



Dust Management Plan

PJ Brown (Civil Engineering) Limited

Crouch's Farm,
Hollow Lane,
Hoathly,
Lewes,
East Sussex,
BN8 6QX.



PROVIDING SOLUTIONS, ENSURING COMPLIANCE

T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way
Telford, Shropshire, TF3 4NR

W www.westburyenv.co.uk



Document Control Table

Project Reference	20/014j
Project Title	Environmental Permit Application
Document Title	Dust Management Plan: Version 3
Document Issue Date	19 January 2026
Client	PJ Brown (Civil Engineering) Limited
Status	Issued

Change log

Version	Changes	Produced by	Checked by	Date
1	Original Dust Management Plan.	Vicky Cawley	Tracey Westbury	03 June 2025
2	Table 3.1	Vicky Cawley	Tracey Westbury	06 November 2025
3	Code 2 Protected Species added to Table 3.1.	Vicky Cawley	Tracey Westbury	19 January 2026



Contents

1. Introduction	1
2. Relevant legislation	2
3. Site location and sensitive receptors	3
4. Operations at the Site	6
5. Dust management and mitigation	8
6. Cessation of Operations for Dust Mitigation	17
7. Monitoring	19
8. Actions when an alarm is triggered.....	20
9. Reporting and complaints response	21

Figures

Figure 3.1 Wind rose from Herstmonceux Weather Station from 06/2002 to 07/2023.	3
--------------------------------------------------------------------------------------	---

Tables

Table 3.1: Sensitive Receptors within 1km of the Site boundary	4
Table 4.1: Potential of waste types to produce dust emissions	7
Table 5.1: Source-pathway-receptor routes	9
Table 5.2 Mitigation Measures	11
Table 6.1 Estimating the magnitude of risk	17
Table 6.2 Temperature	17
Table 6.3 Risk matrix for warm weather	17
Table 6.4 Risk matrix for cool weather	18
Table 6.5: Action required for each level of risk	18

Drawings

Drawing No. 21/014j 001	Site Layout Plan
Drawing No. 21/014j 002	Sensitive Receptors Plan

Appendices

Appendix 1	Inspection Checklists
Appendix 2	Complaints Form
Appendix 3	Dust Procedure and Form



1. Introduction

- 1.1. Westbury Environmental Limited has prepared this Dust Management Plan on behalf of PJ Brown (Civil Engineering) Limited (the Operator) to support an Environmental Permit application.
- 1.2. The waste will be deposited to construct new silage clamps and make improvements to an existing lagoon at Crouch's Farm, Hollow Lane, East Hoathly, BN8 6QX (Site).
- 1.3. The Site extends to an area of approximately 4.6 hectares. The location and extent of the Site is shown on Site Layout Plan Drawing No. 20/014j 001.
- 1.4. This Dust Management Plan provides information on the sources, risks and mitigation measures related to the potential of dust from the waste operations undertaken on the Site.

Content of the Dust Management Plan

- 1.5. This Dust Management Plan will form part of the Environmental Management System (EMS) for the Site. Procedures and Forms referenced within this Dust Management Plan will be included within the EMS. Completed forms (records) will be kept, as required by conditions included in an Environmental Permit.
- 1.6. This Dust Management Plan is structured as follows:
 - Section 2 provides a summary of the relevant legislation and guidelines.
 - Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
 - Section 4 provides a summary of the operations carried out on the Site and the delivery of material to the Site.
 - Section 5 provides information on the site management and the mitigation measures employed at the Site.
 - Section 6 provides a risk matrix for the cessation of dust generating activities.
 - Section 7 provides information on how dust emissions are monitored at the Site.
 - Section 8 provides a summary of what happens when an alarm is triggered.
 - Section 9 provides a description of how complaints can be made and how they are addressed by the site management.



2. Relevant legislation

- 2.1. The Air Quality Strategy (AQS) for England, Scotland, Wales and Northern Ireland fulfils the requirement under Part IV of the Environment Act 1995 for a national air quality strategy which sets out policies for improving ambient air quality and keeping these under review. The first strategy, the National Air Quality Strategy (NAQS), was published in March 1997. In January 1999, proposals to amend the strategy were put out for consultation and a consultation document was produced. Following consultation, a revised version of the strategy was published in January 2000. This was further revised in 2007 and has not been revised since this date.
- 2.2. The AQS provides a framework for air quality control through air quality management and air quality standards and objectives for different pollutants (including particulate matter). These air quality standards and objectives were transposed into English Law by the Air Quality (Standards) Regulations 2010.

Air Quality Management Area (AQMA)

- 2.3. The system of local air quality management (LAQM) was introduced under the Environment Act 1995. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within the relevant period, the authority must designate an AQMA.
- 2.4. The Site is not located within an AQMA. The closest AQMA is the Lewes Town Centre AQMA for NO₂ which is located c. 5km southwest of the Site.

Low Emission Zone (LEZ)

- 2.5. A LEZ is an area that has restrictions on the type and age of vehicles permitted in it, therefore, vehicles emitting high levels of pollution can be prevented from entering and operating within the zone.
- 2.6. The Site is not located within a LEZ.



