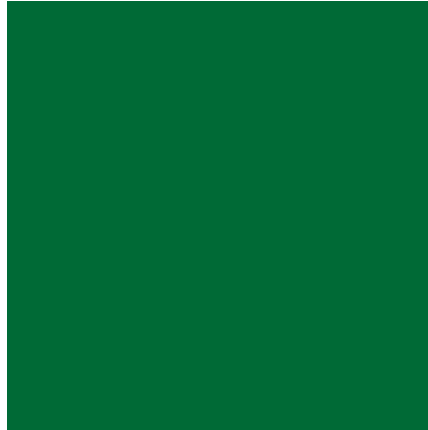




Morgan Sindall Woodchip Storage Facility

Dust Management Plan

(Version 2, March 2026)

Dust Management Plan for Morgan Sindall Woodchip Storage Facility

1 Introduction

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare a Dust Management Plan (DMP) for the proposed Morgan Sindall Woodchip Storage Facility (the 'Facility'), located in Ridham Dock, Sittingbourne, Kent, ME9 8SR.

The Site will require an Environmental Permit (EP) to be issued by the Environment Agency (EA) before it can operate. This DMP has been prepared in support of the application for the EP.

The Facility will undertake storage operations only. The only waste type to be accepted under the EP is woodchip.

Scope of the Dust Emissions Management Plan

It is recognised that activities at the Facility may result in the release of fugitive dust emissions, which have the potential to diminish amenity in the local area through deposition (dust soiling) and visible dust clouds. Smaller dust particles have the potential to increase local ambient concentrations of suspended particulate matter (PM₁₀ and PM_{2.5}).

It is a requirement to control activities at the Facility in order to prevent or mitigate potential releases of dust. This DMP provides a proactive approach to the effective management of dust during the Facility works and operation.

This DMP sets out the potential sources of dust at the Facility, the measures in place to control dust generation and monitor releases, and the management and monitoring actions that will be taken in response to a dust event. The determination of receptor sensitivity and dust emission magnitude has been determined with reference to the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Mineral Dust Impacts for Planning¹, herein referred to as the IAQM Mineral Dust Guidance.

The DMP is a 'live document', in this respect the dust control measures, and management procedures contained within it will be updated on a periodic basis. This DMP will be kept in the Facility office and be available to all employees. The DMP will be implemented throughout the duration of the Facilities' operation.

Key Guidance

In developing the DMP, key guidance documents that have been consulted include:

- The Mineral Industry Research Organisation (MIRO), Good practice guide: control and measurement of nuisance dust and PM₁₀ from the extractive industries (2011)²; and
- IAQM, Guidance on the Assessment of Mineral Dust Impacts for Planning (2016).

¹ IAQM, Guidance on the Assessment of Mineral Dust Impacts for Planning, v1.1, 2016.

² MIRO, Good practice guide: control and measurement of nuisance dust and PM₁₀ from the extractive industries, February 2011.

2 Site Operations

The Facility will have an annual throughput of up to 30,000 tonnes per annum (tpa) of woodchip. Activities on-site include transfer, storage and handling of the woodchip material. There is no treatment of waste undertaken at the Facility. The Facility will store up to 3,500 tonnes of woodchip within the proposed EP boundary.

The Facility would support operations under the neighbouring EPR/HB3337AG permit by storing the woodchip generated from the adjacent (off-site) wood processing activities. The woodchip will be stored on the Site in windrow-style stockpiles pending export via water and road.

Site Layout

The EP boundary and operational layout is illustrated in Drawing 01 and Drawing 02 provided in Appendix A. The Site comprises:

- Woodchip storage area - located in the northern half of the Site and with surfacing comprising of hard standing (made up of a compacted hard standing and areas of concrete).

The access point to Site is located on its eastern boundary at NGR TQ 91997 68289, via Lockyer Road.

Hours of Operation

The Facility operates on a 24/7 basis, operations could therefore be undertaken at any time, 7 days-a-week, including public holidays. However, the majority of the scheduled receipt of waste will be between the core operational hours of 06:00 – 22:00.

Receipt of Waste & Storage

The List of Waste (LoW) codes to be accepted under the EP for the woodchip storage are set out in Appendix B. Woodchips would be imported from the adjacent facility to the north using sheeted tractor and trailer units and would consist of the following grades:

- C grade: 8 – 100mm particle size; and
- A grade: 50-100mm particle size.

Duty of care documentation would be checked against incoming waste and if deemed acceptable, permission granted to tip the waste directly into the designated stockpile area.

Woodchips would be stored in windrow style stockpiles in one of four defined stockpiles on an area of hardstanding. There would be a minimum of 6m distance between each stockpile and the Site boundary. Stockpiles will be formed by pushing up the tipped materials with loading shovels into the profile of the windrow style stockpiles. Each stockpile will be up to 120m long and 10m wide. The positioning and set-up of the woodchip windrows will allow plant access to the sides of all piles and as such the rows can be broken up, turned, moved and monitored effectively. The maximum size of each stockpile is as shown in Table A.

