Chapter K

Summary of Mitigation and Monitoring

East Claydon Greener Grid Park Environmental Statement

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K1.0 Introduction

K1.1 Schedule 4, Part (7) of the Town and Country Planning (Environmental Impact Assessment ('EIA')) Regulations 2017 as updated ('the 2017 EIA Regulations')[1] requires that an Environmental Statement ('ES') provides a description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements. These have been summarised in this chapter for ease of reference for the decision maker (Buckinghamshire Council ('BC')) and to assist in it forming its reasoned conclusion on this ES; for a full description the mitigation and monitoring measures, please refer to Chapters D to J of this ES.

K1.2 The Planning Practice Guidance ("PPG")[2] confirms that *"mitigation measures proposed in an Environmental Statement are designed to limit or remove any significant adverse environmental effects of a development. Local planning authorities will need to consider carefully how mitigation measures proposed in an ES are to be secured"* [ref. ID: 4-051-20170728].

K1.3 In accordance with Regulation 26(3) of the 2017 EIA Regulations, the PPG further states that *"if planning permission or subsequent consent is to be granted, the local planning authority or Secretary of State must consider whether it is appropriate to impose monitoring measures"* [ref. ID: 4-051-20170728].

K1.4 To assist in defining the means by which mitigation can be secured, reference is given to guidance provided in 'Delivering Quality Development'[3] which identifies three different types of mitigation:

- **Primary (inherent) mitigation** – otherwise known as embedded or inbuilt mitigation, these comprise modifications or measures built-in to the location or design of a development during the pre-application stage. These measures are already inherent to a proposed development but will require additional action to ensure their implementation, such as the imposition of a planning condition;
- **Secondary (foreseeable) mitigation** – this will require further activity in order to achieve the anticipated outcome identified in an ES such as through the imposition of a planning condition; and
- **Tertiary (inexorable) mitigation** – these are measures that would occur with or without input from the EIA and could, for example, include actions that would be undertaken to meet other existing legislative requirements, or actions considered to be standard or best practice to manage commonly occurring environmental effects.

K1.5 This ES has identified a series of mitigation and ongoing monitoring and / or management measures which are designed to limit or remove any significant adverse environmental effects of Proposed Development. This chapter reviews these measures in the context of the categorisation identified to ensure that they can be effectively secured.

K2.0 Mitigation and Monitoring

K2.1 The following section provides a summary of the mitigation and monitoring measures identified in this ES and divides these into primary, secondary and tertiary measures. This is provided for ease of reference to the reader only; for a full description of the mitigation and monitoring measures, please refer of Chapters D to I of this ES.

Primary 'Embedded' Mitigation

K2.2 The iterative process of assessment, design development and consultation in respect of the Proposed Development has resulted in a range of 'in-built' or embedded mitigation measures that have been taken into account as part of this ES. These have been specifically included in the Proposed Development for the purposes of this EIA; as a result, the need for any further mitigation has been assessed on the basis of these measures already having been secured. The embedded mitigation measures are included to aid in avoiding significant adverse environmental effects.

During construction

K2.3 Embedded mitigation measures include the following **during construction**:

1 The implementation of a **Construction Environmental Management Plan ('CEMP')** in accordance with the Framework CEMP set out within Chapter C of this ES, including the following measures:

   a Temporary lighting control;

   b Waste management;

   c Ecological Management;

   d Tree protection;

   e Noise management;

   f Pollution prevention;

   g Visual impacts; and

   h Reducing carbon footprint.

   The CEMP will sit alongside the CTMP and together will manage and ensure implementation of the key mitigation measures required for the construction phase.

2 The implementation of a **Construction Traffic management Plan (CTMP)**, which will be submitted as a detailed version for approval prior to the commencement of development. It is anticipated that this will be secured by condition and be in accordance with the CTMP submitted at Appendix G2 of this ES. This will include the following measures:

   a Construction working hour limits;

   b Traffic control;

   c Construction routing and access information (including a specific enforced route for Abnormal Indivisible Load vehicles);

d Construction period and programming;

e Construction delivery management;

f Dust control measures;

g Existing Condition Survey; and

h Monitoring and Compliance.

