

Dust Management Plan

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For: I Ringway Infrastructure Services Lt

Site: Newport Pagnall

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1. Introduction

1.1 Background

- 1.1.1 This Dust and Particulate Emission Management Plan (DMP) sets out measures to prevent or minimise dust/particulate pollution arising from the storage of streetsweeping and gully waste at National Highways Newport Pagnall depot, Newport Pagnall, next to Newport Pagnall Services at Junction 14/15, M1, Buckinghamshire, MK16 8DS (the Site).
- 1.1.2 This DMP has been prepared in accordance with the Environment Agency's H5 Dust and Particulate Emission Management Plan Template and Gov.uk Guidance 'Control and monitor emissions for your environmental permit' (published 1st February 2016). It provides an assessment of the production of fugitive emissions relating to waste operations on the Site.
- 1.1.3 The DMP identifies potential sources of dust emissions and the associated potential impacts along with measures to be implemented at the Site to mitigate dust and particulate matter.

1.2 Site activities

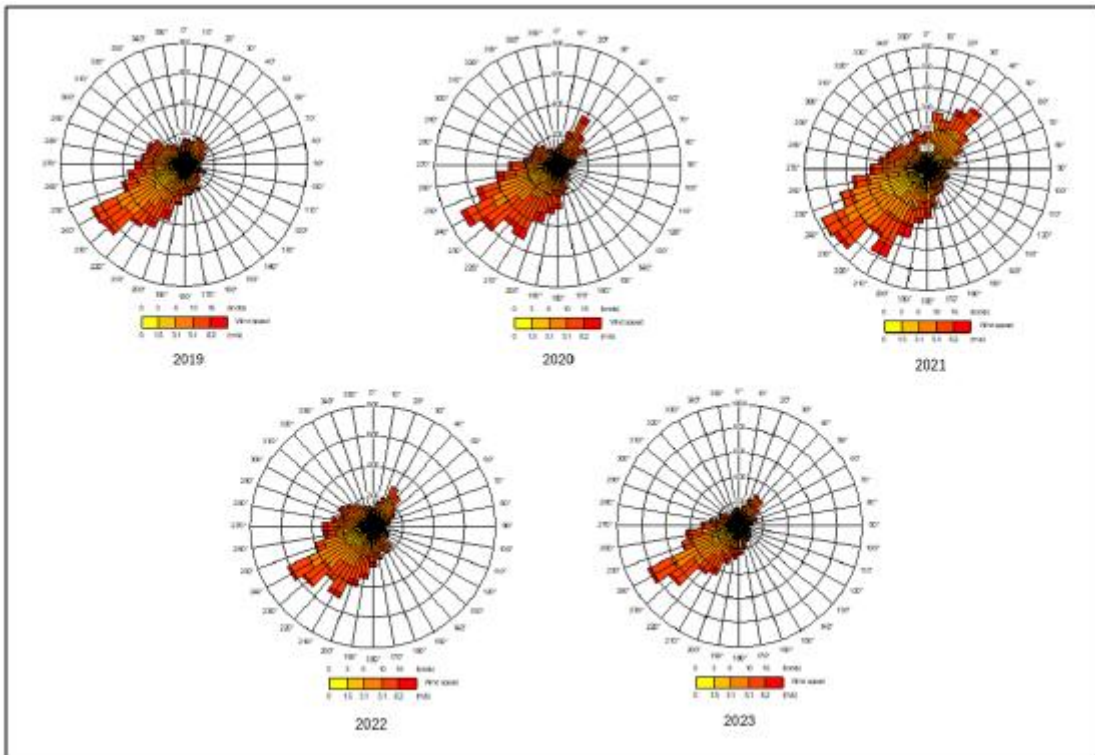
- 1.2.1 The Operator is sub-contracted by National Highways to provide carriageway support services, including regular streetsweeping and clearing of gullies on a regular basis.
- 1.2.2 The Site will store street-sweeping and gully waste within the concrete storage bay on site. Gully waste with a high water content will be allowed to drain into the ACO drain. This water element will be discharged to the foul sewer under a discharge consent and the solid fraction will be transferred to a suitably permitted facility for recovery.
- 1.2.3 The proposed permit boundary and Site activity layout are shown on the Site Layout Plan.