Table A Stockpile Windrow Capacities

Stockpile	Length (m)	Width (m)	Height (m)	Volume (m³)
1	120	10	4 (at Apex)	2,395.73
2	120	10	4 (at Apex)	2,395.73
3	120	10	4 (at Apex)	2,395.73
4	120	10	4 (at Apex)	2,395.73

Each windrow would have a maximum capacity of 2,395.73m³, with a total of 9,582.92m³ stored on site across the four windrows at any one time.

Woodchip waste would be stored for a maximum duration of 6 months with the Site working on a strict 'First in First out' (FIFO) principle. All woodchip waste is stored on hard standing made of compacted hard standing. Other areas of the Site are comprised of concrete with a sealed drainage system.

Due to the type of inputs, it is expected the bulk of wastes will be evenly spread throughout the year. The quantity of stored waste will be monitored against the allowed maximum capacities.

Waste Acceptance

All woodchip waste would be sourced from CRL's neighbouring facility. The Site will implement waste acceptance procedures as per details provided within the EMS to check the waste meets the criteria stipulated during waste pre-acceptance.

All vehicles bringing waste material to the Site will report to the Site Office. All wastes will undergo a visual inspection during deposition to confirm its description and composition against the pre-acceptance criteria. Waste will only be stored at the Site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the pre-acceptance criteria. In addition, all relevant storage areas (quarantine, reception and general) at the Site must have the physical capacity needed for the waste to be received. Wastes will not be accepted if this capacity is not available.

As per the EMS, should non-conforming waste be identified, waste would be removed and placed in a designated quarantine area located on the Site prior to removal to a suitably permitted facility. The waste quarantine areas will be clearly marked. A record is kept in the Site Diary of all rejected wastes and all wastes kept in isolation storage.

Mobile Plant & Equipment

Particulate matter can be a by-product of internal combustion and the Facility is expected to utilise items of plant with internal combustion engines.

The exact type, model and emission rating of mobile plant and equipment operating at the Facility is not known at this stage. The internal plant and machinery will however meet the most recent Non-Road Mobile Machinery (NRMM) emission standards. Due to the size and nature of the Facility, only a small number of operational plant are anticipated to be in use at any one time.

General Housekeeping

Regular cleaning of the hard standing areas within the Site is undertaken, in line with the daily inspections. Where required, appropriate remedial and corrective action will be implemented as soon as practicable.

Mitigation of Community Impacts

The following measures are adopted to ensure a 'good neighbour' approach to local residents:

- A phone number for members of the public to contact the Site Management Team will be visible on the Site board at the entrance; and
- Responding to dust complaints promptly and keeping the complainant informed of outcome of investigation (as detailed in Section 5).

3 Site Location & Baseline

The Facility is located at Ridham Docks, Sittingbourne, Kent, centred on National Grid Reference (NGR) 91863 68335. The village of Iwade is located approximately 1.5km southwest of the Facility. The area surrounding the Facility comprises predominantly agricultural / open marshland to the west, with areas of industrial and commercial use to the south, north and east. The Facility is accessed on its eastern boundary via Lockyer Road.

The Swale, a tidal channel of the Thames estuary, is situated 210m to the north of the Facility boundary at its nearest point within Ridham Docks. The Swale is designated as a Ramsar site, Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA) and forms part of Elmley National Nature Reserve (NNR). The Facility borders the Swale SSSI, SPA and Ramsar sites on its western and southern boundaries.

Table B below summarises the surrounding land uses. The location of the Facility is illustrated in Figure B.

Table B Surrounding Land Uses

Boundary	Description
North	To the north lies industrial/ commercial premises and The Swale which is designated as an SSSI, Ramsar site and SPA. The land beyond this predominantly comprises Elmley NNR.
East	To the east lies industrial/ commercial premises and The Swale which is designated as an SSSI, Ramsar site and SPA. The land beyond this predominantly comprises Elmley NNR.
South	Land to the south of the site predominantly consists of industrial/ commercial premises. Beyond this is the village of Kemsley located approximately 2km south of the Facility.
West	The A249 lies approximately 680m to the west. Land around this largely comprises open / agricultural land, in addition to the village of Iwade which is located approximately 1.5km southwest of the site. The dwellings in Iwade are the closest residential receptors to the site. Swale railway station is located 900m northwest of the Facility.

