ECO POWER
SUFFOLK

EcoPower Suffolk Solar

Draft Outline Decommissioning Environmental Management Plan

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Executive Summary

Ex. 1 This draft outline Decommissioning Environmental Management Plan (oDEMP) 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 oDEMP sets out how decommissioning-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 MW) with Battery Energy Storage Systems (BESS) and associated infrastructure, including underground cabling and grid connection to the Yaxley 400 kV National Grid Substation being construction by another developer.

Ex. 4 Subject to receiving consent, one or more detailed DEMP(s) will be prepared by the appointed Contractor(s) substantially in accordance with the final oDEMP submitted for approval by Babergh and Mid Suffolk District Council (BMSDC) before commencing relevant phases of decommissioning work.

Ex. 5 The oDEMP combines embedded design measures, good practice, and topic-specific controls.

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

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

1. Introduction

1.1. Overview

1.1.1 This draft outline Decommissioning Environmental Management Plan (oDEMP) 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 for 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 oDEMP incorporates embedded and good practice measures, as well as any further mitigation that arises out of the EIA process. A final version of the oDEMP 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 development of detailed DEMP(s) by the appointed Contractor(s), substantially in accordance with the oDEMP, to be submitted for approval by Babergh and Mid Suffolk District Council (BMSDC) in advance of decommissioning.

1.1.4 It is recognised that there could be multiple detailed DEMPs prepared which relate to different parts of the Proposed Development, depending on the detailed decommissioning strategy. Where this is the case, each detailed DEMP will set out how the management of decommissioning impacts will be co-ordinated across areas covered by the other detailed DEMPs.

1.1.5 The nature of the decommissioning activities and potential for significant effects is anticipated to be similar to, and no worse, than during the construction phase. Therefore, detailed DEMP(s) and Decommissioning Traffic Management Plan(s) (DTMP(s)) will include measures consistent with the principles of the outline Construction Environmental Management Plan (oCEMP), detailed CEMP(s), as well as the outline Construction Traffic Management Plan (oCTMP) submitted with the DCO application, covering issues such as transportation methods, pollution prevention, and noise management. A draft oCEMP and draft oCTMP are available for comment as part of the Preliminary Environmental Information.

1.1.6 The detailed DEMP(s) will adhere to regulations and guidance applicable at the time of writing, and are expected to include:

a. an overview of the Proposed Development and detailed programme and extent of decommissioning activities;
b. prior assessment of potential environmental impacts;
c. mitigation measures to prevent or reduce potential adverse impacts;
d. monitoring of effectiveness of mitigation measures; and
e. links to other complementary plans and procedures

1.2. Structure of the oDEMP

1.2.1 The oDEMP 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 decommissioning activities, programme and standard management measures;

c. **Decommissioning environmental management**: defines the roles which the Applicant will identify within the detailed DEMP(s) to deliver the environmental management and mitigation measures, stakeholder engagement, decommissioning programme and control measures.

d. **Mitigation and management**: identifies the environmental mitigation and management measures required to address the environmental effects of the works during decommissioning and how these will feed into the detailed DEMP(s). It also provides procedures for monitoring and reviewing compliance with the detailed DEMP(s) and rectifying beaches of detailed DEMP 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 the 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, also 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 infrastructure, along with underground cabling and 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 other associated infrastructure, 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 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. Decommissioning environmental management

3.1. Introduction

3.1.1 The following section sets out the general assumed principles of arrangements for the decommissioning phase of the Proposed Development.

3.2. Decommissioning activities

3.2.1 The process of decommissioning would involve the removal of all solar infrastructure, including the solar PV modules, and BESS and all Associated Development. Where possible, the components would be recycled or disposed of in accordance with good practice and processes at that time. Any piles would be removed.

3.2.2 Upon decommissioning, the above-ground physical infrastructure within the Principal Area would be removed with each Area restored to its original use and returned to the landowner. This would include the areas of agricultural land where the agricultural resource has been maintained (and potentially improved) during operation, and the established habitats, in addition to any planting for Biodiversity Net Gain (BNG) which has been secured and maintained for a minimum of 30 years. Post-decommissioning, the landowners will choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

3.2.3 Where land is to be returned to agricultural use, checks on land drainage will be carried out and previously identified land drains that were removed or permanently affected by the works would be reinstated or replaced with equivalent drainage provision, unless otherwise agreed with the relevant landowner.

