



Crown Quay Lane, Sittingbourne: Dust Management Plan

Prepared for

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1 Introduction

1.1 Background

This Dust Management Plan (DMP) has been prepared by Stantec UK Ltd (Stantec), on behalf of Keltbray Built Environment Limited (Keltbray) in support of an Environmental Permit (EP) application. This DMP relates only to the management of dust during the proposed deposit of waste for recovery activities to be undertaken at Land East Of Crown Quay Lane Sittingbourne, Kent, ME10 3ST (the Site).

It is understood that Keltbray will be the 'Operator' under any future EP and in its role as Contractor to the Developer of the Site, Bellway Homes Ltd (Bellway).

This DMP has been prepared in conjunction with the following, relevant guidance:

- Risk assessments for your environmental permit (Environment Agency, 2018a);
- Control and monitor emissions for your environmental permit (Environment Agency, 2018b); and
- Dust and particulate management plan template (Environment Agency, undated).

This DMP provides detailed information on the sources, risks and mitigation measures related to the potential emission of dust from the proposed deposit of waste for recovery operations to be undertaken on the Site.

1.2 Proposed deposit for recovery operations

On 22 June 2022, planning permission (re. 20/503325/FULL) was granted by Swale Borough Council was granted for the:

“Erection of 107 residential dwellings together with associated access, infrastructure, drainage, open space and landscaping.”

As part of this development, it is required to increase levels at the Site to construct a development platform to facilitate the construction of residential dwellings. As such, extant on-site waste and imported materials are required.

It is estimated that 26,000m³ of material is required to construct the development platform. The material to construct this platform will comprise of the following:

- 14,000m³ of waste already present on the Site at the time of EP application (which will undergo stabilisation separately to the deposit for recovery EP)
- 12,000m³ of inert waste to be imported from local sites owned and/or developed by Bellway.

Documents that make up the planning permission included the submission of an Air Quality Assessment (Phlorum, 2020). While sufficient for planning application purposes, this document is considered not to meet all of the criteria required for a DMP for EP application purposes, thus this DMP has been prepared.

1.3 Structure of the DMP

The DMP will form part of the Environmental Management System (EMS) to be implemented at the Site once the Environmental Permit for the Site is issued by the Environment Agency.

The DMP includes the following sections:

- Section 2 setting out who is responsible for implementing this DMP on the Site;
- Section 3 provides information on the Site's setting and sensitive receptors;
- Section 4 provides a summary of the proposed deposit for recovery operations and the layout of the Site;
- Section 5 describes how dust will be managed and mitigated from the deposit for recovery operations;
- Section 6 provides a summary of how dust will be monitored by equipment and via visual assessment on the Site;
- Section 7 describes the reporting and complaints response to be implemented on the Site; and
- Section 8 provides concluding statements on the DMP.

2 Implementation of the DMP

2.1 Responsibility for Implementation of this Plan

The Site Manager or their delegated representative will have responsibility for implementing and maintaining the DMP. It will be reviewed annually or following any relevant change in the Site operations or in the event of an incident. The Site Manager will be suitably trained and be familiar with the Site and its processes.

The Site Manager is responsible 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 supervisor is delegated responsibility.

This DMP will be reviewed 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 to reduce the potential for dust emissions from the Site.

All staff members will be given the necessary training to deliver dust suppression measures detailed within this DMP. All staff will be given training on the EMS for the Site, which includes procedures related to emissions, including dust. Site procedures will be communicated between staff via EMS training and weekly toolbox talks. Where new dust suppression measures are to be implemented, refresher training will be provided to ensure staff remain competent. This training will be delivered by the Site Manager or appropriate representative.

3 Site setting and receptors

3.1 Site Location

The Site is located on a 2.08 hectare parcel of land located to the east of Crown Quay Lane in the residential town of Sittingbourne. The Site is centred on approximate National Grid Reference TQ 90821 64060. The location of the Site is shown in Figure 3.1.

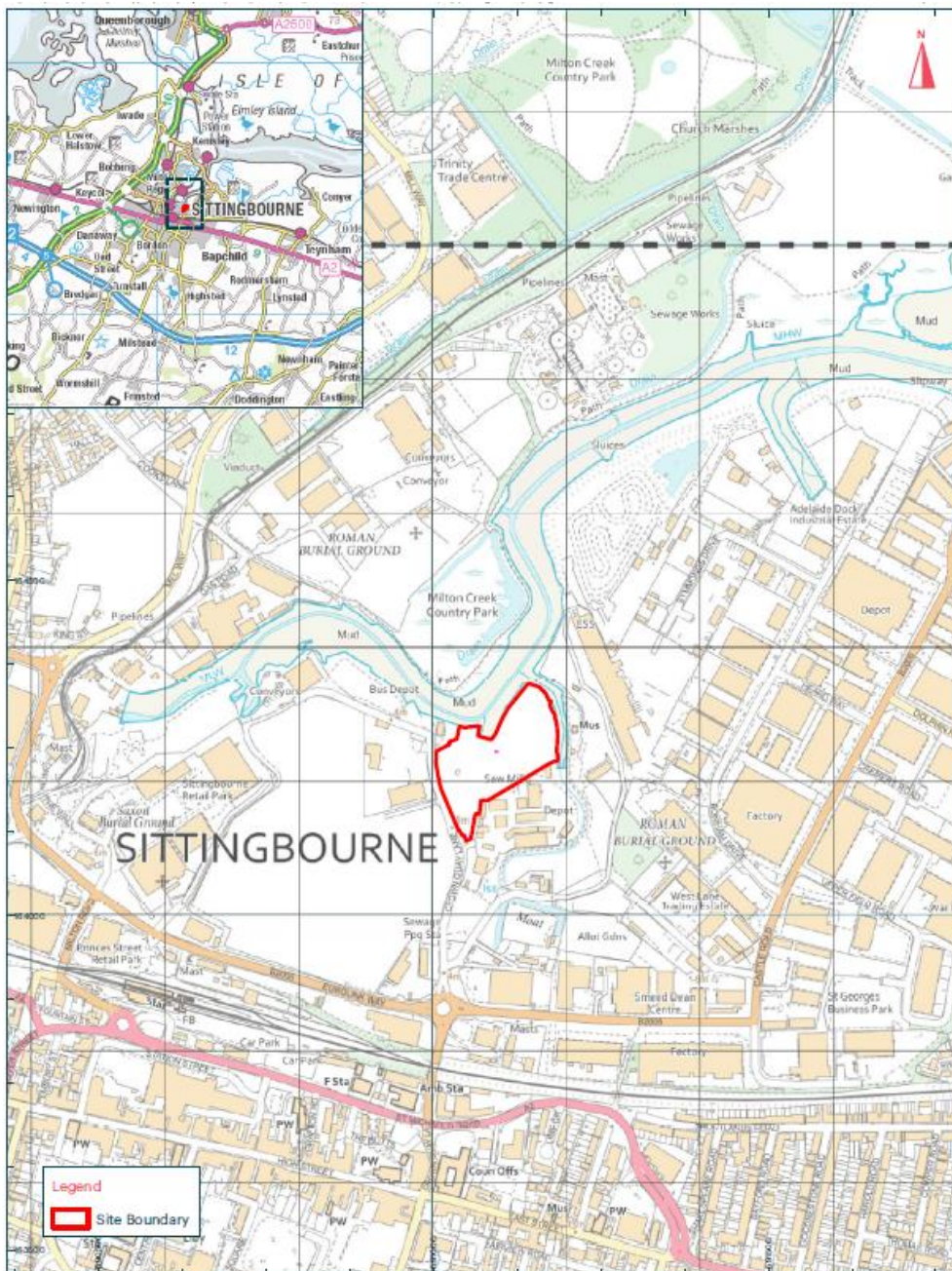


Figure 3.1 Site Location

The Site is located within a 'mixed use' area, with large industrial units immediately bounding the Site. Further south of the Site is Sittingbourne Railway Station, with Sittingbourne High Street and Town Centre being located approximately 650 m southwest of the Site. Milton

Creek, part of the Swale Estuary, is located adjacent to the Site and to the north and northeast of the Site.

