

N&P Crayford Materials Recycling Facility Ltd.

Litter and Dust Management Plan (L&DMP)

**N+P Crayford MRF Ltd
Century Wharf
Crayford Creek
Dartford
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LITTER MANAGEMENT PLAN ISSUE LOG

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1. INTRODUCTION

1.1. Litter and Dust Management Plan - Objectives

This document outlines the measures that shall be implemented and maintained by N+P throughout the operational life of the site to assess, minimise and, wherever possible, to prevent the escape of airborne litter and dust from the confines of Crayford Materials Recycling Facility (MRF) in accordance with Condition 5.1 and 5.5 of EPR/KB3806FD.

It provides the explicit list of 'appropriate measures' required for effective litter and dust management and control, and serves to aid the decision-making process on the choice of controls, general site design, and operational practice in line with current industry best practice.

The Litter and Dust Management Plan (L&DMP) is a working document with the specific aim of ensuring that:

- Permit Condition 5.1 and 5.5 is complied with;
- All potential litter and dust sources are identified;
- Litter and dust impact is considered as part of routine site inspections;
- Litter and dust is primarily controlled at source by good operational practices, the correct use and maintenance of plant/infrastructure, and operator training;
- All appropriate measures are taken to prevent or, where that is not reasonably practicable, to minimise airborne litter and dust release from the installation boundary;
- Potential receptors outside of the site are not exposed to levels of litter and dust that would result in harm to the environment or loss of amenity;
- The risk of unplanned litter/dust releasing incidents or accidents are minimised; and
- Site developments take into account the potential for escape of litter/dust from site.

The L&DMP forms part of N+P's Environmental Management System (EMS).

1.2. Key Reference Documents

The methodologies presented take full account of Environment Agency (EA) and other guidance documentation, as detailed below:

- The Environmental Permitting (England and Wales) Regulations 2010
- Operational Development Management Plan (Site Working Plan / ODMP)
- Dust & Emission Management Plan (DEMP)

2. SITE ENVIRONMENTAL SETTING

2.1. Installation Details

Crayford MRF is located on land at Century Wharf, Crayford Creek, approximately 2 km to the north of Crayford and Dartford Town Centres, and south of the River Thames at National Grid Reference TQ 528 757.

The site is bound to the west by the Dartford / Slade Green / Barnehurst railway link, with the land beyond comprising solely of industrial units. Third party waste management activities are located directly to the south, with the River Cray and A206 located some 50 m and 270 m further south of the site boundary respectively. A former landfill restoration is located directly to the east of the site, with pasture land extending to the north.

The facility is designed to take both co-mingled and pre-segregated recyclables; material is then separated into component fractions. These are either bulked or baled and stored on site prior to onward transportation to suitable re-processors.

2.2. Pathway Assessment

Local meteorological data is routinely recorded by the calibrated on-site weather station, located at the site office. This will include wind speed and direction, rainfall and atmospheric pressure. If litter becomes airborne, weather information, cause, time and location must be recorded in the site diary.

2.3. Potential Receptor Locations

Review of the site's environmental setting has highlighted potentially sensitive off-site receptors with regards to any litter and dust escape from Crayford MRF, as follows:

Receptor Name	Type of Receptor	Distance from Site (m)	Direction from Site	Complaint History (H/M/L)	Sensitivity (H/M/L)*
River Cray	Watercourse	50	S	n/a	M
A206	Public Highway	270	S	n/a	M
Industrial Unit	Commercial	Adjacent	N	n/a	M
Industrial Units	Commercial	50	W	n/a	L
Former Landfill	Commercial	900	E	n/a	M
Pasture Land	Hamlet	600	N & E	n/a	M
Dartford	Residential	2000	W	n/a	L
Crayford	Residential	2000	NW	n/a	L

*Receptor potential sensitivity has been subjectively assessed based on proximity to site, prevailing local weather conditions, and associated consequences of litter escape.

This L&DMP has been written with due regard to the potential for site operations to impact upon the key off-site receptor locations listed above.