1.3 Site Setting

- 1.3.1 The Site is not located within an Air Quality Management Area (AQMA). The nearest area is the Rugby Borough Council AQMA, which is c.45km north northwest of the Site and is designated for Nitrogen Dioxide (NO₂) (first designated on 16/12/2004).
- 1.3.2 Observations taken from a nearby weather station at Bedford (c. 20km northeast of the Site), between November 2019 and 2023, indicates that prevailing winds originate predominantly from the west, southwest (see Figure 1).



Figure 1 Wind roses of 2019 to 2023 (Bedford)



1.4 LOCAL DUST SOURCES

- 1.4.1 Off-Site dust sources have been considered alongside particular noteworthy dust sources.
- 1.4.2 The National Highways depot itself is a possible source of dust. The depot stores large quantities of grit (under cover) which is applied to its service routes in the winter. If in heavy use, this could be a source of dust.
- 1.4.3 The M1 motorway which runs approximately north-south, 50 m east of the Site is a significant source of dust and particulates. The vehicles using this carriageway will also access the Newport Pagnall Motorway Services, c. 30 m southeast of the Site.

1.5 Sensitive Receptors

- 1.5.1 Sensitive Receptors within 500m of the Site boundary have been identified and tabulated in Table 1 below.
- 1.5.2 A 500m radius has been applied to reflect the potential distance that fugitive dust and particulate matter could reasonably be dispersed in meteorological conditions without any mitigation measures in place.



Table 1 Sensitive receptors within 500m of the Site

No.	Name	Type	Direction	Dist. (m)
1	National Highways depot	Industrial	N	15
2	Ramada Hotel	Residential (transient)	SW	15
3	Newport Pagnall Services	Commercial	SE	30
4	M1	Highway	E	70
5	River Great Ouse LWS	Protected habitat	E, N, W,	75
6	Residences off Rowditch Furlong Rd	Residential	NW	100
7	Residences off R. Furlong Rd	Residential	S	105
8	Residences N. of Little Linford Ln	Residential	NW	160
9	Redhouse Park	Recreation	S	220
10	Migratory route (E. Eel, R. Lamprey)	Protected habitat	NW	375

1.6 List of Environmental Receptors

1.6.1 A Nature and Heritage Screen was run by the Environment Agency during basic pre-application advice. The screen returned the following habitats within up to 500m of the Site (Table 2).

Table 2 Protected features/ species within 500m

Screening distance	Protected feature/ species	Protected feature / species
200m	Local Wildlife Site	River Great Ouse
500m	Protected Species (River Great Ouse)	Code 2 European Eel migratory route River Lamprey migratory route

1.6.2 In the same Nature and Heritage Screen, the Environment Agency confirmed that there were none of the following protected sites within the relevant screening distance of the Site:

- Special Areas of Conservation (cSAC or SAC)
- Special Protection Area (pSPA or SPA)
- Marine Conservation Zone (MCZ)
- Ramsar
- Sites of Special Scientific Interest (SSSI)
- National Nature Reserve (NNR)
- Local Nature Reserve (LNR)
- Local Wildlife Sites (LWS)
- Ancient Woodland



- relevant species and habitats.

