# Dust and Emissions Management Plan

## Twyford Embankment Landscape Bund
## Environmental Permit Reference EPR/EP3426SB/A001
## Operated by: EKFB

## Located at Portway Road, Twyford, Buckinghamshire, MK18 4EB

## Revision Number: Rev 0

| Quality Management | | | | |
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## Tables



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# 1 Introduction

1.1 This Dust and Emissions Management Plan (DEMP) sets out the management of emissions from the Deposit for Recovery (DfR) of waste at Twyford Embankment, located at Portway Road, Twyford, Buckinghamshire, MK18 4EB. It covers the deposit for Recovery activities permitted under environmental permit EPR/EP3426SB/A001.

1.2 This DEMP is only in place for the duration of the DfR activities. Following completion of the waste recovery activity the permit will be surrendered and ongoing works not required to be carried out under the DfR permit will not be subject to this DEMP. The expected duration of the works to deposit waste within the landscape bund is circa 1 month.

1.3 The DfR activity will deposit 40,000 cubic metres of waste which will be transported using internal haul roads from Newton Purcell to the site. The waste will have been treated at the Finmere Quarry site prior to arrival at the Twyford Embankment under a separate mobile plant permit.

1.4 RPS was commissioned by EKFB to prepare a Dust and Emissions Management Plan (DEMP) for the DfR at Twford Embankment.

1.5 The aims of this DEMP are to:

- describe the management and operational actions the site will use to deal with both anticipated (e.g. forecast) and actual high-risk conditions (e.g. measured dry dust winds above moderate breeze).
- describe the conditions under which dust is most likely to pose a nuisance risk at sensitive receptors close to the site and set trigger levels which, when exceeded, would require further dust control measures to be implemented (i.e. over and above the routine measures).

1.6 The scope and content of this DEMP is based on the Institute of Air Quality Management (IAQM) recommendations and also has due regard for the Environment Agency's Dust Emissions Management Plan v12 template.

1.7 The structure of this DEMP is as follows:

- A process description, particularly describing dusty, or potentially dusty, activities or materials used, and materials handling, storage and use of equipment;
- A description of waste activities and their respective limits including the identification of all the significant dust release points for the operations or materials together with a description of waste acceptance, storage and retention practices;

- Identification of the sensitive receptors within the area of influence that could be impacted (with reference to a map/plan);
- A description of the routine mitigation/control measures that would be used day-to-day under normal operating conditions in the absence of any unusual risk factors, together with information on how it will be ensured that any dust control equipment is designed, operated and maintained such that it operates effectively to control dust;
- A description of the additional measures that will be applied during these periods to manage dust emissions should actual or forecast trigger levels be exceeded, other risk factors occur, or should routine visual observations show high dust emissions;
- A description of what would trigger the further action/additional measures, such as:
  - The results of planned routine checks/inspections/surveys on site, e.g. visual inspections; and
  - Receiving a dust complaint.
- A description of procedures to check these further dust controls have been effective and, if necessary, escalate the level of additional control or modify or temporarily suspend site operations to prevent dust nuisance;
- A description of procedures, to investigate and take appropriate action to prevent recurrence on receipt of complaints of dust nuisance or on any elevated dust levels being present from the aforementioned checks/inspections/surveys or monitoring; and
- A description of management procedures describing the roles and responsibilities of personnel on site, staff training and competence, planned maintenance and repair, and regular review of the effectiveness of dust controls (including reviewing and updating the DEMP itself).

# 2 Description of the Deposit for Recovery Activity

## Site Description

2.1 The site is located within the administrative area of Buckinghamshire Council (BC).

2.2 The DfR site is located at Portway Road, Twyford, Buckinghamshire, MK18 4EB approximately 0.9 km east of Twyford. The national grid reference for the site is 467364E, 226357N. The main area of the site is approximately 2.9 ha in size. The site is located within the LLAU (Land and Limits of Additional Use) boundary of HS2, in the Twyford area of Buckinghamshire between chainages 081+200 and 081+500. It forms part of the Twyford Embankment Landscape Earthworks, which is currently within its construction phase.

2.3 The DfR site is predominantly bordered by farmland with associated buildings with some residential properties also located within 500 m.

2.4 The site location and local sensitive receptors are shown in Figure 1.

2.5 BC has currently designated five Air Quality Management Areas (AQMAs). The nearest of these AQMAs is located in Aylesbury (approximately 19 km southeast of the DfR).

