

Dust and Emissions Management Plan

Wroughton Closed Landfill

Soilfix Limited

For the Environment Agency

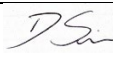
(Produced using **version 12** of the EA DEMP template, released in **August 2025**)



Site details

Operator name:	Soilfix Limited
Site name:	Wroughton Closed Landfill
Site address:	Land off Woodland View, Wroughton, Swindon, Wiltshire, SN4 9AE
Permit reference:	EPR/UP3525MF/A001

Document owner

Document author:	E. Geering	Signature: 
Reviewed by:	D. Mortimer-Simons	Signature: 
Approved by:	D. Mortimer-Simons	Signature: 
Version number:	ISSUE 1	Date: 29/04/2026

List of revisions

Revision number	Revision date	Originator	Checker	Company approver	Description of changes

Operator to read and complete this checklist

Required information	Operator response (Delete as appropriate)
Have you provided receptor information required in Section 1 below, including a site map showing receptors and receptor table?	Yes
Have you provided a detailed description of the site covering everything required in the Section 2 section below?	Yes
Have you provided information required in Section 3 below about the DEMP, the sources of dust and the appropriate measures that you have committed to for managing dust and emissions on site?	Yes
Have you provided all the information required in Section 4 below about particulate monitoring, types of analysers, data management, location of equipment etc?	Yes
Have you included all abnormal events and how these will be managed as required in Section 5 below?	Yes
Have you included information about how complaints will be managed as in Section 6 below?	Yes

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1. Introduction

1.1 Receptors

The proposed Deposit for Recovery (hereafter referred to as DfR) site boundary is approximately 2.3 hectares (23,000m²) and is represented by the green boundary line in Soilfix Figure 1.1 below. The DfR site boundary covers the area of the proposed highways and service corridors where DfR operations are proposed. Figure 1.2 is from the Magic Map website and indicates scale from the planning site boundary.

The DfR site within 500m is bordered as follows:

- **To the North:** New-build residential properties on Clevedon Gardens, residential properties including farm and farmhouse off Woodland View with agricultural grazing land beyond, former landfill area within the wider site boundary, the M4 Motorway
- **To the east & northeast:** Residential properties including Clyde Cottages gardens directly backing onto DfR land, residential properties off Woodland View and Swindon Road main access road (A4361) with agricultural grazing land beyond
- **To the south:** Greenfield Area within development boundary in front of existing public amenity space and residential properties Lister Road and The Mountings.
- **To the southeast:** Existing playing field (Wroughton Juniors FC) with play area on the adjoining boundary
- **To the west:** Former landfill area, with school playing fields beyond (The Ridgeway School and 6th Form College), Ridgeway Leisure Centre. Wroughton Junior Scholl is situated to the west of the school playing fields.

The nearest sensitive human receptors are users of public open space to the south/east as well as residential properties to the south, east and northeast.

The prevailing wind direction is from the southwest, towards the residential receptors on the eastern and northern boundary. These are considered the most sensitive receptors due to the school and playing fields outside of the western boundary being upwind of the prevailing wind direction.

Figure 1.1 Map of site location and receptors



Figure 1.2 Magic Map to indicate scale

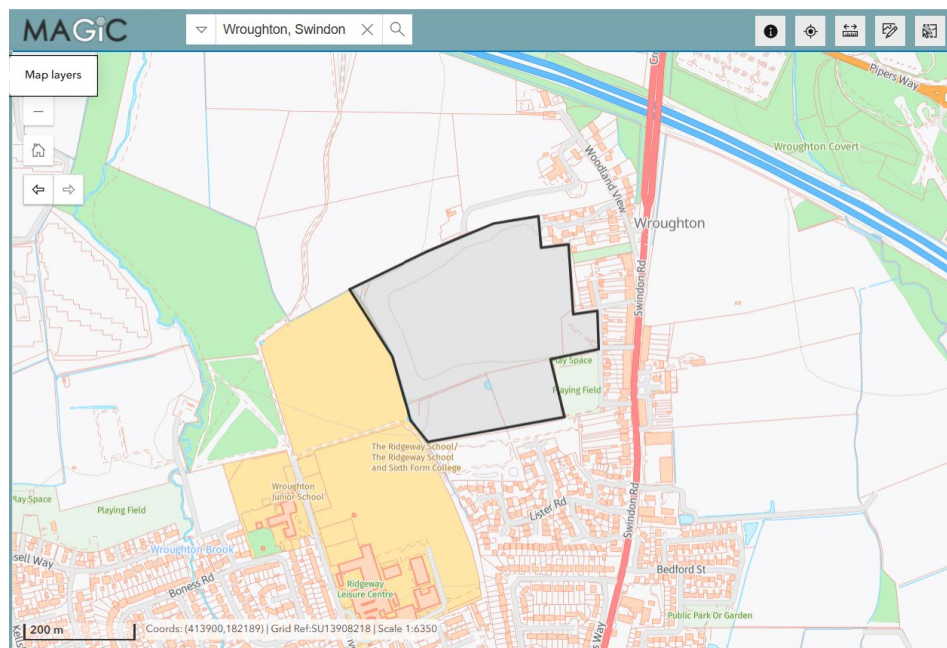


Table 1.1. Distances to selected, representative sensitive locations

Direction from boundary	Description of closest sensitive receptor types e.g. houses, schools, nursing homes, shops.	Approximate distance to site boundary (m)
North	Residential – Clevedon Gardens	0
East	Residential – Clyde Cottages/ Woodland View/ Swindon Road	0-50
Southeast	Park/ Playing Fields	5
South	Public Amenity (green) Space	105
West	School Playing Fields	140
West	Ridgeway School/ Leisure Centre	375
West	Wroughton Junio School	405

Table 1.2. Other sources of dust and/or other emissions

Company name	Address	Type of business	Distance from site boundary (m)
Unknown	Off Woodland View	Farm/ agricultural fields	100 (north)
N/A	N/A	M4 Motorway	290 (north)

2. Site operations

Site History / Setting

The site is a Former Landfill, which was historically used for the extraction of clay from pits excavated into the underlying natural geology of the Kimmeridge Clay Formation (the “Kimmeridge Clay”). This was followed by the landfilling of wastes (and some non-waste materials i.e. haul road and restoration soils) that were deposited into the unlined former clay pits. The maximum depth that waste materials have been encountered during intrusive ground investigation is approximately 10m below ground level (bgl), with landfill materials at the base and then ‘recent construction waste’ above this (predominantly recoverable soils and stones/ recyclable inert rubble).