3. LITTER AND DUST CONTROLS

In line with current industry best practice, the litter and dust controls set out in the sections below will be used as the ‘appropriate measures’ to minimise and, wherever possible, prevent the escape of litter from Crayford MRF.

3.1. Overarching Management Responsibility

The Plant Manager (or Deputy) will have responsibility for ensuring that the potential for litter escape from the facility is minimised. Adequate staffing levels will be maintained at all times to ensure the effective operation of the facility.

Site meetings will be held at minimum quarterly intervals for site management to discuss current and planned site operations with respect to their potential for generating airborne litter. Identified actions arising from the meetings and responsibilities for their completion will be recorded within the meeting minutes prior to circulation within N+P to the relevant personnel.

3.2. Identification of Potential Litter and Dust Sources

In constructing robust risk based management protocols for the site, it is recognised that there are three primary potential litter and dust sources associated with the activities undertaken at Crayford MRF:

- The tipping of bulker vehicles at the facility
- Previously tipped unprocessed feedstock material
- The mechanical movement of waste (loading shovel)

These matters are addressed further in the relevant sections below.

3.3. Waste Feedstock Inventory

With due regard to the potential for waste feedstock material to be inherently susceptible to becoming wind-blown and airborne, key waste streams received at the site are detailed below. Assessment of the associated potential for litter escape from the site under ‘normal’ operational conditions is provided below.

	Waste Type	Windblown Litter Potential (Low, Moderate, High, Very High)
1	Comingled recyclates	Moderate
2	Loose paper and light plastics	High
3	Mixed plastic bottles	Low
4	Mixed plastic, cans and glass	Low
5	Hard plastics	Low
6	Glass	Low
7	Cardboard	Low

Due to the types of waste that the existing activities on site handle, dust is not an issue on site. The existing waste stream accepted on site (mixed recyclable waste, plastic

waste, glass, metals and paper and cardboard) are not dusty wastes and will not create emissions to air of dust.

The SRF produced by the proposed new plant will be derived from clean Dry Mixed Recycling (DMR) which is a product from the existing activities on site. No additional wastes will be accepted by the site as a result of the new plant. Assessment of the associated potential for dust from the site under 'normal' operational conditions is provided below.

	Waste Type	Windblown Dust Potential (Low, Moderate, High, Very High)
1	Comingled recyclates	Low
2	Loose paper and light plastics	Low
3	Mixed plastic bottles	Low
4	Mixed plastic, cans and glass	Low
5	Hard plastics	Low
6	Glass	Low
7	Cardboard	Low

3.4. Feedstock Reception and Storage

Every load accepted onto site will be subjected to pre-acceptance and acceptance checks and inspected by trained site operatives.

Wherever practically possible, the feedstock reception operation will be conducted in the dedicated material reception bays and sheltered tipping building. Mobile plant will be used to ensure that materials are contained within the sheltered tipping bays/buildings.

When required, and as determined by the Plant Manager or deputy, additional mobile waste netting will be placed around wastes that have been identified as having the potential for litter to escape beyond the site boundary.

When required, and as determined by the Plant Manager or deputy, other suitable controls to prevent litter/dust escape will be considered.

3.5. Litter Pickers

Litter pickers are employed at all times on all shifts to collect and minimise loose material / litter within the site boundary. Litter picking of neighbouring properties is undertaken as required and as directed by the Plant Manager or deputy following the daily site inspection.

If litter does escape the boundary of the site, this material will, so far as is reasonably practicable, be collected within 1 hour and, in any case, by the end of the working day. If this cannot be achieved, additional staff will be taken from other site duties and assigned to litter picking duties. Litter will be recovered as soon as practicable utilising all appropriate available resources.

3.6. Waste Bulker Vehicles

All vehicles that contain waste are sheeted before leaving the site or are otherwise enclosed to prevent the escape of litter and dust onto the access road and public highway.

The site will also benefit from a speed limit of a maximum of 10mph to minimise the generation of dust on site.