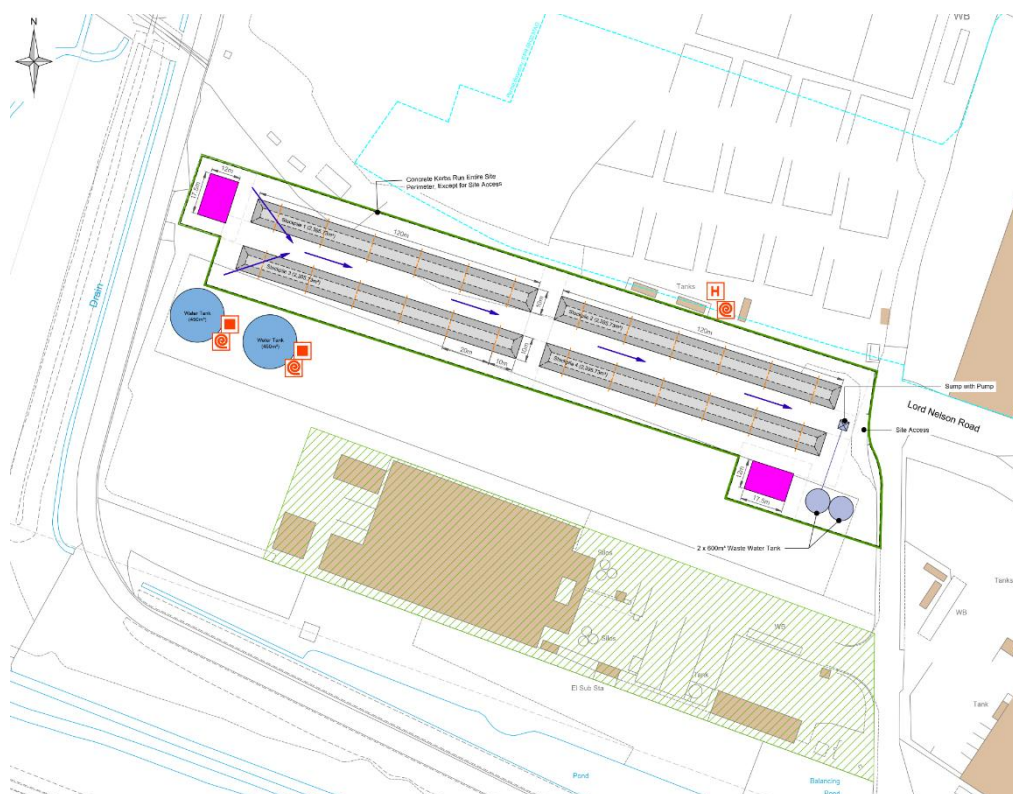


Figure A Site Location

Other Potential Sources of Dust

A review of other potential sources of dust in the Facility locale has been undertaken through use of aerial imagery.

CRL operates the neighbouring “Ridham Dock Wood Facility” under Permit reference EPR/HB3337AG, located immediately to the north of the Site. This neighbouring facility operates as a wood treatment facility to accept, chip and store wood and wood chip for both recovery via biomass Combined Heat and Power (CHP) and manufacture of panel board, with a maximum annual throughput of 100,000 tonnes.

The industrial area of Ridham Dock in which the Facility is located is used to import, export and store a wide range of cargo such as wood, steel, grain, aggregate and concrete products and contains various large-scale buildings. The area also hosts a number of industrial land uses including an aggregate facility (Brett Aggregates), a distribution depot (Morrisons), a building material supplier (Knauf), Kemlsey Paper Mill (DS Sith Paper Ltd) and waste management facilities (the wood processing facility operated by CRL to the north), and the facility operated by MCV Environment Ridham.

Air Quality

The Facility is located within the administrative area of Swale Borough Council (SBC) which currently has six Air Quality Management Areas (AQMAs) declared. AQMAs are areas of sensitivity, declared by local authorities where an Air Quality Assessment Level (AQAL) (including for PM) is not likely to be achieved. The closest AQMA declared based on particulate matter is AQMA No. 4 due to exceedances of the 24-hour mean for PM₁₀. The AQMA is however located at a distance in excess of 4km south of the Facility in the centre of Sittingbourne; as such the Facility setting is not considered to be sensitive to air quality.

The Department for Environment, Food and Rural Affairs (Defra) maintains a nationwide model of existing and future background air quality concentrations at a 1km grid square resolution which is routinely used to support LAQM requirements and air quality assessments. The data sets include annual average concentration estimates for PM₁₀ and PM_{2.5} using a base year of 2021 (the year in which comparisons between modelled and monitoring are made).

The Defra mapped background concentrations for the grid square containing the Facility during the current year (2025) are presented in Table C.

Table C Defra Mapped Background Particulate Matter Concentrations

Grid Square (X,Y)	Year	Annual Mean Concentration (µg/m ³)	
		PM ₁₀	PM _{2.5}
591500, 168500	2025	11.0	6.1
AQAL		40	20

Mapped background concentrations for the 1km grid square containing the Facility are ‘well below’ the respective AQALs.

Sensitive Receptors

The IAQM Mineral Dust Guidance states two key screening distance for dust when determining human and ecological receptors:

- For soft rock quarries (i.e., Sands and Gravel), adverse dust impacts are uncommon beyond 250m; and
- For hard rock quarries (i.e., Granite), adverse dust impacts are uncommon beyond 400m.

These screening distances are typically measured to nearest dust generating source or activity. For the purpose of this DMP, the precautionary 400m screening distance has been applied. This represents a highly conservative approach given that the dust emission potential associated with waste storage activities is typically much lower than the quarrying industry.

In addition, as presented in Table C, it has been established that local PM₁₀ concentrations are 'well below' the AQALs. As such, consideration of both human and ecological receptors within 400m of the Site boundary is considered sufficient.

Human Receptors

Human receptors within 400m of the Facility are limited to those of negligible to low sensitivity associated with existing industrial / commercial premises.

Ecological Receptors

The Swale Ramsar, SPA and SSSI is located adjacent to the western and southern extent of the Site, as presented in Figure B. The Swale Ramsar, SPA and SSSI covers a total area of 65km² comprising a wide range of intertidal habitats which provide important feeding and roosting areas for birds including grazing marsh, intertidal salt marsh and intertidal mud flats. The area within 400m of the Facility is 0.56km², representing <1% of the total area.