- 1.6.3 Predicted exposure risk levels have been determined via a qualitative assessment, which evaluates the likelihood of exposure to dust and particulate emissions based on the receptors' proximity to the Site and the location of the sensitive receptors with respect to the prevailing wind direction.
- 1.6.4 Institute of Air Quality Management (IAQM) Guidance on the Assessment of Mineral Dust Impacts for Planning (May 2016) states that "it is commonly accepted that the greatest impacts will be within 100 m of a source and this can include both large (>30 µm) and small dust particles. The greatest potential for high rates of dust deposition and elevated PM10 concentrations occurs within this distance. Intermediate-sized particles (10 to 30 µm) may travel up to 400 m, with occasional elevated levels of dust deposition and PM10 possible. Particles less than 10 µm have the potential to persist beyond 400 m but with minimal significance due to dispersion." This statement has been considered in the assessment of the exposure level for each receptor. The source of dust from the Site will be general mineral dust.
- 1.6.5 Given the proposed waste activity and type and the estimate vehicle movements, it is considered that receptors in excess of 50m from the Site are unlikely to be adversely impacted by dust emissions from the Site even in poor operation conditions.
- 1.6.6 There are three receptors identified within 50m of the Site, National Highways depot and Newport Pagnall services are both considered to have a low sensitivity to dust in that they are commercial activities, potentially being a source of dust generation themselves.
- 1.6.7 The Ramada hotel 15m southwest of the Site is considered to be sensitive to dust impacts e.g. soiling of parked cars or nuisance of dust via open windows. It is likely that windows of the hotel close to a motorway will be closed for noise purposes. With the site management and mitigation measures proposed, adverse impacts from dust are not anticipated.



2. Site Activities

- 2.1.1 The Operator services a maintenance contract out of the Newport Pagnall Motorway Services (close to post code MK16 8DS). Maintenance includes clearing drains and gullies along a stretch of motorway and road sweeping, including responding to incidents such as flood events.
- 2.1.2 The sweepings will be stored in a dedicated concrete storage bay with sealed drainage. The bay is fronted with an arco drain which receives the passive drainage of the sweepings for discharge to foul sewer.
- 2.1.3 The storage bay will be used as a temporary storage depot / transfer station. Consequently, the waste will be stored for short durations only, typically removed from Site within a week.
- 2.1.4 The storage bay is constructed from 3-sided concrete walls, with sealed drainage, which drains to foul sewer via a silt-trap and hydrocarbon interceptor. The bay measures 11m L x 4m W x 1.9m H.
- 2.1.5 The Operator predicts that it will deposit a tanker of material per night. The water will be allowed to drain to sewer and the resulting drained silt will be removed to an appropriately licenced facility.

2.2 Waste types

- 2.2.1 The Site will accept a single waste code only - waste from street sweeping and gully emptying, see Table 3.

Table 3 Waste types

20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 03	Other municipal wastes
20 03 03	Street cleaning residues including residues from gully emptying

- 2.2.2 Waste is delivered to site in its own vehicles and so as well as pre-acceptance information being available, the Operator will have the knowledge of the collecting driver upon which to base and dynamic risk assessment of the material.
- 2.2.3 Wastes accepted will not comprise wholly or mainly of dust, powder or loose fibres. Waste accepted will be saturated or wet in composition. There is a chance the material will dry out over the course of a week, however should it become or start to become friable, the waste will be dampened or removed.



3. Dust and Particulate (PM10) Management

3.1 Responsibility for Implementation of the DMP

- 3.1.1 The Site Manager and Technically Competent Manager (TCM) will oversee the implementation of the DMP and ensure that the methods detailed within this DMP provide effective dust mitigation.
- 3.1.2 Where the responsible individual is unavailable to supervise in the implementation of dust suppression measures, a suitably experienced site operative will be allocated responsibility.
- 3.1.3 If dust and particulate emissions continue to be observed following the use of the dust suppression measures, the DMP will be reviewed and additional measures considered.
- 3.1.4 Amendments of the DMP to reflect any potential improvements will be made during the review process.
- 3.1.5 The TCM who will administer the implementation of the DMP has been assessed in the implementation of site control measures as part of the Certificate of Technical Competence and therefore is deemed proficient to execute and review this DMP.
- 3.1.6 During the induction process, all staff members will be trained in the dust suppression measures outlined in this DMP. Refresher training will be provided in the scenario where additional dust suppression measures have been introduced to ensure staff remain competent.
- 3.1.7 The DMP will be reviewed at least annually or following any adjustments in operations which have the potential to increase the level of exposure to surrounding sensitive receptors.