3.7. Site Infrastructure

Site infrastructure and plant will be inspected for damage and wear by the Plant Manager or appointed responsible person at a minimum weekly frequency. Records of these checks will be maintained in the site log. The existing processing activities are enclosed within the mini MRF building and plastic processing plant building.

The majority of the SRF treatment process will be undertaken internally, with enclosure of external conveyors to prevent emissions of litter and dust.

The two feed hoppers (one for the recycled residual sub 50mm material and the other for recycled residual >150mm) will also benefit from partial enclosure using a steel frame and cladding to minimise material escape.

3.8. Cleaning Schedule

The site will benefit from concrete hardstanding which will be well maintained and regularly inspected for signs of dust, litter and debris. All concrete hardstanding will be kept clean by means of sweeping and/or washing and free from excess levels of dust and litter. A road sweeper will be operational each morning and additionally throughout the shifts if required.

Daily cleaning schedules will be undertaken to prevent dust and litter escaping the hoppers. All site and equipment is cleaned twice on each 12 hour shift. A 30 minute clean is undertaken within the first half of the site and an hour long clean towards the end of the shift.

3.9. Training

All personnel working at the site are subject to a formal documented training programme in accordance with Company procedures. Matters relating to site litter and dust management and control form part of this core training programme for all individuals.

3.10. Community Liaison

Site contact details and emergency (out-of-hours) numbers are shown on the site entrance gate. Direct feedback to site is encouraged at all times in relation to any perceived issues associated with operational activities.

3.11. Unit Emergency

In the event of site emergency, the Plant Manager will be notified without delay. The relevant site UEP (Unit Emergency Plan) will be implemented by the responsible person(s).

4. CRAYFORD MRF LITTER AND DUST MONITORING

4.1. Meteorological Conditions

An on-site meteorological station is correctly installed, calibrated and maintained in order to measure and record weather conditions (including atmospheric pressure, and wind speed and direction) at regular automated intervals. The station is considered to reflect local and site meteorological conditions.

This will enable the identification of weather conditions that may potentially cause litter and dust control issues and allow remedial actions to be implemented, such as modifications to external activities, the installation of additional controls and/or an increase in monitoring resources.

4.2. Daily Site Inspection

All site personnel are responsible for reporting any litter and dust problems immediately to the Plant Manager (or appropriate responsible person).

The Plant Manager or responsible person will ensure that daily inspections are completed, which will include an assessment of litter on site, at the site boundary, and off-site. A further inspection of the integrity of the storage areas and netting will also be completed and recorded. Any issues identified will result in the appropriate actions being taken as outlined in Section 5.2 below.

Observations will be recorded on the site daily inspection document, which will be maintained at the site office. Weather information captured by the weather station is recorded on the daily site inspection document. This will include wind speed & direction, rainfall and atmospheric pressure. If litter becomes airborne, weather information, cause, time and location will be recorded in the site diary.

5. LITTER AND DUST ACTION PLAN

5.1. Environmental Complaint Investigation

The following actions will be taken on receipt of an external complaint:

- A. The responsible person receiving the complaint at the site will initially record the key details using the Complaint Report Form, Appendix I. The form sets out the key information that must be recorded at this time in order to facilitate further suitable investigation.
- B. The Plant Manager will be informed of the complaint as soon as possible, including the location, time and date of the complaint being logged (where available).

In recognising that amenity issues can be transient and short-lived, timely notification of complaints directly from the complainant and / or the Environment Agency is

imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to N+P, it will not be possible to fully investigate or substantiate the complaint. N+P will, however, complete and record a comprehensive complaint investigation, as set out below, for all complaints received at the site.

If the complaint is received within 12 hours of the incident, the Plant Manager (or appointed representative) will visit the complaint location as soon as possible in order to subjectively determine the extent of any amenity impact.

Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.