Further detail regarding the Site setting and local land use is provided in Table 3.1. A complete description of the Site setting is provided in the ESSD (Stantec, 2022a).

Table 3.1 Site Setting

Site address	Land East Of Crown Quay Lane Sittingbourne Kent ME10 3ST	
NGR	TQ 90821 64060	
Site location	The Site is located within the residential town of Sittingbourne, Kent and is located approximately 650 m north east of the town centre and high street. Existing access to the Site is via Crown Quay Lane, which runs along the eastern boundary of the Site.	
Topography	The majority of the land is relatively flat, with ground elevations in the order of between 4.4 mAOD (metres Above Ordnance Datum) to 4.8 mAOD. There are slopes located along the northern and eastern boundaries, where the ground levels decrease to a low of approximately 1.3 mAOD. Three stockpiles of inert waste are located on the Site, which are proposed to be used in the recovery activity.	
Previous land use	The Site has been used for a range of land uses, including printing works, concrete production / cement works, bulk liquid storage, backfilling marshland, and docks. The most recent use of the Site was as a waste transfer site for construction and demolition waste.	
Surrounding land use	North	The site abuts mudflats to the north, which form part of Milton Creek. Milton Creek is designated as part of the Swale Estuary Marine Conservation Zone (MCZ) and Milton Creek Local Wildlife Site (LWS). To the north of the Site lies Eastwoods Wharf. Milton Creek Country Park is located further north, approximately 670 m from the Site. To the north west of the Site lies Bayford Meadows Kart Circuit, approximately 170 m from the Site. Biffa Sittingbourne (household waste transfer facility) is located approximately 770 m north of the Site.
	East	A concrete producer (Supreme Concrete) is located off Crown Quay Lane to the immediate east of the Site. Industrial units making up Eurolink Industrial Estate are located further to the east. A small tributary of the Swale is located immediately east of the Site.
	South	A timber supplier (Odds Timber) is located immediately south of the Site, with other industrial units located further south. The B2006 is located approximately 230 m south of the Site, with Sittingbourne Train Station being located approximately 470 m south west of the Site.
	West	A builders' merchant (Jewson Sittingbourne) is located to the west of the Site, adjacent to Crown Quay Lane. An area of disused land (allocated for residential development) is also located to the west of the Site.

The Site is not situated within an Air Quality Management Area (AQMA) for particulate matter (PM₁₀) or Nitrogen Dioxide (NO₂). There are, however, two AQMA's located in close proximity to the Site. The AQMA's identified are summarised in Table 3.2.

Table 3.2 Local AQMA's

AQMA	Pollutants Declared	Distance and direction from the Site
St Pauls Street, Sittingbourne	25/01/2013 Nitrogen Dioxide NO ₂ – Annual mean	930m NNW
	22/10/2020, Nitrogen dioxide NO ₂ - Annual Mean	
	22/10/2020, Particulate Matter PM10 - 24-Hour Mean	
East Street, Sittingbourne, Kent	28/02/2013, Nitrogen dioxide NO ₂ - Annual Mean	690m SSE

3.2 Other Sources of Dust in the Site vicinity

It is considered that there are a number of potential sources of dust within the vicinity of the Site.

There is the potential for dust to be emitted from vehicle movements along public highways surrounding the Site.

A housing development is currently being constructed to the southwest of the Site. It is considered that the construction of this development, and the associated traffic with vehicle deliveries and movements may have the potential to generate dust emissions in the vicinity. There are also a number of businesses, such as Odds Timber (large scale Timber Merchant and processing facility) to the south of the Site and Supreme Concrete (a concrete product supplier) to the east and southeast of the Site, that undertake operations that could lead to dust emissions.

Potential dust emissions from neighbouring operations will be monitored by Keltbray staff as part of the dust monitoring regime at the Site. More detail on the monitoring undertaken at the is included in Section 6 of this DMP.

Other earthwork operations, including stabilisation of on-site waste and preparation of the Site for the upcoming housing development will be undertaken at the same time as the proposed deposit for recovery operation. It should be noted that this DMP relates to the deposit for recovery operations to be undertaken at the Site only. It does not consider works outside of the scope of the proposed EP. However, the mitigation measures described within this DMP are considered applicable for these activities also.

3.3 Local meteorology

Unlike many other atmospheric pollutants, the generation of fugitive dust is particularly dependent upon weather conditions and the nature of the operations. 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

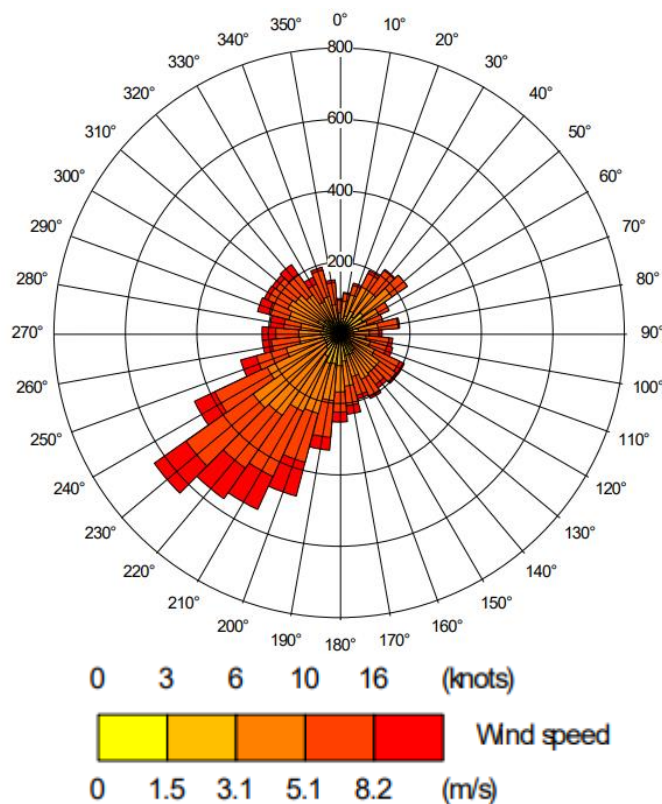
conditions. The most significant meteorological factor is the predominant wind direction and wind speeds, and consequently data has been collected regarding the predominant wind speeds and directions appropriate to the Site.

The most important climatic parameters governing the release and dispersal of emissions are:

- Wind direction which determines the broad transport of the emission and the sector of the compass into which the emission is dispersed and;
- Wind speed which will affect the ground level emission by increasing the initial dilution of pollutants in the emission. It will also affect the potential for dust entrainment.