The landfill permit was surrendered in the 1990s. The site has been informally capped with cohesive soils and topsoil, and is predominantly grassland and scrubland.

The site is not located within an Air Quality Management Area.

There are no overarching Environmental Permits or special controls as part of the site’s infrastructure.

Under planning conditions, the development works will be carried out in accordance with a Construction Environmental Management Plan (CEMP) which is to be approved by the Local Authority prior to commencement. This includes details of emissions management, traffic management and working hours.

Proposed Development

The site is now planned for residential development. The site is to be developed under Planning Permission from Swindon Borough Council, with the erection of 104 no. dwellings, traffic roundabout, access roads, a cricket pitch and pavilion, areas of Public Open Space (POS) and associated works.

In line with circular economy principles as many materials will be retained and reused on this site as possible, to minimise the requirement for lorry movements and import of materials.

Soilfix will carry out remediation and enabling works to prepare the ground for residential houses and related infrastructure, such works will be in accordance with a Remediation Strategy and Earthworks Specification.

Material treatment, to render chemically and geotechnically suitable for reuse, will be a separate regulated activity under Deployment of Soilfix’s Mobile Treatment Licence (MTL), outside of the DfR footprint. Reuse of non-landfill materials will be under a Materials Management Plan. Reuse of treated landfill materials will be under a DfR Permit.

Activities in Relation to this Dust Environmental Management Plan

The proposed works under this DfR Permit includes the sustainable reuse of site won material, to minimise waste to landfill and the requirement to import quarried material as a natural resource. Recovered materials rendered suitable for reuse as engineered fill will be temporarily stockpiled and then reinstated within the Former Landfill Area, primarily within excavations required for proposed highways and deep service corridors, to improve and provide a formation of suitable engineering properties for construction of these features.

The estimated volume of waste materials that will be recovered (reused) as an engineered fill under this DfR permit is 16,356 m³.

2.1 Waste deliveries

Waste Movements

There will be no waste delivered to site as part of the works. All materials to be reused under the DfR Permit are generated on site from the former landfill and placed within the former landfill footprint.

Table 2.1 below details wastes to be handled and reused under this DfR Permit.

Only materials determined to be suitable for their intended use will be reused under the DfR Permit. Any materials found to be unsuitable (and if further treatment under Soilfix's MTL Deployment is not feasible to make them suitable), will be disposed off-site as waste under Duty of Care, and suitable replacement material sourced.

All waste collection activities will be in accordance with Duty of Care, with Soilfix liaising with waste carriers who are Soilfix's approved suppliers register and compliance under environmental management procedures including obtaining their Waste Carrier's Licence prior to instructing any works. Any hauliers will be notified of any access restrictions, either operating hours or access routes to minimise disruption to residents and site rules (no idling, observe speed limit for example) will be briefed upon arrival by the Soilfix Site Team.

It is expected that the majority of waste hauliers will be in 8-wheel tippers or vehicles with roll-on roll-off (RORO) skips.

Where relevant, skips or lorries will be sheeted or have debris netting to prevent loose detritus from being airborne. This will be dependent on the material being loaded.

All skips and lorries will not be overloaded and all vehicles inspected prior to leaving site.

Checks for wheels/ undercarriage and cleaned using jet wash as necessary to prevent migration of mud onto public highways.

Regular inspection of access roads and deployment of road sweeper as required.

Soilfix track all waste movements in accordance with Duty of Care, including retaining all waste transfer notes on an Export Register and storing all waste transfer/ consignment notes electronically for the statutory timeframe.

Table 2.1 Anticipated Waste Types & Volumes Handled under DfR Permit

European Waste Code (EWC)	Product description	Total Volume (estimated) m ³	Deposition Location		
			Road and Service Corridors	Platforms/ Ramps/ General Fill	Other
191302 (non-hazardous)	Solid wastes from soil remediation, other than those mentioned in 19 13 01*	10,925	YES	NO	
191301* (hazardous)	Solid wastes from soil remediation containing dangerous substances	1,214	YES	NO	
19 12 12 (non-hazardous)	Crushed bricks, tiles, concrete and ceramics (including mixtures of materials), from mechanical treatment of waste (i.e. crushing)	4,217	NO	YES	
Total		16,356			

2.2 Site layout and site activities

Provide details for the following below or in the in Figure 2.2:

Treatment of landfill materials is not covered under the DfR Permit nor this DEMP.

Activities under this DfR includes the placement of treated landfill wastes in their final location of deposit.

Soilfix will plan activities to minimise the doubling handling of materials by mobile plant (excavators, dumpers) and distance of stockpiled treated materials in relation to their placement location.

Figure 2.2 below shows the Material Stockpile Area which is the centre of the site, away from nearby receptors, and to the east of the DfR area (highlighted in pink).

Materials will be stored as loose material in stockpiles. Stockpiles will be battered/ sealed using an excavator when not being handled, to minimise water infiltration and dust generation. Stockpiles are away from the site boundary, within the central area of site and will be no more than 3-4m tall, to minimise wind whipping over boundary fences.