3.2.4 During the initial stages of decommissioning, access to the permissive paths will be maintained where this is reasonably practicable. Following the initial stages, permissive paths will be removed, with the precise timing to be determined by the appointed Contractor(s) and communicated to the appropriate local authority in accordance with the detailed DEMP(s).

3.2.5 The mode of dealing with Interconnecting Cables and Grid Connection Cable during decommissioning will be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities.

3.2.6 All excavations are to be backfilled using soil sourced within the Principal Area, or via imported soil where required, using appropriate soil management techniques. Some soil profiling may be required, and the land will be contoured.

3.2.7 To restore the land to its pre-construction condition at the end of operation, the soil resources within the Order Limits will need to be managed through construction, operation and decommissioning. The detailed DEMP(s) will include provisions for the management of soils consistent with the principles of the outline Soil Resources

Management Plan (oSRMP) to be provided with the DCO application, the approved detailed SRMP(s) for the construction phase, and the soil management measures included in the approved detailed Operation Environmental Management Plan(s) (oOEMP). Measures to be implemented include:

a. ensuring the protection and conservation of soil resources;

b. maintaining the physical properties of the soils through best practice; and

c. providing on-site reference on the management of soil resources for appointed Contractor(s) undertaking the proposed works.

3.2.8 Agricultural Land Classification (ALC) surveys will be undertaken and reported as part of the DCO application and will form the basis of how the land will be left at the end of the operational phase. At decommissioning, the soil is anticipated to have undergone up to 40 years of recovery, given that while the Proposed Development is operational, the land would be used for lower intensity farming practices, such as for sheep grazing or being left fallow. Therefore, it is expected to be of the same or better quality once decommissioned, than it is at present.

3.2.9 Where localised soil compaction occurs from the presence of structures such as the substations or the BESS, or the weight of mobile machinery used through construction, operation and decommissioning, management measures will be identified, consistent with the principles in the oSRMP to be submitted with the DCO application, the approved detailed SRMP(s) for the construction phase, and the soil management measures included in the approved detailed OEMP(s) to alleviate compaction (e.g. through ploughing and aeration), to maintain soil structure and enable reinstatement of the land to its original use.

3.2.10 Permissive paths would be managed up to decommissioning, with the timing of their removal to be confirmed within the detailed DEMP(s).

3.2.11 Pre-decommissioning surveys and assessments will be required to identify the appropriateness of embedded mitigation measures for the future baseline of the Proposed Development, and to conform with all applicable biodiversity policies and legislation. This will be further outlined in the detailed DEMP(s).

3.3. Decommissioning programme

3.3.1 The decommissioning of the Proposed Development is expected to take between 12 and 24 months to be completed.

3.3.2 The Proposed Development is assessed in the ES as being decommissioned after up to 40 years of operation, with a possibility for operation to be extended for a further 10 years. Including the likely duration of the construction and decommissioning phases, the land would be required for the Proposed Development for approximately up to 54 years in total.

3.3.3 Each detailed DEMP prepared for any part of the decommissioning works shall be accompanied by a detailed programme for the specific works covered by that plan.

3.4. Responding to environmental incidents and emergencies

3.4.1 The appointed Contractor(s) will designate an Environmental Manager who will be responsible for the implementation of the detailed DEMP(s). This individual will be notified as soon as it is safe to do so following an environmental incident or

emergency. A reporting procedure will be agreed with the appropriate local authority, possibly in consultation with the Environment Agency. Staff will be informed of this process and made aware that it is everyone's responsibility to call the emergency services, should this be needed.

3.5. Good practice

3.5.1 The Considerate Constructors Scheme (CCS), or equivalent scheme at the time, will be adopted to assist in reducing pollution and nuisance from the Proposed Development, by employing best practice measures which go beyond statutory compliance, where relevant to decommissioning.

3.6. Public communication and liaison

3.6.1 Prior to the commencement of decommissioning, the appointed Contractor(s) will develop and implement a Decommissioning Stakeholder Communications Plan alongside the detailed DEMP(s) that will include community engagement measures and will detail a complaints procedure. It is likely that a display board will be installed on-site, and a website will be set up. These will include contact details for the Site Manager or alternative public interface with whom nuisance or complaints can be lodged, and the head or regional office contact information. A logbook of complaints will be prepared and managed by the Site Manager or nominated representative.