3. Site location and sensitive receptors

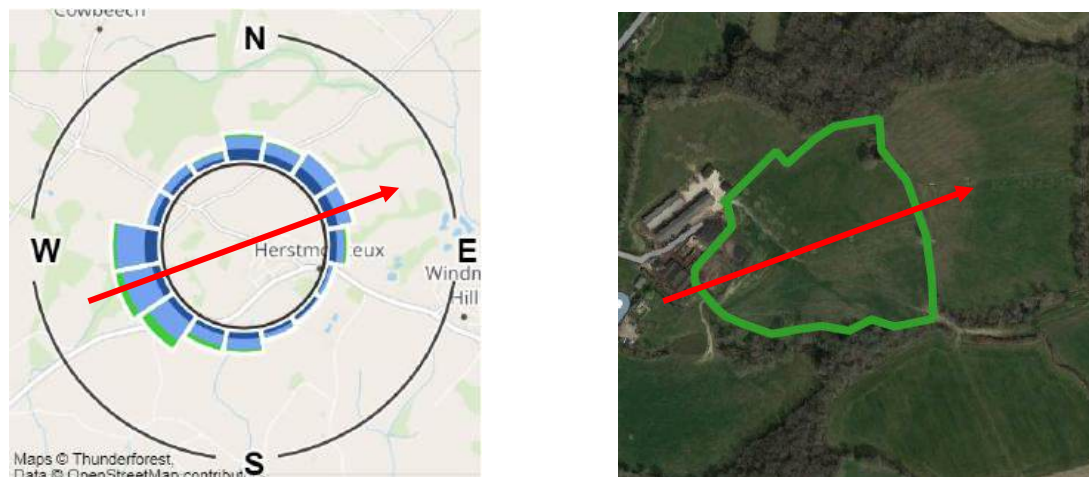
Site Location

- 3.1. The proposed deposit of waste for recovery operation to construct new silage clamps and make improvements to an existing lagoon at Crouch's Farm, Hollow Lane, East Hoathly, BN8 6QX (the Site). The proposed permit boundary is shown on the Site Layout Plan Drawing No. 21/014j 001.
- 3.2. The Site is located at National Grid Reference (TQ 53014 17846) approximately 1.8km north of the town of East Hoathly and 2.4km east of the A22 trunk road.
- 3.3. The Site is surrounded by agricultural land and woodland and to the north, east, south, and west.
- 3.4. The Site does not overlie a bedrock aquifer or superficial aquifer. The Site is not located within a Source Protection Zone (SPZ).

Meteorology

- 3.5. Unlike many other atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.
- 3.6. The prevailing meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site specific, microclimatic conditions. The most significant meteorological factor is the predominant wind direction and wind speeds, and consequently data has been collected regarding the predominant wind speeds and directions appropriate to the Site.
- 3.7. Wind speed and direction data have been obtained from Herstmonceux Weather Station for the period from 06/2002 to 07/2023. Herstmonceux Weather Station is located approximately 12km southeast of the Site. This observing station is the closest wind station to the Site according to "Windfinder.com" and has wind speed and direction data appropriate for characterisation of the wind climate at the Site, see Figure 3.1.

Figure 3.1 Wind rose from Herstmonceux Weather Station from 06/2002 to 07/2023.





Sensitive Receptors

- 3.8. This Dust Management Plan identifies all types of receptors within 1km of the Site that may be sensitive to dust emissions.
- 3.9. Receptors with high sensitivity to dust are food processing and preparation businesses and IT / chip manufacturing businesses.
- 3.10. There are no sensitive receptors within 1km of the Site that will have a high sensitivity to dust.
- 3.11. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from airborne dust. Concentrations of airborne dust reduce significantly further away from the source.
- 3.12. Due to the nature of the materials being handled on this Site the particle size of the dust likely to be emitted is of intermediate to large particles. Therefore, it can be concluded that these particles are highly likely to be deposited within 250m of the source.
- 3.13. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 3.1, Sensitive Receptors Plan, Drawing No. 21/014j 002 shows the location of these receptors in relation to the Site.

Table 3.1: Sensitive Receptors within 1km of the Site boundary

Ref	Receptor	Description	Direction from Site	Approximate Distance from Site Boundary to receptor boundary (m)
1	Crouch's Farm	Agricultural	west	0
2	Moat Shaw Deciduous Woodland and Ancient Woodland	Woodland	north	0
3	Deciduous Woodland and Ancient Woodland	Woodland	south	0
15	Code 2 Protected Species	Protected Species	Northeast	10
4	Small Lake/Pond (Ecological Survey Pond 1 – eDNA tests confirmed presence of GCN June 2021)	Surface Water Feature	northeast	10
4b	Small Lake/Pond (Ecological Survey Pond 2 - no GCN found in June 2021 Ecological survey)	Surface Water Feature	southwest	18
4c	Small Pond and stream (Ecological Survey Pond 6 - no GCN found in June 2021 Ecological survey)	Surface Water Feature	South	36
5	Jewelry Repair Shop	Industrial	southwest	60
6	Crouch's Farm Bungalow	Residential	southwest	160
7	Surface Water Feature	Surface Water Feature	east	190
8	Residential property off Laundry Lane	Residential	south	240
9	Hawkshurst Common Wood	Woodland	north	330
10	Hope Farm	Agricultural	south	340
11	Scallow Caravan and Campsite	Campsite	south	400
12	Great Wood	Woodland	southwest	500
13	Three Acre Brewery	Industrial	northwest	620



Ref	Receptor	Description	Direction from Site	Approximate Distance from Site Boundary to receptor boundary (m)
14	Heronsdale Farm Campsite	Campsite	northeast	810

- 3.14. The Site is located within an area mainly used for agricultural land uses and woodland.
- 3.15. Any dust that is emitted from the Site is likely to be deposited within 250m of the source.
- 3.16. Due to the predominant wind direction from the southwest, it is considered that receptors located northeast of the Site are at greater risk of experiencing adverse impacts of dust emissions from the Site. There are identified significant sensitive receptors located within 250m, northeast of the Site.
- 3.17. There are two residential areas located within 250m of the Site (properties off Hollow Lane and off Laundry Lane). Although these properties are within 250m of the Site, they are not in the direction of the predominant wind direction.

Other Dust Sources

- 3.18. The Site is located on a farm and is surrounded by agricultural land which could be a potential source of dust emissions at certain times of the year when work is being carried out on the fields and around the farm buildings.



4. Operations at the Site

- 4.1. Waste will be delivered onto the Site by Heavy Good Vehicles (HGV's). The movement of vehicles visiting the Site has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements will be enforced on the Site to help reduce the amount of dust generated by vehicle wheels.
- 4.2. All vehicles entering / exiting the Site will be sheeted to minimise the likelihood of dust emissions. Loaded vehicles arriving onto the Site that are not sheeted will be rejected in accordance with the Waste Rejection Procedure within the EMS.
- 4.3. Vehicles entering the Site will be visually inspected prior to unloading to ensure that excessively dusty loads are not accepted. Excessively dusty loads will be rejected from the Site in accordance with the Waste Rejection Procedure in the EMS.