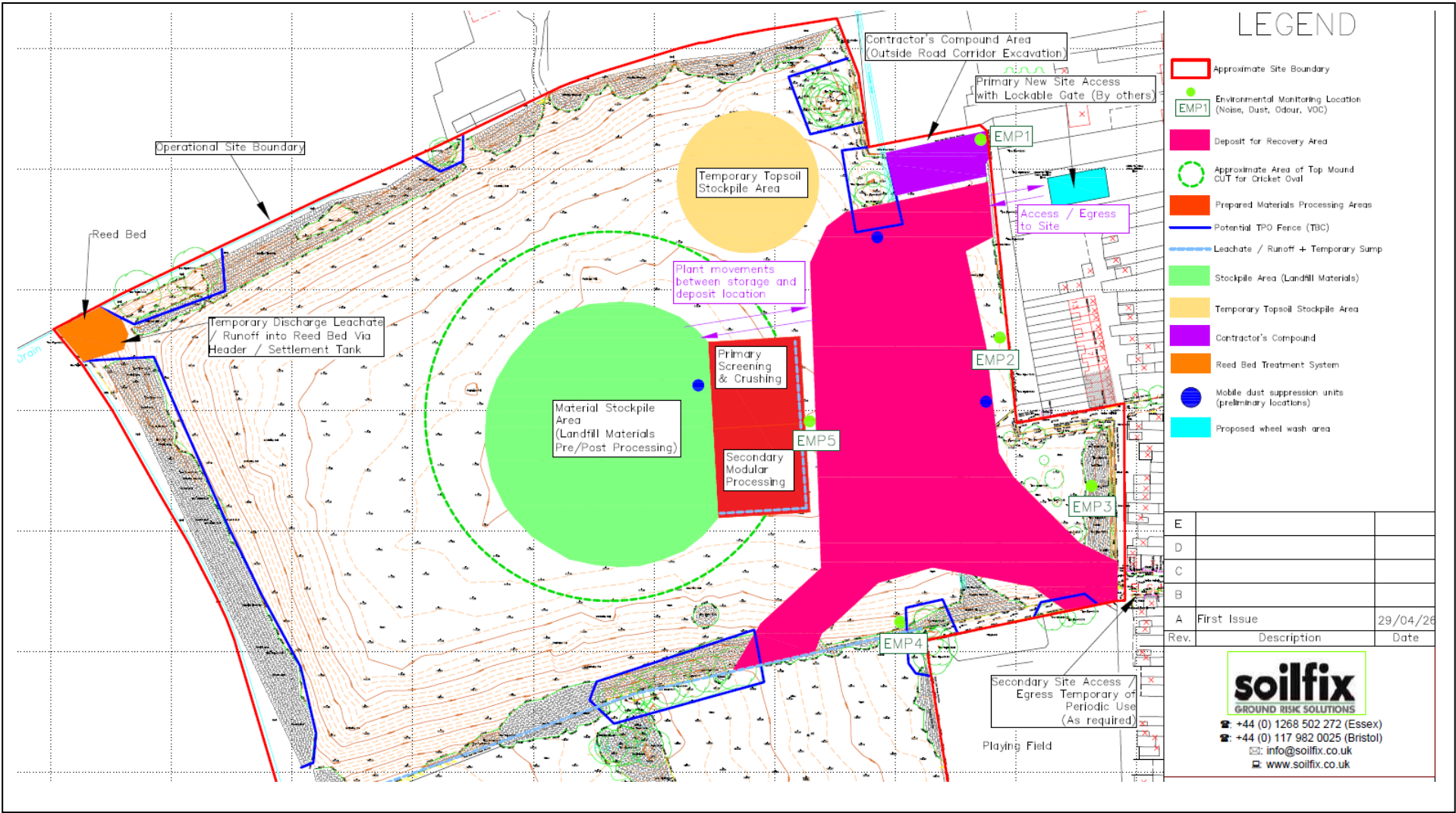
Water management – Soilfix will be managing all surface and perched water within excavations as part of the overall works. Any water collected via sumps or shallow trenches will be transferred to the existing site drainage system, which is via a reed bed treatment system. Soilfix will deploy the use of a silt-buster or similar to remove suspended solids as required. This is in line with the wider site works.

As the site is all soft landscaping once off the main entrance road, traffic management by dedicated haul roads will be engineered to avoid tracking across open areas of soft ground.

Soilfix will adopt a pro-active not reactive approach to dust management, tackling dust at source and not at the receptor. Due to this there will be no fixed dust suppression positions but towable units which will be used at ad-hoc locations dependent on work location and wind direction.

Soilfix will review activities when high winds or extended periods of dry weather are forecast and plan works accordingly.

Figure 2.2 Site layout plan



2.3 Mobile plant and equipment

Table 2.3 lists anticipated plant required to carry out the DfR activities.

The site does not fall under NRMM however all plant hired from approved suppliers will be modern and well-maintained in line with manufacturer recommendations and PUWER regulations. Should Soilfix deem any plant not to be to this standard the plant hire company will be contacted immediately to resolve the issue.

Soilfix procedures include a plant delivery inspection check sheet which will be carried out by the Site Manager/ Supervisor, with any issues upon delivery and prior to using plant be highlighted at this stage.

The majority of plant used on this site will be hired and not owned by Soilfix, with the exception of a dust cannon. Soilfix work across the UK and have a number of approved plant hire companies on the supplier register, which includes stringent checks to ensure all companies comply with Soilfix's health, safety and environmental procedures.

Soilfix are unable to provide make, model and due to the plant being hired.

Soilfix uses ultra-low sulphur diesel (ULSD) to fuel plant and generators on site.

As part of Soilfix's site rules there will be no idling either outside or on site. Clear communication will be provided to all delivery and collection vehicles in relation to site opening/ closing times

Table 2.3 Mobile plant and equipment

Description	Make	TAN (Type Approval Number)	Emission Rating	Hired / owned?	Is ultra-low sulphur fuel used?
360 excavators	Unknown	Unknown	Unknown	Hired	Y
Dumper	Unknown	Unknown	Unknown	Hired	Y
Jet Wash	Unknown	Unknown	Unknown	Hired	Y
Dust cannon	Unknown	Unknown	Unknown	Hired	Y
Dust/ odour atomiser	Unknown	Unknown	Unknown	Hired	Y

3. Dust and particulate matter (PM₁₀) management

3.1 Responsibility for DEMP implementation and training

The Project Manager has the overall responsibility to make sure this DEMP is implemented on site. The site Remediation Engineer and Site Manager is responsible for making sure practical measures are put in place and site rules are followed. The site Remediation Engineer will be responsible for carrying out monitoring as well as reviewing and communicating data (including exceedances), supported by the Project Manager.

The site layout plan, including monitoring locations, will be displayed on the site noticeboard. This DEMP will be communicated with relevant personnel within the Soilfix site team.

