview of the Proposed Development and associated construction programme;

b. proposed design and other mitigation measures to prevent or reduce potential adverse environmental effects;

c. monitoring and reporting of effectiveness of mitigation measures; and

d. links to other complementary plans and procedures.

1.1.7 The appointed Contractor(s) will be responsible for working substantially in accordance with the environmental controls documented in the oCEMP and for the preparation and implementation of each detailed CEMP.

1.1.8 Any additional licences, permits, or approvals that are required would be listed in the detailed CEMP(s).

1.2. Structure of the oCEMP

1.2.1 This oCEMP is structured as follows:

a. **Introduction:** provides an introduction and overview to this document.

b. **Draft Order Limits and Proposed Development**: provides a summary of the Proposed Development, including likely construction activities, programme and standard management measures.

c. **Construction environmental management**: defines the roles to be included within the detailed CEMP(s) to deliver the environmental management and mitigation measures; identifies stakeholders to be engaged; sets out construction assumptions including programme and working hours.

d. **Mitigation and management**: identifies the environmental mitigation and management measures required to address the environmental effects of the works during construction and how these will feed into the detailed CEMP(s). It also provides procedures for monitoring and reviewing compliance with the detailed CEMP(s) and rectifying breaches of detailed CEMP measures.

2. Draft Order Limits and Proposed Development

2.1. Draft Order Limits

2.1.1 The Draft Order Limits outline the maximum extent of land that will be required to facilitate the construction, operation and maintenance, and decommissioning of the Proposed Development. The Draft Order Limits are described in the Preliminary Environmental Findings provided as part of this consultation and are shown on Figure 1.1: Site Location Plan of the Preliminary Environmental Findings.

2.1.2 The Draft Order Limits cover an area of approximately 1,150 hectares (ha) located within the administrative areas of BMSDC and Suffolk County Council (SCC), near to the settlements of Yaxley, Stuston, Brome, Oakley, Eye, Gislingham, Thrandeston, Mellis and Occold.

2.1.3 The Draft Order Limits will continue to be refined in response to consultation feedback and detailed technical assessment work being carried out as part of the EIA process. The final Order Limits will be submitted with the DCO application.

2.2. Description of the Proposed Development

2.2.1 The Proposed Development comprises the construction, operation, maintenance and decommissioning of a new solar farm with a generating capacity over 100 megawatts (MW), Battery Energy Storage Systems (BESS) and Associated Development, along with underground cabling a grid connection to a Point of Connection (PoC) at the Yaxley 400 kilovolt (kV) National Grid Substation being constructed by another developer.

2.2.2 The Proposed Development comprises five Areas (Areas 1 to 5) which form the Principal Area and accommodate the solar photovoltaic (PV) arrays, BESS and Associated Development, including substations and environmental mitigation and enhancement areas. Area 5 Thrandeston and Mellis, closest to the Yaxley 400 kV National Grid Substation, is anticipated to accommodate the centralised BESS, adjacent to the Main Substation. Additional, distributed BESS units are proposed to be co-located within the solar array areas across the Principal Area. The BESS is intended to store surplus electricity generated by the solar PV arrays and/or energy from the grid.

2.2.3 The Proposed Development will also include underground cabling to be routed within areas shown as ‘Draft Cable Corridors’ which are being refined. The underground cabling will connect the five Areas to one another (Interconnecting Cables) and to the PoC at Yaxley 400 kV National Grid Substation via a Grid Connection Cable running from Area 5 Thrandeston and Mellis.

2.2.4 A more detailed description of the Proposed Development, including the proposed environmental mitigation, is set out within Section 2 of the Preliminary Environmental Findings. The indicative layout of the proposed environmental mitigation is shown within the Illustrative Environmental Masterplan (see Figure 2.4) provided as part of the Preliminary Environmental Information. This provides an illustration of how the mitigation and enhancement commitments and outcomes set out in the Preliminary Environmental Information could be delivered and secured through the DCO.

3. Construction environmental management

3.1. Introduction

3.1.1 The following section establishes the general site arrangements for the construction of the Proposed Development.

3.2. Roles and responsibilities

3.2.1 This section sets out the appointed Contractor(s) key roles and responsibilities during the construction phase in managing environmental impacts.

3.2.2 The detailed CEMP(s) to be prepared by the appointed Contractor(s) prior to construction will confirm exact roles and responsibilities and include contact details for key members of staff. Clearly establishing roles and responsibilities is vital to ensure the successful construction of the Proposed Development, including the implementation of the detailed CEMP(s). Roles would likely include but are not limited to:

a. **Construction Project Manager** – overall responsibility for ensuring all elements in the DCO, the detailed CEMP(s) and all environmental, legal and other requirements are implemented, and appropriately resourced, managed, reviewed and reported.

b. **Site Manager** – overall responsibility for activity on site, and will be based on-site full time.

c. **Environmental Manage**r – responsible for the overall management of environmental aspects on site, ensuring environmental legislation and best practices are complied with, and environmental mitigation and monitoring measures identified are implemented. The Environmental Manager will oversee environmental monitoring on site and carry out regular environmental site inspections, will liaise with relevant environmental bodies and other third parties as appropriate.

d. **Archaeological Clerk of Works** – responsible for monitoring the completion of all archaeological works undertaken by the Archaeological Contractor.

e. **Archaeological Contractor** – responsible for the delivery of the archaeological mitigation programme, reporting and responding to any incidents or non-compliance.

f. **Arboricultural Clerk of Works** – responsible for monitoring the completion of all arboricultural works, making sure all impacts are avoided, mitigated or compensated for.

g. **Ecological Clerk of Works (ECoW)** – management of the risks to biodiversity on construction sites, advising on protected valued biodiversity features and providing practical solutions.

h. **Flood Warden** – there will be a dedicated individual responsible for preparing, and managing, the response to flood incidents and ensuring compliance with the approved Flood Warning and Evacuation Plan (FWEP), which will be developed taking into account the measures outlined in the Flood Risk Assessment (FRA) to be submitted with the ES.

i. **Health and Safety Manager** - responsible for the monitoring and controlling of health and safety compliance and related rules and regulations on site.

j. **Community Liaison Officer** – the Community Liaison Group set up during the pre-application process would continue in accordance with relevant DCO Requirement prior to construction and would continue through until final commissioning of the Proposed Development as a formal forum for local issues to be raised. A Community Liaison Officer will be appointed to lead discussions with local communities and also act as the primary point of contact should there be any queries or complaints.

k. **Traffic Safety and Control Officer** – main point of contact for all duties related to traffic management, and to ensure works are being carried out in accordance with the detailed Construction Traffic Management Plan(s) (CTMP) (a draft outline CTMP (oCTMP) is provided at this consultation).

l. All other Staff would be expected to understand and implement procedures relevant to their role as laid out in the detailed CEMP, conduct work with a view to reducing environmental impact and to raise any environmental concerns with the Site Manager, and to report all environmental incidents to the Site Manager.