Overview of Waste Operations

- 4.4. Specific operations to be carried out on the Site are listed below with further information regarding the potential for these activities to cause dust emissions:
 - Vehicle Movements
 - The movement of vehicles within the Site has the potential to cause dust emissions, particularly in dry and windy conditions.
 - Mud could be tracked out of the Site by vehicles potentially causing dust emissions from the road surface.
 - Construction works
 - The construction of the silage clamps and lagoon improvements has the potential to generate dust when material is being moved and deposited.

Site Layout

- 4.5. The proposed location of the construction works at the Site are shown on the Site Layout Plan, Drawing No. 21/014j 001.
- 4.6. Incoming waste will be tipped off directly where construction works are taking place, to reduce double handling. In wet weather, material will be deposited and stockpiled on two areas of hardstanding, see Drawing No. 21/014j 001 Site Layout Plan.
- 4.7. The wheel wash facilities (consisting of wheel spinner and wheel bar) is located on the access road where all vehicles exiting the Site can safely access it. The location of the wheel wash facilities on the access road is considered to be most effective location to ensure that all vehicles can safely access this when leaving the Site.
- 4.8. Visual dust monitoring will be undertaken by Site staff continuously when the Site is operational. Monitoring is undertaken by all Site operatives.

Plant and Equipment

- 4.9. The following equipment will be used on the Site for the waste operations:
 - Bulldozer,
 - Excavator.
- 4.10. All the plant and equipment used on the Site will be subject to maintenance checks in accordance with the procedures within the EMS.
- 4.11. All plant will be operated in a proper manner with respect to minimising emissions, for example, switching off plant when not in use and no-revving of engines etc. The Operator will implement a policy



of replacing older machinery with new, lower emission machinery as it becomes available and as the business development allows.

Waste - Dust Potential

- 4.12. The waste types to be accepted at the Site that have a significant potential to cause dust have been identified in the table below. These have been assigned a “low”, “medium” or “high” risk level for the potential to generate dust emissions.

Table 4.1: Potential of waste types to produce dust emissions

Waste types	Processes waste type subjected to	Dust potential
Concrete, bricks, tiles, , etc.	Storage	Low
	Handling and deposition	Medium
Soils (silty, sandy, clayey), residual waste from screening processes.	Storage	Medium
	Handling and deposition	High
	Handling	Low



5. Dust management and mitigation

Responsibility for Implementation of the Dust Management Plan

- 5.1. The Site Manager is responsible for the implementation of the Dust Management Plan and for ensuring that the mitigation strategies in place are adhered to. Where the Site Manager is unavailable to oversee the implementation of dust suppression measures, a suitably experienced Site Operative is delegated responsibility from the Site Manager.
- 5.2. This Dust Management Plan will be reviewed every four years or when a change in operations is deemed to have a potential effect on increasing dust emissions. The review process will amend any mitigation measures that have been identified as areas for improvement in reducing dust emissions on Site.
- 5.3. All members of staff will receive the necessary training to deliver dust suppression measures described within this Dust Management Plan. All staff will be given training on the EMS for the Site, which includes a Dust Procedure, see Appendix 3 Dust Procedure and Form. All staff on the Site will be trained on the Dust Procedure which includes details regarding mitigation measure and monitoring. Site procedures will be communicated between staff via EMS training and weekly toolbox talks. Where new dust suppression measures are to be implemented additional training will be provided to ensure staff remain competent. This training will be delivered by the Site Manager.

Sources and Control of Fugitive Dust Emissions

- 5.4. Table 5.1 details the potential sources of dust on the Site and which mitigation measures are implemented in order to break the source-pathway-receptor routes for dust emissions.
- 5.5. Table 5.2 Mitigation Measures lists the mitigation measures to control dust emissions at the Site.

**Table 5.1: Source-pathway-receptor routes**

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
Mud	Transportation of dust on wheels and vehicles, then mud dropping off wheels/vehicles on to road surfaces.	Hollow Lane and other public highways	Mud on Hollow Lane and other local roads. Resuspension of mud as airborne particulates.	<p>There is haulage road onto the Site, off Hollow Lane. The haulage road is approximately 170m in length.</p> <p>Haulage routes are dampened down using a mobile bowser when overly dry or dusty conditions present.</p> <p>Hollow Lane and Hawkhurst Lane are subject to regular inspections in accordance with the inspection Checklists. If mud is observed to have been tracked off site on to the local highways, then a road sweeper will be deployed to clean the affected road.</p> <p>A road sweeping vehicle is hired and deployed when necessary to ensure no build-up of mud on the public highways and minimise the generation of dust.</p> <p>The wheel wash facilities (consisting of wheel spinner and wheel bar) will be used by all vehicles exiting the Site to avoid mud being tracked out of the Site.</p>
Debris	Falling off lorries	Hollow lane and other public highways	Visual soiling, also consequent resuspension as airborne particulates	<p>Vehicles delivering waste are sheeted.</p> <p>Where debris falling off vehicles is causing mud on the local highway a road sweeper is hired and deployed.</p> <p>All areas of the Site and haulage road are subject to regular housekeeping, see Appendix 1 Inspection Checklist.</p>
Vehicle / Plant movements	Atmospheric dispersion	Surrounding sensitive receptors including.	Airborne particulates and build-up of dust on surfaces of site and local roads.	<p>The Site is subject to regular housekeeping, see Appendix 1 Inspection Checklist.</p> <p>The wheel wash facilities (consisting of wheel spinner and wheel bar) will be used by all vehicles exiting the Site.</p> <p>The haulage roads will be regularly checked and cleared.</p> <p>Mobile water bowzers will be used on Site for spraying water to minimise dust emissions where necessary.</p>



<p>Tipping, locating storage of wastes.</p> <p>Stored waste (outside of operational hours)</p>	<p>Atmospheric dispersion</p>	<p>Surrounding sensitive receptors</p>	<p>Airborne particulates and build of dust.</p>	<p>When moving materials, drop heights from equipment and vehicles will be kept to a minimum at all times to reduce the risk of wind entrapment causing dust emissions.</p> <p>Operations may be temporarily ceased in accordance with the Risk Matrix presented in Section 6.</p> <p>To minimise the risk of wind whipping of waste stockpiles causing dust emissions outside of operational hours the weather conditions will be assessed at the end of the day to identify if stockpiles need to be sprayed down before the end of the day.</p> <p>Use of water sprays on waste storage stockpiles, when waste is being moved/handled.</p>
------------------------------------------------------------------------------------------------	-------------------------------	----------------------------------------	-------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