3.2 Visual Dust Monitoring

- 3.2.1 Dust monitoring at the Site boundary will be carried out as part of the routine daily Site inspections with any relevant observations recorded and retained on-Site. Dust monitoring locations are shown on the Dust Plan.
- 3.2.2 All plant will be inspected daily and cleaned after use, as appropriate, to prevent the accumulation of dust and loose materials.
- 3.2.3 Informal dust monitoring comprising of operational staff remaining vigilant for observable dust and particulate will be carried out during the operational process. Where dust emissions are identified, operations will cease, and the Site boundary will be examined to ensure emissions are not leaving Site. The source of any fugitive emissions will be cleared before operational processes resume.



- 3.2.4 Results for all dust monitoring will be recorded and retained in the Site office or secure location off-Site along with details regarding dates, times, weather conditions, wind direction and the name of the staff member undertaking the monitoring process, see Section 4 below.
- 3.2.5 The likelihood of emissions impacting on the identified sensitive receptors is considered low. Therefore, no other forms of dust monitoring are proposed for the Site.
- 3.2.6 If dust emissions are identified as an issue, the Operator will review the mitigation measures and monitoring techniques detailed in this DMP to reduce exposure levels and prevent emissions from the Site. In this scenario, quantitative techniques will be considered as a monitoring process.



4. REPORTING AND COMPLAINTS

4.1.1 The Operator maintains a certified Environmental Management System (EMS). Any complaints received concerning dust and particulate emissions at the Site will be dealt with in accordance with the company`s EMS complaints procedure.

4.1.2 Any complaints received at the Site about dust, will be reported to the Site Manager or Technically Competent Person.

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

- The Site Manager/responsible person will immediately record the key details, initiating the investigation process. Details will be entered on the Complaint Report Form (see Appendix 3). The form sets out the key information that should be recorded at this time to facilitate further suitable investigation.
- The Site Manager or Technically Competent Person will be informed of the complaint as soon as possible, including the location, time and date of the complaint being lodged.

4.1.4 In recognising that some causes of complaints, such as dust and noise, can be transient and short-lived, timely notification of complaints directly from the complainant or the Environment Agency is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to cause the complaint and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Site Manager or Technically Competent Person will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Site Manager or Technically Competent Person will subjectively determine the presence or absence of the cause of the complaint, e.g. visible dust presence. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If the cause of complaint, e.g. visible dust, is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
 - Frequency – is the cause of the complaint, e.g. dust, intermittent or persistent; is there a history of complaints at this location?
 - Intensity – is the cause of complaint faint, moderate, strong, or very strong?
 - Duration – how long is the cause of complaint present at this location?
 - Offensiveness – provide a description of the cause of complaint; is it high, moderate, or low offensiveness?
 - Receptor sensitivity - is the cause of complaint present at a remote or highly sensitive location; is it localised or widespread?



4.1.5 The Site Manager or Technically Competent Person will subsequently undertake the following further assessment process:

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

4.1.6 Where a significant complaint is substantiated by the Site Manager or Technically Competent Person, the Operator will contact the Environment Agency to discuss the incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.

4.1.7 Once actions have been completed the Site Manager or Technically Competent Person will visit the complaint location to ensure that the cause of complaint has subsided.

4.2 Reduce or cease operations

4.2.1 In the event of repeat substantiated complaints of dust with an on-site source. Operations will cease until the source is mitigated and dust emissions can be eliminated. Waste will be dampened or removed from Site.