3.2.3 These roles and responsibilities are indicative and will be confirmed in the detailed CEMP(s). It is noted that even if there is more than one detailed CEMP, this does not necessarily mean the above roles will be duplicated to match each CEMP. Any detailed CEMP(s) which follow a first CEMP to be approved will set out how roles and responsibilities will be managed across the different works covered by the respective CEMPs.

3.3. Construction programme

3.3.1 Construction work would be phased across the Draft Order Limits with works on the Substation and BESS within Area 5 Thrandeston and Mellis expected to commence first. It is estimated that the Proposed Development would take approximately 30 months to construct with the majority of works expected within the first 24 months. Works within the Cable Corridors would likely overlap with construction works being carried out within each of the individual Areas.

3.4. Working hours

3.4.1 Construction activities will be carried out Monday to Friday 08:00 – 19:00 and between 08:00 and 13:30 on Saturdays, which constitute core working hours (save for start-up or shut down works). This is with the exception of Horizontal Directional Drilling (HDD) works, which would take place on a 24/7 basis.

3.4.2 Some activities may be required outside the core working hours (such as the arrival and departure of construction workers, the delivery of abnormal loads, concrete pours for foundations, nighttime working for cable construction works (Horizontal Directional Drilling (HDD) or in emergencies).

3.4.3 Non start up or shut down construction works outside the core working hours will require written approval from the local planning authority.

3.4.4 Further matters relating to working hours are set out in Table 4-1 to Table 4-12.

3.5. HDD method statement

3.5.1 Any works relating to HDD activities will be undertaken in line with a detailed Method Statement, which will form part of the detailed CEMP(s).

3.5.2 Strict adherence to the Method Statement will be required when undertaking HDD with any changes requiring approval from the appointed Contractor(s) Project Manager and documented risk assessments. The Method Statement will cover project details, equipment set-up, drilling procedures, and the handling of drilling fluids, emphasising adherence to safety measures and risk assessments.

3.5.3 The document will also include details on environmental monitoring requirements, emergency response procedures, environmental protection strategies, and the use of personal protective equipment. It will also stress the importance of training, supervision, and communication among all personnel involved to ensure the successful and safe completion of the works.

3.5.4 A frac-out contingency plan will also be implemented which will include measures to prevent, contain and control the risk of frac-out including clean-up procedures.

3.6. Control of noise and vibration

3.6.1 The construction works shall be undertaken in a manner which demonstrates that best practicable means (BPM) (as defined in Section 72 of the Control of Pollution Act 1974) will be applied during construction works to minimise noise (including vibration) at neighbouring residential properties and other sensitive receptors. Control measures would be consistent with the measures set out in the relevant topic tables below and, where appropriate to the Proposed Development, the measures within the current version of BS 5228 ‘Code of Practice for Noise and Vibration Control on Construction and Open Sites’ - ‘Part 1: Noise’ and ‘Part 2: Vibration’.

3.6.2 The detailed CEMP(s) will set out a Stakeholder Communications Plan. This would include a procedure for providing monthly information including to local residents, advising them of future potential noisy works, reviewing, monitoring and responding to noise complaints, and the actions taken by the Applicant in response to the complaints. Further details will be confirmed in the detailed CEMP(s).

3.7. Control of light

3.7.1 Lighting will be required during construction for safety reasons but would be temporary in nature and predominantly limited to the core working hours, save for HDD works, emergency works or any works outside those hours approved by the local planning authority.

3.7.2 Lighting will be designed and used in accordance with appropriate standards and guidance, to be confirmed in the detailed CEMP(s). The following principles for lighting will be adhered to (including for non-core working hour works):

3.7.3 Lights installed to be of the minimum brightness and/or power rating capable of performing the desired function.

3.7.4 Lighting during construction will follow a sensitive design (motion-sensor, downward-directed, low-intensity) to minimise light spill towards sensitive ecological receptors.

3.7.5 Use of focused directional fittings to minimise outward light spill and glare (e.g. hoods / cowls which direct light below downwards) outside the Principal Areas.

3.7.6 Lighting to be directed towards the middle of the Principal Area rather than towards the boundaries.

3.7.7 Where the use of security cameras is required, no visible lighting would be required as infrared lighting provided by the CCTV/security system to provide night vision functionality.

3.7.8 Any unavoidable artificial lighting during the hours of darkness required within the period March to October inclusive would only be developed following consultation with the ECoW, in order to determine potential impacts and appropriate mitigation steps, including agreed hours of operation and numbers / specification of luminaires.

3.7.9 Security lighting may be installed on temporary site compounds and permanent structures following consultation with the ECoW to establish appropriate locations. Security lighting would be limited to the minimum number of luminaires required, which would be defined through consultation with the ECoW and based on the sensitivity of the habitats potentially affected and baseline lux levels. Security luminaires would be motion-sensitive and set on a short (less than two minute) timer and orientated to reduce upward light spill as far as practicable (i.e. horizontally orientated) in order to reduce the potential impact on light sensitive species, such as bats.

3.8. Traffic management

3.8.1 During construction, the appointed Contractor(s) will ensure that the impacts from construction traffic on the local community (including local residents and businesses and users of the surrounding transport network) are minimised by implementing the measures set out in the oCTMP, a draft of which is provided as part of this consultation as part of the Preliminary Environmental Information.

3.8.2 Construction access will be confirmed in the detailed CEMP(s) and CTMP(s) as the design progresses and in consultation with the relevant highways authorities.

3.9. Off-site delivery routes

3.9.1 The oCTMP will provide details of the proposed routes to be used by construction or heavy goods vehicles (HGV).

3.10. Parking

3.10.1 Temporary Construction Compounds would include parking areas for staff and construction vehicles. The on-site parking provisions, loading and unloading areas for plant and materials, storage areas, wheel washing facilities and construction traffic management measures will be set out in the oCTMP, and subsequent detailed CTMP(s) which would also include a description of any laydown areas or welfare facilities.

3.10.2 Wheel washing equipment will be available and used on site within the construction areas, as required, to prevent the transfer of dirt and stones onto the public highway. All drivers will be required to check that their vehicle is free of dirt, stones and dust prior to departing from the Principal Area.

3.11. Recycling and waste

3.11.1 In order to control the waste generated during site preparation and construction, the contactor(s) will separate the main waste streams on site, prior to transport to an approved, licensed third party waste facility for recycling or disposal.

3.11.2 A detailed Site Waste Management Plan (SWMP) will be prepared by the appointed Contractor(s), in accordance with the Outline SWMP (oSWMP) to be submitted with the DCO application, which will specify the waste streams which would be monitored and targets set with regards to the waste produced, including any re-use and recycling of materials. The oSWMP will be finalised with specific measures to be implemented prior to the start of construction.

3.11.3 In accordance with the waste hierarchy, the Proposed Development will prioritise waste prevention, followed by preparation for reuse, recycling and recovery, with landfill disposal as the last resort.