Wind speed and direction data have been obtained from Manston Meteorological Station (Figure 3.2) which is considered to have wind speed and direction data appropriate for characterisation of the wind climate.

Figure 3.2 Wind rose (Manston, UK 2019, taken from Phlorum, 2020)



The predominant wind direction, as reported from Manston Station, blows to receptors located to the northeast of the Site.

3.4 Sensitive receptors

Due to the nature of material being handled on the Site, the dust particle size likely to be emitted is considered to be intermediate to large particles. Potential receptors with sensitivity to dust within 1km of the Site have been identified and are presented in Table 3.3. The location of each receptor is shown on Stantec Drawing No. 330201595D2, with reference to the numbers in Table 3.3.

Table 3.3 Receptors

Ref*	Receptor	Receptor type	Distance (m)	Direction from nearest boundary
R1	Public Highway: Crown Quay Lane	Public highway (road)	<10	W
R2	Milton Creek	Surface water feature	10	N and NE
R3	Odds Timber	Timber merchant and storage area	10	S
R4	Jewson Sittingbourne	Builders' merchant	20	W
R5	Supreme Concrete	Concrete manufacturer	60	E
R6	Milton Creek Country Park	Area of country park	80	N
R7	Bayford Meadow Kart Circuit	Outdoor go-cart track	140	NE
R8	Regent Quay	Residential development off Robertson Drive	170	SW
R9	Allotment gardens	Allotment gardens	190	SE
R10	B2006	Public highway (road)	230	S
R11	Sittingbourne Retail Park	Retail units and associated parking / infrastructure	270	W
R12	Eurolink Industrial Estate	Industrial units	450	E
R13	Sittingbourne Train Station	Railway station	490	SW
R14	Milton Creek Local Wildlife Site and Country Park	Protected habitat – Local Wildlife Site	<10	N
R15	Biffa Sittingbourne	Household waste transfer facility	770	N
R16	Deciduous woodland	Nearest deciduous woodland to the Site	910	E
R19	Swale Estuary Marine Conservation Zone	Marine Conservation Zone	<10	N and NE
R20	Coastal and flood plain grazing marsh	Protected habitat	<50	E

Ref*	Receptor	Receptor type	Distance (m)	Direction from nearest boundary
R21	Mudflats	Protected habitat	<10	N and NE
R22	Coastal saltmarsh	Protected habitat	Within N and NE corner	N and NE
R23	Migratory routes for European Eel (<i>Anguilla anguilla</i>) and European Smelt (<i>Osmerus eperlanus</i>)	Protected species migratory route	<10	N and NE

*R17 and R18 are marked on Drawing No. 330201595D2 Sensitive Receptors but are further than 1km from the Site. They have therefore been excluded from the above table.

4 Site Operations and Layout

4.1 Overview of Waste Operations

This DMP considers the operations to be undertaken under the proposed deposit for recovery EP only. It does not consider the stabilisation of material at the Site, nor the housing and infrastructure construction phase of the development. It only considers the importation and placement of waste under the proposed deposit for recovery EP.

The following have been identified as the main potential sources of dust and particulates from the Site:

- Soil stripping, storage and reinstatement;
- Waste handling and movement;
- Mobile plant (both on-site and off-site vehicle movements); and
- Wind scouring of exposed surfaces and stockpiles.

It is anticipated by Keltbray that the deposit for recovery operations would be completed in less than one year.

4.2 Site Layout

The layout of the Site is shown on the drawing “Indicative Site Setup and Monitoring Locations” (ref. 6078 Rev 01). The location of items on the Site are indicative and are subject to change.

The Site is accessed from a concreted public highway (Crown Quay Lane) via two access/egress points. Wheel washes are located at both access/egress points in order to wash the wheels of any outgoing vehicle from the Site. The wheel wash locations are shown on Drawing No. 6078 Rev 01. All vehicles are required to use the wheel wash facility.

Along the western boundary of the Site, between the two access/egress points is the Site Office. A copy of this DMP along with a copy of the issued EP and EMS will be kept within the Site Office for reference.

Emissions monitoring points, known Emission Monitoring Stations (EMS1-4) are located along the north-western, north-eastern, south-eastern and south-western boundaries of the Site to account for movement of dust in multiple directions from the Site operations. Visual dust monitoring by staff members can be taken anywhere within the Site boundary. More information on the monitoring undertaken at the Site is included in Section 6 of this DMP.

The Plant Storage Area and Quarantine Area for contravening wastes are proposed to be located along the southern boundary of the Site. An “incoming waste” storage area is proposed to take up a significant area of the eastern part of the Site. It is envisaged however that wherever possible imported wastes will be deposited directly into the deposit for recovery operation to avoid double-handling of waste types.

The public facing boundaries of the Site are made up of 2.4m hoarding.

4.3 Waste Import and Removal

Waste will be imported via the access points from Crown Quay Lane by sheeted HGVs. It is estimated that 12,000m³ of waste will be required to be imported to the Site in order to meet the desired development platform levels. The extant 14,000m³ of waste on the Site will undergo stabilisation in order for the material to be suitable for use in the construction of the development platform. As such, a total of 26,000m³ of waste will be used in the deposit for recovery operation.

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

Waste to be imported to the Site will be directed to the incoming waste storage area, as denoted on Drawing No. 6078 Rev 01, or, wherever possible, directly to the point of deposit in the works. All waster

Wastes listed in Table 4.1 have the potential to be dusty and may require additional process controls in order to ensure they do not cause dust emissions. In line with the Site's waste acceptance procedures (Stantec, 2022a), all loads must be visually inspected prior to tipping.

Table 4.1 Proposed waste types with dust potential

List of Waste Code	Industry Sector	Description
17 05 04	<i>Construction and Demolition Wastes – soil, stones and dredging spoil</i>	Soil and stones
19 12 12	<i>Mechanical Treatment of Wastes</i>	Construction & demolition wastes that have undergone mechanical treatment, other than those mentioned in 19 12 11*
19 13 02	<i>Mechanical Treatment of Wastes (soil and groundwater remediation)</i>	Solid wastes from soil remediation other than those mentioned in 19 13 01*

Wastes comprising dust, powders or loose fibres will not be accepted at the Site.

Wastes identified as being dry or with the potential to generate dust that could leave the Site boundary, will be dampened prior to unloading. Depending on the moisture content, it may be necessary to dampen after deposit. If the load is determined to be excessively dry or dusty it will be denied access to the Site and rejected.

HGVs must be sheeted when transporting material to the Site i.e. for transit to the waste deposit area to prevent wind entrainment or loss of material from the vehicle.

Before leaving Site, vehicles will pass through a wheel wash to remove residual dust from tyres. They will also be re-sheeted to control residual mud and dust.

4.4 Waste storage and placement

Stabilised waste will be stored temporarily on the Site before placement within the deposit for recovery operations. Imported waste will, wherever possible, be deposited directly into the deposit for recovery operation to avoid double-handling of the waste. However, there may be instances where the imported waste may need to be temporarily stockpiled. Stockpiles of waste will be monitored by Site staff and mitigation measures such as sprays will be implemented if the stockpile is seen to be in a condition where dust may be generated.