3.6.2 Any environmental complaints received 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 relevant local planning authority.

3.6.3 A Community Liaison Officer (or alternative) will be appointed to lead discussions with local communities during the decommissioning phase.

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 DEMP(s). It also identifies where monitoring is proposed, to assess the effectiveness of the mitigation measures. Nothing in this draft oDEMP would prevent the modification or omission of the control measures set out in Table 4-1 to Table 4-11, where the decommissioning 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 DEMP(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 DEMP(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 4-11. The measures will be secured via Requirements of the DCO and must be integrated into the detailed DEMP(s) prior to the commencement of decommissioning by the Applicant.

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 - DEMP	oSRMP to be implemented.	Soil assessments and monitoring will be undertaken, to be detailed in the oSRMP	Overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the detailed DEMP(s), expected to include the Environmental Manager, Community Liaison Officer, Site Manager and Decommissioning Project Manager
	AL2 - DEMP	Adopting and implementing good practice measures for the decommissioning 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 nitrogen dioxide (NO_2) and particulate matter (PM) from on-site and off-site decommissioning vehicle / plant emissions. Increased particulates and deposited dust from activities on the Areas, materials	AQ1 - DEMP	Standards of good practice for air quality, as set out in the Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Dust from Demolition and Construction', or relevant guidance will be followed during decommissioning to minimise dust from activities and vehicles.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the detailed DEMP(s). The following monitoring will be undertaken in	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
transportation, storage and handling, including use of haul roads.		A Dust Management Plan (DMP) may be required as part of the detailed DEMP(s) and will detail any dust monitoring required prior to and during decommissioning, including any relevant baseline dust monitoring to be undertaken before activities commence. Records will be kept of all dust and air quality complaints, cause(s) will be identified and appropriate measures to reduce emissions will be taken in a timely manner. A further record will be kept of the measures taken.	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 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	

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
			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 during demolition, earthworks and construction.	

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 - DEMP	Ecological Clerk of Works (ECoW) to be appointed to advise on protecting valued biodiversity features and provide practical, site-specific and proportionate advice on how to achieve compliance with environmental legislation.	Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the detailed DEMP(s). The detailed DEMP(s) will detail the frequency.	Overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the DEMP, expected to include the ECoW, Environmental Manager, Site Manager and Decommissioning Project Manager.
	BD2 - DEMP	ECoW to complete a pre-decommissioning survey in advance of decommissioning to reconfirm the ecological baseline conditions to identify any new ecological risk. The walkover will be completed sufficiently in advance of the decommissioning works to allow for the completion of any additional seasonal surveys (e.g. surveys in support of protected species licences) and implementation of mitigation measures.		
	BD3 – DEMP	A Species Protection Plan to be to be implemented during decommissioning of the Proposed Development with full details outlined in the detailed DEMP(s). The Species Protection Plan will be a live document subject to review and updating and will assist site personnel in the protection of species during		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		decommissioning, under the guidance of an ECoW.		
	BD4-DEMP	Decommissioning vehicles will be subject to a 10mph speed restriction.		
	BD5 - DEMP	Best practice measures to be implemented to control noise, light, vibration, and airborne and waterborne pollutants, as set out in their relevant topics.		
Spread of invasive nonnative plant species	BD6 - DEMP	Pre-decommissioning surveys will be undertaken to provide an update on the presence and location of any invasive species.		
	BD7 - DEMP	An Invasive Non-Native Species (INNS) method statement will be produced if INNS are identified as present during pre-decommissioning surveys to inform the management of invasive plant species found within the Draft Order Limits.		
Impact upon breeding birds	BD8 - DEMP	Clearance of vegetation of potential value to nesting birds will be completed outside of the bird-breeding season (considered to be between mid-February and August inclusive). However, should it not be possible to avoid this season, vegetation will be inspected/surveyed by the ECoW immediately before clearance (i.e.,		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		within 24 hours of clearance works). An active nest will be given an appropriate disturbance buffer for that species with work only allowed to take place within this buffer once the project ecologist has confirmed any young have fully fledged and left the nest.		
Impact upon bats	BD9 - DEMP	Protection of trees with potential roost features, which will be protected during decommissioning, 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.		
	BD10-DEMP	There will be limited nighttime decommissioning activity. Decommissioning activities will take place between 08.00-19.00 Monday to Friday, 08.00 – 13.00 Saturday (unless necessary and agreed with the local planning authority), 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 activities.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
Impact upon hedgerows and trees	BD11 - DEMP	Hedgerows, tree lines, ditches and trees including the tree RPA are to be protected during decommissioning through the use of suitable buffers and fencing.		
	BD12 - DEMP	Any new or additional access tracks will be located to pass through existing gates and gaps in hedgerows where feasible.		
Impact upon reptiles	BD13 - DEMP	Should ground clearance of habitat suitable for reptiles/amphibians be required then this should be undertaken at the right time of year to avoid the hibernation period - i.e. avoid the period: October to March. The ECoW will supervise works and relocate any reptiles/amphibians found. If clearance of hibernacula features is necessary, then this should be done in the summer months to avoid disturbing hibernating reptiles (April to September).		
Impact upon badger, and other mobile species	BD14 - DEMP	For mobile species such as badger, pre-decommissioning surveys will be required to check the status of the setts identified and to locate any new active setts that will need to be protected. Mitigation will be designed at the appropriate time using survey data and professional judgement.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	BD15 - DEMP	Any setts recorded are to be protected from direct impacts by maintaining a suitable standoff distance measured from professional judgement from existing setts and micro siting equipment if required.		
	BD16 - DEMP	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.		
	BD17 – DEMP	Perimeter security fencing will be maintained until the end of decommissioning. The fence design will be around individual main Areas, to allow the movement of large mammals such as deer through the landscape along retained hedgerow margins.		