## DfR Operations

2.6 The DfR operations activities will be undertaken at the DfR:

- The waste transported from Finmere Quarry will be deposited directly within the specified zone within the Twyford Embankment. Reuse material from Finmere Remediation Area will be transferred via the Mass Haul Road.
- The waste to be deposited under the waste recovery activity is non-hazardous and inert waste that has been excavated from Finmere Quarry landfill and then screened/treated at the Finmere Quarry site prior to being transferred to the Twyford Embankment site. No additional waste material is to be sourced for the development. The proposed waste will form circa 10% of the material to construct the landscape bund with the remaining circa 90% being non-waste material

2.7 The waste accepted onto the DfR falls under EWC code 19 12 12 *"other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11"*

2.8 It should be noted that waste testing indicated extremely low amounts of asbestos (<0.001 %v/v). Waste will be visibly inspected at Finmere prior loading for transfer to the Twyford Embankment site. Any material with visible signs of asbestos will not be transferred to Twyford

Embankment. Separate arrangements for transfer of this material to a suitably permitted facility will be made.

# 3 Sensitive Receptors where Impacts could Occur

3.1 Dust is the generic term used to describe particulate matter in the size range 1-75 µm in diameter [1]. Particles greater than 75 µm in diameter are termed grit rather than dust.

3.2 Dusts can contain a wide range of particles of different sizes. The normal fate of suspended (i.e. airborne) dust is deposition. The rate of deposition depends largely on the size of the particle and its density; together these influence the aerodynamic and gravitational effects that determine the distance it travels and how long it stays suspended in the air before it settles out onto a surface. In addition, some particles may agglomerate to become fewer, larger particles; whilst others react chemically.

3.3 The effects of dust are linked to particle size and two main categories are usually considered:

- $PM_{10}$ particles, those up to 10 µm in diameter, remain suspended in the air for long periods and are small enough to be breathed in and so can potentially impact on health; and
- Dust, generally considered to be particles larger than 10 µm which fall out of the air quite quickly and can soil surfaces (e.g. a car, window sill, laundry). Additionally, dust can potentially have adverse effects on vegetation and fauna at sensitive habitat sites. No designated sensitive habitat sites have been identified within 500 m of the site. A number of sensitive species are located within 500 m of the site, 2 non fish protected species are located approximately on the 500m boundary, a protected fish species (Bullhead) is noted circa 350m from the site boundary and European Water Voles are located >400m from the site boundary. As per the IAQM guidance on the assessment of dust from demolition and construction works, the screening distance for ecological sites is set at 50m of the boundary. All protected species are well beyond this distance and on this basis are not considered as sensitive habitats for the purpose of this DEMP.

3.4 Concentration-based limit values and objectives have been set for the $PM_{10}$ suspended particle fraction but no statutory or official numerical air quality criterion for dust annoyance has been set at a UK, European or World Health Organisation (WHO) level. Dust assessments have tended to be risk based, focusing on the appropriate measures to be used to keep dust impacts at an acceptable level.

3.5 The national PPG provides little detailed guidance on identifying dust-sensitive receptors; therefore definitions and examples described in the IAQM *Guidance on the Assessment of Mineral Dust Impacts for Planning* [2] (referred to hereafter as the IAQM minerals guidance) have been used. This includes, amongst others, homes, schools, hospitals, car parks/showrooms, places of work and footpaths.

3.6 In terms of establishing the extent of the area likely to be affected by nuisance dust effects, the IAQM minerals guidance suggests that disamenity dust impacts are not usually experienced beyond 400 m of the sources and the main impacts are within 100 m.

3.7 On this basis, to ensure a worse-case scenario and in accordance with EA guidance, consideration has been given to sensitive receptors within 500 m of the site boundary, as seen in Figure 1. Receptors are of course present at greater distances, but these are unlikely to be affected by nuisance dust effects during the construction of the DfR site.

3.8 Table 3.1 gives details of the sensitive receptors located within the 500 m boundary.

3.9 Table 3.2 summarises potential sources of dust emissions and their pathways. Potential receptors have been identified and mitigation measures chosen to reduce the effectiveness of pathways and any subsequent dust impacts.

**Table 3.1: Summary of Closest Local Sensitive Receptors within 500 m of the Site**

| Receptor ID | Receptor Name | Receptor Type | Receptor Sensitivity | Approximate Distance and Direction from Development Site |
|---|---|---|---|---|
| 1 | Property North of Portway Farm | Residential | High | 20 m – south of the DfR |
| 2 | Portway Farm | Commercial | Low | 100 m – south of DfR |
| 3 | Portway Farm | Residential | High | 290 m – south of DfR |
| 4 | Portway Cottages | Residential | High | 320 m – south of DfR |
| 5 | Portway Road (Approximately 10-15 Residential Properties) | Residential | High | 350 m – 500 m south to southwest of DfR |
| 6 | Three Bridge Mill | Residential | High | 430 m – north of the DfR |
| 7 | Seven Stars Cottage | residential | High | 430 m – northeast of the DfR |
| 8 | Three Bridge Mill Industrial Park | Commercial | Medium | 470 m – north of the DfR |

3.10 Meteorological data collected at Benson, located approximately 35 km south of the Application Site, has been used to establish the prevailing wind direction in compiling this DEMP. The wind rose for Benson is shown in Figure 2. The prevailing wind direction is southerly, so any receptors to the north of the site are at greatest risk.