4.2.2 In the unlikely event of repeat complaints and no obvious sign of an on-site dust source, consideration will be given to engaging with the complainant for a resolution and/ or a visit to the site.

4.2.3 Substantiated off-site sources of dust will be recorded in the Site Diary for future reference.

4.3 Community engagement

4.3.1 The Site will display their site notice with information on who may be contacted in the event of an event or incident. It also has the contact details for the Environment Agency in the event of an emergency or if a complaint is to be lodged.

4.3.2 The Operator wishes to maintain an unobtrusive presence in the business community and amongst neighbouring residents. In the regretful event of a complaint, the Operator will maintain an open line of communication with the complainant, so they are aware of the steps being taken and the eventual outcome.



4.3.3 The Operator will engage with any complainant via the preferred method / method used to make the complaint., where this is possible.



Drawings

Site Location Plan Drawing No. 316660 DW01

Site Layout Plan Drawing No. 316660 DW02



Appendices



Appendix A HOUSEKEEPING PROCEDURE



Housekeeping Procedure

Purpose: To ensure good housekeeping and control of litter, pest and vermin at the Site. Good housekeeping ensures that issues are identified and resolved quickly to prevent accidents, incidents and unwanted emissions.

Spills / liquids

1. All spills are cleared up immediately upon detection and no later than the end of the working day
2. Site surfaces will be maintained in a dry condition, where possible to prevent slips and minimise the risk of unidentified liquids occurring on the surface. This may arise from rainwater ingress, spills, leaks.
3. Where possible, the source of the liquid should be identified so that the root cause can be rectified i.e. leaking containers. Vehicles, fault with equipment or infrastructure.

Dust / Particulates

Dust can build from movement of waste types, people and vehicles.

1. Site surfaces will be swept weekly to maintain clear surfaces.
2. All spills or in the case of extra soiling with particulates/dusts, will be cleared promptly and by the end of the working day.
3. Waste storage bays and containers are cleared regularly to prevent build-up of dust, particulates/ loose fluff. Bay inspections happen each time the storage bay is 'turned- over'. If necessary, the bay is swept/ cleared. This activity should be undertaken at least monthly.

Waste / litter

Permitted waste types are not likely to contain litter.

1. Incumbent litter/ packaging will be cleared daily, where necessary.

Pests / vermin

Accepted wastes do not pose an inherent risk of attracting pests and vermin.

1. Keeping the site clear will deter vermin and disturb places where pests may nest.
2. The site is inspected and cleared weekly.

Responsibilities

1. It is the responsibility of duty staff to undertake all regular and daily housekeeping duties, for which they will have received training.
2. Ultimate responsibility for these activities rests with the Site Manager and Directors



Appendix B Daily Checklist



Daily Checklist

Daily Inspection Checklist				
Item for Visual Inspection	Aspects for Inspection	Checked?	Remedial Action Required?	Action Form Completed
Litter	None present within treatment building			
	None present within permit boundary			
Dust emissions	No visible dust/ powders accumulating on site surfaces			
	No dust clouds leaving Site, checking: <ul style="list-style-type: none"> - Permit boundary - Via doors 			
Weather conditions	Temp, wet, dry, wind dirn.			
Housekeeping	Surface clear of dusts, liquids			
	Impermeable surface is intact (such that there is no pathway from the Site to the environment in the event of a spill)			

Date: _____ Completed by: _____

Signature: _____



Appendix C Complaint Form



COMPLAINT RECORD FORM	
Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time they made the complaint	
What caused it?	
Was anyone else aware of this? If so who?	
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.	
What have you done to make sure it won't happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
<p>If there was then you must notify the Environment Agency on 03708 506 506 (open 24hours/day)</p> <p>Have you done so?</p> <p>You must also notify the Environment Agency via email or letter.</p>	<p>Yes/No/not applicable</p> <p>Time:</p> <p>Date:</p> <p>EA Incident number:</p>
Please print name and sign:	