Table 4-4 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
Release of greenhouse gas (GHG) emissions during decommissioning	CC1 - DEMP	Increasing recyclability by segregating decommissioning waste to be re-used and recycled, where reasonably practicable.	Regularly record compliance via an appropriate method to be determined in the detailed DEMP(s). The	Overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the DEMP, expected to
	CC2 - DEMP	Adopting the CCS to assist in reducing pollution, including GHGs, from the		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		Proposed Development by employing good industry practice measures.	detailed DEMP(s) will detail the frequency.	include the Environmental Manager, Flood Warden, Site Manager and Decommissioning Project Manager
	CC3 - DEMP	Decommissioning the Proposed Development in such a way as to minimise the creation of waste.		
	CC4 - DEMP	Reusing suitable infrastructure and resources already available in the Draft Order Limits where possible to minimise the use of natural resources and unnecessary materials (e.g. reusing excavated soil for fill requirements).		
	CC5 - DEMP	Encourage the use of lower carbon modes of transport, to be set out in the worker travel plan.		
	CC6 - DEMP	Liaising with decommissioning personnel for the potential to implement staff minibuses and car sharing options.		
	CC7 – DEMP	Implementing a Travel Plan to reduce the volume of decommissioning staff and employee trips to the Proposed Development		
	CC8 - DEMP	Switching vehicles and plant off when not in use and ensuring decommissioning vehicles conform to current European Union (EU) emissions standards.		
Impact of climate change on decommissioning works	CC10 – DEMP	Protecting workers and resources from extreme weather conditions.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	CC11 - DEMP	Using equipment's cooling systems where necessary/adapting working practices and equipment used based on current weather conditions.		
	CC12 - DEMP	Monitoring weather forecasts and the news for Environment Agency flood warnings, relevant weather warnings, and water levels of the local waterways.		
	CC13 - DEMP	Protecting workers and resources from extreme weather conditions. The safety of all members will be paramount during the decommissioning phase. It is not considered appropriate to specify such requirements now as the decommissioning environment is likely to be considerably different to today. However, general measures will likely include: • Work should be scheduled during the cooler parts of the day, such as early mornings or late afternoons, to avoid extreme temperatures and heatwaves. Shade structures will be provided in rest areas, and workers will have access to drinking water and regular breaks. • Workers will be required to wear ultraviolet (UV)-protective clothing, hats and sunglasses. Sunscreen will		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		be made available as part of Personal Protective Equipment (PPE), and shaded work zones will be established where feasible. • 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 Flood Warning and Evacuation Plan (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). Fire safety plans will be developed for all site facilities, and appointed Contractor(s) should follow best practices such as keeping flammable materials away from ignition sources and ensuring fire extinguishers are readily available.		