**Table 3.2: Source, pathway, receptor and proposed mitigation**

| Hazard/ Contaminant | Source | Pathway | Receptors | Mitigation Measures |
|---|---|---|---|---|
| Dust/Particulates | Delivery/pick up of waste | Airborne<br>Track out from muddy/dusty vehicles | Site Personnel/visitors<br>Businesses and residential receptors within proximity of the site (see Table 3.1) | • All traffic carrying surfaces to be paved, other than vehicle movements within the embankment itself.<br>• All loaded vehicles to be enclosed/sheeted.<br>• Speed controls to be implemented and enforced (10 mph).<br>• All waste transfer will use internal roadways, No waste delivery vehicles will use public highways thereby avoiding residential streets.<br>• Water assisted sweeping as required.<br>• All vehicles to switch off engines when stationary.<br>• If needed a wheelwash is available at the entrance/exit of T2G site A4421 Barton Hartshorn. |
| Dust/Particulates | Movement of waste onsite | Airborne | Site Personnel/visitors<br>Businesses and residential receptors within proximity of the site (see Table 3.1) | • All traffic carrying surfaces to be paved, other than vehicle movements within the embankment itself.<br>• All loaded vehicles to be enclosed/sheeted.<br>• Speed Controls to be implemented and enforced (10 mph).<br>• All drop heights to be minimized.<br>• Water assisted sweeping as required.<br>• All vehicles to switch off engines when stationary.<br>• Compaction of waste material as soon as practicable after deposit. |
| Dust/Particulates | Wind erosion of stored waste materials | Airborne | Site Personnel/visitors<br>Businesses and residential receptors within proximity of the site (see Table 3.1) | • Waste will not be stored at the site prior to incorporation into the landscape bund. The waste will be excavated from Finmere Quarry historic landfill, treated before leaving the Finmere Quarry site, and placed directly into the landscape bund.<br>• Any unsuitable waste removed prior or during deposit will be removed and quarantined within a dedicated covered skip. |

| | | | | |
|---|---|---|---|---|
| Gases/particulates | Exhaust emissions from site plant | Airborne | Site Personnel/visitors<br>Businesses and residential receptors within proximity of the site (see Table 3.1) | • Operation of construction plant in accordance with the manufacturer's written recommendations.<br>• Vehicles and plant will be switched off and secured when not in use.<br>• The following construction vehicles to conform to the current EU emissions standards and, where reasonably practicable, their emissions should meet upcoming standards prior to the legal requirement date for the new standard.<br>• Vehicle and construction plant exhausts to be directed away from the ground and positioned at a height to facilitate appropriate dispersal of exhaust emissions.<br>• The enclosure, shielding or provision of filters on plant likely to generate excessive quantities of dust beyond the site boundaries.<br>• Devices such as dust extractors, filters and collectors on drilling rigs and silos will be used.<br>• Movement of construction traffic around the site will be kept to the minimum reasonable for the effective and efficient operation of the site and construction of the project. |

# 4 Routine Mitigation/Control Measures

4.1 The air quality section of the national PPG advises that *"mitigation options where necessary will be locationally specific, will depend on the proposed development and should be proportionate to the likely impact"*. In accordance with that guidance, the appropriate dust management and mitigation measures for this site have been selected taking into account the dust sources on site; the location and proximity of sensitive receptors and their sensitivity to dusts; and the weather conditions.

4.2 The potential for dust impacts is highest when the site is operational. As per the Control of Pollutions Act (COPA) 1974 S61 document (25/00021/BCHS2COPAS61) produced by Buckinghamshire Council, the consented work hours within this area are:

- 07:00 to 19:00 Monday to Friday; Applicable up to 01/11/2025 and from 02/03/2026 (earthworks season): Monday to Friday 07:00 to 19:00 hours, Saturday 08:00 to 17:00 hours.
- Applicable between 01/11/2025 to 02/03/2026 (outside of earthworks season): Monday to Friday 08:00 to 18:00 hours, Saturday 08:00 to 13:00 hours.

4.3 No significant dust effects are anticipated when the site is not in operation as all wastes brought to site will immediately be placed into the landscape bund.

