ECO POWER
SUFFOLK

EcoPower Suffolk Solar

Draft Outline Operational Environmental Management Plan

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econergy

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Executive Summary

Ex. 1 This draft outline Operational Environmental Management Plan (oOEMP) 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 oOEMP sets out how operational-phase mitigation, management 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 Development, including underground cabling and grid connection to the Yaxley 400 kV National Grid Substation being constructed by another developer.

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

Ex. 5 The oOEMP combines embedded design measures, good practice and topic-specific controls to manage operational activities including maintenance, component replacement, lighting, traffic, waste, vegetation management, and security arrangements.

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

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

1. Introduction

1.1. Overview

1.1.1 This draft outline Operational Environmental Management Plan (oOEMP) has been prepared on behalf of EcoPower Suffolk Limited (the 'Applicant') as part of the consultation process relating 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 oOEMP incorporates embedded and good practice measures, as well as any further mitigation that arises from the EIA process. A final version of the oOEMP 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 OEMP(s) by the appointed Contractor(s), substantially in accordance with the oOEMP to be submitted for approval by Babergh and Mid Suffolk District Council (BMSDC) in advance of starting the relevant phase of works.

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

1.1.5 The oOEMP is designed with the objective of ensuring compliance with the relevant environmental legislation and mitigation measures to be set out within the ES. This oOEMP provides the likely structure of the detailed OEMP(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 of the detailed OEMP(s).

1.1.6 The key elements of this oOEMP include:

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

b. identification of potential environmental effects;

c. proposed design and other mitigation measures to prevent or reduce potential adverse environment effects;

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

e. 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 oOEMP and for the preparation and implementation of each detailed OEMP. Any additional licences, permits, or approvals that are required will be listed in the detailed OEMP(s).

1.2. Structure of the oOEMP

1.2.1 The oOEMP 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 Draft Order Limits and the components that make up the Proposed Development

c. **Operational environmental management**: provides the likely operational activities, programme and standard management measures; and

d. **Mitigation and management**: identifies the environmental mitigation and management measures required to address the environmental effects of the works during operation and how these will feed into the detailed OEMP(s).

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 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 and grid connection infrastructure to connect 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 Findings could be delivered, and secured through the DCO.

3. Operational environmental management

3.1. Introduction

3.1.1 The following section sets out the general arrangements for the operational phase of the Proposed Development.

3.2. Operational activities

3.2.1 During the operational phase, general activity within the Proposed Development would be minimal and restricted principally to vegetation management, equipment maintenance and servicing, replacement and renewal of any components that fail, and monitoring. It is anticipated that maintenance and servicing would include the inspection, removal, reconstruction, refurbishment, or replacement of faulty or broken equipment to ensure the continued effective operation of the Proposed Development.

3.2.2 Across the anticipated lifetime of the Proposed Development of up to 40 years, it is expected that alongside the regular maintenance of equipment, infrastructure such as panels and batteries would require replacement. As components of the Proposed Development approach the end of their design life, an evaluation would be conducted to determine if they require maintenance or replacement across the Proposed Development.

3.2.3 It is not expected that an extensive replacement of all components would be required across the entirety of the Proposed Development during one period; instead, the programme for replacement of equipment is anticipated to be staged to maintain the electrical export to the National Grid.

3.2.4 The following assumptions have been considered:

a. solar PV panels typically have a lifespan of up to 40 years or more, and it has been assumed that solar PV panels could be replaced once during the lifetime of the Proposed Development. The solar PV panels are anticipated to be replaced over a maximum 12 - 18-month period;

b. the BESS could be replaced up to two times during the operational phase;

c. transformers are assumed to have a design life of 30 years, transformers may require replacement once during the lifetime of the Proposed Development, although, replacement will only be carried out if required for performance or health and safety reasons; and

d. no intrusive ground works will be required to replace solar PV panels or BESS.

3.2.5 If any abnormal loads are required for the replacement of equipment, consultation will be carried out and approvals sought from the relevant local planning and highways authorities.

3.2.6 Along the Cable Corridor, activity will consist of routine inspections (schedule to be determined) and any reactive maintenance, such as where a cable has been damaged.

3.2.7 The Yaxley 400 kV National Grid Substation at Yaxley will be managed and maintained by National Grid. The substations on the Principal Areas will be managed and maintained by the Applicant / operator of the Site.