4.5 Plant and equipment

The EP operations will employ the use of essential plant only, which are considered to comprise:

- Excavators;
- Dump trucks;
- HGVs;
- Wheel washing facilities;
- Water bowser (operating vehicle); and
- A roadsweeper.

All HGVs and plant to be used at the Site are low sulphur diesel. Plant and vehicles to be used in the site works will be in good repair and confirm to the manufacture or legislative/British Standard emission standards.

5 Dust Management and Mitigation

5.1 Overview of Dust Control at the Site

Dust control measures are in place to help mitigate dust emissions at the Site. These measures are implemented when appropriate, particularly in period of dry weather or when dust is identified as leaving the Site boundary. Good practice dust management measures will be employed to reduce the likelihood of dust generation by imposing controls at point-of-origin, using proven dust control measures within the industry.

The potential for dust generation from the proposed waste operations at the Site are anticipated to be predominately as a result of material importation and placement operations.

Strict waste acceptance controls will ensure that only suitable inert waste will arrive to and be deposited at the Site which will not include dry or dusty materials. Any rogue or dusty loads which may arrive on Site will either be rejected upon arrival or quarantined on-Site with sheeting prior to off-Site disposal.

Sheeting of vehicles to prevent the escape of debris, dust and particulates from vehicles as they move into, from and around the Site. Excessively dusty loads will not be accepted into the operations, which will be ensured via visual checks of the waste to be accepted under the Environmental Permit.

Particulate emissions can arise from the unloading and on-Site handling and placement of imported materials, handling of existing on-Site stabilised materials and vehicle movements on-Site and from unsealed surfaces. In order to reduce any impact on local receptors, the method of handling existing on-Site soils will be through appropriate use of excavators and Site plant to ensure that the soils are only moved in small quantities at any one time. This allows soils to be stockpiled and compacted soon after movement, to minimise further drying and the risk of dust generation.

All soil handling works will be conducted in accordance with prevailing EA guidance as well as relevant industry guidance, including but not limited to MAFF (2000) and DEFRA (2009).

It is generally considered that day-to-day activities should not generate dust as the materials to be handled on-Site will be generally cohesive with a natural moisture content. The Site Manager will modify, reduce or suspend any activities that are identified to have the potential to cause dust to leave the Site boundary during dry windy weather.

Drop heights when handling waste will be minimised. Minimising the height at which waste is dropped should reduce the distance over which dust could be blown and disperse by winds.

Good housekeeping will be implemented on the site. A consistent, regular housekeeping regime that is supported by management, will ensure the Site is regularly checked and issues remedied to prevent and remove dust build up

Presence of hoarding/fencing around the perimeter will assist in prevent dust emissions from waste operations from leaving the Site boundary.

Stockpiles will be managed to maintain a smooth profile and dampened down when necessary to avoid dust emissions from windwhipping.

Operations will cease during high winds and exceptionally dry conditions. Mobilisation of dust particles likely to be greater during periods of strong winds or exceptionally dry conditions. Hence ceasing operations may be necessary during these times if other mitigation measures implemented at the Site are not effective in reducing / preventing dust emissions. It is ultimately the decision of the Site Manager whether operations under the EP leading to dust emissions should be temporarily paused.

Off-Site inspections of Crown Quay Lane for tracked dust and soils will be undertaken daily and any material observed on the road surface will be swept the same day or as soon as practicable.

Upward or sideways exhausts will be present on the mobile plant to be used in the works under the Environmental Permit, rather than downward blowing exhausts to prevent material from becoming airborne dust.

All Site surfaces will be dampened as necessary by the use of sprays to prevent material becoming airborne. The access points and Crown Quay Lane will be cleaned using a road sweeper and swept as necessary to remove loose materials.

A wheel wash will be present on the Site to clean wheels of outgoing vehicles and prevent mud from being tracked onto the access road and local highways. The wheel wash will be maintained in line with manufacturers specifications. The wheel wash will be inspected on a daily basis and will include checking spray nozzles, water levels and bed of the washing area. If necessary, the wash area will be jet washed to remove any residues.

Any spillages will be cleared as quickly as possible by appropriate means to prevent unnecessary track-out onto the public highway. A roadsweeper will be deployed when mud/dust is observed on the local highways and access road to the Site. Internal pathways and routes will be kept clear of debris and checked daily. A speed limit of 5 mph into the Site and around the Site will be set.

5.2 Sources and Control of Fugitive Emissions

Table 5.1 details the potential sources of dust on the Site and which mitigation measures are implemented to break the source-pathway-receptor routes for dust emissions.

Table 5.2 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 when dry.	Crown Quay Lane, local highways, and local businesses.	Mud on and other local roads. Resuspension of mud as airborne particulates.	<p>All vehicles entering exiting the Site must do so via the wheel washes.</p> <p>The Site and unpaved surfaces are dampened down by mobile water bowsers when overly dry or dusty conditions present.</p> <p>Should the above measures fail, a road sweeping vehicle will be deployed when necessary to mitigate any mud on the public highways and prevent the generation of dust as a result of the Site operations.</p>
Debris	Falling off lorries.	Crown Quay Lane local highways, and local businesses.	Visual soiling, also consequent resuspension as airborne particulates.	<p>Vehicles delivering waste are sheeted.</p> <p>Where debris is identified, it will be cleared up immediately, either manually or by road sweeper.</p> <p>All areas are subject to regular housekeeping.</p>
Stockpiles	Atmospheric dispersion by windwhipping	Surrounding sensitive receptors	Visual soiling and airborne particulates.	<p>Presence of hoarding/fencing around the perimeter will assist in prevent dust emissions from waste operations from leaving the Site boundary.</p> <p>Stockpiles will be managed to maintain a smooth profile and dampened down when necessary to avoid dust emissions from windwhipping.</p>
Tipping of wastes in the open	Atmospheric dispersion.	Surrounding sensitive receptors.	Visual soiling and airborne particulates.	<p>The potential of dust emissions will be minimised by lowering drop heights, where possible.</p> <p>Presence of hoarding/fencing around the perimeter will assist in prevent dust emissions from waste operations from leaving the Site boundary.</p> <p>It is intended for incoming waste to be deposited directly into the tipping face or as close to its intended deposit location as is operationally possible.</p> <p>Operations will be halted when wind speeds are deemed to be excessive.</p>

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
Vehicle/ Plant Movements	Atmospheric dispersion from resuspension of dust.	Surrounding sensitive receptors.	Airborne particulates and build-up of dust on surfaces of site and local roads.	The Site is subject to regular housekeeping and water is utilised to dampen surfaces as required.
Vehicle exhaust emissions	Atmospheric dispersion.	Surrounding sensitive receptors.	Airborne particulates.	No idling policy will be implemented. All vehicles/ site plant will be maintained in accordance with manufacturer recommendations.