Table 5.2 Mitigation Measures

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
Preventative Measures					
Site speed limit, 'no idling' policy and minimisation of vehicle movements on Site.	Reducing vehicle movements reduces dust emissions from the Site. Enforcement of the speed limit and limiting movements will reduce the chance and amount of re-suspension of dust by vehicle wheels.	There is a no-idling policy in place on the site for vehicles. Vehicle movements will be minimised by ensuring that the double handling of materials is avoided where possible. A 5mph speed limit is enforced on the entire Site.	5mph speed limit signage. Enforcement of speed limit by Site Manager and constant observation and reminders by Site operatives.	These measures will be implemented by staff training on the EMS and speed limit signs on the Site.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered. If there is mud on the public h Hollow Lane or Hawkhurst Lane, then a road sweeper will be hired in and deployed to clean the surface. If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease.
Minimising drop heights for waste.	Minimising the height at which waste is dropped should reduce the distance over which dust could be blown and dispersed by winds and reduces the chance of dust cloud generation from the depositing material.	The EMS will require that the handling of waste material on Site should be minimised at all times. Staff will be trained with regard to minimising drop heights.	This measure will be implemented whenever the Site is operational i.e. whenever material is being moved.	By plant operators lowering the shovels, excavators etc. on the equipment being used to move potentially dusty materials.	Mobile water bowsers will also be available to dampen surfaces and stockpiles to reduce dust generation. If excessive dust emissions continue after these measures, then operations shall cease.
Good housekeeping	Having a consistent, regular housekeeping regime that is supported by management, will ensure the Site is regularly checked and issues	The EMS implemented on the Site will have a specific procedure for enforcing good housekeeping.	These measures will be implemented whenever the Site is operational.	Good housekeeping is implemented by following the housekeeping procedure within the EMS and by carrying out site inspections.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the



Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
	remedied to prevent and remove dust build up.	On-site litter will be collected and disposed of daily by a Site Operative to keep the Site tidy.		Details of housekeeping checks are included in the Inspection Checklists, see Appendix 1 Inspection Checklists. Completed Maintenance Checklists are reviewed by the Site Manager on the day that they are completed.	further mitigation measure(s) will be triggered e.g., water suppression.
Wheel washing (consisting of wheel spinner and wheel bar)	Vehicles exiting the site will use the wheel wash facilities to minimise the tracking of mud out on to the haulage road and local highway.	All vehicles exiting the site use the wheel wash facilities. The wheel wash facilities are located on the haulage road so can be safely accessed by all vehicles.	All vehicles will use the wheel wash facilities when exiting the site.	All exiting vehicles will be directed to the wheel wash facilities.	A reason that the wheel wash facilities may not be effective is if it was not operational e.g. insufficient water available. Additional water would made available in this instance (Wheel wash facilities are subject to regular Inspection checks) If the wheel wash facilities are being used and mud is found to be tracked out onto the local highway, then a road sweeper will be employed to clean the affected road.
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	The EMS will state that all vehicles entering / exiting the Site must be sheeted to minimise the likelihood of dust emissions. Excessively dusty loads will not be accepted onto the Site.	The loading of potentially dusty materials on to a vehicle will be followed by closing of the sheet covers on that vehicle. This situation is only anticipated should waste be rejected from site. Visual observation of	The sheeting equipment will be activated and checked to ensure proper coverage before the vehicle is allowed to leave the site. The need for waste to be removed from site only applies to rejected loads. Incoming vehicles that are not sheeted will be rejected	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered. Materials may be dampened.



Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
			<p>incoming vehicles will take place.</p> <p>All vehicles carrying waste to the site will be sheeted at all times unless being loaded or unloaded.</p>	<p>from the site or sheeted immediately.</p>	
<p>Ceasing operations during high winds and/or exceptionally dry conditions.</p>	<p>Mobilisation of dust and particulates is likely to be greater during periods of strong winds or exceptionally dry conditions and hence ceasing operation at these times may reduce peak pollution events.</p>	<p>During exceptionally dry and/or windy conditions, if any operations / Site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormal dust emissions are observed within the Site, site waste operations may be suspended to avoid further dust emissions.</p> <p>The weather conditions at the Site will be considered and recorded at the start of each working day so that the day's work may be planned to take in regard any potential dust emissions. If the wind speed and direction are likely to increase the risk of nuisance to neighbouring receptors, then operations may be temporarily stopped. There is no specific wind speed limit and/or no specific criteria for this to occur, as dust is dependent on other conditions such as rain.</p> <p>The Site Manager will decide whether to cease operations as a result of weather conditions.</p> <p>This decision is based on a combination of factors, including those mentioned above. The conditions are recorded on the Inspection Checklists. The record</p>	<p>If excessive dust is being generated by the operations, then the Site Manager will notify staff and operations may be temporarily ceased.</p> <p>Operations commence once the wind has subsided and/or the area is dampened down.</p> <p>Prevailing weather condition monitoring (Visual observation) including wind strength, wind direction and rainfall. This monitoring will be recorded on the Inspection Checklists.</p>	<p>The Site Manager makes the decision to cease activities that are causing the dust emissions.</p>	<p>N/A</p>



Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
		includes an overall description of the weather conditions including, but not limited to, wind strength (e.g. windy, not windy), wind direction (e.g. towards northern boundary) and rain.			
Remedial Measures					
Road sweeper	Removes the mud from A508 Hollow Lane other public highways and reduces the potential for dust emissions from vehicle movements in the area.	<p>A road sweeping vehicle is hired to control the amount of mud on local roads and minimise the generation of dust when appropriate.</p> <p>The road sweeper will be maintained in accordance with the manufacturer's specifications.</p> <p>Appendix 1 Inspection Checklists will be populated with items on the Site that are required to be maintained on a scheduled basis, such as the wheel wash facilities.</p> <p>The cleanliness of roads in the vicinity of the Site entrance are checked as part of the Inspection Checklists.</p> <p>If the Inspection Checklist identifies a requirement for the road sweeper to be used, then a road sweeper will be hired and deployed to be used by a trained member of staff.</p>	<p>Visual observation of the state of the local roads - findings recorded on the Inspection Checklists in Appendix 1.</p> <p>This identifies the need for the use of the road sweeper. Constant observation by all operatives on the Site.</p> <p>The Site Manager will check on the state of the road at least once daily and if mud is visible on the road, that has been tracked out from the Site, then the road sweeper will be hired and deployed.</p>	The road sweeper would be deployed to clean the local roads. Site management instructs a trained Site Operative to carry out the road sweeping.	N/A
Water suppression	<p>Using mobile water bowsers and hoses. This measure can remove particles from the air and dampen down dry / dusty materials.</p> <p>A mobile water bower will be used to transport water to</p>	Hoses, attached to a water supply, will be in use at the Site to dampen surfaces and material to prevent dust emissions. The condition and integrity of hoses will be checked as part of the Inspection Checklists in Appendix 1.	When materials are being moved and deposited water/hoses and spray equipment will be available for use to ensure that dust emissions are prevented.	<p>The hose is attached to a mobile water bower by Site Operatives. The tap is then switched on to allow water out of the hose.</p> <p>Water sprays will be used to avoid / suppress dust emissions when waste is</p>	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) is triggered. Cease operations



Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
	<p>the location where dust suppression is required.</p>	<p>Mobile water bowsers will be used to allow water to be available at all locations around the Site.</p>	<p>When significant dust emissions are observed to be leaving the Site boundary.</p> <p>Visual observation will be carried out by all employees on the Site.</p> <p>Findings from the visual observations will be recorded on Inspection Checklists.</p> <p>Use of water hoses on the Site are used to minimise dust emissions unless the Site is not operational or there is wet weather.</p>	<p>tipped off from vehicles and when this material is being deposited.</p>	<p>causing the dust emission.</p>



Other considerations:

Water availability

- 5.6. There is a mains water supply within Crouch's Farm, and this is used to provide water necessary for dust suppression equipment used on the Site.
- 5.7. To prevent dust generation waste may be dampened down using water from hoses attached to the mobile water bowsers.
- 5.8. Dust suppression equipment includes a trailer mounted water bowser that can be moved around the Site as necessary.
- 5.9. In this way, water can be supplied to all areas of the Site, including the haulage road. Hoses and spray attachments are used to dampen materials and surfaces and to control any dust emissions.

In the event of a drought

- 5.10. During exceptionally dry and/or windy conditions, if any operations / site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormally high dust emissions are observed within the Site, operations may be suspended to avoid further dust emissions. This will be decided by the Site Manager.
- 5.11. Depending on the severity of the drought conditions, restrictions may be in place on the amount of water available for use on Site from the supplier (mains water supply). In this case, operations may be reduced or suspended in order to comply with any water usage restrictions.
- 5.12. When possible alternative sources of water will be sourced, and mobile bowsers will be used to import and supply water for dust suppression during the event of drought or other water shortage.



6. Cessation of Operations for Dust Mitigation

- 6.1. The following section details the assessment process to be taken when determining if activities on Site should stop to prevent significant dust emissions.
- 6.2. Weather conditions are monitored each working day as part of the daily inspection checklist. See Appendix 1: Inspection checklists.

Estimating Magnitude of Risk

- 6.3. Table 6.1 provides a matrix for estimating the magnitude of risk from a potential hazard, considering both the probability and consequences of the hazard occurring.
- 6.4. The magnitude of risk determines the level of management required to reduce the probability of the hazard occurring.
- 6.5. In this management plan, the hazard is considered to be the significant emission of dust from the Site such that it could cause nuisance to local sensitive receptors. Table 6.1 describes this Risk Matrix applied to this assessment of risk.

Table 6.1 Estimating the magnitude of risk

	Magnitude of Risk	Consequence			
		High	Medium	Low	Negligible
Probability	High	Very high	High	Medium/Low	Very low
	Medium	High	Medium	Low	Very low
	Low	High/Medium	Medium/Low	Low	Very low
	Negligible	High/Medium/Low	Medium/Low	Low	Negligible

- 6.6. An assessment of the most common weather conditions and their potential to generate significant nuisance dust emissions from the activities on Site has been undertaken and is presented in Table 6.2 to Table 6.4.
- 6.7. The risk assessment is separated into 2 sections. In table 6.2 the operator must record the temperature and then proceed to the corresponding table. Tables 6.2 and 6.4 contain all common weather conditions and their risk magnitude. Actions required for each risk category are detailed in table 6.5.

Table 6.2 Temperature

Temperature	Action
Warm (Above 18°C)	Go to table 6.3
Cool (Below 18°C)	Go to table 6.4

Table 6.3 Risk matrix for warm weather

Conditions	Probability	Consequence	Risk magnitude
Wet, low wind (<3 Beaufort)	Medium	Negligible	Very Low
Wet, medium wind (>4 Beaufort)	Medium	Low	Low
Wet, high wind (>8 Beaufort)	Low	Medium	Medium/low
Dry, low wind (<3 Beaufort)	Medium	Low	Low
Dry, medium wind (>4 Beaufort)	Medium	Medium	Medium
Dry, high wind (>8 Beaufort)	Low	High	High

**Table 6.4 Risk matrix for cool weather**

Conditions	Probability	Consequence	Risk magnitude
Wet, low wind (<3 Beaufort)	Medium	Low	Low
Wet, medium wind (>4 Beaufort)	Medium	Low	Low
Wet, high wind (>8 Beaufort)	Low	Medium	Medium/low
Dry, low wind(<3 Beaufort)	Medium	Low	Low
Dry, medium wind (>4 Beaufort)	Medium	Low	Low
Dry, high wind (>8 Beaufort)	Low	Medium	Medium

6.8. The action required for each level of risk is provided in Table 6.5: Action required for each level of risk.

Table 6.5: Action required for each level of risk

Risk Magnitude	Action
Low	Continued implementation of preventative mitigation measures.
Medium	Continued implementation of preventative mitigation measures. Dust emissions are likely therefore remedial measures to be employed. Relevant activities* temporarily cease if preventative and remedial measures are not proving effective in controlling the dust emission. Relevant waste activity can resume upon implementation of additional mitigation if measures are effective. Relevant waste activity can resume when the conditions no longer apply/ additional remedial mitigation is implemented and there are no significant dust emissions.
High	Continued implementation of preventative mitigation measures. Dust emissions are likely therefore remedial measures to be employed. Relevant waste activity may not be undertaken or will be temporarily ceased. Relevant waste activity can resume when the conditions no longer apply / additional remedial mitigation is effectively implemented and there are no significant dust emissions.