Toolbox talks will be carried out to all site personnel and will include relevant environmental based topics including environmental nuisance, dust management and reporting. Site rules including traffic management and speed limit will be communicated upon induction.

All personnel asked to operate equipment (such as dust monitors) will be suitably trained, or up skilled to do so.

This DEMP will be reviewed periodically (minimum every 6 months) to ensure the contents are still relevant and reflect site conditions and plant being used.

All plant operatives will have a CPCS card or equivalent.

All monitoring equipment used will be maintained in accordance with manufacturers recommendations and be serviced and calibrated at intervals as recommended. Soilfix equipment is maintained by the Field Kit Manager who is responsible for making sure calibrations are maintained and held on a central file electronically. Calibration certificates will be obtained from hire companies prior to use.

3.2 Sources and control of fugitive dust / particulate emissions

Activities in relation to the handling of treated landfill material as fines (oversize and deleterious/ unsuitable material removed) in the form of:

- Excavation of treated landfill materials from temporary stockpile and loading into dumper – release of dust and fine particulates through movement
- Transport from storage area and unloading to deposition location via dumper – release of dust and fine particulates through movement
- Transport from storage area and unloading to deposition location via dumper – debris falling off dumper onto haul roads
- Use of soil conditioning reagents (lime for example) to dry/ make geotechnically suitable prior to placement – localised release of alkaline dust
- Placement of treated landfill materials into designated excavations (namely highways areas and service corridors) – release of dust and fine particulates through movement
- Compaction of materials via roller – release of dust and fine particulates through movement
- Use of combustion engines (cars & vans, excavators, dumpers, rollers, generator-powered plant and equipment) – particulate emissions to atmosphere
- Vehicles entering and / or leaving the site with muddy wheels and tracking dust on to or off site – dust released into atmosphere through vehicles/ wind whipping

- Waste movements (for unsuitable materials being transported off-site) – debris falling off load within site or off-site

3.3 Appropriate measures used to control dust / particulates (PM_{10} / $PM_{2.5}$) and other emissions

Table 3.3 Appropriate measures used on site

Appropriate Measure	Description
VEHICLE MANAGEMENT	
Cover / seal temporary waste vessels	Covering or sealing waste skips/ containers/ lorries helps prevent the escape of any debris, dust and particulates as they travel.
Prevent overloading by operator/ driver	Both the excavator operator loading materials and the receiving driver of the dumper or lorry will be responsible for ensuring the load weight is not exceeded and load space is not over-filled. This will be briefed to site personnel as part of the pre-works briefing.
Use modern, well-maintained plant and equipment	Using Euro 5 / 6 for road-worthy vehicles or Stage V for non-road mobile machinery significantly reduces emissions from diesel and petrol vehicles, particularly particulate matter (PM) for diesel. The site does not fall under NRMM requirements, however Soilfix will ensure all suppliers use modern well-maintained vehicles/ plant and Soilfix will report any sign of defect to the hire provider.
Visual inspection of load/ mud on vehicle	Soilfix will use site personnel to visually inspect the undercarriage and wheels of any lorries prior to going off-site and clean as required. Should any vehicles coming to site be suspected of bringing soils onto site, Soilfix will notify the supplier to resolve the issue and provide cleaning prior to release back onto the public highway.
Wheel washing	Due to material reuse, being maximised as part of the project there is minimal waste anticipated for these works particularly soil fines. Soilfix will carry out wheel washing/ debris removal via a jet wash on an area where run-off is controlled to prevent secondary pollution on site.
SITE DESIGN AND LAYOUT	

Appropriate Measure	Description
Speed limit and 'no idling' policy.	As part of site rules Soilfix will enforce a speed limit (maximum 10mph). A no idling policy both outside of the site entrance and once on site will also be enforced as part of site rules. Regular toolbox talks including energy efficiency, and emissions will be briefed to site personnel. Turning off engines can reduce emissions from vehicles and reduced speed may also reduce resuspension of particulates by vehicle wheels.
Layout site to avoid double handling of dusty materials and long journeys by vehicles and plant.	Soilfix will avoid double handling of materials as part of good site practice, however material storage also needs to be away from the nearest sensitive receptors (residents along the eastern boundary). Temporary stockpiling of materials prior to placement will be located to minimise haulage distances within site. Carrying out these practices will reduce resuspension of dust that can impact receptors nearby.
Debris netting/ litter pick	Debris netting will be placed on strategic locations (near downwind residential receptors) on temporary fencing to capture any airbourne litter being blown across site. Regular inspections for surface litter and litter picks at frequency as required.
Stockpile height	Stockpiles will be kept segregated based on material type and shaped by sloped edges and a flat plateau and kept as low as practicable based on site constraints. Stockpiles will be no more than 4m high to assist in the prevention of particulate release from the wind whipping of stockpiles.
Stockpile sealing	Stockpiles of fines material will be shaped and sealed via an excavator to compact the surface and minimise water infiltration as well as minimising dust and odour generation. Sealing will also lock in natural moisture ahead of future movement of the materials.
Suitable fencing for site boundary.	The site boundary along the eastern portion of the site is bounded by wooden fence panels. The site is then fenced off due to areas of tree protection, where debris netting can be fixed.