During operation

K2.4 Embedded mitigation measures include the following **during operation**:

1 **Site layout** – the location of the Greener Grid Park compound within the northern part of the Site to limit the loss of existing tree groups, tree belts, hedgerows and individual trees;

2 **Built development appearance** – the built form of the Proposed Development will comprise materials, finishes and hues which are evident in the local landscape and considered to be visually recessive, finishing the batteries in muted tones likely to be olive green;

3 **Structural landscaping** – including planting of 175 new trees of 3-3.5metres in height at the point of planting, and creation of a 5m high landscaped bund wrapping around the southwest corner of the Greener Grid Park compound;

4 **Tree retention** - Retention of existing tree groups and belts, individual trees and hedges within and adjacent to the boundaries of the Site wherever possible. This includes a minimum of 1,700m existing hedge retained and enhanced at key boundaries;

5 **Habitat creation** - Planting of species-rich wildflower meadow across the Site, to the northern areas of the Site surrounding the new tree planting and the Greener Grid Park compound;

6 **Sensitive lighting scheme** - The lighting scheme for the development has been developed with sensitivity to neighbouring residential properties and ecological areas, with low light pollution installations utilised that will be used only in short term, temporary instances;

7 **SUDS** - Creation of SuDS including attenuation basins and swales, designed to have landscaping and ecological benefits, including swales which will provide wet wildflower meadow mix;

8 **Cut and fill balance** – the site levels have been designed to ensure re-use of material onsite;

9 **Noise mitigation** – in the form of an acoustic fence, a landscaped acoustic bund which also delivers visual screening, and sensitive location of the compound within the Site;

10 **Biodiversity Net Gain** – delivery of a 58.50% net gain for habitats and a 10.24% net gain for hedgerows;

11 The use of **energy efficient technologies**, including:

a Energy efficient lighting control to reduce operational energy usage;

b Efficient battery technologies and low loss systems components (transformers);

12 **Operational access route –** operational traffic will access the Site via an agreed route, as proposed within the Transport Statement (Appendix G3);

13 **Minimal operational traffic** - The Proposed Development will be unoccupied and controlled remotely with maintenance visits to the Site twice per month. This will minimise emissions generated by maintenance vehicles travelling to and from the Site.

During decommissioning

14 **Restoration of the Site** at the end of the 40 year planning permission to it's previous agricultural use;

15 Preparation and implementation of a **Decommissioning Environmental Management Plan (DEMP),** which will cover the same scope as the CEMP, and specifically include measures:

a to **protect and retain existing trees** and vegetation via decommissioning exclusion zones and tree protective fencing;

b proposed **use of the operational lighting** for decommissioning activities, avoiding the need for any additional temporary floodlighting;

c **Protection of habitats** implemented as part of the Proposed Development, to be informed by an ecological baseline survey of habitats and fauna within the Site.

Secondary Measures

K2.5 The iterative process of assessment and design has therefore ensured that a significant element of mitigation is already inherent as part of the Proposed Development and as illustrated on plans and strategies provided as part of the planning application which this ES accompanies. There are, however, other secondary measures which may be secured additionally or as a result of further analysis than that which has been undertaken and is already envisaged. Table M2.1 below sets out a summary of those additional measures which would need to be secured via planning condition or s106 obligations.

Table K2.1 Summary of Identified Secondary Mitigation

Environmental Topic	Summary of Secondary Mitigation
During Construction	
LVIA	None.
Noise	None
Ecology	Provision of eight skylark nest plots in retained arable land within the Site ahead of the construction works.
Traffic and Transport	None.
Climate Change	None.
Archaeology	Submission of trial trenching results and evaluation to BC to confirm the type/scope of further mitigation measures required in relation to the Enclosure System (Romano-British ladder settlement). The mitigation will be secured and agreed through a planning condition.