3.2.8 During the Proposed Development's operational phase, each Area is expected to receive approximately five maintenance visits per month (equating to less than one trip per day) for security, deliveries, and maintenance servicing of equipment purposes. These would typically be made by Light Goods Vehicles (LGVs). The installed Grid Connection Cables (within the Cable Corridors) will be located underground. Access may be required for inspection and maintenance, but this is only likely once or twice a year.

3.2.9 Alongside regular maintenance trips it is expected, as noted above, that some infrastructure i.e. solar panels and batteries will require replacement during the 40-year life cycle.

3.2.10 As the expected programme for battery and panel replacements is less intensive and will occur on a site-by-site basis, the number of vehicle trips will be lower during replacement activities than during the construction phase. Any replacement traffic is expected to result in fewer vehicle trips across the Proposed Development compared to traffic associated with the construction phase for both Heavy Goods Vehicles (HGV) and total traffic movements.

3.2.11 Welfare facilities will be required at the substations within each Area. Any wastewater will be removed via tanker to local wastewater treatment works.

3.3. Operational programme

3.3.1 Operation of the Proposed Development is expected to start following construction, with an anticipated completion and connection to the grid by early to mid-2031. The Proposed Development will operate for 40 years and decommissioning is estimated to commence around 2070. Decommissioning may take between 12 and 24 months. However, it is possible that decommissioning may take less time, and this would be confirmed in the final Decommissioning Environmental Management Plan (DEMP). A draft Outline DEMP (oDEMP) is available for comment at this consultation.

3.4. Working hours

3.4.1 The Principal Area will generally be unmanned during normal operation. Routine maintenance (including infrastructure replacements) would be carried out as required Monday to Friday 08:00 – 19:00 and between 08:00 and 13:30 on Saturdays. Emergency maintenance would be carried out as and when needed. Works required outside of these working hours will require written approval from BMSDC, except in respect of emergencies.

3.5. Control of light

3.5.1 During operation, no part of the Proposed Development will be continuously lit. The use of motion detection security lighting to avoid permanent lighting will be utilised within the substation and BESS. A sensitive lighting scheme will be developed ensuring inward distribution of light and avoiding light spill onto existing boundary features.

3.5.2 Lighting will be directed downward away from boundaries.

3.5.3 Where lighting is required during infrastructure replacement activities, this will be for safety reasons, will be temporary in nature and predominantly limited to the core working hours. Whilst the type of lighting to be used for infrastructure replacement activities has not yet been confirmed, the following principles will be adhered to:

a. use of focused directional fittings to minimise outward light spill and glare (e.g. hoods/ cowls which direct light downwards) outside the Areas; and

b. lighting to be directed towards the middle of the Areas rather than towards the boundaries.

3.6. Traffic management

3.6.1 During maintenance activities, the appointed Contractor(s) will ensure that the impacts from traffic on the local community (including local residents and businesses and users of the surrounding transport network) are minimised, where reasonably practicable. Existing field accesses / construction access points will be used to access the Proposed Development wherever practicable.

3.7. Parking

3.7.1 During operation, parking will be provided at the substation / switch rooms locations.

3.7.2 Wheel washing facilities will be provided at each access. This will be located at the egress of each construction compound. A visual inspection of vehicles will be undertaken before they depart the construction compound, to ensure that they are not carrying debris onto the highway.

3.8. Recycling and waste

3.8.1 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.

3.8.2 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.

3.8.3 All waste to be removed from the Temporary Construction Compounds would 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).

3.9. Management of vegetation planting

3.9.1 An Outline Landscape and Ecological Management Plan (oLEMP) will be prepared and submitted as part of the application. A draft oLEMP is available for review and comment at this consultation.

3.9.2 The oLEMP provides a framework for delivering the landscape strategy and the successful establishment and future management of proposed landscape works associated with the Proposed Development. It sets out the short and long-term measures and practices that will be implemented to establish, monitor and manage

landscape and ecology mitigation and enhancement (biodiversity net gain) measures embedded in the design.

3.9.3 The oLEMP sets out the measures proposed:

a. to mitigate the effects of the Proposed Development on landscape, biodiversity and heritage features;

b. to enhance the biodiversity and landscape value of the Draft Order Limits; and

c. to secure compliance with relevant national and local planning policies.

3.9.4 A detailed Landscape and Ecology Management Plan (LEMP) will be prepared substantially in accordance with the oLEMP submitted to and approved by the relevant local planning authority or authorities prior to construction as a Requirement of the DCO. This will include provisions in respect of ongoing maintenance and management of the landscape and ecological measures proposed, which will be cross referenced in the detailed OEMP(s).