3.11.4 All waste to be removed during construction of the Proposed Development will be undertaken by a fully licensed waste carrier and taken to a suitably licensed waste management facility and managed in line with the requirements of the Waste (England and Wales) Regulations (2011) and the Hazardous Waste (England and Wales) Regulations (2005) (as amended).

3.12. Security

3.12.1 Site security during construction will be managed by the appointed Contractor(s). The perimeter security fencing would remain in place throughout the duration of the construction period. Any storage of materials would be kept secure to prevent theft or vandalism. A safe system for accessing the materials storage areas would be implemented by the appointed Contractor(s).

3.13. Responding to environmental incidents and emergencies

3.13.1 Emergency planning will be developed in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environment Agency in relation to responding to flood warnings and events.

3.14. Utilities management

3.14.1 Engagement with utilities companies has been undertaken and commitments (such as offsets or working practices) will be made through protective provisions in the draft DCO to be submitted with the DCO application.

3.15. Good practice

3.15.1 The Considerate Constructors Scheme (CCS) (Ref.1-1) will be adopted to assist in reducing pollution and nuisance from the Proposed Development, by employing good practice measures which go beyond statutory compliance.

3.16. Public communication and liaison

3.16.1 Prior to commencing works on site, the appointed Contractor(s) will develop and implement a Stakeholder Communications Plan that includes community engagement (including taking account of the proposed Community Liaison Group to be set up) and will detail a complaints procedure. A display board will be installed on site, and a website will be set-up. These will include contact information for the Site Manager or alternative public interface with whom any complaints can be lodged or questions raised, and the head or regional office contact information. A logbook of complaints will be prepared and managed by the Site Manager or nominated representative.

3.16.2 Any environmental complaints will be investigated, with appropriate action taken and recorded, so that a full audit trail is available should the complainant raise the issue(s) with the local planning authority.

3.16.3 A Community Liaison Officer (or alternative) would be appointed to lead discussions with the local community during construction, as part of the proposed Community Liaison Group. Details of the frequency and attendees to the Community Liaison Group will be agreed with the local planning authority pursuant to a Requirement in the draft DCO.

4. Mitigation and management

4.1. Purpose

4.1.1 This section sets out the mitigation and management measures to be included as a minimum in the detailed CEMP(s). It also identifies where monitoring is proposed, to assess the effectiveness of the mitigation measures. Nothing in this draft oCEMP would prevent the modification or omission of the control measures set out in Table 4-1 to Table 4-12, where the construction methodology means that the measures can be modified or omitted. This will be confirmed (including confirming that the absence or change to such control measures would not lead to any materially new or materially different effects than those reported in the ES) at the time of submission of the detailed CEMP(s).

4.2. Mitigation and management measures

4.2.1 A summary of the mitigation and management measures, along with monitoring requirements, to be included as a minimum in the detailed CEMP(s) (save where reference is made to other management plans where the measures will be included in detailed versions of those plans), is provided in Table 4-1 to Table 4-12.

4.2.2 The measures must be integrated into the detailed CEMP prior to the commencement of construction by the Applicant and this would be secured via the DCO.

Table 4-1 Summary of mitigation and management measures, and monitoring requirements – Agricultural Land and Soils

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Temporary loss of agricultural land and impact on soils	AL1 - CEMP	Outline Soil Resources Management Plan (oSRMP) to be implemented.	Regularly record compliance via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the CEMP, expected to include the Environmental Manager, Community Liaison Officer, Site Manager and Construction Project Manager
	AL2 - CEMP	Where possible, underground cables would be installed using a cable plough or trenching.		
	AL3 - CEMP	Minimising fragmentation of residual agricultural land.		
	AL4 - CEMP	Adopting and implementing good practice measures for the construction stage of the Proposed Development to minimise damage to soils that remain in place and those that are stripped, stockpiled and reinstated; minimise soil carbon losses; maintain water infiltration; and enhance soil biodiversity.		

Table 4-2 Summary of mitigation and management measures, and monitoring requirements – Air Quality

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Increased NO_2 and particulate matter (PM) from on-site and off-site construction vehicle / plant emissions. Increased particulates and deposited dust from activities on the Areas, materials transportation, storage and handling, including use of haul roads.	AQ1 - CEMP	Appropriate mitigation and control measures would include the following measures from the Institute of Air Quality Management (IAQM) (Ref.1-3) best practice guidance. Dust management mitigation measures would take into account the sensitivity of receptors within 250 m from the Draft Order Limits, the construction activities and the dust emission magnitude. **General** • Develop and implement the stakeholder communications plan that includes community engagement before work commences on site. • Display the name and contact details of person(s) accountable for air quality and dust issues at the construction compound. This may be the environmental manager, construction project manager or the site manager. • Display the Contractor(s) head or regional office contact information. • Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the relevant local planning authority.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the CEMP(s). The following monitoring will be undertaken in line with the IAQM best practice guidance: Undertake daily on-site and offsite inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results and make the log available to the local planning authority when asked. Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local	The overall responsibility will be the Applicant and the Environment Manager.

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		Site Management • Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. • Make the complaints log available to the local planning authority when asked. • Record any exceptional incidents that cause dust and/or air emissions, either on site or offsite, and the action taken to resolve the situation in the logbook. • Hold regular liaison meetings with other third party, high-risk construction sites within 250 m of the Draft Order Limits, to ensure plans are co-ordinated and dust and PM emissions are minimised. It is important to understand the up-to-date picture of the interactions of the off-site transport / deliveries which might be using the same strategic road network routes. **Preparing and maintaining the Areas** • Plan site layout so that machinery and dust causing activities are located away from receptors, as far as practicable. • Erect solid screens or barriers around dusty activities or the Areas that are at least as high as any stockpiles on site. • Fully enclose site or specific operation where there is a high potential for dust	planning authority or authorities when asked. Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions. Agree dust deposition, dust flux, or real-time PM 10 continuous monitoring locations with the local planning authority. Where practicable, commence baseline monitoring at least three months before work commences on site or, if a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring	

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		production and the Area is active for an extensive period. • Avoid site run-off of water or mud. • Keep site fencing, barriers and scaffolding clean using wet methods. • Remove materials that have a potential to produce dust from site as soon as practicable, unless being re-used on site. If they are being re-used on site cover as described below; and • Cover, seed, or fence stockpiles to prevent wind-whipping. **Operating vehicle / machinery and sustainable travel** • Ensure all vehicles / machinery switch off engines when stationary / not in use – no idling vehicles. • Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable. • Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas. • A detailed Construction Traffic Management Plan(s) will be produced in substantial accordance with the Outline Construction Traffic Management Plan	during demolition, earthworks and construction.	