Environmental Topic	Summary of Secondary Mitigation
	The measures could include a limited strip, map, and sample or targeted excavation where there is a direct impact – as identified on Figure I8 of the ES.
During Operation	
Landscape and Visual	Production and implementation of a Landscape Management Plan, with a review schedule, to ensure that landscape proposals and existing features are maintained throughout the lifetime of the Proposed Development.
Noise	Selection of appropriate battery units and transformers/inverters plant.
Ecology	Monitoring and management of newly planted habitats to ensure they achieve and maintain the desired condition, through the implementation of a Landscape Ecological Management Plan (LEMP) or similar. This should include detail of breeding bird monitoring of the operational Site.
Traffic and Transport	*Operational assessment scoped out of the EIA.*
Climate change	None.
Archaeology	Measures to avoid accidental damage will be implemented if archaeological remains are preserved on Site as part of the construction mitigation strategy. This could include demarcation of areas and limits on activities such as plant movements and land maintenance. The need for mitigation would be confirmed following the trial trenching works and secured by condition if required.
During Decommissioning	
Landscape and Visual	None.
Noise	None.
Ecology	None.
Traffic and Transport	None.
Climate change	Preparation and implementation of an 'end-of-life plan' for the materials left from the decommissioned development to ensure materials are responsibly disposed of and materials are reused and repurposed where possible.
Archaeology	If there are areas of archaeological remains preserved in situ, then measures to limit accidental damage would be required at decommissioning stage. This is likely to include fencing and prohibition on ground works or plant movements. The need for any mitigation would be confirmed after the evaluation, and if required would be secured through a planning condition requiring an Archaeological Decommissioning Method Statement.

K3.0 Means of Securing Mitigation

Assessment Methodology

K3.1 This section sets out the means by which the mitigation proposed throughout the ES can be secured.

K3.2 The PPG states that "*conditions attached to a planning permission or subsequent consent may include mitigation measures…[whilst]…mitigation measures can also be secured through planning obligations which are enforceable by the local planning authority"* [ref. ID: 4-051-20170728]. The PPG also makes clear that any monitoring measures can be attached via planning conditions or s106 planning obligations, as long as any provisions used are clear and precise and ensure clarity for all parties concerned.

K3.3 Consideration has been given to the primary, secondary and tertiary mitigation measures identified within Section M2.0 and Table M3.1 sets out the recommended route by which each can be secured to ensure that the outcomes of this ES will be implemented as envisaged:

Table K3.1 Summary of Identified Mitigation

Identified Mitigation		Relevance to Environmental Aspect	Anticipated Means of Implementation
Primary (Embedded) Mitigation			
1	Development of the Proposed Development to be brought forward in accordance with the proposed plans	All	Planning condition – compliance
2	Implementation of a CEMP in accordance with the Framework CEMP included within Chapter C of this ES.	All	Planning condition to require the submission of a detailed CEMP
3	Implementation of a CTMP in accordance with the version submitted at Appendix G2 of this ES (including AIL route).	Transport, Noise, Climate	Planning condition requiring the approval of the final CTMP (including AIL route)
4	Implementation of the structural and soft landscaping scheme in accordance with the landscaping plans	LVIA, Ecology, Noise	Planning condition – compliance
5	A minimum 10% Biodiversity Net Gain to be achieved	Ecology, LVIA, Climate Change	Planning condition (in accordance with national BNG requirements) and /or Section 106 agreement.
6	Implementation of the sensitive lighting scheme	Ecology, LVIA	Planning condition – compliance
7	SUDS	Ecology, LVIA	Planning condition to implement drainage strategy in accordance with details submitted