*Relevant activities: Activities identified as generating significant dust emissions or having the potential to generate significant dust emissions in such conditions.



7. Monitoring

Visual Dust Monitoring

- 7.1. Dust emissions at the Site will be monitored by visual observation.
- 7.2. Visual monitoring will be undertaken during operational hours. It is expected that staff members will also check for dust emissions as they approach and leave the Site (twice a day).
- 7.3. It will be the responsibility of every member of staff to monitor the dust emissions on the Site as they undertake their daily tasks.
- 7.4. Reports will be made to the Site Manager regarding dust emissions when significant amounts of dust is observed leaving, or about to leave, the Site boundary.
- 7.5. If excessive dust emissions (dust clouds) are observed, then the Site Manager will establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken will be recorded and retained.
- 7.6. Visual dust monitoring will be undertaken by Site staff continuously when the Site is operational. This will be recorded on the Inspection Checklist, see Appendix 1 Inspection Checklist.
- 7.7. The recorded visual monitoring checks will be carried out by a Site Operative, who will have been trained in accordance with the Dust, Maintenance and Housekeeping procedures within the EMS. Remedial actions required will be specified and identified on the Inspection Checklists.



8. Actions when an alarm is triggered

- 8.1. Monitoring will be carried by visual observation and assessing whether dust emissions are excessive i.e. leaving the Site boundary.
- 8.2. The staff member who identified the dust generation/ emission will raise the alarm by notifying the Site Manager.
- 8.3. If the Site Manager confirms that dust is being generated and causing dust emissions from the Site, they will take remedial action.
- 8.4. Remedial measures are stated in Table 5.2 Mitigation Measures.**Error! Reference source not found.**



9. Reporting and complaints response

- 9.1. The EMS on the Site will have a procedure for responding and dealing with complaints. A complaints form is included in the EMS and must be completed and stored whenever a complaint is received in accordance with the EMS complaints procedure.

Engagement with the Community

- 9.2. The Site Notice Board will be placed at the entrance of the Site with the following information:
- The Permit holder's name (PJ Brown (Civil Engineering) Limited).
 - An emergency contact name and telephone number.
 - A statement that the Site is permitted by the Environment Agency
 - The Environmental Permit reference.
 - The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).
- 9.3. The provision of the above information will ensure that members of the community can contact the Operator should they be concerned by dust emissions or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

Reporting of Complaints

- 9.4. Should a complaint regarding dust be received by the Site, the complaint will be recorded on the Complaints Form in the EMS and investigated in accordance with the Complaints Procedure within the EMS. The Complaints Form will record who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again. A copy of the Complaints Form is included as Appendix 2, see Appendix 2 Complaints Form.
- 9.5. The Site Manager will identify what caused the excessive dust emission to be generated. This generation may have been caused by failure of Site machinery or dust procedures. If the excessive dust emission has been caused by a procedure not being carried out properly, then staff will receive further training on the dust procedures and site management. If the excessive dust emission has been caused by plant failure, then the plant will be repaired as soon as possible.
- 9.6. All complaints will be acknowledged and investigated, with resultant actions reported to the complaint. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day.

Out of Hours Arrangements

- 9.7. In the event of an out-of-hours complaint or incident occurring at the Site related to dust emissions, then a Site manager can be contacted via phone call.
- 9.8. The Site manager can attend the Site or instruct a relevantly trained Site Operative to attend the Site in their absence. On arrival at the Site, the cause of the dust emission will be identified, and the most suitable corrective measure will be instigated.
- 9.9. Outside of operational hours the only potential source of nuisance dust will be wind whipped from stockpiles and the Site surface. The risk of this causing a nuisance to local sensitive receptors is minimised through the dampening down of surface and stockpiles prior to staff leaving for the day.
- 9.10. At the end of each working day weather conditions are to be assessed to determine if additional spraying of stockpiles is required. These conditions include prolonged hot, dry weather (>20 degrees) and windy conditions (Beaufort scale >4). If these weather conditions present a significant risk, then waste stockpiles will be dampened prior to the Site closing.

Management Responsibilities

- 9.11. Site staff will be responsible for dust management issues and detecting/reporting dust emissions. All members of staff will be given training on the EMS for the Site, which will include a Dust Procedure. All



staff on the Site will be trained on the Dust Procedure which will include details regarding mitigation measures and monitoring/recording visual inspections.

- 9.12. On receipt of a complaint the Site Manager will investigate and establish the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant will be contacted with details of the actions to be implemented and the estimated timescales for completion. The maximum response time for investigating the cause of the complaint and contacting a complainant will be two working days.
- 9.13. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) will be investigated in accordance with the Accidents, Incidents & Complaints Procedure within the EMS. Operations on the Site will cease, should excessive dust emissions be seen leaving the boundary following the implementation of additional mitigation measures or when instruction from the Environment Agency to cease operations has been received.