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility

		(oCTMP) to manage the sustainable delivery of goods and materials.
		• Ensure all off-road vehicles comply with the requirements of the Non-Road Mobile Machinery (NRMM) currently available for Greater London Authority (Ref.1-3) standards, which includes:
		  ○ All NRMM above 56 kW to be EU stage IV as a minimum.
		  ○ Emission standards for engines smaller than 56 kW have not been directly defined, but in most cases must meet stage V.
		  ○ Constant speed engines, such as generators, must meet stage V.
		• Encourage sustainable travel (public transport and car-sharing).
		Operations
		• Only use cutting, grinding or sawing equipment fitted, or in conjunction with, suitable dust suppression techniques, such as water sprays or local extraction e.g. suitable local exhaust ventilation systems.
		• Ensure an adequate water supply on the site for effective dust / PM suppression mitigation, using non-potable water where practicable and appropriate.
		• Use enclosed chutes and conveyors and covered skips.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		• Minimise drop-heights from loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate. • Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods. **Waste management** • No bonfires and burning of waste materials. **Earthworks** • Re-vegetate earthworks and exposed areas / soil stockpiles to stabilise surfaces as soon as practicable. • Use Hessian, mulches or tackifiers where it is not practicable to revegetate or cover with topsoil, as soon as practicable. • Only remove the cover in small areas during work and not all at once. **Construction** • Avoid scabbing (roughening of concrete surfaces) if practicable. • Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		ensure that appropriate additional control measures are in place. • Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery. • For small supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust. **Trackout** • Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the Areas. This may require the sweeper being continuously in use. • Avoid dry sweeping of large areas. • Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport. • Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable. • Record all inspections of haul routes and any subsequent action in a site logbook. • Install hard surfaced haul routes, which are regularly damped down with fixed or		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		mobile sprinkler systems, or mobile water bowsers and regularly cleaned. • Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the Areas where reasonably practicable). • Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits. • Access gates to be located at least 10 m from receptors where practicable.		

Table 4-3 Summary of mitigation and management measures, and monitoring requirements – Biodiversity and Ecology

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Direct and indirect impacts upon ecological features, including disturbance and damage / loss	BD1 - CEMP	The construction compounds will be located outside of NERC s.41 Priority habitat.	Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency.	The overall responsibility will be with the Applicant.
	BD2 - CEMP	Construction activities would take place between Monday to Friday 08:00 – 19:00 and between 08:00 and 13:30 on Saturdays. This will reduce impacts to foraging/commuting bats which will not be subject to lighting impacts other than for a short period potentially during spring/autumn when bat activity at dusk may overlap with end of day and start of day working. During any overlap of the bat active periods, bat sensitive lighting practices will be implemented in line with the Bat Conservation Trust Artificial Lighting Guidance (2023) (Ref.1-5).		Specific responsibilities will be confirmed in the CEMP, expected to include the ECoW, Environmental Manager, Site Manager and Construction Project Manager.
	BD3 - CEMP	Where practical, vegetation clearance will be undertaken at an appropriate time of year, outside of the breeding season for birds. Therefore, construction will seek to avoid the nesting bird period i.e. February to August (inclusive) for any vegetation which is suitable for breeding birds (including grassland for ground nesting birds and woody vegetation).		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	BD4 - CEMP	Where vegetation clearance is not practical outside the nesting bird period, habitats will be checked for the presence of any nests by a suitably qualified ecologist, prior to vegetation removal, and if active nests are found, then appropriate buffer zones would be put in place and the area monitored until the young birds have fledged.		
	BD5 - CEMP	Fencing is due to be implemented during construction. For areas which provide habitat for ground nesting birds, secure fencing will make sure the area is protected from predators. Fencing in certain areas to be designed to let small mammals and badgers pass through (excluding that around the on-site 132 kV and 400 kV substations).		
	BD7 - CEMP	The Proposed Development will aim to propose trenchless crossing methods on any watercourses of value to fish. Where not possible, the Proposed Development includes open trenching (locations to be confirmed) to watercourses of value to fish, key fish migration timings will be avoided e.g. avoiding key fish migration seasons (April to June for European eel and spined loach).		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	BD8 – CEMP	Any access tracks, cable routing and fencing will be located to pass through existing gates and gaps in hedgerows where practicable.		
	BD9 - CEMP	Where temporary habitat loss will occur, such as the removal of sections of hedgerow to accommodate Interconnecting Cable, these features will be reinstated following construction as far as practicable.		
	BD10 – CEMP	Pre-construction surveys, such as riparian mammal, badger walkovers and/or bat emergence survey (if roost features are impacted), will be undertaken as required to support the baseline survey findings and to comply with relevant wildlife legislation.		
	BD11 – CEMP	Provision of an ECoW to minimise impacts to great crested newt, reptiles and nesting birds during construction, via conducting searches of habitats in advance and establishing temporary buffer zones.		
	BD12 – CEMP	Invasive Non Native Species (INNS) method statement will be produced if INNS are identified as present during preconstruction surveys to inform the management of invasive plant species found within the Draft Order Limits.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	BD13--CEMP	All construction lighting will be deployed in accordance with the following recommendations to prevent or reduce the impact on human and ecological receptors: • Lighting will conform to best practice guidelines with respect to minimising light spill into adjacent habitats and prevent disturbance to bats and other species during construction • The use of lighting will be minimised to that required for safe site operations. Infrared, movement sensor security lighting would be used at night. Lighting would be available for emergencies; • Lighting will utilise directional fittings to minimise outward light spill and glare (e.g. via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal); and • Lighting will be directed towards the middle of the construction area rather than towards the boundaries.		
	BD14 - CEMP	Establishment of a sensitive lighting plan covering construction lighting to ensure lighting of suitable bat commuting, foraging and roosting		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		habitats and otter/water vole habitat is minimised		
	BD15 - CEMP	Protection of trees with potential roost features, which will be protected during construction, development, in line with British Standard BS 5837: Trees in relation to design, demolition and construction by establishing an exclusion zone around their Root Protection Areas (RPA).		
	BD16-CEMP	Any exposed trenches or holes are to be covered up when contractors are off site (i.e. at nighttime) or a slope provided to allow any trapped badgers or other mobile species a safe exit.		

Table 4-4 Summary of mitigation and management measures, and monitoring requirements – Cultural Heritage

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Impact upon known and unknown archaeological remains	CH1 - CEMP	If below ground archaeology constraints arise through further site investigation the mounting structure of solar PV modules will utilise non-intrusive options such as ballast slabs, anchor, or block which sit on the ground surface where this is necessary and appropriate to mitigate any impacts to the archaeological remains.	Monitoring requirements will be set out in the Archaeological Mitigation Strategy (AMS)/Outline Written Scheme of Investigation (oWSI) and compliance with measures regularly recorded via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the CEMP, expected to include the Environmental Manager, Site Manager and Construction Project Manager.
	CH2 - CEMP	Where archaeological remains within the Draft Order Limits do not require preservation in situ and cannot be avoided through embedded mitigation (e.g. changes to the layout and/or construction methods or amended foundation design), it is anticipated that additional mitigation to off-set adverse impacts will take the form of a programme of archaeological investigation and recording, secured by a DCO Requirement. Such a programme may include pre-commencement phases of archaeological investigation (trial trenching), pre-commencement targeted archaeological excavation and/or archaeological monitoring (watching brief) during construction		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		where appropriate. The scope and methodology of the mitigation will be set out within an AMS and Outline Written Scheme of Investigation (oWSI), which will be submitted with the DCO application.		
	CH3 - CEMP	Installation and maintenance of fencing around designated heritage assets (or other heritage assets of equivalent importance or where preservation in situ through the layout of the Proposed Development is proposed) within the Draft Order Limits during construction works.		
	CH4 – CEMP	Toolbox talks to inform site contractors of these measures and the procedure to follow in case of archaeological remains being exposed will also be produced and distributed.		