3.10. Panel cleaning

3.10.1 Due to the wet UK climate, solar PV panels are largely self-cleaning and deterioration in PV system output due to dust or dirt is generally low. The requirement for, and the frequency of, cleaning of the solar PV panels due to the build-up of dust and dirt varies depending upon site specific conditions. For example, the presence of fine dust emitters such as quarries, agricultural operations (harvesting), and the volume and proximity of nearby woodland can all impact the level of dust deposition. However, the main factor influencing cleaning requirements in the UK is lichen growth, which again, is influenced by site specific and climatic factors.

3.10.2 As stated above, the deterioration in output due to dust or dirt is generally low and, therefore, the requirement for cleaning due to loss of output is balanced against cost of the cleaning operation. Some sites can operate without the need to be cleaned, whereas some sites require cleaning annually. The cleaning requirements for the Proposed Development can only be accurately determined once operational and, therefore, to present a worst-case for the assessments, an annual cycle is assumed.

3.10.3 The solar PV panels would be cleaned using water only. Deionised water would be used as preference. No chemical cleaning products would be used, with stubborn dirt brushed or wiped off the panels.

3.11. Security

3.11.1 The Principal Area will be subject to several security risk management threat assessments during the development, construction, operation and ultimately decommissioning phases. These security risk management threat assessments are to be procured by the Applicant and / or Operator and conducted by Suitable Qualified and Experienced Persons (SQEP) and will determine security risks.

3.11.2 The Applicant recognises, and embraces, the symbiotic relationship between safety and security. The security arrangements to be present at the Site will therefore contribute to the overall safety of all who will, or may, enter the Site. The security arrangements will be SQEP reviewed at identified epochs commensurate to the

Security Risk rating and will further assess any changes in the Security Risk Management Threat Assessment.

3.11.3 The boundary of the Areas will be secured by both fencing and by the provision of Closed-Circuit Television (CCTV) equipment. Cameras would be placed on lamp poles at the BESS and substations up to 4 m in height, and up to 3 m in height across the rest of the Principal Area.

3.11.4 Perimeter fencing would be deer wire mesh and wooden post fencing with a maximum height of 2 m.

3.11.5 There would be palisade fencing around the substations, and the central BESS compound and de-centralised BESS would be fenced with moss green wire mesh, which will have a maximum height of 2.5 m.

3.11.6 All new access tracks would be secured by gates, which would be set back from the public highway. Where existing access tracks are used that also provide access to residential properties, appropriate security measures would be put in place in consultation with the relevant property owner(s).

3.11.7 A security risk management assessment will be undertaken ahead of operation of the Proposed Development, to determine security measures. Security measures expected to be included comprise:

a. CCTV at the BESS compounds directed towards the infrastructure;
b. detection systems such as beam break and image detection to raise alarm when fence breached;
c. barriers / locked gates at main entrances to the Principal Areas;
d. steel doors on substation buildings;
e. buried cables, as much as practicable;
f. remote monitoring; and
g. alarm response contract with keyholder/security company.

3.12. Responding to environmental incidents and emergencies

3.12.1 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.

3.12.2 As set out in the outline Battery Safety Management Plan (oBSMP) (also available in draft as part of the Preliminary Environmental Information), an Emergency Response Plan would be prepared at the detailed design stage, secured via a Requirement of the 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 OEMP(s). It also identifies where monitoring is proposed, to assess the effectiveness of the mitigation measures. Nothing in this draft oOEMP would prevent the modification or omission of the control measures set out in Table 4-1 to Table 4-10, where the operational methodology means that the measures can be so 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 OEMP(s).