Table 4-5 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 on archaeological sensitivity	CH1 - DEMP	Removal of panels and infrastructure in areas of archaeological sensitivity should not result in additional impact.	Regularly record compliance via an appropriate method to be determined in the detailed DEMP(s). The detailed DEMP(s). will detail the frequency.	Overall responsibility will be with the appointed Contractor(s). Specific responsibilities will be confirmed in the detailed DEMP(s).
Impact upon known and unknown archaeological remains	CH2 - DEMP	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.		
Impacts to archaeological features during decommissioning activities	CH3 - DEMP	In the event of maintenance works being required outside of the footprint of original construction activities consultation the detailed DEMP(s) will include a process for consultation with the BMSDC to ensure that any below ground archaeological remains which have been preserved *in situ* are protected from disturbance or that suitable mitigation is agreed in advance of works taking place.	Mechanism for consultation with BMSDC to be set out in the detailed DEMP(s).	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the detailed DEMP(s).

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
GHG emissions during decommissioning	GHG1 - DEMP	Measures proposed for the construction phase (see the draft oCEMP) will also be adopted for the decommissioning phase in respect of GHG emissions.	Regularly record compliance via an appropriate method to be determined in the detailed DEMP(s). The detailed DEMP(s) will include the frequency.	The overall responsibility will be with the appointed Contractor(s). Specific responsibilities will be confirmed in the detailed DEMP(s).

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 decommissioning activities.	LV1 - DEMP	Minimising the duration and footprint of decommissioning activity, where reasonably practicable.	Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the detailed DEMP(s). The detailed DEMP(s) will include the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the detailed DEMP(s), expected to include the ECoW, Environmental Manager, Site Manager and Decommissioning Project Manager.
	LV2 - DEMP	Maintaining well-managed and tidy decommissioning working areas and site compounds to reduce their visual impact and appearance in the landscape.		
	LV3 - DEMP	Keeping decommissioning lighting to the minimum luminosity necessary for safe working within decommissioning compounds and working areas and where possible, fitting it with motion sensors to reduce the duration of potential light spill in nighttime 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
Decommissioning traffic noise and vibration on sensitive receptors	NV1 - DEMP	Routing for heavy goods vehicles (HGVs) through local villages will be minimised as reasonably practicable.	If a decommissioning noise monitoring scheme is determined to be required, it will be developed and agreed with appropriate stakeholders and set out in the detailed DEMP(s). The noise monitoring scheme is expected to be similar to that for the construction phase. Compliance with all measures regularly recorded via an appropriate method to be determined in the detailed DEMP(s), which will also include the frequency.	The overall responsibility will be with the appointed Contractor(s). Specific responsibilities will be confirmed in the detailed DEMP(s), expected to include the Environmental Manager, Health and safety Manager, Community Liaison Office, Site Manager and Decommissioning Project Manager.
	NV2 - DEMP	Standards of good practice for noise and vibration will be followed to minimise noise and vibration impacts from activities and vehicles. The detailed DEMP(s) measures will be based on the principles of the oCEMP. The detailed DEMP(s) will account for any new sensitive receptors or changes to the baseline conditions since construction.		

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 - DEMP	Explore employment and supply chain opportunities throughout the decommissioning period.	Regularly record compliance via an appropriate method to be determined in the detailed DEMP(s). The detailed DEMP(s) will include the frequency.	The overall responsibility will be with the appointed Contractor(s). Specific responsibilities will be confirmed in the detailed DEMP(s., expected to include the Environmental Manager, Community Liaison Officer, Site Manager and Decommissioning Project Manager.
	SE2 - DEMP	An updated oPRoWAMP will be prepared and agreed with the relevant local planning authority prior to the decommissioning phase to maintain provision of diverted PRoW routes.		