Table 4-5 Summary of mitigation and management measures, and monitoring requirements – Climate Change Resilience

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Increased frequency and intensity of extreme weather events	CCR1	Health and safety plans and risk assessments developed for construction activities will be required to account for potential climate change impacts on workers, such as flooding, storms and heatwaves. This will include: • hoarding, securing and protection of materials against high winds; • on-site and good practice health management measures for construction staff working in heat such as wearing loose clothing, staying hydrated and applying sun protection; • protecting workers and resources from extreme weather conditions through appropriate Personal Protective Equipment (PPE) and working practices; • using equipment's cooling systems where necessary / adapting working practice and equipment used based on current weather conditions; • monitoring weather forecasts and news for Environment Agency flood warnings, relevant weather	Regular monitoring of weather forecasts for extreme conditions and activation of response plans as needed to reduce risks to the Proposed Development from heatwaves, heavy rainfall, and strong winds during construction phase. Recording extreme weather incidents impacting construction of the Proposed Development (e.g., road surface damage, flooding, snow, ice) will help to identify thresholds that trigger maintenance. Post-event inspections should follow intense rainfall or other extreme conditions to assess damage and apply necessary mitigation. Conducting regular inspections of drainage systems, materials, and structures will identify signs of deterioration. Additional checks should be carried out	Site Manager

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		warnings, and water levels of the local waterways. Contractor(s) will regularly monitor weather forecasts and Environment Agency flood alerts to ensure appropriate safety measures are in place for extreme events (e.g. flash floods, heavy rainfall or strong winds). This will be outlined in a FWEP prepared alongside the detailed DEMP(s) prior to decommissioning works. The FWEP will be developed taking into account the measures outlined in the Flood Risk Assessment (FRA).	after extreme weather events (e.g., flooding, heatwaves, droughts, storms), with repairs or replacements scheduled as needed.	

Table 4-6 Summary of mitigation and management measures, and monitoring requirements – Greenhouse Gas

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Greenhouse Gas (GHG) emissions from construction traffic, equipment and materials.	GHG1	Increasing recyclability by segregating construction waste to be reused and recycled where reasonably practicable.	To be confirmed in the detailed CEMP(s) and CTMP	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the CEMP, expected to include the Environmental Manager, Site Manager and Construction Project Manager.
	GHG2	Designing, constructing and implementing the Proposed Development in such a way as to minimise the creation of waste and maximise the use of materials with lower embodied carbon, including (where reasonably practicable) locally sourced materials and materials with higher recycled content where feasible		
	GHG3	Reusing suitable infrastructure and resources already available in the Order Limits where practicable to minimise the use of natural resources and unnecessary materials (e.g. reusing excavated soil for fill requirements or storing, preserving and restoring top soil).		
	GHG4	Encouraging the use of lower carbon modes of transport through the implementation of sustainable travel initiatives as outlined in the CTMP to reduce the volume of construction staff and employee trips to the		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		Proposed Development. This includes the use of shared transport and providing appropriate facilities for the safe storage of cycles.		
	GHG5	Conducting regular planned maintenance of the construction plant and machinery to optimise efficiency.		

Table 4-7 Summary of mitigation and management measures, and monitoring requirements – Landscape and Visual Amenity

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Visual disruption caused by construction activities.	LV1 - CEMP	Minimising the duration and footprint of construction activity where reasonably practicable.	Keeping construction lighting to the minimum luminosity necessary for safe working within construction compounds and working areas and where possible, fitting it with motion sensors to reduce the duration of potential light spill in night-time views.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the CEMP, expected to include the ECoW, Environmental Manager, Site Manager and Construction Project Manager.
	LV2 - CEMP	Maintaining well-managed and tidy construction working areas and construction compounds to reduce their visual impact and appearance in the landscape.		
	LV3 - CEMP	Keeping construction lighting to the minimum luminosity necessary for safe working within construction compounds and working areas and where possible, fitting it with motion sensors to reduce the duration of potential light spill in night-time views.		

Table 4-8 Summary of mitigation and management measures, and monitoring requirements – Noise and Vibration

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Construction traffic noise and vibration	NV1 - CEMP	Routing for HGVs through local villages will be avoided or minimised as reasonably practicable.	The detailed CEMP(s) will outline a Stakeholder Communications Plan for prior warning of activities with the potential to cause disturbance, alongside details on the establishment of the Community Liaison Group. During construction, appropriate mechanisms to communicate with local residents will be set-up to highlight potential periods of disruption for both noise and vibration. The Stakeholder Communications Plan will include a point of contact for the Contractor(s) for any queries or complaints. Any noise or vibration complaints will be investigated and appropriate action taken, as required.	The overall responsibility will be with the PC. Specific responsibilities will be confirmed in the detailed CEMP, expected to include the Environmental Manager, Health and safety Manager, Community Liaison Office, Site Manager and Decommissioning Project Manager
Noise and vibration from construction site activities	NV2 - CEMP	The construction works shall be undertaken in a manner that demonstrates that BPM (as defined in Section 72 of the Control of Pollution Act 1974) will be applied during construction works to minimise noise (including vibration) at neighbouring residential properties and other sensitive receptors. This may include the implementation of Section 61 consents. Measures to control noise as defined in Annex B of British Standard BS 5228:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites - Part 1: Noise' and measures to control vibration as defined in Section 8 of BS 5228:2009+A1:2014 'Part 2: Vibration' will be adopted where		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		reasonably practicable. Examples of these measures include: • Careful selection of plant and construction methods. Only plant conforming to relevant national, EU or international standards, directives and recommendations on noise and vibration emissions will be used. • Design and use of site enclosures, housing and temporary stockpiles, where practicable and necessary, to provide acoustic screening at the earliest opportunity. • Where practicable, doors and gates will not be located opposite occupied noise-sensitive buildings. The mechanisms and procedures for opening doors/gates will minimise noise, as far as reasonably practicable. • Choice of routes and programming for the transport of construction materials, spoil and personnel. • Careful programming so that activities which may generate significant noise are planned with	Where relevant, the Contractor(s) will carry out noise and/or vibration monitoring during peak periods at the receptors most likely to be impacted. Details of the monitoring strategy will be developed for the detailed CEMP(s). Where construction vibration may be perceptible for residents, the Contractor will engage to provide reassurance that properties will not be at risk of damage.	