**Table 4.1: Deposit for Recovery– Baseline Mitigation/Control Measures**

| Description of Baseline Mitigation/Control Measure | Yes/No |
|---|---|
| All traffic carrying surfaces will be paved, other than vehicle movements within the embankment itself. | Yes |
| All loaded vehicles will be enclosed or sheeted. | Yes |
| Speed controls will be implemented and enforced. | Yes (10 mph max speed on unsurfaced roads, 15 mph max speed on surfaced roads) |
| All waste transfer will use internal roadways, No waste delivery vehicles will use public highways thereby avoiding residential streets. | Yes |
| Frequent road sweeping to ensure that internal access roads remain clean at all times. Site management procedures should ensure that a water assisted sweeper is readily available when required and that sufficient resource is available to ensure it can be operated at these times. | Yes (manual sweeping) |
| Ensure all vehicles switch off engines when stationary. There should be no idling vehicles on site | Yes |

4.4 The baseline mitigation/control measures (i.e. those measures that would be used day-to-day under normal operating conditions in the absence of any unusual risk factors) that will be employed at the site are listed below:

4.5 Dust suppression is not likely to be required due to the minimal fugitive emissions as the waste will not be stored on site but directly deposited into the landscaping bund and compacted. However, two tractor and water bowsers and one ADT water bowser will undertake dust suppression from Chetwode to Twyford across the full working day. The bowsers abstract water from the on-site attenuation ponds and dampen down the whole site, including areas within the Twyford Embankment DfR area should this be needed.

4.6 The HS2 project requires that plant used outside of Greater London, which includes the Twyford Embankment, must meet a minimum of Stage IV emissions standard for plant 37kW to 560kW. The plant to be used on site will have been checked as compliant by the EKFB Plant Manager. Checks of continued compliance will be undertaken during Environmental Site Inspections. The plant will comprise: 1 No. 50t Excavator; 2 No. 30T 360 deg Excavator; 2 No. D6 Dozer 28T; 2 No. 20t padfoot roller; 5 No. ADT; 1 No. Tractor towing water bowser; 1 No. 15T 360 deg Excavator; 1 No. 95T Excavator; 1 No. Lime mixing plant; 1 No. Concrete Mixer Truck; and 2 No. Vibratory Roller 18T. The IAQM '*Guidance on the assessment of dust from demolition and construction*' states *"Experience of assessing the exhaust emissions from on-site plant (NRMM) and site traffic suggests that they are unlikely to make a significant impact on local air quality, and in the vast majority of cases they will not need to be quantitatively assessed. For site plant and on-site traffic, consideration should be given to the number of plant/vehicles and their operating hours and locations to assess whether a significant effect is likely to occur."* For this permitted activity there is only 1 'high' sensitivity receptor within 200 m of the DfR site, given the limited duration of the activities and likely vehicle movements emissions from vehicles are not considered significant.

4.7 The schedule of housekeeping measures and their frequency is shown in Table 4.2. Housekeeping and cleaning procedures are kept under continual review through the recording of daily site inspections and associated monitoring of the effectiveness of any procedures applied.

**Table 4.2: Deposit for Recovery- Housekeeping Schedule**

| Housekeeping Procedure | Frequency |
|---|---|
| Site housekeeping inspection | Daily |
| Visual dust inspection | Daily |
| Site sweeping and removal of mud/dust (manual) | Daily |
| Site sweeping and removal of mud/dust (mechanical) | As required |

| | |
|---|---|
| Vehicle checks | Daily |

# 5 Additional Mitigation/Control Measures

5.1 Trigger levels have been devised based on the outcome of our risk assessment of nuisance dust impacts undertaken using a source-pathway-receptor approach. If any of these trigger levels are exceeded, further mitigation measures will be implemented. Any of the following conditions associated with the DfR activity would trigger additional dust controls:

- Routine visual checks/inspections/surveys identify evidence of dust off or on-site;
- A dust complaint is received;
- Dust-raising meteorological conditions (e.g. winds that are, or are forecasted to be, above a moderate breeze (Beaufort Scale force 4 or speed 6 to 8 $m.s^{-1}$).
- Vehicles/plant exhibiting smoke from their exhausts.

5.2 If any of the above trigger levels are exceeded, any of the following additional controls can be employed:

- Increase frequency of use of water assisted sweeping, tractors and mobile bowsers on-site.
- Temporary cessation of the activities responsible for causing the dust impact until the trigger level is no longer exceeded;
- In the event of an equipment or control failure, access to the site will be prevented until the issue is resolved or a spillage is cleaned-up.

5.3 A suitable and sufficient application of the above additional measures (either singly or in combination) will be applied as necessary to effectively control dust emissions, as evidenced by the visual and monitoring checks described in the next section.

5.4 The Site Manager will be responsible for implementing these risk management measures in accordance with procedures.

# 6 Procedures to Check the Dust Controls/Mitigation are Effective

6.1 The Site Manager is responsible for the implementation of the DEMP. In practice some tasks may be delegated to other members of staff; however, the ultimate responsibility lies with the Site Manager. If the Site Manager is not on site, the responsibility for the implementation of the DEMP will be delegated to a nominated deputy.