4.2. Mitigation and management measures

4.2.1 A summary of the mitigation and management measures to be included as a minimum in the detailed OEMP(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 4-10. The measures must be integrated into the detailed OEMP(s) prior to the commencement of operation by the Applicant. This will be secured via a Requirement of 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
Impacts upon agricultural land and soil resources	AL1 - OEMP	Outline Soil Resources Management Plan (oSRMP) to be implemented.	Regularly record compliance via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.
	AL2 - OEMP	Adopting and implementing good practice measures for the operational 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
BESS fire emissions	AQ1 - OEMP	Measures are to be developed and included in the oBSMP to be submitted with the DCO application. These will be developed further in the detailed Battery Safety Management Plan (BSMP) include measures to limit human exposure to air pollution in the event of a fire, such as: • Notification of potentially affected residents including advice on the health effects of smoke and ways to	Refer to the draft oBSMP.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		reduce exposure (e.g. close windows and stay indoors); • Should there be a BESS fire in close proximity to the SRN, the Site operator is to determine wind direction from the BESS Compound weather station and seek to close the road if deemed necessary; and • Notification of potentially affected members of the public to move to a cleaner air location in the event of a BESS fire.		
Dust and air quality complaints resulting from any operational replacement works	AQ2 - OEMP	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 authority when asked.	The detailed OEMP(s) will outline a communication strategy to address dust and air quality complaints, a transparent investigation protocol and a commitment to take remedial action where required	
Back-up generator emissions	AQ3 - OEMP	Ensure the back-up generators adhere to emissions standards and seek alternatives were practicable, such as batteries or alternative fuel.	To be confirmed in the detailed OEMP(s).	
Vehicle emissions from the operational	AQ4 - OEMP	Vehicles will be correctly maintained and operated in accordance with	The overall responsibility will be	

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
maintenance activities required during operation of the Proposed Development		manufacturer's recommendations and in a responsible manner. All plant and vehicles will be required to switch off their engines when not in use and when it is safe to do so. In addition, plant and vehicles will conform to relevant applicable standards.	with the Applicant. Specific responsibilities will be confirmed in the detailed OEMP(s).	
Fugitive dust emissions during replacement activities	AQ5 - OEMP	Good practice measures set out for construction (outlined in the outline Construction Environmental Management Plan (oCEMP)) will be reintroduced and implemented for replacement activities. Appropriate mitigation and control measures will be included in the detailed OEMP(s), which would include: **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 on the Site. This may be the environmental manager, construction project manager or the site manager. • Display the Contractor(s) head or regional office contact information.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the detailed OEMP(s). The following monitoring will be undertaken: Undertake on-site and off-site inspection (particularly during replacement works), where receptors (including roads) are nearby, to monitor dust, record inspection results and make the log available to the Local Authority when asked.	

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		• Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the relevant local authorities. 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 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 particulate matter 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.	Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local 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 PM10 continuous monitoring locations with the Local Authority. Where practicable, commence baseline monitoring at	

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		Preparing and maintaining the Sites • 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 Solar Development Sites that are at least as high as any stockpiles onsite. • Fully enclose site or specific operation where there is a high potential for dust production and the site 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. • 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.	least three months before work commences on-site or, if a large site, before work on a phase commences. Further guidance is provided by Institute of Air Quality Management (IAQM) on monitoring during demolition, earthworks and construction. Any unforeseen issues that arise in relation to vehicle movements will be logged by the Site Manager. If necessary, the issues will be discussed with the local highway authority so that they can be resolved as appropriate.	

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		• 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) (CTMP) will be produced in substantial accordance with the draft Outline Construction Traffic Management Plan (oCTMP) to manage the sustainable delivery of goods and materials.		

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 - OEMP	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 OEMP. The OEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.
	BD2- OEMP	oLEMP to be implemented during the operational phase.		
	BD3- OEMP	Establishment of a sensitive lighting plan covering operational lighting to ensure lighting of suitable bat commuting, foraging and roosting habitats, and otter/water vole habitat is minimised.		
Impact upon badger, and other mobile species	BD4 - OEMP	Perimeter security fencing will be maintained through operation. 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.		
Direct and indirect impacts upon ecological features, including disturbance and damage / loss	BD5 - OEMP	Maintenance and other site vehicles will be subject to a 10 mph speed restriction within the Draft Order Limits.		
	BD6 - OEMP	The Proposed Development would generally not be lit. Lighting will be the minimum required for safety and security and not illuminating key habitat		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		features (river corridors, hedgerows, Priority Habitats, mature trees). Where lighting is necessary, it will adhere to best practice guidelines and will be deployed in accordance with the following recommendations: Consideration of hood design, lamp height, and angle to reduce light spill particularly avoiding illuminating retained foraging and commuting habitat on the site such as mature trees, waterbodies, tree lines, and hedgerows. Use of LED with less blue light e.g. 'warm white' (~3000K) or red light where appropriate. No metal halide lamps should be used anywhere in the Proposed Development. Minimising hours of lighting to those absolutely necessary for security and safety purposes, where possible lighting should avoid key periods of bat activity (i.e. sunset and sunrise).		