The primary habitats located within 400m distance of the Facility include 'acid, calcareous or neutral grassland' and 'improved grassland' with small areas of coastal saltmarsh and coastal sand dunes. In accordance with the IAQM guidance, the sensitivity of the Swale SPA / SSSI is considered to be High.

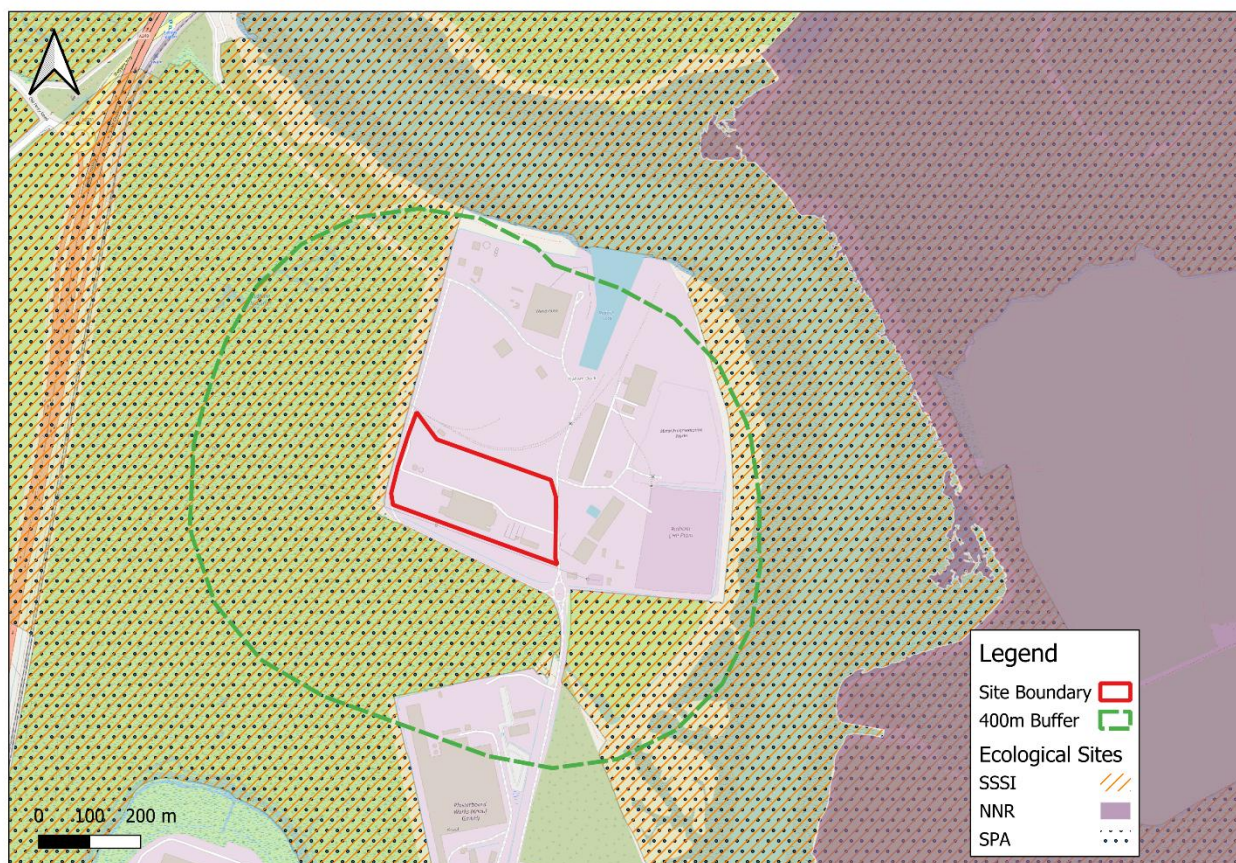


Figure B Site Setting in Relation to Sensitive Receptors and Ecological Designations

4 Dust and PM₁₀ Management

Identification of Dust Sources

In reference to the Site operations (as outlined in Section 2) the following potential dust sources at the Site are identified:

- Road vehicles entering and leaving the site, tracking material out onto the public highway;
- Internal vehicle / plant movements within the Site;
- Dust or particulates released from handling of woodchips;
- Dust or particulates released from storage of woodchips; and
- Exhaust emissions from vehicles/plant operated.

Woodchips identified as a potential source of dust emissions in consideration of their high organic matter content and low moisture content.

Control Measures

The following dust control measures are adopted at the Site. In the first instance, operational measure have been adopted to minimise or prevent the release of dust. Where dust emissions cannot be prevented, mitigation measures (such as suppression and containment) would be adopted to further minimise or prevent the release of dust. The 'routine' measures, which would be adopted on a regular basis, are outlined in Table D.