6.2 The Site Manager will be responsible for the continual review and update of the DEMP. It is anticipated that this will be done on an annual basis; however, this does not preclude a necessary update at other times.

## Monitoring

6.3 The Site Manager will make daily inspections at the site boundary to ensure that visible dust is not leaving the site. Particular attention will be given to the northern part of the site boundary, closest to the residential properties identified as being most susceptible to nuisance dust.

6.4 Out of hours inspections are not proposed as all wastes will immediately be deposited into the landscape bund and compacted. Therefore, the site is not expected to generate signficant dust out of hours.

6.5 The results of the inspections will be recorded in a site log and using the visual monitoring form shown in Table 6.1. The prevailing weather conditions and the activities undertaken at the time of the inspection will also be recorded in the site log.

6.6 If any of the trigger levels in section 5 are exceeded and additional measures are employed, the frequency of the visual site boundary inspection will increase to twice daily until such time as no dust is visible at the site boundary. If after two days, the results of monitoring indicate that the additional control measures are not effective, the Site Manager will instruct all site operatives that the operations will cease until the issue can be resolved.

**Table 6.1: Daily Dust Inspections Sheet**

| **Dust Inspections sheet** | | | **Date** | | |
|---|---|---|---|---|---|
| Time of test | | | | | |
| Location of test<br>e.g. street name etc | | | | | |
| Weather conditions (dry, rain, fog, snow etc): | | | | | |
| Temperature (very warm, warm, mild, cold, or degrees if known) | | | | | |
| Wind strength (none, light, steady, strong, gusting) Use Beaufort scale if known | | | | | |
| Wind direction (e.g. from NE) | | | | | |
| Duration (of test) | | | | | |
| Constant or intermittent in this period or persistence | | | | | |
| Receptor sensitivity (see below) | | | | | |
| Is the source evident? | | | | | |
| Any other comments or observations | | | | | |

| Dust Inspections sheet | | | Date | | |
|---|---|---|---|---|---|
| | | | | | |

## Monitoring Dust Complaints

6.7 Quite separate from the procedural response to a received complaint (covered later in section 7) is the monitoring of complaints levels. Reliable complaints should be considered a form of monitoring and complaints should be treated as if they were monitoring data.

6.8 Complaints are a very important indicator of community dissatisfaction (although not the only one) and the technique of complaints monitoring is a powerful tool. However, it is important to bear in mind that complaints are only a symptom of annoyance or nuisance; there are various reasons why complaint level is not an exact indicator of dust annoyance or nuisance itself. Nevertheless, the collection, maintenance and analysis of complaints records is an important method of indicating the effectiveness or otherwise of measures implemented to reduce nuisance due to dust.

6.9 In relation to complaints and enquiries received via HS2 helpdesk, EKFB (as the nominated undertaker in this area) has two contracted requirements. (1) In relation to enquiries and complaints not classed as urgent, EKFB is contracted to respond within 20 working-days. Since this first requirement was established in 2021, EKFB has maintained average response times below 7 working days and has typically averaged between 3 and 4 days during 2024 and 2025 to date. (2) In relation to enquiries and complaints that HS2 assesses and assigns as urgent (construction-related and requiring a rapid response, e.g. safety or environmental concern such as faulty traffic lights or reported high noise/dust levels), EKFB are required to respond within 2-working days. This much smaller category is typically responded to within hours.

6.10 EKFB will implement a system of complaints monitoring and analysis for the duration of the waste recovery activity. Complaints are collected, registered and validated as described in Section 7 of this DEMP.

6.11 Any action deemed necessary as a result of the analysis shall be identified and discussed in order to programme a course of corrective actions.

6.12 Continuation of the mobile visitor centre to support the delivery of key messaging throughout the area. EKFB hold monthly parish meetings, where EKFB update on construction activities and discuss and complaints or enquiries.

# 7 Complaints Action Procedure

## Receipt of a Complaint

7.1 All complaints will be directed to the Site Manager who will be responsible for recording information regarding the complaint using the proforma in Table 7.1.

7.2 If any complaint is made by a member of the public about any matter associated with the facility, EKFB will give notice in writing to the Environment Agency no later than the next working day after the complaint is received. This written notification will normally be in the form of an email. The notification will include a description of the complaint, the name and address of the person making the complaint and the action proposed as a result. Depending on the nature of the complaint, it will not always be possible to resolve the matter within this short timescale. In such cases an indication will be given that further investigations are necessary.

7.3 Once a complaint has been received, the complaint details will be investigated and a record of the investigation included on the proforma in Table 7.1..

## Investigation of Dust Complaints

7.4 A manager will review complaints and provide a response. This can be by letter or email or, if preferred, a telephone call.

7.5 This part of the procedure is called stage 1. If the complainant is not happy with the outcome, a request can be made to consider the complaint at stage 2. In some serious cases, the complaint may be referred to stage 2 immediately.