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		regard to local occupants and sensitive receptors / activities. • All vehicles and mechanical plant shall be fitted with effective exhaust silencers and shall be maintained in good and efficient working order and operated to minimise noise emissions. • All compressors and generators shall be 'sound reduced' models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use, and all pneumatic percussive tools will be fitted with mufflers or silencers of the type recommended by the manufacturers. • All machines in intermittent use will be shut down in the intervening periods between works or throttled down to a minimum. Lorry engines will be switched off, as soon as practicable, when vehicles are stationary. • Noise emitting equipment which is required to run continuously will be housed in a suitable acoustic enclosure.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		• Temporary noise barriers will be used to reduce noise levels where appropriate and practicable. Such measures will be particularly appropriate for stationary or near-stationary plant such piling rigs and compressors. Barriers will be located as close to the plant as practicable, and in order to provide adequate attenuation and will have a mass per unit area of at least 7 kg/m2. • Plant and equipment liable to create noise and/or vibration whilst in operation will, as far as reasonably practicable, be located away from sensitive receptors and away from walls reflecting towards sensitive receptors. • Where night working is required and (with the exception of HDD and emergency works) agreed with the local planning authority, materials for night-time working shall be delivered, where practicable, during normal hours of working and be placed as close as practicable to the work area for which they are required.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		• Where reasonably practicable, fixed items of construction plant will be electrically powered in preference to combustion engine driven. • To minimise potential vibration impacts, where required compaction could be achieved without using a vibratory system, however there may be a resulting increase in the duration of the compaction works.		
	NV2 - CEMP	No noisy operations will take place during mobilisation/shut down which is 1 hour before and after core working hours. Mitigation measures listed below are recommended for any potential night-time operations for HDD: • Where practicable, avoid cable construction works within 300 m of residential or other sensitive receptors. • Advance notice and details of any night working to be provided by the contractor to the relevant local planning authority and any sensitive residential receptors.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		• The potential use of quieter equipment will be explored by the Contractor. • Depending on location, plant and timing of works, noise barriers will be installed to minimise noise emissions to environment.		

Table 4-9 Summary of mitigation and management measures, and monitoring requirements – Socio-economics

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Impacts to local residents, businesses and community facilities	SE1 - CEMP	Existing access to community facilities/assets to be maintained at all times or a suitable equivalent provided.	Regularly record compliance via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the CEMP, expected to include the Environmental Manager, Community Liaison Officer, Site Manager and Construction Project Manager.
	SE2 - CEMP	Wherever possible, local employment and supply chain to be used throughout the lifetime of the Proposed Development		
Impacts to PRoW users	SE3 - CEMP	PRoW will be managed in accordance with the outline Public Rights of Way and Access Management Plan (oPRoWAMP) which will be updated by the appointed Contractor(s) as a Requirement of the DCO.	n/a the oPRoWAMP will detail the frequency of any required monitoring.	

Table 4-10 Summary of mitigation and management measures, and monitoring requirements – Transport and Access

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Increased traffic flows and severance and intimidation associated with increased traffic	TT1 - CEMP	HGVs will be required to follow prescribed Construction Traffic Routes between the strategic road network and the access points. These routes will be identified based on their suitability to cater for HGVs, avoiding sensitive receptors as far as reasonably practicable.	Monitoring of traffic to and from the site as detailed and required in the CTMP. Compliance with all measures regularly recorded via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the CEMP, expected to include the Environmental Manager, Site Manager and Construction Project Manager.
	TT2 - CEMP	Temporary Traffic Management will be used along construction routes and at access points where required.		
	TT3 - CEMP	Passing places or localised, widening of the highway and/or traffic management where required.		
	TT4 - CEMP	Car sharing/minibuses to minimise trips on the network associated with construction.		

Table 4-11 Summary of mitigation and management measures, and monitoring requirements – Water Resources and Flood Risk