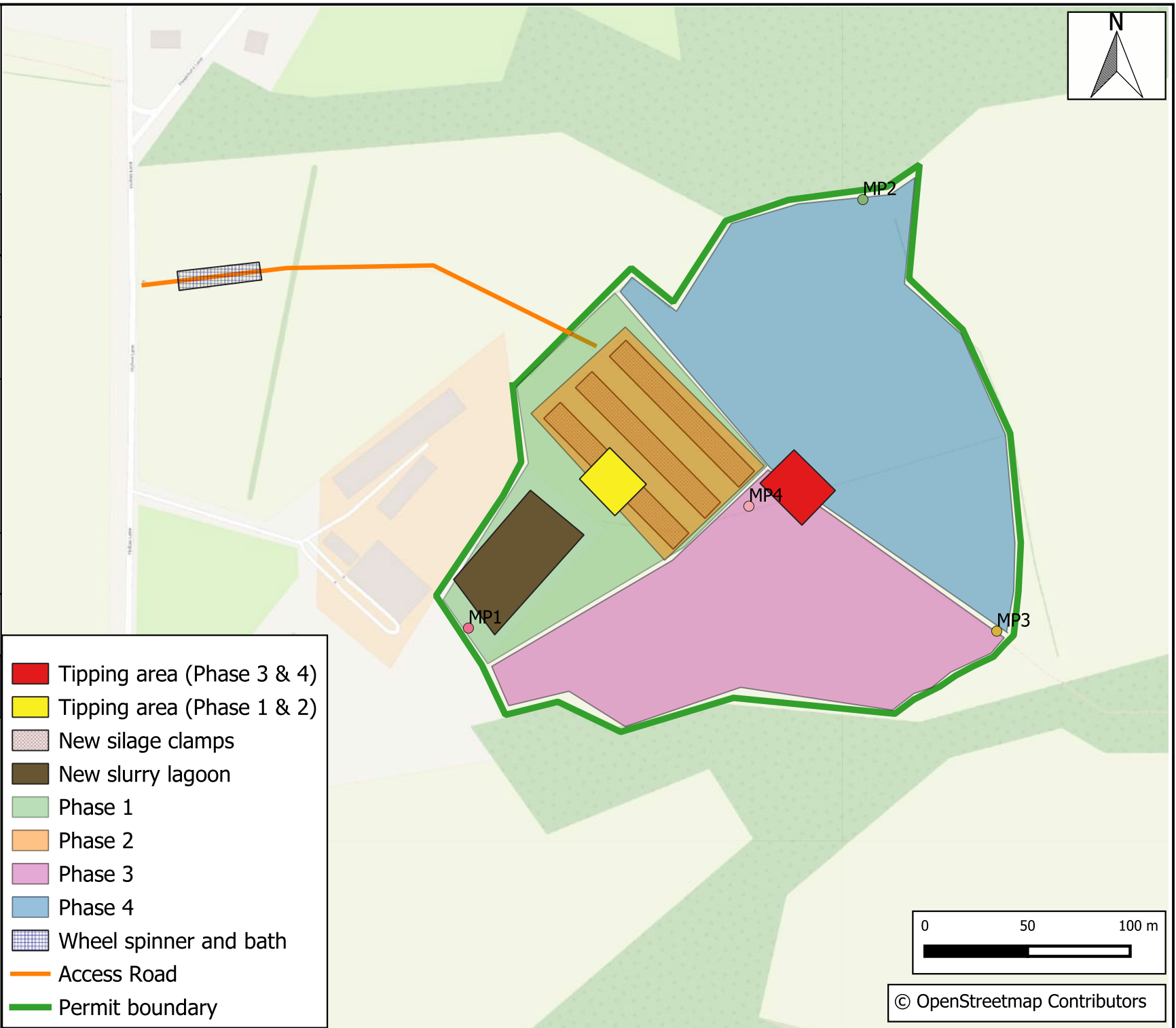
Drawings

Drawing No. 21/014j 001

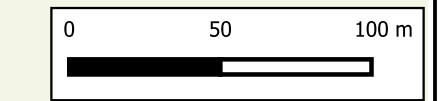
Site Layout Plan

Drawing No. 21/014j 002

Sensitive Receptors Plan



-  Tipping area (Phase 3 & 4)
-  Tipping area (Phase 1 & 2)
-  New silage clamps
-  New slurry lagoon
-  Phase 1
-  Phase 2
-  Phase 3
-  Phase 4
-  Wheel spinner and bath
-  Access Road
-  Permit boundary