7.6 For each complaint the dust Complaint Report Form shown in Table 7.1 will be filled out and retained as part of the management system records.

7.7 If multiple complaints are received, the following additional controls will be employed until the dust impact has ceased:

- Increase frequency of use of the road sweeper, both on-site and on local roads;
- Temporary cessation of the activities responsible for causing the dust impact until the trigger level is no longer exceeded;
- In the event of an equipment or control failure, access to the site will be prevented until the issue is resolved or excess dust is removed.

7.8 Where several complaints are received, Senior Management will be notified.

**Table 7.1: Dust Complaint Report Form**

| Dust Complaint Report Form | |
|---|---|
| Time and date of complaint: | Name and address of complainant: |
| Telephone number of complainant: | |

| | |
|---|---|
| Date Recorded: | |
| Time Recorded: | |
| Location of Dust/emissions | |
| Weather conditions (i.e., dry, rain, fog, snow): | |
| Temperature (very warm, warm, mild, cold or degrees if known): | |
| Wind strength (none, light, steady, strong, gusting): | |
| Wind direction (eg from NE): | |
| Duration (time): | |
| Constant or intermittent in this period: | |
| Does the complainant have any other comments? | |
| Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure): | |
| Any other relevant information: | |
| Do you accept that the dust/emissions are likely to be from your activities? | |
| What was happening on site at the time the dust/emissions occurred? | |

| | |
|---|---|
| | |
| Operating conditions at time the dust/emissions occurred | |
| Actions taken: | |
| Form completed by: | Date |

## Further investigation of the complaint

7.9 Requests for complaints to go to Stage 2 should be made in writing to the Environmental Manager, no later than 28 working days after you receive the Stage 1 response. An acknowledgement will be received within 3 working days of receipt that the complaint is being investigated further.

7.10 The Environmental Manager will offer to meet with the complainant to discuss the complaint. The Environmental Manager will also meet members of staff who have been involved and anyone else who has relevant information about the complaint.

7.11 A report will be produced by the Environment Manager and sent to the appropriate director. The report will say whether the complaint has been upheld (in whole or in part) or not. It will contain recommendations for action to put things right if the complaint has been upheld. The Director of Environment and Infrastructure will write to the complainant to say whether he agrees with the report and recommendations and what action will be taken.

7.12 Stage 2 will be completed within 25 working days of receipt of the request that the complaint go to Stage 2. If for any reason this is not possible, the Environment Manager will contact the complainant within that period to explain the reason for the delay and inform them when Stage 2 will be completed.

7.13 If the complainant is not satisfied with the outcome of Stage 2 they can ask the Local Government and Social Care Ombudsman to investigate. The Ombudsman is completely independent of the Council. Complainants can contact the Ombudsman's advice line on 0300 061 0614; or submit their complaint online at the website www.lgo.org.uk.

## Interacting with Neighbouring Businesses and Local Residents

7.14 Where a dust issue has the potential to affect neighbouring businesses or local residents the Site Manager would advise on any required interactions.

# 8 Management Procedures

## Roles and responsibilities

8.1 The Operational Head of Environment is responsible for the implementation of the DEMP. In practice, some tasks may be delegated to other members of staff; however, the ultimate responsibility lies with the Operational Head of Environment. If the Operational Head of Environment is not on site, the responsibility for the implementation of the DEMP will be delegated to a nominated deputy. The Site Manager will have training on minimising dust emissions and suppression techniques.

8.2 The Operational Head of Environment will be responsible for the regular review and update of the DEMP. It is anticipated that this will be done on an annual basis; however, this does not preclude any necessary updates at other times.

## Training and competence

8.3 All staff on the site will be made fully aware of the need to be constantly vigilant with regard to site dust control and management procedures. New staff will be trained to deal with dust management issues including minimising dust emissions and suppression techniques and will be made aware of the DEMP during the induction process. All staff will be made aware of the details of changes to the DEMP.

8.4 The Training and Onboarding Together Manager (TOTM) will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.

8.5 Any sub-contractors working on site will be made aware of the DEMP and will be expected to comply with the DEMP at all times.

# 9 Review

9.1 This DEMP is designed to cover the DfR activity at the Twyford Embankment which is expected to have a duration of circa 1 month. On this basis the DEMP is unlikely to be subject to periodic review.