The Plant Manager will subsequently undertake the following further assessment process:

- A. Review of the site operations at the site prior to and at the time of the complaint;
- B. Review of the environmental control systems prior to and at the time of the complaint;
- C. Review of the meteorological conditions (wind speed / wind direction / rainfall / atmospheric pressure) prior to and at the time of the complaint to establish whether a pathway can be established between the site and the complainant;
- D. Review of the previous complaint history at the location identified.

The complaint details will be transferred to N+P's internal Incident Management System in accordance with company procedures.

Where necessary, N+P will contact the Environment Agency to discuss each complaint incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed. If the necessary contact details are available and direct feedback has been requested, N+P will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.

5.2. Action Plan

In the event that material is becoming airborne and has the potential to escape from site, the following actions shall be taken:

Responsible Person(s):

N+P's primary point of contact will be the Plant Manager for the site on all matters associated with site operations and environmental performance. In the event that the Plant Manager is unavailable or non-contactable, the persons detailed within the unit emergency plan will be contacted.

Actions:

The Plant Manager will be informed. Thereafter the Plant Manager will co-ordinate with (where appropriate):

If the incident relates to receipt of an external complaint, an investigation will be completed in accordance with Section 5.1, above.

If not previously undertaken, the Plant Manager or appropriate responsible person will undertake a site investigation in order to determine the likely cause(s) of the off-site litter escape.

The site investigation will incorporate detailed assessment of the site infrastructure and process conditions against the specific requirements of the facility litter controls set out in Section 3, above, to determine any diversion away from 'normal' site operating conditions.

Key items for consideration will be as follows:

- Material inputs – change in waste type, volume
- Potential litter/dust sources – waste movements, loading and unloading
- Waste reception bays/buildings – building integrity, housekeeping, netting control
- Mechanical breakdown – hopper, trommel, conveyors, etc
- Procedural failure (human error)
- Short-term abnormal weather patterns - wind direction, speed temperature, etc
- Abnormal operating conditions - temporary activities.

Upon identification of the likely litter/dust source(s), the appropriate corrective and preventative measures will be identified and implemented under the direction of the Plant Manager. All reasonable steps will be taken to prevent escape or further escape. These measures may include amendments to the process design. Additional support and technical expertise will be provided by internal / external technical specialists, as required.

5.3. Timescales

In the event that it proves impracticable to carry out adequate remedial measures within one working day, the Plant Manager will notify and agree with the Environment Agency the proposed actions and the timescales for their completion as a programme of works.

5.4. Recovery Procedure

In the event of a temporary closure of the site to tipping vehicles, it may be necessary to divert materials to alternative processing sites.

Notice of the temporary site closure will be given the appropriate plant managers and supervisors. The recovery team will convene and review additional actions that may be required. Customers will be informed promptly of the diversion plan by their account managers. All managers will be informed of the decisions and given an estimated time to the return to either full or partial service. Members of the recovery team will supervise their own area of expertise. The facility will be secured.

5.5. Records

Details of litter and dust 'non-conformances' including subsequent investigations, timescales and remedial measures taken, and notifications of the relevant internal and external bodies will be recorded by the Plant Manager or deputy on the internal Incident Management System and site diary in accordance with company procedures.

5.6. Additional Supportive Monitoring

The requirement for (and frequency of) additional supportive monitoring will be agreed between the Plant Manager HSE-Q Business Partner. This may include, but not be limited to, additional on-site and off-site litter inspections.

6. DOCUMENT AUDIT AND REVIEW

6.1. Review Requirement and Timescale

While operations continue at the site that could give rise to the generation of windblown litter and dust, this litter and dust management plan will be formally reviewed at a minimum quarterly intervals in order to ensure the stated management controls and conditions continue to reflect best available techniques and the operational requirements/sensitivities at the site, which may change over time.

An updated copy of the management plan will be submitted to the Environment Agency following review, as required. Any required changes to the conditions set out within this document will be formally agreed with the Environment Agency prior to their implementation. In potentially critical circumstances where N+P proposes the immediate implementation of changes to the management plan to prevent or reduce litter emissions, these will be discussed with the Environment Agency but may be actioned by N+P ahead of formal agreement with the Environment Agency.