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 GHG emissions during operation	CCR1-OEMP	Conducting regular planned maintenance of the plant and machinery to optimise efficiency.	Regularly record compliance via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP
	CCR2 - OEMP.	Encourage the use of lower carbon modes of transport.		
	CCR3 - OEMP	Switching maintenance vehicles and plant off when not in use and ensuring maintenance vehicles conform to current EU emissions standards.		
Impact of climate change on operational works	CCR4 - OEMP	Using equipment's cooling systems where necessary/adapting working practices and equipment used based on current weather conditions.		
Heightened risks posed by flooding and extreme weather events, due to climate change	CCR5 - OEMP	Suitable measures will be implemented during operation to manage the heightened risks posed by flooding and extreme weather events, due to climate change. The safety of all members will be paramount during the operational phase. 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	Regularly record compliance via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		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 UV-protective clothing, hats and sunglasses. Sunscreen will be made available as part of 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 OEMP(s) prior to the operational phase. 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 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 the setting of heritage assets	CH1 - OEMP	Visible structures such as substations, fencing, BESS, inverters will be blended into the landscape through the careful selection of colours and/or cladding.	Regularly record compliance via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.
	CH2 - OEMP	Appropriate buffers between heritage assets and the operational (servicing and maintenance) works. Buffers will be determined on an individual basis, based on the nature and condition of each heritage asset.		
Impacts to archaeological features during necessary maintenance	CH3 - OEMP	In the event of maintenance works being required outside of the footprint of original construction activities consultation, the OEMP will detail process for consultation with the LPA 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 LPA to be detailed in OEMP.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.

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 the operation of the Proposed Development	GHG1 - OEMP	Managing the Proposed Development to ensure efficient operation and optimal electricity generation by implementing suitable maintenance regimes to support operational efficiency over the lifetime of the development.	Regularly record compliance via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.

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
Potential loss / damage to trees and vegetation	LV1 - OEMP	oLEMP to be implemented during the operational phase	Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency.	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.
	LV2 - OEMP	Careful siting of the Proposed Development in the landscape to avoid or reduce the loss of existing vegetation and siting solar PV modules and other above ground infrastructure to relate to existing landform and vegetation patterns to maximise landscape integration.		
	LV3 - OEMP	Conserving and responding positively to landscape, ecology and historic features of value, including below-ground, across the Draft Order Limits.		

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
Noise from operational equipment impacting sensitive receptors	NV1 - OEMP	The assessment presented in noise and vibration is based on an indicative design available at the time of writing to inform a reasonable worst-case assessment. The design is expected to continue evolving, and changes may occur, such as modifications to the final plant selection or the layout of the BESS. Any changes will ensure that resulting operational noise impacts do not lead to significant effects. If required, the submission of the detailed OEMP will include: • Details of the operational noise mitigation measures that have been implemented as part of the detailed design. • A noise impact assessment of the finalised detailed design of that part of the Proposed Development to which the OEMP relates. This will be required to demonstrate that the operational noise sources will not lead to effects worse than reported in the ES. • If relevant, submit a verification/compliance exercise to	The overall responsibility will be within the Applicant. Specific responsibilities will be confirmed in the detailed OEMP(s). Details of the noise impact assessment including any noise monitoring, will be determined within the detailed OEMP(s).	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		confirm that the conclusions of that noise impact assessment have not changed. • Review potential remedial actions to ensure those conclusions are delivered.		
Noise complaints resulting from any operational replacement works	NV2 - OEMP	If relevant, record noise complaints, identify cause(s), take appropriate measures to reduce noise emissions in a timely manner and record the measures taken. If required, make the complaints log available to the local authority when asked.	The detailed OEMP(s) will outline a communication strategy to address noise complaints, a transparent investigation protocol and a commitment to take remedial action where required.	
Noise due to maintenance activities impacting sensitive receptors.	NV3 - OEMP	Where practicable, operator will schedule maintenance and replacement works which may result in considerable levels of noise for daytime periods only. Operator will implement measures to minimise potential noise impacts at sensitive receptors following the principles of the oCEMP.	Specific responsibilities will be confirmed in the detailed OEMP(s).	
Noise due to replacement activities impacting sensitive receptors.	NV4 - OEMP	The replacement of infrastructure, will follow, where practicable, the same principles to control noise outlined in the oCEMP.	Specific responsibilities will be confirmed in the detailed OEMP(s).	