Identified Mitigation		Relevance to Environmental Aspect	Anticipated Means of Implementation
8	Construction and operational traffic routes	Transport, Noise	Planning condition to accord with details in the CTMP and TS
9	Restoration of the Site at the end of the 40 year period of the planning permission	All	Planning condition for the temporary life of the permission
10	Protection of trees and habitats beyond decommissioning	Ecology, LVIA	Planning condition
11	Implementation of DEMP in accordance with the Framework CEMP and CTMP included within Chapter C of this ES and Appendix G3, and informed by up to date ecological surveys.	All	Planning condition
Secondary (Additional) Mitigation			
12	Provision of Skylark nesting plots	Ecology	Planning condition
13	Submission of trial trenching evaluation and securing of mitigation measures (limited strip, map, and sample or targeted excavation), including any protection required through the operational phase.	Archaeology	Planning condition
14	Landscape Environmental Management Plan, with a review schedule	LVIA, Ecology	Planning condition
15	Archaeological Decommissioning Method Statement, **if** there are areas of archaeological remains preserved in situ.	Archaeology	Planning condition
16	Selection of appropriate battery units and transformers/inverters plant.	Noise	Planning condition
17	'End-of-life plan' for disposal, recycling, re-use of materials.	Climate Change	Planning condition

K3.4 It is considered that the above will ensure that the mitigation and monitoring envisaged by the ES can be appropriately secured.

K4.0 Summary & Conclusions

K4.1 This ES has been prepared on behalf of Statkraft UK LTD (the Applicant) and sets out the finding of an EIA of the proposed East Claydon Greener Grid Park. The description of development is:

"Construction of a Greener Grid Park comprising energy storage and grid balancing equipment and associated infrastructure including access, drainage, landscaping and other incidental works."

K4.2 The Proposed Development has been subject to a process of systematic analysis of potential significant environmental effects and iterative design to embed key principles that can assist in reducing adverse effects where these arise. The ES (Chapters A to I) has described the key components of the Proposed Development, the methodological approach adopted and the extent to which consultation and engagement has assisted in this process. It is intended to be used by Buckinghamshire Council and other key stakeholders in its determination of the planning application for the Proposed Development.

K4.3 Chapter J has drawn together and summarised the main outcomes from the EIA process, and this Chapter and has divided the range of mitigation measures identified into those already embedded or 'built in' to the proposals that are included in the planning application; into measures that will need to be secured via planning conditions and/or a s106 planning obligation; and other measures to which the future development will comply as a result of the requirements of other legislation or best practice procedures. It has been demonstrated that all mitigation required to appropriately address likely significant environmental effects of this Proposed Development can be secured to an acceptable level.

K5.0 Abbreviations & Definitions

Abbreviations

- BC Buckinghamshire Council
- CEMP Construction Environmental Management Plan
- CTMP Construction Traffic Management Plan
- DEMP Decommissioning/Demolition Environmental Management Plan
- EIA Environmental Impact Assessment
- ES Environmental Statement
- LEMP Landscape Ecological Management Plan
- PPG Planning Practice Guidance
- SUDS Sustainable Drainage Systems

Definitions

- **Primary (inherent) mitigation** – otherwise known as embedded or inbuilt mitigation, these comprise modifications or measures built into the location or design of a development during the pre-application stage.
- **Secondary (foreseeable) mitigation** – these measures will require further activity in order to achieve the anticipated outcome identified in an ES such as through the imposition of a planning condition.
- **Tertiary (inexorable) mitigation** – these are measures that would occur with or without input from the EIA and could, for example, include actions that would be undertaken to meet other existing legislative requirements, or actions considered to be standard or best practice to manage commonly occurring environmental effects.

K6.0 References

1 HM Government, (2017), Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

2 Department for Levelling Up, Housing and Communities; Ministry of Housing, Communities and Local Government, (2019), Planning Practice Guidance ('PPG').

3 IEMA, (2016), Environmental Impact Assessment Guide to: Delivering Quality Development