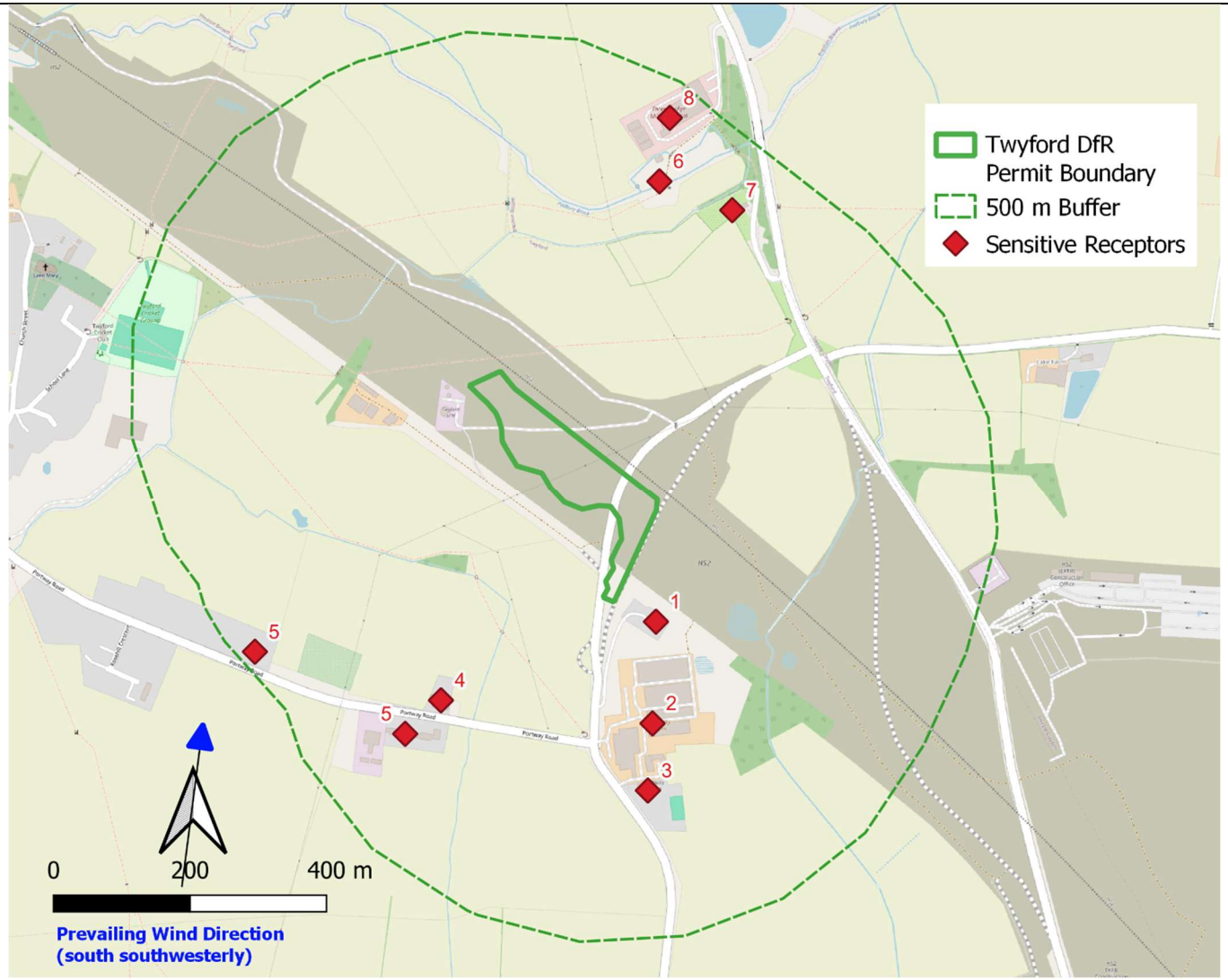
9.2 The DEMP will be reviewed under the following circumstances:

- Where there are multiple complaints on multiple days over a period of more than 1 week.
- In the event of a significant dust incident.
- Where the Environment Agency requests the DEMP be updated.
- Where the proposed activities continue beyond the expected timeline for a duration of more than 12 months.

# Glossary

| | |
|---|---|
| Deposited Dust | Dust that has settled out onto a surface after having been suspended in air. |
| DEMP | Dust and Emissions Management Plan |
| Dust | Solid particles suspended in air or settled out onto a surface after having been suspended in air |
| Effect | The consequences of an impact, experienced by a receptor |
| EPUK | Environmental Protection UK |
| HGV | Heavy Goods Vehicle |
| IAQM | Institute of Air Quality Management |
| Impact | The change in atmospheric pollutant concentration and/or dust deposition. A scheme can have an 'impact' on atmospheric pollutant concentration but no effect, for instance if there are no receptors to experience the impact. |
| LGV | Light Goods Vehicle |
| R&A | Review and Assessment |
| Receptor | A person, their land or property and ecologically sensitive sites that may be affected by air quality |
| Risk | The likelihood of an adverse event occurring |
| Trackout | The transport of dust and dirt from the construction/demolition site onto the public road network, where it may be deposited and then re-suspended by vehicle using the network |