Appropriate Measure	Description
GOOD HOUSEKEEPING	
Good housekeeping.	Good housekeeping can significantly reduce the amount of available dust sources on the site floor that can be available for wind whipping and resuspension from vehicles. The Site Manager (SM) will ensure daily site walkovers, alongside environmental monitoring, are carried out and recorded. This includes detailing site activities, weather conditions and wind speed/ direction. The Site Manager will carry out the walkover or ensure one of the Soilfix Site Team carries it out (Site Supervisor, Remediation Engineer typically). Upon delivery of plant, an inspection is carried out and recorded on the inspection form, as part of Soilfix procedures. Any defects will be raised at this point, to the plant hire supplier. The SM also ensures daily plant checks are carried out by the operator, in accordance with Soilfix procedures, with all sheets being handed to the SM at the end of the week. Housekeeping around machinery can assist with maintenance and preventing build ups that could attribute to plant downtime and operational status of the site. General site inspections will be carried out routinely by the SM to ensure security measures remain in place (fencing checks) and condition of haul roads, surface litter etc. Monthly Health Safety and Environmental inspections will be carried out which includes emissions monitoring, reporting, environmental controls as well as spill prevention. Having a consistent, regular housekeeping regime that is supported by management, will ensure the site is regularly checked and issues remedied to prevent and remove dust and particulate build up, especially areas not caught by road sweepers and other cleaning apparatus. There will be no set schedule for controls such as road sweeping, however the roads will be inspected daily and a road sweeper deployed at short notice as required. During high vehicle movements or wet conditions, the frequency of a road sweeper might be daily, but in drier conditions be weekly or on an ad-hoc basis.
Haul road maintenance	Due to site being soft ground and not hardstanding, temporary haul roads will be engineered and maintained by Soilfix such as visual checks for integrity and repairs/ compaction as required, surface scrapes to remove mud.

Appropriate Measure	Description
	Haul roads will prevent constant tracking across soft ground, particularly in wet weather, and cross contamination of soils onto haul roads, ultimately leading to dust generation.
Stockpile dampening	Keeping stockpiles damp at the surface will prevent airbourne dust particulates, however, caution not to over-wet soils or create run-off.
Spray loads when loading.	For particularly dusty loads, materials will be sprayed by jet wash or misting cannon during loading, to reduce dust and particulates.
Hosing of vehicles on exit.	May remove some dirt, dust and particulates from the lower parts of vehicles. Due to low number of loads off-site containing soil fines, and no wastes being delivered to site, a fixed wheel wash is not required.
SITE PROCESSES AND OPERATIONS	
Minimise waste storage volumes on site.	If the site is causing dust problems, the issue may be that the volume of waste handled needs to be reduced so the site can remain in control. Soilfix will aim to remove any materials deemed waste for off-site disposal at the earliest opportunity to minimise potential sources of dust and allow maximum amount of workable space on site. Minimising storage volumes also reduces the surface area over which particulates can be mobilised.
Cover external waste piles with sheeting.	The works do not anticipate long-term storage of materials and therefore covering with a sheeting will only be considered if the material is deemed to be a source of dust which cannot be controlled by shaping/ sealing and water suppression as detailed throughout this document.
Wind screening around stockpiles.	Should certain materials be a source of dust that cannot be controlled through shaping/ sealing and water suppression, Soilfix will consider providing solid infrastructure 'bay' type wind screening around free-standing stockpiles to help minimise dust dispersion.
Minimise drop heights for waste.	As part of good site practice and materials handling, The Site Manager will brief all machine operatives and banksman to minimise the drop height at which waste is handled, to reduce dust generation and the distance over which dust and particulates could be blown and dispersed by winds.

Appropriate Measure	Description
Enclose skips / storage vessels.	For any skips that contains easily liberated materials (general waste/ plastics for example) then the skip will be covered or have debris netting places over to prevent wind whipping and detritus blowing across site.
Have a maintenance schedule for all fixed / mobile plant.	All mobile plant used on site will be modern and well-maintained by the plant hire company and provide relevant test/ inspection certificates where relevant. Regular plant inspections and notification to plant hire companies for call out to resolve issue or replace plant. Soilfix only use approved suppliers who have gone through Soilfix's vetting process.
Cease operations during high winds and/or prevailing wind direction.	The Soilfix Site Team will take into account the weather forecast and planned activities. A review of activities and potential for affects of strong winds will be carried out and work procedures or tasks reduced, or worst case temporarily ceased during this period. This would be applicable for unusual high winds rather than in relation to the typical wind direction or site conditions. The DfR activities are planned in the eastern portion of the site, which is downwind of the prevailing wind direction for England (typically from the southwest blowing towards the northeast). Position of dust control measures and monitoring will be driven by location of activity, location of nearest sensitive receptor(s) and daily wind direction. Wind speed/ direction will be recorded on the daily environmental monitoring form.
Dust and particulate monitor with trigger alarm.	As part of the DfR application Soilfix have produced an Emissions Monitoring & Mitigation Plan (EMMP), which includes qualitative and quantitative monitoring for noise, odours and dust. The EMMP includes trigger and action values, with trigger values used to enable pro-active mitigation rather than reacting to action values considered harmful to health for on and off-site personnel. Soilfix have five designated Environmental Monitoring Points (EMP) across the DfR boundary (three along the eastern boundary), as shown in Figure 4.1, which are fixed locations as part of the daily walk over and monitoring programme.

Appropriate Measure	Description
	Soilfix have proposed the use of a roving PM10 monitor with short-term thresholds for particulate concentrations in order to make immediate decisions for site practices to be reviewed or application of mitigation measures improved/ increased. Soilfix will carry out pre-commencement 'baseline' dust monitoring, as this will indicate if there are any off-site sources of dust that might affect readings during operations. For example, to the north of the site is agricultural land which may be ploughed. Weather conditions, wind speed and direction will be recorded daily. A weather station is not required at the site as accurate meteorological information can be obtained from the Lyneham Weather Station which is 10 miles west of the site.
DUST SUPPRESSION	
Towable water bowser with jet wash	Soilfix will use a combination of jet wash to dampen down localised areas, such as loading material or addition of conditioning materials (i.e. lime). For all suppression activities Soilfix will ensure the minimum amount of water is used to effectively carry out the task, without over-wetting materials or flooding surfaces.
Towable water bowser with bar suppression	For haul roads or wider areas of accessible exposed material a towable bowser will be used, typically towed slowly by tractor or dumper. Using bowsters is a quick and effective method of damping down large areas of the site. For all suppression activities Soilfix will ensure the minimum amount of water is used to effectively carry out the task, without over-wetting materials or flooding surfaces.
Water suppression with mist sprays cannons with	Soilfix typically use rotary atomiser-type dust suppression unit which can also double as an odour suppression unit for wider suppression. These are capable of a range of 8m high and 15m length depending on wind speed and direction. Other towable units (typically 2000L) are a nebuliser design and have a linear range up to 30-40m.