Table 5.2 Mitigation Measures

Abatement / Mitigation Measure	Description / Effect	Overall implementation on Site	Trigger for implementation	Further mitigation measure if ineffective
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 resuspension of dust by vehicle wheels.	<p>There is a no-idling policy in place on the site for vehicles.</p> <p>Vehicle movements will be minimised by ensuring that the double handling of materials is avoided where possible.</p> <p>A 5mph will be enforced. These measures will be implemented by staff training, through use and understanding of the EMS and speed limit signs on Site.</p>	<p>Speed limit signage.</p> <p>Enforcement of speed limit by Site Manager and constant observation and reminders by Site operatives.</p>	<p>If there is mud on the access road, then a mobile bowser will be deployed to clean and dampen the surface.</p> <p>If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease.</p>

Abatement / Mitigation Measure	Description / Effect	Overall implementation on Site	Trigger for implementation	Further mitigation measure if ineffective
<p>Minimising drop heights for waste</p>	<p>Minimising the height at which waste is dropped should reduce the distance over which dust could be blown and dispersed by winds.</p>	<p>The EMS will require that the handling of waste material on Site will be minimised where possible. Staff will be trained about the importance of reducing drop heights.</p> <p>Measure will be implemented by plant operators ensuring that they lower grabs/shovels on the equipment being used to move and deposit materials.</p>	<p>This measure will be implemented whenever the Site is operational i.e., whenever material is being moved.</p>	<p>Water will also be available to dampen surfaces and stockpiles to reduce dust generation.</p> <p>If excessive dust emissions continue after these measures, then operations shall cease.</p>
<p>Good housekeeping</p>	<p>Having a consistent, regular housekeeping regime that is supported by management, will ensure the Site is regularly checked and issues are remedied to prevent and remove dust and particulate build up.</p>	<p>Inspections will take place daily with actions followed up immediate by Staff on site.</p> <p>Staff will target areas not caught by the road sweeper or other cleaning apparatus.</p> <p>The waste types to be accepted at the Site will contain very little, if any, litter, or dust.</p> <p>Good housekeeping is implemented by following the housekeeping guidance as set out in the EMS.</p>	<p>These measures will be implemented whenever the Site is operational.</p>	<p>If excessive dust emissions are observed to be leaving the Site boundary, then the further mitigation measure(s) will be triggered e.g., water suppression.</p>
<p>Sheeting of vehicles</p>	<p>Prevents the escape of debris, dust, and particulates from vehicles as they travel.</p>	<p>The EMS will state that all vehicles entering / exiting the Site must be sheeted to minimise the likelihood of dust emissions.</p> <p>Excessively dusty loads will not be accepted to the Site.</p> <p>Sheeting equipment will be activated and checked to ensure proper coverage before the vehicle can leave the site.</p>	<p>Loading/ unloading of materials to/from a vehicle will be followed by closing of the sheet covers on that vehicle.</p> <p>Visual observation of incoming vehicles will take place to ensure vehicles arriving are sheeted.</p>	<p>If excessive dust emissions are observed to be leaving the Site boundary, then the further mitigation measure(s) will be triggered. Materials may be dampened.</p>

Abatement / Mitigation Measure	Description / Effect	Overall implementation on Site	Trigger for implementation	Further mitigation measure if ineffective
		Incoming vehicles that are not sheeted will be rejected from the site or sheeted immediately.	All vehicles carrying waste to the site will be sheeted at all times unless being loaded or unloaded.	
Ceasing operation during high winds and/or prevailing wind direction	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.	<p>Methods are likely to reduce dust and particulate emissions but are not considered long term solutions. 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 then operations may be temporarily stopped. There are no set values/ criteria for this to occur as there are other contributing factors that dust is dependent on such as rain.</p> <p>The decision to cease operations because of weather conditions is at the discretion of the Site Manager.</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.</p>	N/A
Road sweeper	<p>Removes the mud from the access road and local highways.</p> <p>It dampens down dust and particulates whilst brushing and</p>	<p>A road sweeping vehicle will be deployed to control the amount of mud on local roads and minimise the generation of dust when required.</p> <p>The road sweeper will be maintained in accordance with manufacturer's specifications.</p>	Visual observation of the state of the access roads and local roads to be conducted and recorded in the Site Diary. This will identify the requirement for the use of the road sweeper.	N/A

Abatement / Mitigation Measure	Description / Effect	Overall implementation on Site	Trigger for implementation	Further mitigation measure if ineffective
	<p>collecting dust and particulates from the road surface, particularly at the kerbside.</p> <p>It also reduces the potential for dust emissions from vehicle movements in the area.</p>	<p>The cleanliness of roads in the vicinity of the Site entrance are checked daily.</p> <p>The road sweeper would be deployed to clean the access road and local roads..</p>	<p>Constant observations to be made 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, which has been tracked out from the Site, then the road sweeper will be hired and deployed.</p>	
<p>Installed wheel washes</p>	<p>Provides a wash of vehicle wheels and lower parts (including under body) using a series of jet sprays.</p>	<p>Wheel washes are located at both access/egress points in order to wash the wheels of any outgoing vehicle from the Site</p> <p>The wheel washing facility is used solely to remove mud from the wheels of vehicles and is inspected on a regular basis to ensure the facility is in working order.</p> <p>Vehicles will drive through the wheel wash slowly to allow sufficient time for dust and dirt to be effectively removed.</p> <p>The wheel wash will be used by all vehicles entering and exiting the Site.</p>	<p>The wheel wash will be used by all vehicles entering and exiting the Site.</p>	<p>N/A</p>
<p>Water suppression with water bowser</p>	<p>Using a mobile water bowser to dampen Site surfaces.</p>	<p>Highly water intensive and more likely to minimise dust and particulates on the ground that is at risk of being re-suspended rather than already airborne dust and particulates. Very effective at dampening down roads and large surface areas. Can also come with hose attachments and other attachments to increase its versatility.</p>	<p>During periods of dry/ windy weather to prevent entrainment of dust by wind.</p>	<p>If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) is triggered.</p>

Abatement / Mitigation Measure	Description / Effect	Overall implementation on Site	Trigger for implementation	Further mitigation measure if ineffective
				Cease operations causing the dust emission.

5.3 NO₂ emissions

The following good practice measures will serve to minimise NO_x emissions from vehicles used on the Site;

- A no idling policy will be implemented; and
- All vehicles/ Site plant will be maintained in accordance with manufacturer recommendations.

Based on the minimal number of plant to be used on Site and the proposed mitigation measures, NO_x is not considered to pose unacceptable emissions from the Site.

5.4 Out of hours arrangements for mitigation

For out of hours arrangements, the Site Manager will make the decision on whether to implement mitigation measures depending on the forecast for the upcoming closed hours. For example, a decision may be made to dampen down surfaces if the forecast is for particularly dry or windy weather.

Should a complaint of dust emissions be received out of hours, a relevantly trained operative will be informed by the Site management to attend the Site in order to implement remedial measures and/or investigate the cause of the complaint. The complaints procedure to be implemented at the Site is discussed in more detail in Section 7.

5.5 Water Availability

To prevent dust generation, site surfacing and stockpiles of dusty materials may be dampened down using water from the mobile bowser and spray attachment.

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 operations may be temporarily suspended or methodologies amended to avoid further dust emissions. This is decided by the Site Manager.

In the unlikely event that there is a shortfall in the required amount of water for dust suppression such as in times of dry periods or drought, this will be addressed by importing tankers of water on to the Site. Site operations may also temporarily cease or be reduced.