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 - OEMP	Implementation of the outline Public Rights of Way and Access Management Plan (oPRoWMP), including proposed permissive paths.	Monitoring of PRoW and permissive paths as required in the PRoWMP. Regularly record compliance via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP

Table 4-10 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 – OEMP	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 OEMP. Compliance with all measures regularly recorded via an appropriate method to be determined in the	The overall responsibility will be with the Applicant. Specific responsibilities will be confirmed in the OEMP.
	WFR2 – OEMP	Management and maintenance requirements of water supply and drainage assets including monitoring requirements will be identified prior to operation. Water requirements, sources of supply and measures to reduce consumption, and foul water management will be detailed in the Drainage Strategy.		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
	WFR3 - OEMP	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.	OEMP. The OEMP will detail the frequency.	
	WFR4 - OEMP	Regular inspection and maintenance of the drainage systems, Sustainable Drainage Systems (SuDS) and culverts will take place throughout the operational phase. A management and maintenance team will be established to maintain SuDS features throughout the lifetime of the Proposed Development. The maintenance of drainage features will be largely in accordance with the requirements of the SuDS Manual (CIRIA 753). Any interfaces and subsequent maintenance requirements with Internal Drainage Board (IDB) maintained watercourses will be discussed and agreed with Waveney Lower Yare & Lothingland IDB in subsequent design stages.		
	WFR5-OEMP	A suitable FWEP will be prepared alongside the detailed OEMP(s) and put in place for the operational phase.		
Impact upon water quality through erosion	WFR6-OEMP	Sediment control measures (silt fences, settlement/attenuation ponds etc.) would be used in the vicinity of		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		watercourses, springs or drains where natural features (e.g. hollows) do not provide adequate protection.		
Impact upon water quality through pollution	WFR7 - OEMP	A minimum offset of 10 m from bank top of all riparian boundaries and watercourses for all works will be maintained, with the exception of watercourse crossings. Where flood defences are present a minimum buffer of 8 m from the landward toe of defences will be established.		
	WFR8 - OEMP	SuDS will be provided at source, where practicable, ensuring that surface water runoff is managed consistently with existing site conditions.		
	WFR9 - OEMP	Access tracks will be permeable to allow water to filtrate through and maintain greenfield runoff rates.		
	WFR10 - OEMP	The Drainage Strategy and Outline BSMP will outline how firewater runoff will be managed. At the BESS Compound, drainage infrastructure will be designed to contain and isolate firewater during an incident.		
	WFR11 - OEMP	Per- and polyfluoroalkyl substances (PFAS) is not to be used in solar panel coatings. Measures to prevent coating damage will be undertaken, including following specific recommendations from the manufacturer and avoiding		

Potential impact being managed / mitigated	ID	Mitigation and/or management measure to be implemented	Requirement for monitoring	Responsibility
		thermal shock during cleaning. Cleaning of the panels will only be done using water. If any soiling remains on the panels, they will be further cleaned with a soft cloth or brush.		
	WFR12 - OEMP	Foul water generated will be appropriately collected in sealed storage tanks and regularly emptied and disposed of by a licensed Waste Contractor(s), in accordance with regulatory requirements.		

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).

Abbreviations

Table 5-1 Abbreviations

Term	Definition
BESS	Battery Energy Storage Systems
BMSDC	Babergh Mid Suffolk District Council
BSMP	Battery Safety Management Plan
CCTV	Closed-Circuit Television
CEMP	Construction Environmental Management Plan
DCO	Development Consent Order
DMP	Dust Management Plan
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
ES	Environmental Statement
FRA	Flood Risk Assessment
FWEP	Flood Warning and Evacuation Plan
HGV	Heavy Goods Vehicles
IAQM	Institute of Air Quality Management
IDB	Internal Drainage Board
kV	Kilovolt
MW	Megawatt
oBSMP	Outline Battery Safety Management Plan
oCEMP	Outline Construction Environmental Management Plan
oCTMP	Outline Construction Traffic Management Plan
oDEMP	Outline Decommissioning Environmental Management Plan
oLEMP	Outline Landscape and Environmental Management Plan
OEMP	Operational Environmental Management Plan
oOEMP	Outline Operational Environmental Management Plan
oPRoWAMP	Outline Public Rights of Way and Access Management Plan
oSRMP	Outline Soil Resource Management Plan
PFAS	per- and polyfluoroalkyl substances
PoC	Point of Connection
PPE	Personal Protective Equipment

Term	Definition
PRoWAMP	Public Rights of Way and Access Management Plan
PV	Photovoltaic
SCC	Suffolk County Council
SQEP	Suitable Qualified and Experienced Persons
SRMP	Soil Resources Management Plan

Glossary

Table 5-2 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 (BESS), 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 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.

Term	Definition
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 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 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 new National Grid 400 kV Substation located at Yaxley, Suffolk, being constructed by another developer.