Appropriate Measure	Description
nebuliser/ atomiser head	For all suppression activities Soilfix will ensure the minimum amount of water is used to effectively carry out the task, without over-wetting materials or flooding surfaces. Mist sprays are useful for point source suppression but not very effective for site boundary suppression. Misting systems are also not as effective at damping down surfaces but do use less water. Due to the small water droplet size, it can also assist in the damping down of airborne dust and particulates, therefore, reducing emissions from site. However, due to the small water droplet size, it means that the mist can be greatly affected by the wind.
Boundary nozzle misting line	Soilfix will not deploy the boundary misting system as standard as the primary aim is to control dust at the source and not the receptor. Soilfix will consider the use of boundary misting suppression as an option if above control measures not sufficient, alongside a review of work practices and other options for dust suppression. The placement of a fixed (although can be repositioned on site as required) nozzle misting line creates a curtain of water vapour mist either around a source area or along a boundary between the source and receptor. The nozzle line systems are a line of water pipe with nozzles typically 1.5-2m intervals along a line of 50-100m. The system uses high pressure, multi-nozzle dispersal delivery to a localised area for dust suppression, and if an odour neutralising product is added, can also be used to control odour.
Foam Suppression.	Foam will not be used as standard as the product is best used for static piles of material and not during operations when materials are being handled (main part of DfR operations). Soilfix will consider the use of foam suppression as an option if above control measures not sufficient in controlling stockpiled materials.

Appropriate Measure	Description
	Foam suppression is a method that uses foam to reduce dust emissions from waste management operations. Foam is sprayed onto dust sources to create a barrier that prevents dust from becoming airborne, particularly on waste stockpiles. Surface foam cover is one of the most effective and quickest means of achieving short-term dust suppression or odour control. The initial foam cover collapses, dries and becomes invisible in a matter of hours, its longevity being dependant on a number of factors, including atmospheric conditions and the porosity of the surface it's applied to. However, a thin film remains until disturbed, significantly reducing the subsequent bleed rate of nuisance emissions into the atmosphere.

3.4. Other considerations

A temporary water supply is expected to be provided for the works. Contingency for sufficient water includes an aboveground bulk water storage tank (typically up to 40m³) and routine delivery by tanker.

For all suppression activities Soilfix will ensure the minimum amount of water is used to effectively carry out the task, without over-wetting materials or flooding surfaces.

As part of general site activities Soilfix will manage surface water and will have systems in place to intercept run-off and capture it to go into an existing water treatment system.

Site resources are considered and regular toolbox talks on energy efficiency and sustainable use of materials is communicated with site personnel. This includes water efficiency and practices that can be deployed on site to make sure only enough water is used as is needed. This includes making sure supply water pipes on site are regularly inspected, anyone on site that sees a leak should report it, and any leaks fixed at the earliest opportunity.

Incoming freezing conditions can have a detrimental effect and cause leaks and therefore this is also taken into consideration by the Site Team.

3.5 Visual dust monitoring

As part of the EMMP Soilfix propose to carry out daily visual (qualitative) dust monitoring at all five EMPs, as highlighted in Figure 4.1 below. These locations are a minimum and Soilfix have capability to carry out additional locations and record on the daily monitoring form. This will be dependent of activity location, wind direction and receptor. The assessment will include a scale of 1-4 as follows:

- 1 – Not noticeable
- 2 – Slight dust
- 3 – Moderate dust
- 4 – Significant/ unacceptable dust

The Trigger being 3 and Action being 4.

If the Trigger Value is recorded additional quantitative PM10 monitoring will be carried out at the EMP and anywhere else deemed relevant.

Use of enhanced dust suppression measures where necessary to control fugitive dust emissions (e.g. dust cannon or jet wash/bowser). Reassessment of activities to establish whether an alternative available.

If the Action Value is breached the works causing the production of fugitive dust will cease and an alternative working methodology sought. This may also include the deployment of additional dust mitigation measures as detailed in Table 3.3 above.

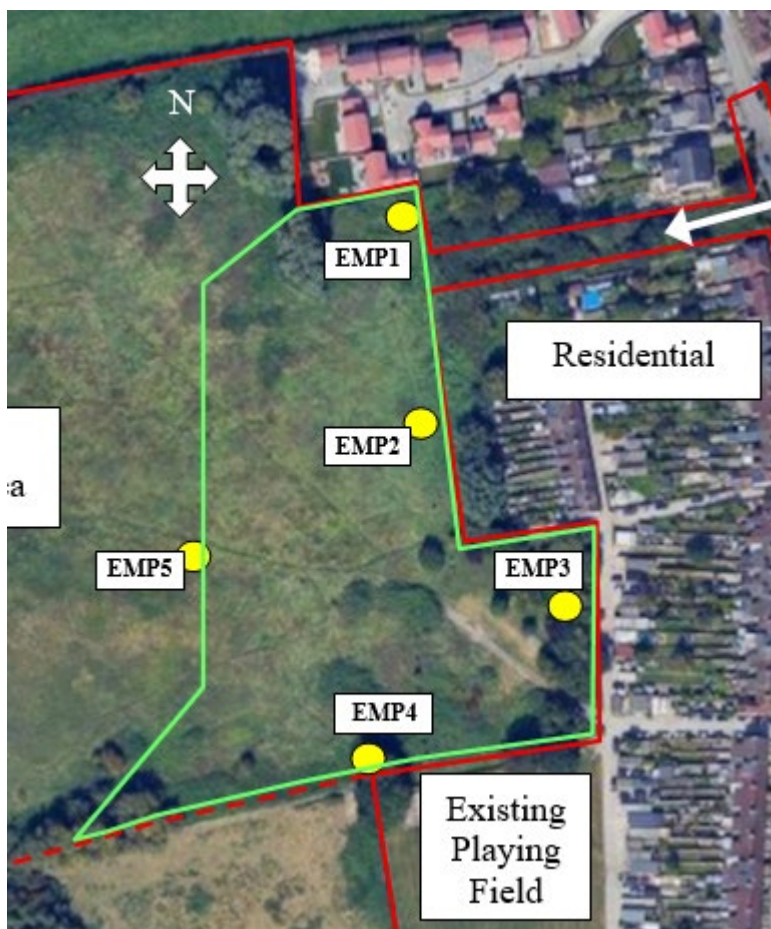
Alternatively, the above will be carried out if complaints are received, alongside an investigation into the complaint and source of dust.