Table D Routine Control Measures for Dust / Particulates

Abatement Measure	Description / Effect	Overall Consideration & Implementation	Trigger for Implementation
Site speed limit and minimisation of vehicle movements on site	Reducing vehicle speeds reduces dust emissions from vehicles movements.	Implement as part of good practice and incorporated into training / induction process. Speed limit clearly presented around the Site.	Enforced at all times when the Site is operational.
Storage restrictions	Setting limitations on the size and height of stockpiles of woodchips ensures dust potential from wind whipping is minimised.	Maximum height of stockpiles is 4m (at apex). Maximum storage capacity of each stockpile would be approximately 790 tonnes (2,395.73m ³ per stockpile)	Implemented at all times that the Site is operational.
Marking of stockpile base	Clear delineation of storage areas minimises the risk of vehicles traversing across loose particulates on the ground and causing re-	Easy method to implement, with clear line marking provided on the impermeable concrete at the storage areas.	Implemented at all times when the Facility is operational.

	suspension or re-distribution.		
Visual dust monitoring	Visual dust monitoring provides a cost-effective method of monitoring that allows for pro-active, immediate response to dust generating events.	Daily visual monitoring as part of routine operations. Where monitoring identifies that dust from the Site operations is present beyond the Site boundary, investigation would be undertaken, and remedial measures implemented, as outlined in Section 5.	Periodic dust monitoring is undertaken as detailed in Section 5.
Surfacing of vehicle routes	Hardstanding or impermeable surfaces limit the potential for vehicles movements to resuspend dust/particulates.	Site access & internals roads are made up of hardstanding. Hardstanding surfaces reflect industry best practice.	Surfaces are periodically inspected for signs of wear or damage. Remedial works will be commissioned as required.
Sheeting of loaded vehicles	Minimises the escape of debris, dust and particulates from loaded vehicles.	Loaded tractor / trailer units importing the woodchip and HGVs exporting waste would be checked for coverings upon entering / exiting the Site.	Implemented for all loaded vehicles entering the Site.
Good housekeeping	A consistent, regular housekeeping regime is in place to ensure Site is kept clean, and in doing so prevents dust and particulate build up within the operational areas.	Easy to implement and requires minimal equipment. Encourages a sense of pride and satisfaction amongst the staff which promotes vigilance and a positive culture.	Implemented at all times that the Site is operational.
Minimising material drop heights	Reducing the height at which materials are handled reduces the potential for debris, dust and particulates to be suspended and dispersed by winds.	Implement as part of good practice and incorporated into the training process.	Implemented at all times that the Site is operational.
Use of low-emission vehicles / plant	Use of low emission plant and vehicles would minimise the airborne emissions from vehicular exhausts.	All internal plant and machinery will meet the most recent NRMM emission standards. The fleet accessing the Site for export of waste would be a minimum of Euro VI compliant.	Implemented at all times that the Site is operational.

Additional 'reactive' measures can be implemented as/when it is identified that they may be required (i.e. in response to visual dust monitoring or complaints), as summarised in Table E.

Table E Reactive Control Measures for Dust / Particulates

Abatement Measure	Description / Effect	Overall Consideration & Implementation	Trigger for Implementation
Dust suppression	Water suppression can be a highly effective way of reducing the dust potential at-source, eliminating the pathway to the receptors.	Water suppression is available via a tractor / bowser for the internal haulage / access routes and via a water boss unit for the woodchip stockpiles.	Implemented as required, to be determined by the Site Manager by monitoring of meteorological conditions (i.e. identify periods of low rainfall, high temperatures and/or low wind speeds blowing towards sensitive receptors).
Road sweeping	Removal of any material deposited on the hard paved access road, removing the material at source before it is tracked out onto the local road network	Road sweeper is available for the hard paved site access road, as required.	Implemented as required, to be determined by the Site Manager by routine visual monitoring.
Visual dust monitoring	Visual dust monitoring provides a cost-effective method of monitoring that allows assessment of effectiveness of dust control measures	Where monitoring or complaints identifies that dust from the Site operations is present beyond the Site boundary, investigation would be undertaken, and remedial measures implemented, as outlined in Section 5. Visual monitoring used to assess the effectiveness of the measures.	Periodic reactive dust monitoring is undertaken as detailed in Section 5.
Temporary cessation of dust generating activities	Temporary stopping dust generating activities can significantly reduce dust emission from the Site.	Ceasing dust generating activities would reduce dust emissions from the Site, however this would have implications for the operational effectiveness of the Site, so should only be adopted where other control measures have been exhausted.	This is to be adopted as a final contingency measure, only where other reactive mitigation measures have been implemented and visual dust monitoring identifies that dust is still being transported beyond the Site boundary.

Magnitude of Dust Emissions

Potential magnitude of dust emissions from sources at the Site are presented in Table F. The potential magnitude of emissions has been determined in consideration of the proposed Site operations (Section 2), dust potential of materials and control measures (Table D and Table E).