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Impact upon water resources	WFR1 – CEMP	A Construction Water Management Plan (CWMP) would be produced prior to construction by the Applicant. This document would ensure site wide management of rainfall runoff, site drainage, surface water and groundwater including monitoring requirements during construction. The management plan would also detail water requirements, sources of supply and measures to reduce consumption, and foul water management.	Appropriate water quantity and quality monitoring requirements to be agreed with relevant stakeholders and set out in the CEMP. Compliance with all measures regularly recorded via an appropriate method to be determined in the CEMP. The CEMP will detail the frequency. Specific monitoring requirements	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the CEMP, expected to include the Environmental Manager, Flood Warden, Site Manager and Construction Project Manager.
Impact upon water quality through erosion and/or mobilisation and runoff of sediments and/or the leakage or accidental spillage of construction materials and potential pollutants used on site migrating to nearby surface watercourses or infiltrating to groundwater.	WFR2 - CEMP	Up to date requirements set out in pollution prevention guidance (and any other relevant guidance available at the time of construction) will be provided in the CEMP.		
	WFR3 – CEMP	Sediment control measures (silt fences, settlement/attenuation ponds etc.) would be used in the vicinity of watercourses, springs or drains where natural features (e.g. hollows) do not provide adequate protection. Sediment control measures will also be used within watercourses downstream of any in-channel construction works, to minimise the potential for siltation of reaches and/or other watercourses downstream.		
	WFR4 - CEMP	Trenching or excavation activities in open land would cease during periods of intense rainfall and temporary bunding would be provided as required, to reduce the risk of sediment transport to the natural drainage system.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	WFR5 - CEMP	Permanent relocation or longer-term storage of soils would be re-instated with vegetation as soon as practicable	(including monitoring methods, locations and frequency) will be detailed within the detailed CEMP(s), detailed Pollution and Spillage Response Plan (PSRP), Materials Management Strategy (MMS), frac-out contingency plan, Foundation Works Risk Assessment and detailed SWMP.	
	WFR6 – CEMP	The movement of construction traffic would be controlled to minimise soil compaction and disturbance.		
	WFR7 - CEMP	Access tracks would be completed as soon as possible and surfaced appropriately to protect soils from runoff. Temporary fences or markers should be used to ensure minimal disturbance of the surrounding land.		
	WFR8 - CEMP	Wheel washing would be undertaken in designated areas only and sediment control measures would be used to ensure runoff from these areas would not enter directly into watercourses.		
	WFR9 – CEMP	A minimum offset of 10 m from bank top for all watercourses and their associated riparian zones from all construction works including stockpiling of construction materials and excavated spoil will be adopted, except where watercourse crossings are required. Where flood defences are present, a minimum buffer of 8 m from the landward toe of defences will be adopted.		
	WFR10 - CEMP	Equipment would be provided to contain and clean up any spills to minimise the risk of pollutants entering the watercourses or surface water features.		
	WFR11 – CEMP	Refuelling of vehicles and plant machinery (if required) would be confined to the designated fuelling areas and would be carefully controlled and		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		placed away from areas with high groundwater dependency and outside watercourse buffers.		
	WFR12 – CEMP	Vehicles, plant machinery and equipment would be cleaned at designated washout areas located conveniently and within a controlled area of the Proposed Development.		
	WFR13 - CEMP	All fuel and chemicals would be stored within appropriately specified containers and within specifically designed stores / storage areas and would include appropriate measures to avoid spillages in line with the relevant legislation.		
	WFR14 - CEMP	Drip trays would be placed under standing machinery. All solid and liquid waste materials would be properly disposed of in controlled landfill sites away from the site.		
	WFR15 - CEMP	Routine mechanical maintenance of vehicles would be carried out off-site or in a suitable designated area of the Proposed Development.		
	WFR16 - CEMP	There would be no unapproved discharge of foul or contaminated drainage from the Draft Order Limits either to groundwater or any surface waters, whether direct or via soakaway.		
	WFR17 - CEMP	All on-site activities likely to generate effluent will be identified to determine whether it constitutes a pollutant should it be discharged into the water environment.		
	WFR18 - CEMP	Suitable standoff from springs or pond features (standoff will be dependent on construction		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		activities, local conditions and receptors to prevent derogation).		
	WFR19 - CEMP	Suitable standoff from Environment Agency groundwater monitoring boreholes (standoff will be dependent on construction activities, local conditions and receptors to prevent derogation).		
	WFR20 - CEMP	A 50 m stand-off will be applied from all groundwater and surface water abstractions, both licensed and private water supplies		
	WFR21 - CEMP	Development of frac-out contingency plan for HDD crossings will be produced by the Contractor(s) prior to commencement of construction activities. The plan will document how risks of any fluid breakouts will be reduced, and in the event of an outbreak from trenchless construction works during construction, how any breakout will be managed and mitigated, to reduce environmental impacts. The plan will consider breakout of all drilling fluids or muds that could breakout to the environment. Measures within this plan will need to include: • Measures to reduce the risk of breakout. • Measures to monitor and communicate breakout. • Measures to ensure operations cease once a breakout is reported.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		• Measures to contain breakout, for example sandbags to reduce extent of smothering. • Measures to remediate released drilling fluids, if a significant volume is released - for example pumped back to a lagoon within an appropriate compound or pumped to interceptor drains. This will be confirmed by the Contractor in advance of the commencement of relevant construction activities. The above management plan is to be agreed with the Environment Agency, prior to commencement of associated works.		
	WFR22 - CEMP	In active construction areas visual checks will be undertaken daily, with observations reported back to senior personnel on a weekly basis. The visual inspections will be focussed on areas where high risk activities are being undertaken, such as concrete pouring, stockpiling of materials and refuelling.		
	WFR23 – CEMP	Locations for monitoring will be identified at detailed design, and monitoring requirements as set out in the detailed CEMP(s) and detailed PSRP where necessary.		
	WFR24 – CEMP	Cables are to be per- and polyfluoroalkyl substances (PFAS) free where practicable, and fluid-filled cables will not be used to mitigate against contamination to groundwater.		
	WFR25 – CEMP	Ground investigation will be undertaken to inform the detailed design of the BESS, substations and		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		construction compounds. This is to ensure that appropriate drainage design and aquifer protection measures are incorporated into the construction and operational designs, tailored to the specific geological/ groundwater conditions at each location, to protect the water environment.		
Hydro-morphological impacts to waterbodies including changes to physical form (for example where temporary watercourse crossings are required) which underpin habitats.	WFR26 - CEMP	Where required, any cable crossings of designated Main Rivers and/or WFD river water bodies will use an appropriate trenchless methodology (assumed to be HDD at this stage). Where cable crossings are required on ordinary watercourses, appropriate crossing methods will be confirmed for the ES following reconnaissance surveys to confirm the receptor value of the watercourse and may include HDD.		
	WFR27 - CEMP	Where open trench construction of cable crossings of ordinary watercourses is required, reinstatement/restoration of the impacted areas of the watercourse channel and riparian zone will be undertaken.		
	WFR28 - CEMP	Temporary construction access crossings of watercourses should be avoided insofar as reasonably practicable, with a preference to reuse existing crossing points and structures wherever possible. Where required, appropriate crossing methods will be confirmed based on reconnaissance surveys to confirm the receptor value/sensitivity of the		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		watercourse and engagement with the Environment Agency.		
	WFR29 - CEMP	A minimum offset of 10 m from bank top for all watercourses and their associated riparian zones from all construction works will be adopted, except where watercourse crossings are required.		
Increased flood risk	WFR30 – CEMP	Both pre- and post-construction condition surveys will be undertaken to ensure the integrity of the Environment Agency Managed flood defence infrastructure is maintained. Protective Provisions will be secured in advance of any works beneath these features.		
	WFR31 – CEMP	Existing watercourse crossings are to be used wherever practicable. Where watercourse crossing structures are required, the design will maintain a natural watercourse bed, where practicable. Main Rivers will not be culverted. Any culverts will be sized appropriately to the flow in the watercourse.		
	WFR32 - CEMP	Construction activities within the floodplain, such as trenching for the Interconnecting Cables within the Draft Cable Corridors will be carefully managed to avoid adverse impacts on flood storage and conveyance. A sequential approach will be adopted, ensuring that spoil from excavation is stored outside the functional floodplain and Flood Zone 3, thereby reducing the risk of obstruction to flood flows and minimising potential contamination of the water environment.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	WFR33 - CEMP	Construction flood risk management including scheduling of temporary/ construction works excavations and storage to not increase flood risk or be placed within the floodplain as far as practicable.		
	WFR34 – CEMP	Temporary drainage measures must also be provided, to ensure that surface water runoff and quality is adequately managed.		
	WFR35 – CEMP	Where Temporary Construction Compounds are needed to be placed within the floodplain, for example for trenchless solutions such as HDD, then flood warnings and additional processes will be established.		
	WFR36 – CEMP	Temporary land take areas (Temporary Construction Compound with car parking, temporary storage area, temporary laydown areas, welfare facilities etc.) will be fully reinstated following the construction period to reduce areas of semi-impermeable surfaces.		
	WFR37 – CEMP	Use of underground cabling methodology that minimises disruption to the ground (e.g. where practicable cable plough which cuts, installs and backfills in one operation). The use of underground cabling will consider the risk of groundwater flooding and be appropriately waterproofed.		
	WFR38 – CEMP	The area of hardstanding required for laydown and Construction Compounds will be minimised.		
	WFR39 - CEMP	A detailed Surface Water Management Plan will be prepared to accompany the detailed CEMP(s) prior		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		to the commencement of construction and will provide details on suitable management and monitoring measures for surface water during construction.		
	WFR40 - CEMP	Temporary land take areas (construction compounds with car parking, temporary storage area, temporary laydown areas, welfare facilities etc.) within the Draft Order Limits will be brought into the development (e.g. becomes solar PV modules). Any semi-impermeable surfaces will be cleared of hardcore, re-graded with soil to a natural profile and re-vegetated as required.		
	WFR41 – CEMP	A suitable FWEP will be prepared to accompany the detailed CEMP(s), considering the measures to be outlined in the FRA and put in place prior to and during construction.		
	WFR42 – CEMP	Access tracks will be of permeable construction to allow water to filtrate through and maintain greenfield runoff rates.		
	WFR43 – CEMP	Where surface water attenuation may be needed, Lead Local Flood Authority guidance will be followed to ensure the overall volume of surface water leaving the site is managed.		
	WFR44 - CEMP	Temporary watercourse crossing structures should be removed once they are no longer required for the purposes of construction.		
	WFR45 - CEMP	All Temporary Construction Compounds (including associated construction staff welfare facilities) will be located outside of fluvial Flood Zones 2 and 3.		