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
Impacts from decommissioning traffic and transport	TT1 - DEMP	HGVs will be required to follow prescribed decommissioning 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.	Appropriate traffic monitoring requirements to be agreed with relevant stakeholders and set out in the detailed DEMP(s). Compliance with all measures	The overall responsibility will be with the appointed Contractor(s). Specific responsibilities will be confirmed in the detailed DEMP(s), expected to include the

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	TT2 - DEMP	Where required to mitigate potentially significant effects, site management may be required to schedule the arrival and departure times of deliveries to minimise the number of HGVs travelling to the Areas during the net-work peak hours on decommissioning traffic routes.	regularly recorded via an appropriate method to be determined in the detailed DEMP(s), which will also include the frequency	Environmental Manager, Community Liaison Officer, Site Manager and Decommissioning Project Manager.
	TT3 - DEMP	Temporary traffic management will be used along decommissioning routes and at access points where required		
	TT4 - DEMP	Passing places or localised widening on the highway will be undertaken where required		
	TT5 - DEMP	Car sharing/minibuses to minimise trips on the network associated with decommissioning.		

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 and flood risk	WFR1 – DEMP	Implementation of measures outlined in FRA and Drainage Strategy.	Appropriate water quality monitoring requirements to be agreed with relevant stakeholders and set out in the detailed DEMP(s).	The overall responsibility will be with the appointed Contractor(s). Specific responsibilities will be confirmed in the
	WFR2 – DEMP	Should decommissioning require significant water use, this will be assessed in detail at the appropriate time and appropriate measures included in the detailed DEMP(s), as relevant, in line with		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		prevailing guidance and regulatory requirements.	Compliance with all measures regularly recorded via an appropriate method to be determined in the detailed DEMP(s), which will also include the frequency.	detailed DEMP(s), expected to include the Environmental Manager, Flood Warden, Site Manager and Decommissioning Project Manager.
Impact upon water quality through erosion	WFR3 - DEMP	Up to date requirements set out in pollution prevention guidance (and any other relevant guidance available at the time of decommissioning) will be provided in the detailed DEMP(s).		
	WFR4 - DEMP	Sediment control measures (silt fences, settlement/attenuation ponds etc.) will be used in the vicinity of watercourses, springs or drains where natural features (e.g. hollows) do not provide adequate protection.		
	WFR5 - DEMP	Trenching or excavation activities in open land will cease during periods of intense rainfall and temporary bunding will be provided as required, to reduce the risk of sediment transport to the natural drainage system.		
	WFR6 - DEMP	Permanent relocation or longer-term storage of soils will be re-instated with vegetation as soon as practicable.		
	WFR7 – DEMP	The movement of decommissioning traffic will be controlled to minimise soil compaction and disturbance.		
	WFR8 – DEMP	Wheel washing will be undertaken in designated areas only and sediment control measures will be used to ensure		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		runoff from these areas will not enter directly into water courses.		
	WFR9 – DEMP	No decommissioning activities will take place within the watercourse buffer zone, excluding works to remove any watercourse crossings.		
Impact upon water quality through pollution	WFR10 – DEMP	Equipment will be provided to contain and clean up any spills to minimise the risk of pollutants entering the watercourses or surface water features.		
	WFR11 – DEMP	Excavation activities in open land will cease during periods of intense rainfall.		
	WFR12 – DEMP	Refuelling of vehicles and plant machinery (if required) will be confined to the designated fuelling areas and will be carefully controlled and placed away from areas with high groundwater dependency and outside watercourse buffers.		
	WFR13 – DEMP	Vehicles, plant machinery and equipment will be cleaned at designated washout areas located conveniently and within a controlled area of the Proposed Development.		
	WFR14 – DEMP	All fuel and chemicals will be stored within appropriately specified containers and within specifically designed stores / storage areas and will include appropriate measures to avoid spillages in line with the relevant legislation.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	WFR15 - DEMP	Drip trays will be placed under standing machinery. All solid and liquid waste materials will be properly disposed of in controlled landfill sites away from the site.		
	WFR16 - DEMP	Routine mechanical maintenance of vehicles will be carried out off-site or in a suitable designated area of the Proposed Development.		
	WFR17 - DEMP	There will be no unapproved discharge of foul or contaminated drainage from the Order Limits either to groundwater or any surface waters, whether direct or via soakaway.		
	WFR18 - DEMP	Minimum offset of 10 m from bank top of all riparian boundaries and watercourses. Where flood defences are present, the minimum buffer should be 8 m from the landward toe of those defences.		
	WFR19 - DEMP	Suitable standoff from springs and existing abstractions (standoff will be dependent on decommissioning activities, local conditions and receptors to prevent derogation).		
	WFR20 - DEMP	Regular water quality monitoring is recommended in order to efficiently detect potential accidental pollution events.		
	WFR21 – DEMP	Surface water systems will be decommissioned with due regard to water		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		quality management and the prevention of uncontrolled runoff. The decommissioning process will typically involve dewatering, disconnecting, and sealing any drainage outfalls to prevent uncontrolled discharges; removing silt or debris from any drainage features including sustainable drainage systems (SuDS); and ensuring no residual contaminants remain that could pose a risk to surface or ground waters.		
	WFR22 - DEMP	A benefits / impact analysis is to be undertaken ahead of decommissioning to determine the approach to be taken to decommissioning below ground infrastructure (i.e. leave in situ or remove).		
Increased flood risk	WFR23 - DEMP	Temporary land take areas (decommissioning compound with car parking, temporary storage area, temporary laydown areas, welfare facilities etc.) within the Order Limits will be fully reinstated following decommissioning to reduce areas of semi-impermeable surfaces. Temporary land take areas will be cleared of hardcore, re-graded with soil to a natural profile and revegetated.		