Table F Dust Release Inventory

Dust Source	Potential Magnitude of Emissions	Reasons
Vehicle movements – access road	Low	Hardstanding access road. Minimal trackout from site due to impermeable haul roads. Site speed limit enforced. Tractor & bowser on site / road sweeping as required.
Vehicle and plant movements – internal haul roads and operational areas	Low	Site speed limit enforced. Tractor & bowser on site / road sweeping as required. Paved internal haulage roads.
Dust / particulates from loaded vehicles	Low	Loaded tractor / trailer units importing the woodchip from adjacent site would be sheeted upon entering the Site. HGVs exporting woodchip waste offsite would be covered (sheeted / enclosed).
Storage of woodchip waste	Moderate	DustBoss unit onsite for dampening of stockpiles, as required. Stockpile restrictions, i.e. 4m maximum height at apex and maximum storage of 2,395.73m ³ per stockpile. Clear designation of windrow base.
Handling of woodchip waste	Moderate	Minimal handling; woodchips transferred to site and deposited directly into windrow stockpiles. DustBoss unit onsite for dampening of material handling operations, as required.
Vehicle emissions	Low	The fleet exporting waste from the site is Euro VI compliant. All internal plant and machinery will meet the most recent NRMM emission standards. Relatively small number of vehicles in use at the Site.

Pathway

The primary pathway by which dust and particulates may be transported to sensitive receptors is by atmospheric dispersion. In general, dust impacts at sensitive receptors are more likely during period of high wind speeds (above 5m/s).

The nearest meteorological recording station to the Site is Southend Airport, located approximately 21km north north-west of the Site. In reference to the five-year average meteorological data acquired from this recording station, the prevailing winds in the Site locale are from the south-west (48% of the period presented, sector 180° to 270° inclusive).

As such, the potential impact of emissions is likely to be greater to the north-east of the Site. A wind rose from Southend meteorological station, showing the frequency of wind speed and direction, is presented in Figure C.

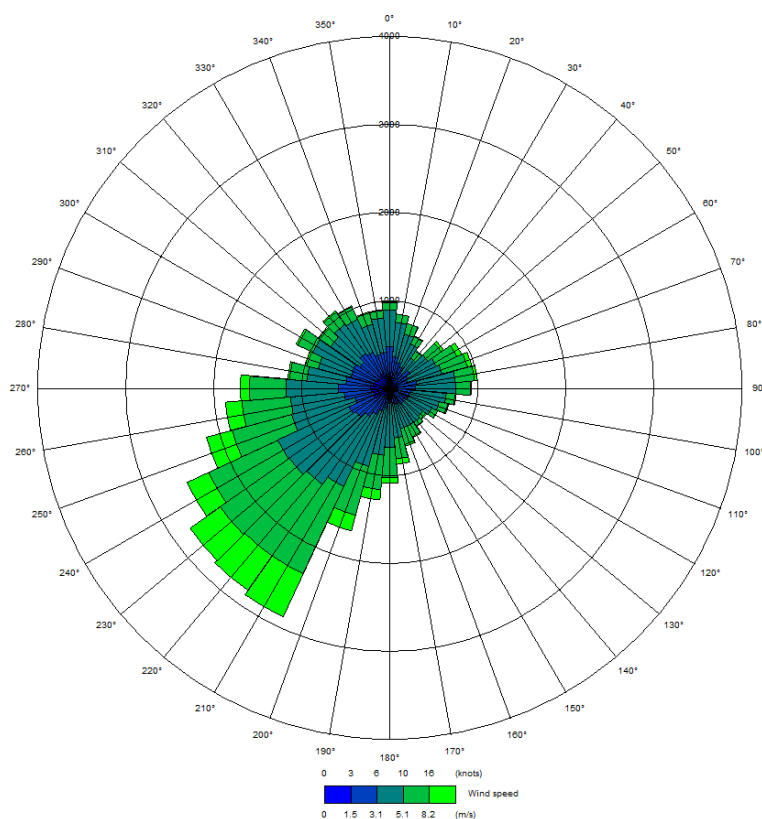


Figure C Wind Rose for Southend Meteorological Station (2017-2021 Average)

Rainfall is also an important climatological parameter in the generation of dust; enough rainfall can suppress dust at the source and eliminate the pathway to the receptor. Rainfall greater than 0.2mm per day is considered sufficient to suppress dust emissions³.

Relevant rainfall data applicable to the Site has been obtained from the Meteorological Office website⁴ of UK mapped climate averages for 1991-2020. The annual average days of rain $\geq 0.2\text{mm}$ for the area of the Facility is 150-160 days per year. Natural dust suppression (from rainfall) is therefore considered to be effective for 42% of the year.

Source-Pathway-Receptor Routes

The pathway for the majority of the releases is atmospheric dispersion; wind whipping of stockpiles and handling operations. The source-pathway-receptor routes are detailed in Table G.

Table G Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of Impact	Where Relationship can be Interrupted
Vehicle and plant movements	Deposition & suspension of dust and particulates as a result of vehicle movements. Atmospheric dispersion of	High sensitivity ecological receptors located within approximately 50m of the nearest internal or access haul road.	Dust deposition / visual soiling	All external and internal haul routes are hardstanding, therefore the suspension and accumulation of dust / particulates by vehicles whilst on (or leaving) Site is anticipated to be minimal.