Legend

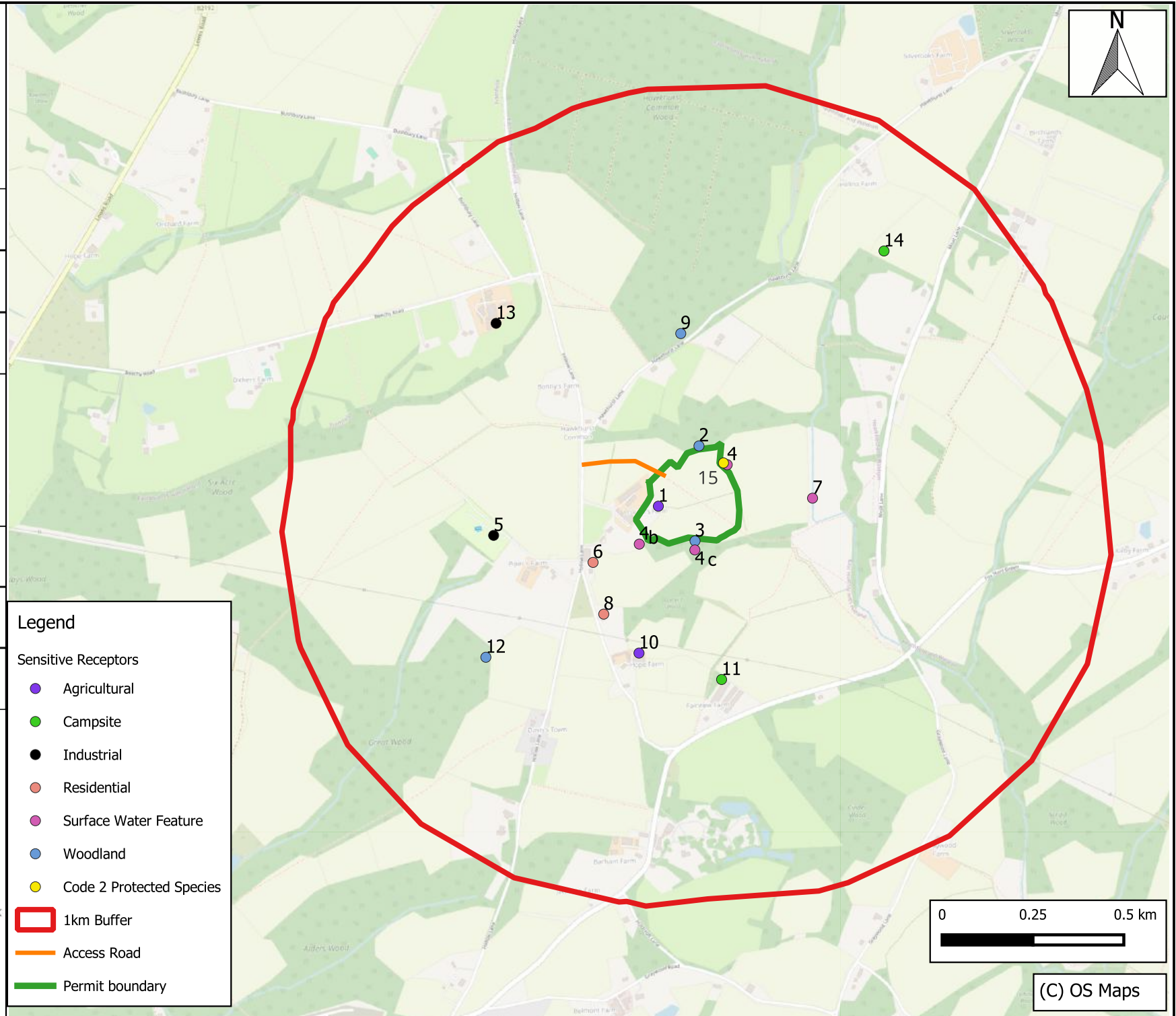
Sensitive Receptors

- Agricultural
- Campsite
- Industrial
- Residential
- Surface Water Feature
- Woodland
- Code 2 Protected Species

1km Buffer

Access Road

Permit boundary





Appendix 1

Inspection Checklists



Daily Checklist

V.1 November 2023

Item	Aspects	Checked ✓ / ✗	Comment	Remedial Action (if required)	Action Form ✓ / ✗	
					Required	Completed
Litter	Within waste operation area					
	Along Site boundaries					
	Immediately outside Site entrance and exits					
Signage	Adequate and clear					
Roads	Public highways (Hollow Lane and Hawkhurst Lane) clear of mud and debris					
Dust Emissions	No excessive dust emissions should be escaping the boundary of the Site					
Plant / Equipment	Cleanliness and good housekeeping after use					
Housekeeping inspection	Haulage road clear of mud and debris.					
Weather	Absence of adverse weather conditions -wind >Beaufort scale 4 -prolonged dry and hot (20 deg) weather. Provide a description of the weather.					
Wheel Wash	Sufficient water in the wheel wash					

Date: _____ Time of Check: _____ Completed by: _____ Signature: _____



Weekly Checklist

V.1 November 2023

Item	Aspects	Checked ✓ / ✗	Comment	Remedial Action (if required)	Action Form ✓ / ✗	
					Required	Completed
Site Security	Locks on gates working and no holes in gate.					
	No damage to boundary					
Water Hoses	Hoses in good condition					

Date: _____ Completed by: _____ Signature: _____



Annual Checklist

V.1 November 2023

Item	Aspects	Checked ✓ / ✗	Comment	Remedial Action (if required)	Action Form ✓ / ✗	
					Required	Completed
Haulage road to Site	In good condition, no potholes/damage					

Date: _____

Completed by: _____

Signature: _____



Appendix 2

Complaints Form



Complaints Form

Who made the complaint?	Name:	
	Address:	
	Phone No.:	
Date and time they made the complaint:		
What happened? What was it about?		
Was anyone else aware of this – other neighbours or your staff? If so, who?		
Did the complaint relate to your site? If so, what happened? What went wrong?		
What have you done to make sure that it does not happen again?		
Was there any significant pollution – for example: dust, odour or noise outside the site or spillage of polluting liquids onto the ground, into a drain or a watercourse?		
If there was, then you must notify the Environment Agency on 0800 807060 and any other relevant regulators. Have you done so? Yes <input type="checkbox"/> No <input type="checkbox"/>		At what time did you phone?
You must also write or send an email to confirm this to your local Environment Agency office. Have you done so? Yes <input type="checkbox"/> No <input type="checkbox"/>		What date did you contact?
Please print and sign our name:		



Appendix 3

Dust Procedure and Form

Dust Control & Monitoring

Purpose: To control and monitor emissions of dust, fibres, and particles from the recovery operations at Crouch's Farm, East Sussex.

	RESPONSIBLE PERSON	RECORD
1. The most common cause of dust on site is from the following: <ul style="list-style-type: none"> • Material handling and movement • Vehicle movements 		
2. The boundary of the Site can be seen on Drawing No 21/014j 001 Site Layout Plan and is shown by the green line boundary.		Drawing No. 21/014j 001 Site Layout Plan

Mitigating the Impacts of Dust

3. Dust suppression equipment includes a trailer mounted water bowser with spray equipment that can be moved around the Site as necessary.		
4. Water is able to be supplied to all areas to the Site, including the access road.		
5. The handling height of material will be kept to a minimum where possible for all mobile plant in order to reduce the distance over which dust and particulates could be blown and dispersed by winds.		
6. A 5mph speed limit and the minimisation of vehicle movements is enforced to help minimise the amount of dust generated by vehicle wheels.	Site Manager	
7. There is a no idling policy implemented for vehicles on site.		
8. The mitigation measures listed above will be implemented at all times the site is operational for.		

Dust Monitoring

9. It is the responsibility of every member of staff to be vigilant to the emission of dust arising from operations. Any significant emission of dust should be reported to the Site Manager and appropriate action taken to avoid risk of this causing nuisance.	Site Operative	Inspection Checklist
10. The Inspection Checklist will be completed daily. The Inspection Checklist includes details on dust.		Inspection Checklist

Actions in case of significant dust emissions

11. More frequent dust monitoring will be completed when: <ul style="list-style-type: none"> • Windy weather conditions are recorded. • Dry weather conditions are recorded. • A complaint is received 	Site Manager	
12. During exceptionally dry and/or windy conditions, if any operations are likely to cause visible dust emissions beyond the boundary, or if abnormal dust emissions are observed within the boundary, operations may temporarily cease to avoid further dust emissions.		

**RESPONSIBLE
PERSON** **RECORD**

13. Records of dust monitoring will be kept in a secure place until the deployment has been complete and for a further 12 months.