5. Monitoring and reporting

5.1.1 Environmental monitoring of the Proposed Development and its impacts will be undertaken throughout the decommissioning phase. Monitoring requirements will be set out in the detailed DEMP(s).

5.1.2 The Environmental Manager will observe site activities and report any deviations from the detailed DEMP(s) in a logbook, along with the action taken and general conditions at the time. The Applicant will be informed by the appointed Contractor(s) of any deviations from the detailed DEMP(s) as soon as practicable following identification of such issues. The Environmental Manager would also act as day-to-day contact with the appropriate local authority and other regulatory agencies such as the Environment Agency.

5.1.3 During decommissioning, the Environmental Manager will conduct regular walkover inspections to ensure all requirements of the detailed DEMP(s) are being met. Actions from these surveys will be documented on an Environmental Action Scheme for implementation.

5.2. Implementation

5.2.1 The detailed DEMP(s) will set out roles, responsibilities and actions required in respect of implementation of the mitigation measures, including:

a. an organogram showing team roles, names and responsibilities;
b. training requirements for relevant personnel on environmental topics;
c. information regarding on-site briefings and toolbox talks that will be used to equip relevant staff with the necessary level of knowledge to follow environmental control procedures;
d. measures to advise employees of changing circumstances as work progresses;
e. communication methods;
f. document control;
g. monitoring, inspections and audits of site operations; and
h. environmental emergency procedures.

6. 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).

Abbreviations

Table 6-1 Abbreviations

Term	Definition
ALC	Agricultural Land Classification
BESS	Battery Energy Storage Systems
BMSDC	Babergh and Mid Suffolk District Council
CEMP	Construction Environmental Management Plan
CCS	Considerate Constructors Scheme
DCO	Development Consent Order
DEMP	Decommissioning Environmental Management Plan
DMP	Dust Management Plan
DTMP	Decommissioning Traffic Management Plan
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
ES	Environmental Statement
EU	European Union
FRA	Flood Risk Assessment
FWEP	Flood Warning and Evacuation Plan
GHG	Greenhouse Gas
HGV	Heavy Goods Vehicles
IAQM	Institute of Air Quality Management
INNS	Invasive Non Native Species
LPA	Local Planning Authority
kV	Kilovolt
MW	Megawatt
NO_2	Nitrogen dioxide
oCTMP	outline Construction Traffic Management Plan
oDEMP	outline Decommissioning Environmental Management Plan
oOEMP	outline Operational Environmental Management Plan
oSRMP	outline Soil Resource Management Plan
PM	Particulate Matter

Term	Definition
PM_{10}	Particulate matter where particles are less than 10 micrometres in diameter
PoC	Point of Connection
PRoW	Public Right of Way
PRoWAMP	Public Rights of Way and Access Management Plan
PV	Photovoltaic
SCC	Suffolk County Council
SRMP	Soil Resources Management Plan
SRN	Strategic Road Network
SuDS	Sustainable drainage system

Glossary

Table 6-2 Glossary

Term	Definition
the Applicant	EcoPower Suffolk 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.

Term	Definition
	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 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;
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 plan showing 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 photovoltaic 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.