If the action threshold is recorded, then Soilfix will cease works in relation to dust generation and review/ adapt working methods. This will include a review of current dust suppression methods and if additional measures as detailed in Table 3.3 should be deployed to site (boundary nozzle line for example).

For example, if there is a change in wind direction forecast from the prevailing wind (i.e. north to south), Soilfix can adopt additional locations in front of sensitive receptors.

Monitoring will be carried out Approximately 2m above ground level and at locations in the open (not sheltered by trees, buildings etc).

Figure 4.1 Location of particulate matter monitoring (EMP) locations



4.2. Particulate matter monitoring equipment / data management/ actions and investigations

The monitoring equipment will be predominantly used by the Remediation Engineer, with cover the Site Manager/ Site Supervisor. All personnel will be trained in-house or by the supplying hire company to ensure instruments and any software are used proficiently and personnel know how to carry out any field checks or maintenance (e.g. filter replacement) / troubleshooting.

The person carrying out the monitoring is responsible for scanning and saving the monitoring sheets so the data can be shared/ reviewed by the wider Soilfix Team.

The monitoring results will be reviewed by senior personnel (Senior Remediation Scientist / Project Manager/ Technical Director) and any trends in dust results be reviewed against site activities/ weather conditions and if there are preventative measures to be put in place to mitigate trigger levels being met.

The person carrying out the monitoring should raise any trigger exceedances immediately with the Site Manager (face to face or over the phone rather than via email) and discuss possible sources and further action to be taken. Soilfix carry out weekly project workshops in which this will be discussed within the wider Project Team.

Should an action level be recorded, the Site Manager should immediately be notified (face to face or over the phone rather than via email) and works ceased to investigate the source of dust and contributing factors. A notification email to the wider Project Team (Project Manager and relevant personnel) should be distributed, in which a follow up email can be shared to relevant stakeholders for the project.

4.3 Quality assurance / quality control and record keeping

The instruments will be serviced and calibrated as per the manufacturer's recommendations. For Soilfix owned equipment this will be the responsibility of the Field Kit Manager, who arranges for equipment to be calibrated ahead of works commencing, or collected during the works and hired in units as cover if required. Service and calibration for Soilfix owned equipment is held electronically within a central folder, maintained by the Field Kit Manager.

For hired equipment this will be through the supplier. Soilfix will request copies of calibration certificates upon placement of an order and copies held electronically within the project folder.

Soilfix will record when these are due to expire, particularly for long-term hire over the typical 6 month or 12-month calibration and contact the hire company to arrange in good time so that the unit doesn't expire.

Any suspected defects should also be raised immediately with the Soilfix Site Manager or hire company.

4.6 Reporting of data

There is currently no active Environmental Permit at the site. Upon receipt of the DfR Environmental Permit Soilfix will comply with monitoring requirements and reporting regimes as detailed within it.

All data is held as hard copies in site folders and electronically with the project folder for 'Emissions Monitoring'.

5. Abnormal events

Table 5.1 Abnormal events

Abnormal event	Recovery steps
Staff absence (unplanned)	The Site Manager or Site Supervisor can provide short-term cover for the Remediation Engineer to carry out environmental monitoring both qualitative and quantitative.
Equipment Failure (monitoring)	Qualitative assessment can be carried out in the place of quantitative for short-term. Any defects to be reported immediately to Soilfix Field Kit Manager or to hire company to try and troubleshoot on site or send for repair. Hire in equipment to cover as required. Typically equipment can arrive to site within 48hrs.
Equipment failure (suppression)	Any defects to be reported immediately to Soilfix Plant Manager or to hire company to try and troubleshoot on site or send for repair. Hire company typically will swap in new kit, Soilfix owned will need to be repaired and temporary hire to cover as required. Typically, equipment can arrive to site within 48hrs.
Extreme heat	Additional or higher range suppression units to be obtained and programme of works to be assessed if prolonged extreme heat forecast
High winds	Review of activities and reduce intensity or location of activities where possible. High winds typically short-lived rather than prolonged periods (multiple days), so works may need to cease for a short period.

6. Reporting and complaints response

6.1 Community engagement

Soilfix or the client/ landowner will provide a pre-work notification via a letter drop to local residents. The letter will provide a summary of Soilfix activities and provide contact details and ways the local community can engage with Soilfix. The letter will include anticipated timeframe and key activities that have potential to generate nuisance or disruption.

Soilfix or the client/ landowner will also provide updates on progress (if overrunning for example) or any significant activities taking place that has potential to cause nuisance, to minimise the element of surprise for residents.

All site personnel will be briefed to direct any enquiries to the SM in a polite manner, who will speak with the complainant and take details (as per Section 6.2 below).

6.2 Complaints management and reporting

Soilfix have a Complaints Record template so that the SM can make sure pertinent information and contact details are taken. A copy of Soilfix's Complaints Form is included in Appendix B. Note that some complaints may come via email, directly from the complainant, through the client or from a regulator. These will be saved electronically within the project folder alongside any forms.

Soilfix have a template for a Public Communication and Complaints Log, where any letter drops or other form of communication is recorded, as well as any formal complaints received. A copy is included in Appendix B.

The Site Manager will share the complaint with the Project Manager and relevant personnel within the Project Team at the earliest opportunity, and no longer than 24 hours.

Any complaints received will be recorded in the Complaints Log, which is maintained by the Site Manager and overseen by the Project Manager.

Soilfix will investigate the complaint, which will include looking at weather and wind conditions, activities taking place on site and potentially off-site, daily monitoring records and any other relevant information depending on the nature of the complaint.