5.6 Maintenance of plant and Site infrastructure

It is recognised that regular scheduled maintenance is essential to prevent fugitive emissions from the Site. The following best practice measures will be implemented to limit emissions, in so far as is possible:

- All vehicles will be maintained in accordance with manufacturer recommendations;
- All non-road-going plant will be maintained in accordance with manufacturer recommendations, cleaned and serviced regularly;
- Paved surfaces on and in the vicinity of the Site along will be swept as required during Site operations. This may be reduced during periods of reduced traffic/site operations, or increased if material deposition on surfaces can be observed to be accumulating during the day;

- Sweeping of unpaved surfaces will not be undertaken routinely, however may be appropriate if loose debris or particulates accumulate, though this is considered unlikely, due to regular dampening/dust suppression activities;
- Plant operational areas and processing areas will be kept tidy and orderly, with any loose material being cleared and removed or stockpiled by the end of each working day;
- On-Site vehicles will be cleaned on a weekly basis to prevent the build-up of dust and mud, which may become entrained. The frequency may be increased if higher rates of soiling are observed or decreased if high rates of soiling are not observed to occur;
- All roads and surfaces will be maintained in a good state of repair. All surfaces will be inspected weekly for defects or repaired as they arise or following notification from a Site operative/ driver.
- Site speed limit of 5 mph will be enforced on the Site.
- Monitoring equipment will be serviced and calibrated in accordance with the manufacturer recommendations.
- Fencing and structures along the Site boundary will be regularly checked for damage and will be maintained as appropriate.

5.7 Staff training and management

All Site personnel will be trained in best practice for dust control via regular toolbox talks on the Site.

Operatives will to be briefed on the requirements to keep dust to a minimum in their induction training and through method statement briefings.

To ensure that environmental standards are maintained, Keltbray considers it necessary that all personnel working on the site are aware of company and their personal environmental responsibilities. Keltbray will aim to keep dust to a minimum from its activities on the site by ensuring that:

- Subcontractors are aware of and comply with the requirements of this DMP;
- Resources (personnel and financial) are available to meet the environmental management requirements for this project;
- Corrective actions are implemented without undue delay and investigations carried out;
- Records and other relevant documentation are maintained;
- Continuous communication is kept with the adjacent occupiers and the local authority; and
- Complaints and queries are to be addressed as soon as it is practicable.

6 Monitoring

6.1 Monitoring location

Recorded dust monitoring is to be undertaken at four monitoring points, referred to Environmental Monitoring Stations (EMS1-4). The locations of EMS1-4 on the Site are shown in

Figure 6.1.



Figure 6.1 Environmental Monitoring Stations

6.2 Monitoring Equipment

Frisbee gauges are proposed for use to monitor dust deposition. The mean rate of dust deposition will be calculated over a 14-day monitoring period and samples will be analysed by a UKAS Accredited Laboratory. The frisbee gauges are located at EMS1-4 as denoted on

Figure 6.1.

Dust deposition will be measured in accordance with the guidelines given in “*Guidance on Monitoring in the Vicinity of Demolition and Construction Sites*” (IAQM, 2018).

Table 6.1 summarises the monitoring equipment to be used at each of the four monitoring points, EMS1-4.

Table 6.1 Monitoring Equipment and Receptor Points

ID	Unit	Data Host	Retrieval Method	Measuring Mode	Text/Alerts (Action Levels)
EMS1	Frisbee Gauge	Internal online platform	Mean rate (14 day)	Mg/m ² /day	>200 mg/m ² /day over 2 week period
EMS2	Frisbee Gauge	Internal online platform	Mean rate (14 day)	Mg/m ² /day	>200 mg/m ² /day over 2 week period
EMS3	Frisbee Gauge	Internal online platform	Mean rate (14 day)	Mg/m ² /day	>200 mg/m ² /day over 2 week period
EMS4	Frisbee Gauge	Internal online platform	Mean rate (14 day)	Mg/m ² /day	>200 mg/m ² /day over 2 week period

The manufacturers' instructions that accompany measuring instruments should be followed strictly and every precaution will be taken before use to ensure that the instruments are accurately calibrated. BS5228-1:2009+A1:2014 recommends that instruments are tested for conformity periodically in accordance with BS EN 61672-3:2013.

It is noted that the mitigation measures put in place to minimise dust on the Site will act to further reduce the risk of any such emissions reaching sensitive receptors.

6.2.1 Action in case of exceedance of action level

Where monitoring values are recorded to be above the action level, the Site Manager will be informed. An investigation will take place into why the exceedance may have occurred. The investigation will consider all activities which took place on site on the day in question, the prevailing weather conditions and any recorded off-site activities or events. A brief description of the reason(s) for the exceedance will be recorded, alongside any available mitigation taken to prevent reoccurrence.

If the exceedance is deemed to be as a result of off-Site activities, the EA will be made aware of the anticipated source.

If the limit is exceeded on more than one consecutive occasion or if the source of the exceedance is deemed to be from the same process, a more detailed investigation for the exceedances will be carried out.

6.3 Visual Monitoring

In addition to the use of monitoring equipment, visual monitoring will be undertaken by Site staff at all times as they carry out their daily tasks and can be undertaken anywhere within the Site boundary, depending on where operations are taking place. As well as visual monitoring being undertaken by Site Operatives at all times, there are times of the day where visual

monitoring is required to be recorded, referred to as “qualitative monitoring”. The qualitative monitoring checks will be carried out by a Site Operative, who will have been trained in accordance with the procedures within the management system for the Site. Remedial actions required will be specified and identified on the check sheets (Appendix B), along with weather conditions.

Qualitative monitoring will be undertaken along with quantitative monitoring at each of the EMS1-4 locations. This will be measured on a numerical scale from 1 to 5 with “1” being “no noticeable issue” through to “5” meaning a “major issue”. Each value has a corresponding action relating to the level of compliance, for example:

- a score of “1” on the qualitative monitoring would require no action to be taken.
- whereas a score of “5” would require stopping the works causing the major issue immediately and only recommence those works when a solution is implemented.

Qualitative monitoring will also take place when operations with the highest potential to produce dust are taking place. Undertaking visual monitoring recorded checks at the times when the Site is considered to have the highest potential for dust emissions is considered to be the most beneficial method to ensure that mitigations measures in place at the Site are effective.

Extra and unplanned monitoring will be carried out on the Site when conditions are particularly windy or dry, new activities are being undertaken, new machinery is being used or following the receipt of a complaint or incident related to dust emissions.

6.3.1 Action in case of observed dust emission

If dust from the Site is detected beyond the Site boundary, either as a visual plume or observed dust deposition immediately outside the Site, and if not detected by the Site Manager or representative, the detection should be reported to them directly. The following actions will be taken by the Site Manager / their representative:

- Active activities will be assessed for dust generating potential;
- Any active processes such as waste handling or vehicle movements will be immediately stopped;
- If the source of emission is deemed to be fugitive emissions from the Site surface or stockpiles, dampening of the material/surface will take place immediately;
- If the source is deemed to be re-suspension of dust on the road as a result of tracked mud, the road will be swept immediately, and a record made of the conditions which lead to the mud being tracked;
- If the source is deemed to be off-site, a record will be made in the Site diary for future reference;
- In all cases, the observation and resulting action and any lessons learned will be recorded in the site diary; and
- Any subsequent actions will be incorporated into the DMP.

If it is not possible to resume activities without causing emissions – e.g. if prevailing weather conditions do not allow, then works will remain suspended until conditions are favourable.

A record of the emission and the attributed cause will be recorded. A note should be made of any procedural improvements to prevent recurrences which should be implemented as soon as practicable. Revisions to this DMP should be implemented, if required.