# Figures



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Client: EKFB

Project: Twyford Embankment Landscape

Job Ref: 794-ENV-EM-AIR-23072

File location:

Date: | Rev: 0

Drawn: WH | Checked: JS

Figure 1: Site Location and Local Sensitive Receptors

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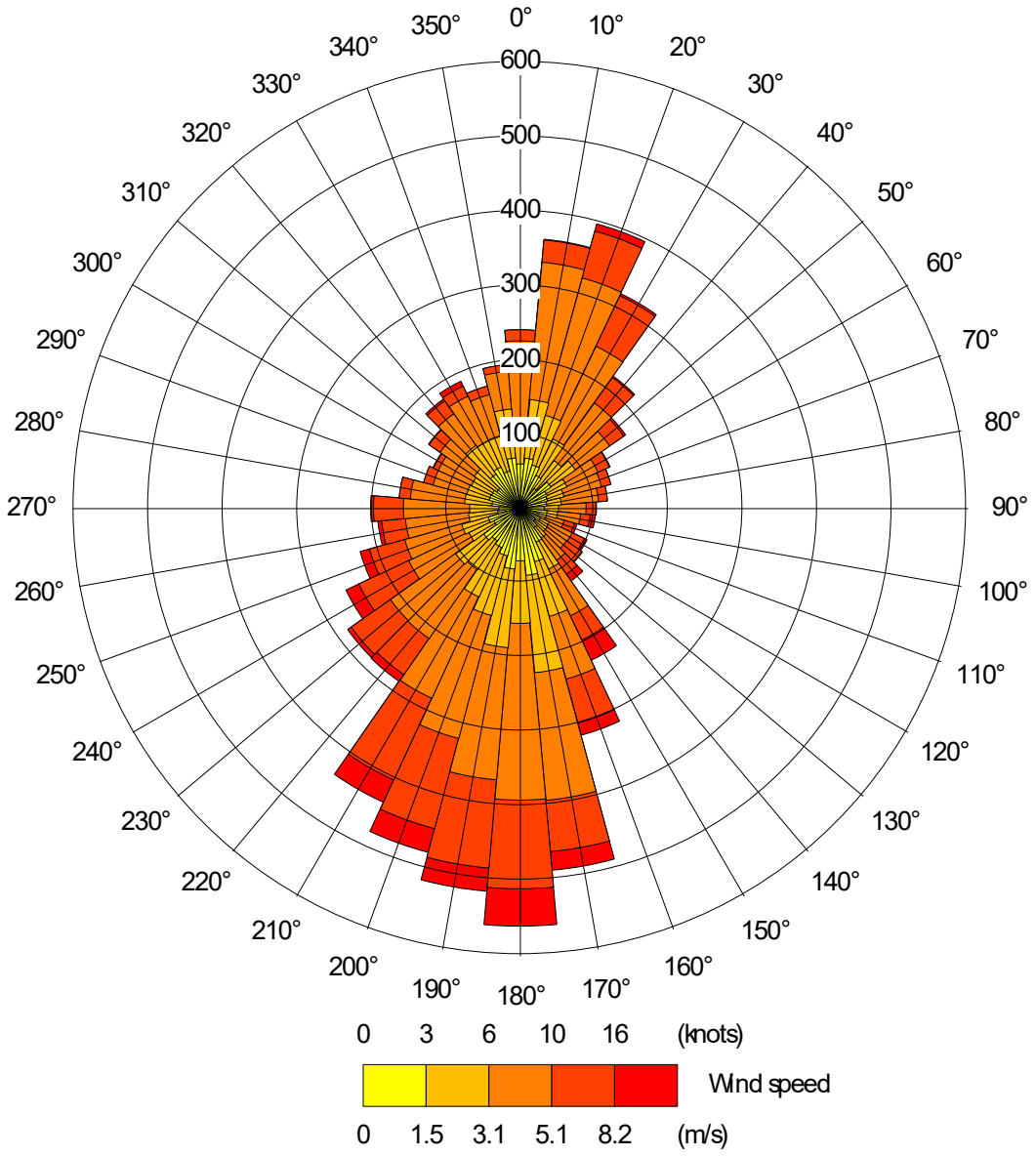


Figure 2: Wind Rose, Benson 2021

| | | | | | |
|---|---|---|---|---|---|
| Project Number | 794-ENV-EM-AIR-23072 | Project Title | Twyford Embankment Landscape | | |
| Client: | EKFB | Rev : | 0 | Drawn By: | WH |
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# References

1 British Standard Institute (1983) BS 6069:Part 2:1983, ISO 4225-1980 Characterization of air quality

2 IAQM (May 2016) Guidance on the Assessment of Mineral Dust Impacts for Planning

3 IAQM (January 2024) Guidance on the assessment of dust from demolition and construction