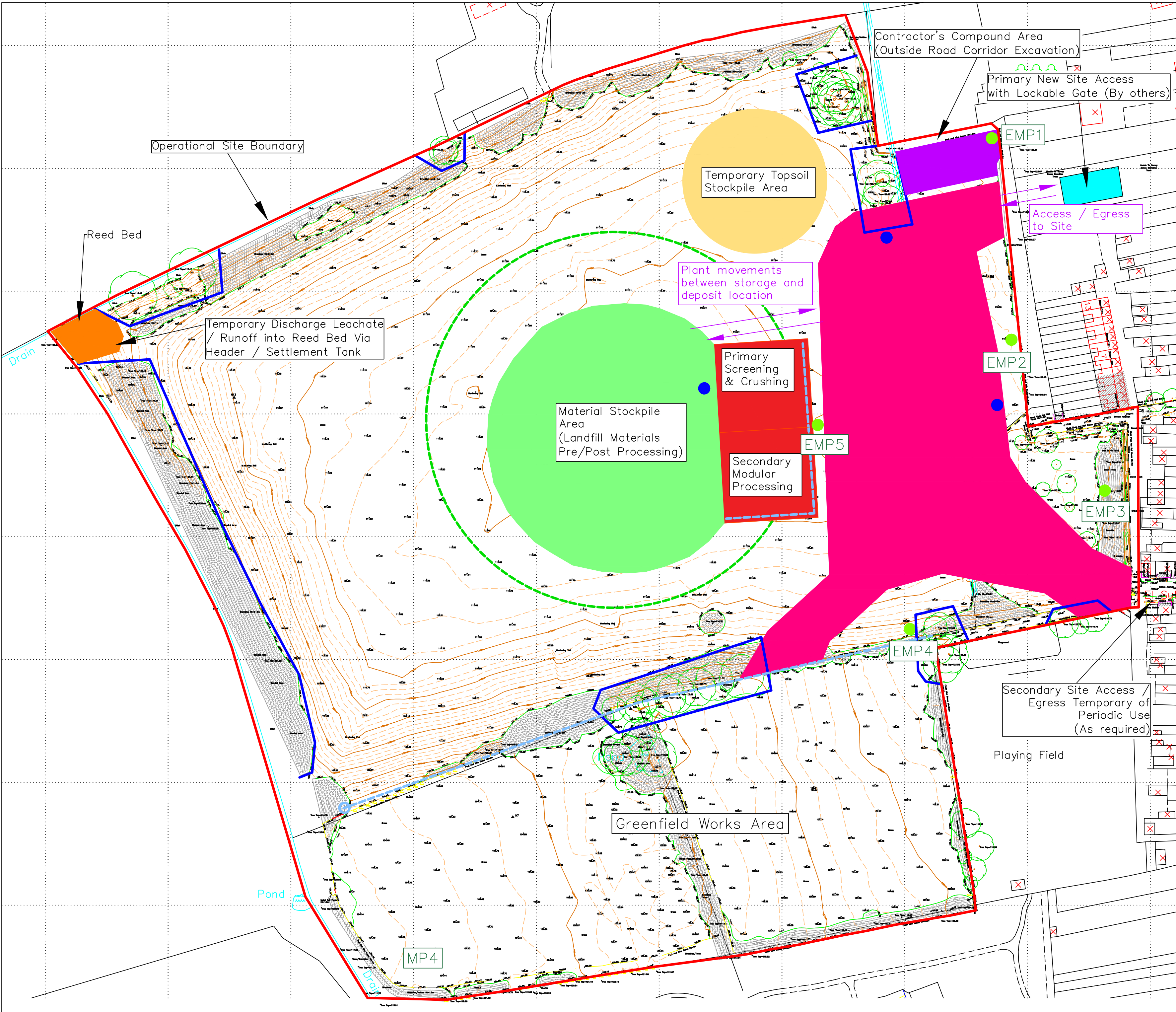
Outcomes of the investigation and actions/ responsibilities and deadlines will be allocated and closed out within the Complaints Log.

Soilfix will aim to respond to the complainant within 72 hours, to allow time to investigate, discuss with relevant stakeholders and provide a robust response.

Soilfix will send notifications/ investigation reports to relevant parties within the required timeframe as detailed within the DfR Permit.

Appendices

Appendix A – Site Layout Plan



LEGEND

- Approximate Site Boundary
- Environmental Monitoring Location (Noise, Dust, Odour, VOC)
- Deposit for Recovery Area
- Approximate Area of Top Mound CUT for Cricket Oval
- Prepared Materials Processing Areas
- Potential TPO Fence (TBC)
- Leachate / Runoff + Temporary Sump
- Stockpile Area (Landfill Materials)
- Temporary Topsoil Stockpile Area
- Contractor's Compound
- Reed Bed Treatment System
- Mobile dust suppression units (preliminary locations)
- Proposed wheel wash area

E		
D		
C		
B	Updated for DEMP	29/04/26
A	For DfR application	10/01/26
Rev.	Description	Date



☎: +44 (0) 1268 502 272 (Essex)
☎: +44 (0) 117 982 0025 (Bristol)
✉: info@soilfix.co.uk
🌐: www.soilfix.co.uk

Site Address:			
Wroughton Closed Landfill			
Title: Remediation & Recovery Site Layout Plan			
Client: The Hills Group			
Drawn: EG	Checked: DMS	Appvd: DMS	Rev: A
Contract: C578.HDL	Dwg No: C578-BPA-DWG-RRSL	Scale:	A4

Appendix B – Soilfix Complaint Record and Log



10 St. Martins Industrial Park, Avonmouth, Bristol BS11 0RS
23 Bellingham Lane, Rayleigh, Essex, SS8 7ED

SF206 Complaint Record

Project Address:

Contract No:

Site Manager:



Date Complaint Received:

Received by: (telephone to office / site, person visiting site office):

Name of Person who Received the Complaint:

Name of Person Making the Complaint:

Involvement of Person Making the Complaint (e.g. nearby resident / business owner etc)

Contact Details of Person Making the Complaint (mobile number / house address / email address)

Detail of Complaint:

Notes / Actions:

**SF59 PUBLIC COMMUNICATION & COMPLAINTS LOG**

Unit 10 St. Martins Industrial Park,
Avonmouth, Bristol BS110RS

Project No./Site: C

23 Bellingham Lane, Rayleigh,
Essex. SS6 7ED

[illegible]