7 Reporting and complaints response

7.1 Engagement with the community

A Site notice board will be displayed prominently by the Site entrance and will contain the following information:

- the Permit holder's name (company name at least);
- an emergency contact name and telephone number;
- a statement that the Site is permitted by the EA;
- the Permit number; and
- EA telephone number 03708 506506 and the incident hotline 0800 807060 (or another number the EA subsequently advises of in writing).

The notice board may also be used to alert the public to planned changes which may be of interest to the local community.

7.2 Receipt of complaints

The Site Notice Board will allow members of the public to notify Keltbray about any fugitive emission, including outside of the Site's normal operational hours, or to make a complaint.

All complaints will be recorded in a complaints log, together with any action required/taken, and any procedural changes necessary to prevent a similar recurrence. Information on the complaint including the nature of the complaint, the likely cause, time and date of the complaint and photographs where appropriate will be shared among the wider Keltbray team. The Site Manager will ensure that:

- monitoring data taken at the time of the complaint is analysed by authorised personnel;
- site activities at the time are reviewed and investigated; and
- when practicable additional mitigations are identified they are implemented at earliest opportunity.

Complaints will be acknowledged promptly to the complainant along with an explanation as to what, if any, action is being undertaken as a result and an estimated time in which they will aim to respond. For minor issues, it is expected that responses can be provided within two working days. If further investigation is required beyond this time, this too will be communicated to the complainant together with a revised timescale.

The suspected activity will be ceased until it can be determined what the cause for the complaint is, if the complaint is warranted and what action should be taken. If the complaint is a result of something outside the control of Keltbray, this will be clearly communicated to the complainant in a timely manner.

If a complainant is not satisfied with the investigation outcome, then the complaint will be escalated to senior management and/or a director, who will then review and investigate the complaint.

Complaints outside of operating hours will be dealt within one working day. The nature of the complaint may require remedial action to be implemented at the Site as soon as possible. A

relevantly trained operative will be informed by the Site management to attend the Site in order to implement remedial measures and/or investigate the cause of the complaint.

7.3 Reporting of complaints

Keltbray will keep a record of all complaints received in relation to dust and particulates suspected to result from the Site by completion of a Complaints Form (**Appendix A**). Each substantiated complaint will be reported to the EA as soon as practicable.

7.4 Management responsibilities

Management has the responsibility to:

- Ensure all relevant staff have received suitable training to carry out the visual dust monitoring and reporting responsibilities;
- Ensure that all necessary mitigation equipment (water bowsers etc) are provided;
- Ensure the Site notice board is legible and contains correct information; and
- Ensure complaints and non-compliances are reported to the EA.

8 Conclusions

This DMP includes consideration of the current baseline air quality in relation to particulate matter and dust. It also considers the potential sources of these emissions associated with the proposed operations to be undertaken on the Site. The potential for dust impacts on local sensitive receptors are subsequently assessed together with the identification of appropriate mitigation measures sets out how the Site will prevent, mitigate and monitor against dust and particulate emissions from the Site.

This DMP will be regularly reviewed, either following an event which requires its update, following a change in site operation or as part of a review of the Site's operating techniques.

The standard and Site-specific mitigation measures to be employed by Keltbray, described in this document, will ensure close control is maintained by Keltbray on the generation and mitigation of fugitive dust and particulate emissions from the Site.

It is considered that due to the mitigation measures proposed, those receptors most sensitive to dust and particulates should not experience any significant adverse impact as a result of the Site operations. Any adverse impacts experienced will be minor and reversible, and will be dealt with constructively by Keltbray, including appropriate and rapid mitigation, effective response to complaints and swift revision to operating procedure, as required.

Keltbray will ensure that relevant Site information is prominently displayed outside the Site such that complaints may be submitted by the public. All complaints will be investigated, recorded and reported, where relevant. The complainant will be kept informed of the investigation process and outcome. Management will provide all necessary staff, training and equipment to ensure that dust may be adequately mitigated.

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DRAWINGS

Permit Boundary Plan

Drawing No. 330201595D1 Rev3

Sensitive Receptors Plan

Drawing No. 330201595D2 Rev2

Indicative Site Setup and Monitoring Locations

Drawing No. 6078 Rev 01



Drawing No.: 330201595D1

Title: Permit Boundary Plan

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Client
Keltbray Built Environment
Limited