³ Arup Environmental, Ove Arup and Partners (1995) The Environmental Effects of Dust from Surface Mineral Workings, HMSO, London (ISBN 11 75 3186 3)

⁴ The Meteorological Office, <https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages> [accessed March 2026].

	materials transported.			Tractor & trailer units transferring material to the Site shall be covered (sheeted). HGVs exporting woodchip waste offsite would be covered (sheeted / enclosed) A speed limit of 10mph (or less) is in place for vehicles or plant at the Site. Roads will be swept and cleaned whenever necessary In the event that mud, debris or waste arising from the Site is deposited outside the Site boundary, the affected area will be cleaned, and traffic will be isolated from sources of mud and debris within the Site. Daily visual inspections of the Facility by Site management will identify any areas that would then be cleaned up as soon as possible. Where necessary road cleaning equipment will be deployed. The Facility will benefit from good housekeeping and all areas of the Facility will be cleaned on a daily basis.
Unloading, loading, manoeuvring and storage of woodchip waste	Suspension of dust and particulates as a result of unloading and loading activities. Atmospheric dispersion of stored materials.	High sensitivity ecological receptors located within approximately 50m of Site boundary	Visual soiling, also consequent resuspension as airborne particulates.	Drop heights are minimised where possible. Water suppression will be used to dampen material handling and storage activities using a DustBoss unit during periods of dry / windy weather.
Vehicle emissions	Atmospheric dispersion of exhaust emissions.	High sensitivity ecological receptors located within approximately 50m of the nearest internal or access haul road.	Airborne particulates.	The fleet exporting waste from the site is Euro VI compliant. All internal plant and machinery will meet the most recent NRMM emission standards.

5 Monitoring, Complaints & Training

Dust Monitoring

Visual dust monitoring provides a cost-effective method of monitoring that allows for pro-active, immediate response to dust generating events.

Visual assessment is undertaken on a daily basis by the Facilities operatives for airborne and deposited dust. Facility operatives who undertake the visual dust assessments will receive appropriate training. Daily assessments include, as a minimum, a visual assessment of the following areas:

- Perimeter walk around;
- If required, offsite walkover surveys;
- Material storage areas;
- Internal haul routes; and
- Access road and public highway near Site exit.

Based upon the size of the Facility, it is considered viable for daily monitoring to include a walkover of the entire perimeter (permit boundary) as the routine. All visual monitoring is recorded in the daily logbook and made available to the EA as required. Details recorded include (as a minimum):

- Weather conditions (qualitative wind speed, direction, rainfall);
- Current site operations (location of activities);
- Identification of any significant dust within the Facility or dispersion beyond the Site boundary; and
- Additional mitigation measures put in place, if required.

An increase in the frequency and scale of visual monitoring will be undertaken where:

- Particularly dusty conditions are detected by operational staff;
- Dust emissions are evident near the boundary during any activity; and / or
- In response to complaints being received – in this situation off site monitoring will also be carried out at appropriate locations.

The results of the visual dust monitoring will be monitored by the Facility management. Where it is identified that significant dust levels are present on-site, or dust is visible beyond the site boundary, management will ensure that the appropriate mitigation measures are adopted in response. In the event that visual dust monitoring identifies dust being transported beyond the Site boundary and mitigation measures fail to resolve the issue, all dust generating activities will cease until the source of the dust has been identified and steps taken to prevent the off-site emissions.

In the event that continuous offsite dust emissions are detected (i.e. more than 2 days in a row) alongside complaints being received by members of the public, correspondence with the EA will be undertaken to discuss subsequent steps.

Dust Complaints Procedure

Complaints may be notified to the Facility either during or after an event, directly by the complainant or indirectly through a regulator (such as the Local Planning Authority or Environmental Health Department) who was notified.

Complaint records will include the following (recorded in the site logbook):

- Date, time, and name of complainant (if given);
- Nature of complaint;
- Locality of complaint; and
- A summary of the investigation and actions taken and the outcome.

Complaint response will have the objective of investigating the incident and preventing any continuing issue, for example by putting in place additional control measures to prevent re-occurrence of the incident and updating the DMP. Complainants will be informed of the findings of investigations and the actions taken (if contact details are provided at the time the complaint is made).

Investigations will include but not be limited to:

- Visit by Facility personnel to location of complainant to verify issue (if the complaint is made 'after' rather than 'during' a dust event this may not be possible);
- Review of activities at time of incident to investigate potential sources;
- If dust event is occurring or a recurring event undertake more frequent targeted on-site and off-site visual monitoring and record findings;
- Review of control measures and management actions at the time of the incident;
- Review of meteorological conditions at the time of the incident (using data from the meteorological station based at the CRL Ridham Dock Wood Facility); and
- Reporting of findings (using Appendix C Example Dust Complaints Form or site logbook).

All complaints will be acknowledged within 2 working days and a response provided in line with the Councils Complaints Procedure. An example Dust Complaint & Dust Event Form is included in Appendix C & D. Where a number of complaints are received (or recurring complaints are received), the complaints investigation would be escalated to the Site Manager, who will lead an investigation seeking to rectify the issue at the earliest opportunity. The Site Manager may engage the services of a specialist contractor to investigate where appropriate.

Training

All personnel on Site will understand their responsibility to ensure the generation of dust is avoided, minimised and controlled. Each employee shall be made aware of the importance of effective dust control and the most effective measures available to minimise such emissions from the various activities. Such training shall be provided as part of the induction process for all new employees. Refresher training is expected to be provided every two years.