6.2. Audit

The processes described in this document will be audited by N+P's HSE-Q Department in accordance with the Company's auditing procedures. Audit reports will be maintained at the site office.

6.3. Review and Plan Update

This management plan sets out the appropriate measures N+P will undertake in controlling any potential windblown litter emissions from the facility. If, on review of the performance of the facility, N+P and/or the Environment Agency propose to seek revision of this plan, then the following course of action will be undertaken by both parties:

In potentially critical circumstances where N+P recognises the requirement for the immediate implementation of changes to the management plan to prevent or reduce significant litter emissions, these changes will be discussed with the Environment Agency without delay but may be actioned by N+P ahead of formal agreement with the Environment Agency.

Where N+P proposes changes to the management plan that involve a more strategic and/or phased approach rather than a need for immediate implementation, a formal proposal will be submitted by N+P to the Environment Agency setting out the specific issues arising from document review, and the options/issues requiring N+P's further attention following Agency approval. The Environment Agency will review N+P's submission/updated management plan and confirm they are satisfied with the proposed changes. Where possible, the response should be within 28 days of receipt of

N+P's submission. The agreed required changes will then form the future 'appropriate measures' for the site with regard to litter management and control.

Where changes to the management plan are proposed by the Environment Agency, these will be discussed with N+P setting out the Environment Agency's clear expectation from the changes in addition to timescales for their implementation. It is recognised that these changes may range from matters that require immediate implementation to those that may be implemented over an extended timeframe. In each case, the required changes will be discussed with N+P and an appropriate action plan agreed. N+P will (wherever possible) undertake the identified changes in accordance with the timescales proposed for the work, at which point the updated 'appropriate measures' will take effect.

[END]

Appendix I - Complaint report form environmental complaint report form.

To be completed upon receipt of complaint then passed to the Plant Manager or responsible person for further action.

Complaint Reference Number		EA NIRS reference				
IMS Ref		Name, Address and Contact Details of Complainant:				
Date/Time Complaint Received:						
Date/Time of Complaint Event:						
Complaint Received From: EA / Resident / EHO / Website <i>(delete, as appropriate)</i>						
Feedback Requested: Yes/No <i>(delete, as appropriate)</i>		Yes/No <i>(please delete, as appropriate)</i>				
Type of Complaint <i>(e.g. odour, noise, litter, etc):</i>						
Location of Incident <i>(if not at above address):</i>						
Direction of Incident from Site <i>(e.g. NW):</i>						
Complainants Description of the Incident: 1. Odour/noise type 2. Extent of issue <i>(localised/widespread)</i> 3. Intensity <i>[scale of 1 (faint) to 5 (very strong)]</i> 4. Duration 5. Constant or intermittent						
For completion by the Plant Manager or responsible person						
Off-Site Investigation Completed: Yes / No <i>(delete, as appropriate)</i>	<i>(If no, state why?)</i>					
Survey Log Sheet Reference Number(s):						
Management Plan Actions Completed: <i>(See Section 5.1 of LMP)</i>	1	2	3	4	5	6
Meteorological details at time of complaint						
Weather Description <i>(e.g. dry, rain, snow, fog, etc)</i>	Wind Direction <i>(e.g. from the NE)</i>	Wind Speed	Atmospheric Pressure <i>(mb)</i>			
Site operational details at time of complaint, and complaint history						
What was happening on site at the time of the complaint that might relate to the incident?						
Were all environmental control systems fully operational at the time of the complaint?						
Have any other complaints been received previously from this location?						
Are there any other complaints from other locations relating to the same incident?						
Any other relevant information?						
To be completed by the Plant Manager upon completion of investigation						
Does this complaint relate to N+P activities?				Yes / No / Undetermined <i>(please delete, as appropriate)</i>		
Actions taken:						
Form Completed By (print name):						
Date:						
Signed:						