Date
February 2024

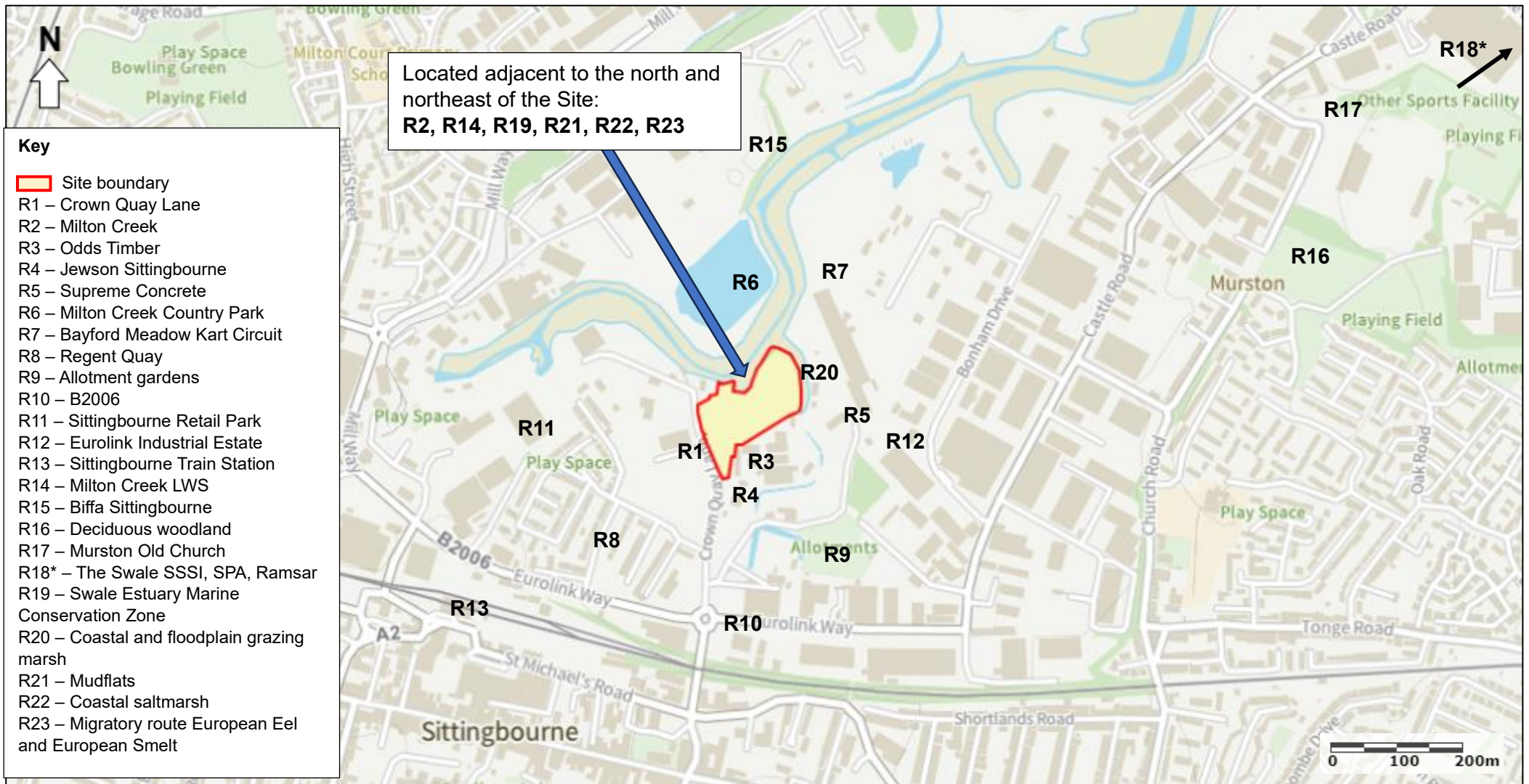
Original
A4

Site
Land east of Crown Quay Lane,
Sittingbourne, ME10 3ST

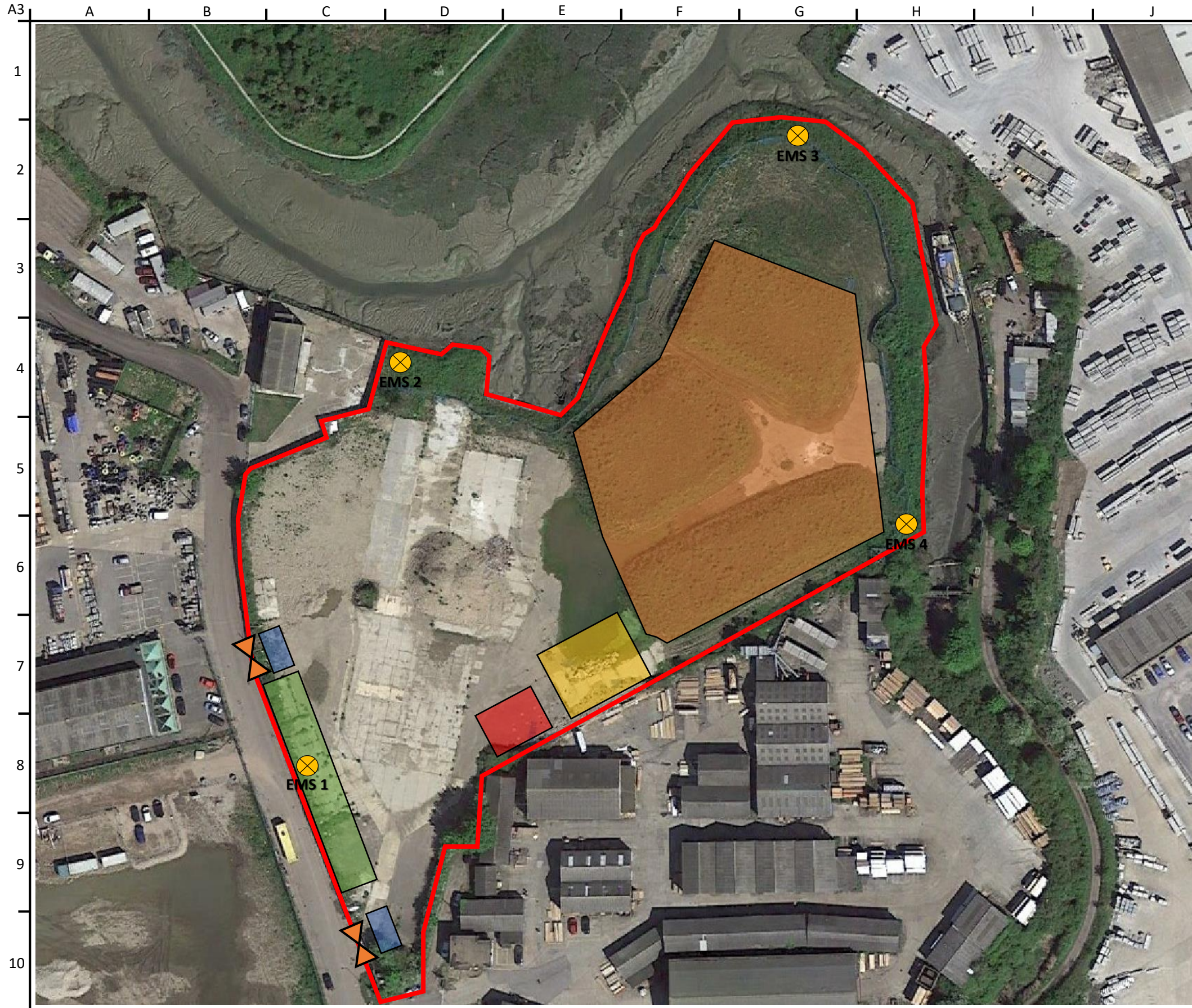
Drawn
Final

Revision
3





Drawing No.: 330201595D2 Title: Sensitive Receptors © Crown copyright. All rights reserved. Licence number AL 100015683	Client Keltbray Built Environment Limited	Site Land east of Crown Quay Lane, Sittingbourne, ME10 3ST	
	Date February 2024	Drawn Final	
	Original A4	Revision 2	



Notes:

1. This drawing is to be read in conjunction with Keltbray's Management Plan and relevant engineer's drawings and specifications.
2. Drawings should not be scaled either by hand or from the computer digital data, only figured dimensions are to be used.
3. Not to scale

- Key:**
- Operating Site Boundary (2.4m Hoarding)
 - ⊗ Environmental Monitoring Location
 - Access / Egress
 - Site Welfare / Office
 - Jet Wash / Wheel wash Facilities
 - Plant Storage Area
 - "Incoming Waste" Storage Area
 - Quarantine Area

Client **Bellway**

Keltbray Job No. 6078 Rev. 01

Project Name
Crown Quay Lane, Sittingbourne

Drawing Title
FIGURE 1. Indicative Site Setup and Monitoring Locations

01	30.03.21	DV	TS	TS
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Issued with Noise and Dust Management Plan

Rev	Date	By	Checked	Approved

Drawing Ref
n/a

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Do Not Scale

APPENDICES

Appendix A

Trigger / Incident / Complaints Form

Trigger / Incident / Complaints					
Trigger/Incident/Complaint Reference No :			Date:		Time:
YES/NO	Noise:				
	Location:				
	First Action Level: dB				
	Second Action Level: dB				
	Level of Exceedance:				
YES/NO	Dust:				
	Location:				
	First Action Level: mg/m ² /day				
	Second Action Level: mg/m ³				
	Level of Exceedance:				
Complaints Notification					
Contract/Project Name:			Contract/Project Number:		
Date:		Time:		Received by:	
Complainants Name:			Telephone Number:		
Complainants Address:			Weather Conditions:		
Type of Complaint (Tick Appropriate Box)					
Noise		Dust		Highways	
Other (Specify)					
Description of works:					
Action Taken:					
Site Assistance/Advice Requested?			(If Yes Who?)		
Is the Complaint considered:	Justified		Unsubstantiated		Unfounded
Signed:		Print Name:		Date:	
Copy to:	Operations Director		HEO:		Client:

Appendix B

Dust Visual Monitoring Check Sheet