Specific training will be provided to:

- Operatives in use of the water suppression techniques;
- All site personnel on the importance of reporting potential / actual dust emissions or the malfunctioning dust control to the appropriate person; and
- Methodology of visual dust assessments;

Training will also incorporate the following aspects:

- Waste types that can be accepted at the Facility, as outlined within the associated permit;
- Identification of high dust potential waste;
- Key activities with the highest potential for dust generation;
- Importance of unofficial visual dust assessments during everyday work and how to report visible dust emissions;
- How to respond to a complaint from a member of the public;
- The complaints protocol and escalation method;
- What to do in the event of a dust emission incident, and who to inform;
- The importance of the DMP, its 'active' format and its location;
- Any dust monitoring methods incorporated on Facility at the time;
- Overview of the prevailing winds and how this affects daily operations;
- Key aspects to look out for during routine operations with regard to dust generating activities;
- Cleaning regime onsite (routine and intermittent);
- Regime of maintenance of onsite plant;
- Routine measures that can be incorporated into daily work schedules to minimise dust and emissions (i.e. no idling, minimise drop heights, traversing across base of stockpiles, covering of loads); and

- Additional measures that can be undertaken to minimise dust and emissions (i.e. notification of relevant person visual dust plumes are identified, remedial actions).

Engagement with the Community

The Site Manager (or nominated representative) will act as liaison with the regulator and local community for issues relating to dust nuisance.

The nominated representative will respond promptly to all complaints by undertaking an investigation into the dust event, including weather conditions, operations on Site and mitigation measures in place at the time of the complaint.

Liaison with local residents and business can be undertaken through posts on the local council / community council's websites as appropriate.

Management Responsibilities

There will be a trained Waste & Recycling Supervisor present at the Facility during operational hours, responsible for dealing with complaints (i.e. receipt, recording and investigation).

Contact details will be available at all times at the Facility entrance, with details (including a phone number / email address) provided for both operational hours and out-of-hour periods.

A suitably trained Supervisor will be present at the Facility when operational, who is responsible for the implementation of dust management measures where required. Responsibilities are allocated to specific personnel to ensure dust generation is effectively controlled as outlined in Table G.

Table G Dust Management Responsibilities

Actions	Responsibility
Monitoring meteorological forecast	Site Supervisor
Routine daily visual dust monitoring	Site Supervisor
Routine monthly visual dust monitoring	Site Supervisor
Coordinating plant area cleaning	Site Supervisor
Application of plant dust suppression	Site Supervisor
Completing dust event forms	Site Supervisor
Liaison with public and regulator	Site Supervisor
Coordinating DMP updates	Site Supervisor
*The procedure for the Supervisor to review feedback from visual monitoring will be to review the visual monitoring record in the Site Logbook.	

Record Keeping

The operator will keep records of all dust monitoring, dust contingency actions, investigations and complaints on site for a minimum period of 2 years; these shall be made available to the regulator for examination on request.

DMP Update and Review

This DMP is a controlled document, and forms part of the Environmental Management System (EMS). The DMP will be reviewed on an annual basis. However, the DMP is intended to be a 'live' document which serves as a reference during daily operations, and as such will be updated on a more frequent basis should the following occur:

- Significant changes are made to the plant or operational practices;

- The regulator requests that the DMP is updated; or
- Complaints are received, which on subsequent investigation result in the identification of further control measures or remedial action, in addition to those set out within this DMP.

Countrystyle Recycling Limited
March 2026

Appendix A Drawings

Appendix B List of (Woodchip) Wastes Accepted

LoW Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 03	plant-tissue waste (wood and bark only)
02 01 07	wastes from forestry (wood and bark only)
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 03	wooden packaging
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 01	Waste wood from construction and demolition
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 07	wood other than that mentioned in 19 12 06
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 38	wood other than that mentioned in 20 01 37
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste (wood and bark only)

Appendix C Dust Complaints Form

Complainant Details	
Complainant Name:	
Address and postcode:	
Complainant contact details (telephone/ email):	
Date & time of complaint:	
Complaint reference number:	
Complaint details:	
Investigation Details	
Investigation carried out by:	
Investigator position/role:	
Date & time of investigation:	
Weather conditions at time of complaint and investigation:	
Wind speed and direction at time of complaint and investigation:	
Investigation findings:	
Feedback given to NRW and/or local authority?	
Date feedback given:	
Feedback given to complainant and/or public?	
Date feedback given:	
Review and improve	
Improvements needed to prevent a reoccurrence:	
Proposed date for completion of required improvements:	

Complainant Details	
Actual date of completion (to be filled in once completed):	
If proposed date for completion of improvements was missed, state why:	
Does the DMP need updating?	
Date that the DMP was updated (if applicable):	
Closure	
Site supervisor review date:	
Site supervisor signature (to confirm no further action required):	

Appendix D Example Dust Event Form

Dust Event Form	
Name of Author	
Description of Event e.g. Complaint registered (name and address), or location of the visible dust crossing the site boundary	
Date / Time	
<u>Activities taking place during time of event</u>	
<u>Dust mitigation techniques employed at time of event</u>	
<u>Summary of weather conditions leading up to and during the event</u>	
<u>Details of corrective actions</u>	
Notes	