Table 4-12 Summary of mitigation and management measures, and monitoring requirements – Ground Conditions

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Potential impact on land drains due to Construction.	GC1 - CEMP	Ground penetrating radar surveys will be undertaken in advance of construction.	N/A N/A	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the CEMP
Ground Investigations	GC2 - CEMP	The contractor will undertake further ground investigations prior to commencement of the Proposed Development.		
Potential impacts to construction workers	GC3 - CEMP	Construction workers would be provided with appropriate PPE and required to follow best practice measures with regards to limiting the risks associated with ground contamination and instability.		
Potential impacts to controlled waters	GC4 – CEMP	The lead contractor will produce a Foundation Works Risk Assessment. post consent, as part of the Environmental Management System prior to commencement of works. The above risk assessment is to be agreed with the Environment Agency, prior to commencement of associated works.		

5. References

Ref.1-1 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. SI 2017/572. [Online]. London: The Stationery Office. Available at: https://www.legislation.gov.uk/uksi/2017/572/contents (Accessed: 22 May 2026).

Ref.1-2 Considerate Constructors Scheme. Available at: https://www.considerateconstructors.com/ (Accessed: 22 May 2026).

Ref.1-3 Institute of Air Quality Management (2024) Guidance on the assessment of dust from demolition and construction (Version 2.2). London: IAQM. Available at: https://iaqm.co.uk/wp-content/uploads/2013/02/Construction-Dust-Guidance-Jan-2024.pdf (Accessed: 22 May 2026).

Ref.1-4 Greater London Authority (2024) Non-Road Mobile Machinery (NRMM). Available at: https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/pollution-and-air-quality/ultra-low-emission-zone-ulez-london/non-road-mobile-machinery-nrmm. (Accessed: 22 May 2026).

Ref.1-5 Bat Conservation Trust (2023). Artificial Lighting Guidance - Buildings, planning and development. Available at: Artificial Lighting Guidance - Buildings, planning and development - Bat Conservation Trust. (accessed 29 May 2026).

Abbreviations

Table 5-1 Abbreviations

Term	Definition
BESS	Battery Energy Storage Systems
BMSDC	Babergh Mid Suffolk District Council
BPM	Best practicable means
CEMP	Construction Environmental Management Plan
CCS	Considerate Constructors Scheme
CTMP	Construction Traffic Management Plan
CWMP	Construction Water Management Plan
DCO	Development Consent Order
DMP	Dust Management Plan
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
ES	Environmental Statement
FWEP	Flood Warning and Evacuation Plan
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicles
IAQM	Institute of Air Quality Management
INNS	Invasive Non Native Species
kV	Kilovolt
MW	Megawatt
NRMM	Non-Road Mobile Machinery
oPRoWAMP	Public Rights of Way and Access Management Plan
oSRMP	Outline Soil Resource Management Plan
oSWMP	Outline Site Waste Management Plan
oWSI	Outline Written Scheme of Investigation
PFAS	per- and polyfluoroalkyl substances
PM	Particulate Matter
PoC	Point of Connection
PPE	Personal Protective Equipment

Term	Definition
PV	Photovoltaic
RPA	Root Protection Area
SCC	Suffolk County Council
SRMP	Soil Resources Management Plan
SWMP	Site Waste Management Plan
WSI	Written Scheme of Investigation

Glossary

Table 5-2 Glossary

Term	Definition
the Applicant	EcoPower Suffolk Solar Limited, a Special Purpose Vehicle of Econergy International Ltd. Econergy is an international independent power producer of renewable energy projects, operating across seven different countries in Europe, including the United Kingdom. The Applicant has a current pipeline of projects under various stages of development across Europe, with an approximate generation capacity of 8 GW and storage capacity of 11 GWh.
the DCO application	Development Consent Order application.
Area	Area of land wholly contained within the Site which will contain solar photovoltaic panels, ecological mitigation and other Associated Development. There are five discrete Areas within the Principal Area, connected by Cable Corridors.
Associated Development	Development which is associated with the Proposed Development. This includes inverters, transformers, switchgear, substations, environmental mitigation and enhancement measures, supporting ancillary works comprising maintenance and welfare facilities, temporary compounds, fencing, boundary treatments, security measures, lighting, drainage and utility works, signage, earthworks, and highway works to facilitate access, including permissive paths.
Battery Energy Storage System	Battery Energy Storage Systems, is used to describe the battery storage installation to allow for the storage, importation, and exportation of energy to the National Grid. Both centralised and decentralised (DC-coupled) options are included within the Proposed Development.
Draft Cable Corridor	Land within the Site where interconnecting cables connect the five Areas within the Principal Area and grid connection cables connect the Principal Area to the Yaxley 400 kV

Term	Definition
	National Grid Substation. The extent of the Cable Corridors is currently indicative to cover a number of different cabling routing and alignment options, as well as to allow an area for the construction of temporary haul roads for access.
Draft Order Limits	The draft physical boundary which contains the Site and within which the Proposed Development may be carried out and land acquired or used;
EIA Regulations	Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as amended.
Grid Connection Cable	Underground cabling (400 kV) connecting the Main Substation to the Yaxley 400 kV National Grid Substation.
Illustrative Environmental Masterplan	A draft, high level, illustrative plan showing the layout of the proposed environmental mitigation and enhancement measures.
Interconnecting Cable	Underground cabling (33 kV or 132 kV) connecting the Field Substations within the Principal Area to the Main Substation and Secondary Substations.
Preliminary Environmental Findings	Forms part of the Preliminary Environmental Information that has been prepared to inform consultation. It provides an overview of the preliminary Environmental Impact Assessment undertaken to date, written in a non-technical language to help members of the public, statutory consultees and other stakeholders to develop an informed view of the Proposed Development and understand the potential likely significant environmental effects of the Proposed Development.
Principal Area	Collective term for all land parcels within each of the five Areas all of which are contained within the Site that will contain solar photovoltaic panels, ecological mitigation and other Associated Development.
Proposed Development	EcoPower Suffolk Solar, comprising all infrastructure and development associated with the project i.e. the solar PV panels, battery storage and Associated Development for connection to the Yaxley 400 kV National Grid Substation.
Solar photovoltaic array	Solar photovoltaic panel designed to convert solar irradiance to electrical energy. The solar photovoltaic panel is attached to a Mounting Structure.
Temporary Construction Compound	A temporary laydown area comprising hard standing which could include offices, car parking, materials storage and equipment during the construction and decommissioning phases of the Proposed Development.
Yaxley 400 kV National Grid Substation	The National Grid 400 kV Substation being constructed at Yaxley, Suffolk, by another developer.