



PART OF  SLR

# Dust Management Plan

## Bovey Basin Central Area

### Sibelco UK Limited

Prepared by:

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V2	8/10/2025	P Sanderson (Wardell Armstrong LLP [Part of SLR])	Revision of the Dust Management Plan (DMP)

## Basis of Report

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## 1.0 Dust Management Plan

### 1.1 Introduction

1.1.1 This Dust Management Plan (DMP) has been prepared to supersede the various existing dust management measures applying to the Southacre, Whitepit and John Acres Lane Quarries near Kingsteignton, Devon, collectively forming the Bovey Basin Central Area. A Planning Application (DCC/4344/2023) was submitted to Devon County Council (DCC) on 24th April 2023 to consolidate the existing planning permissions for the Central Area, and an Environmental Statement (ES) was prepared to accompany this application which included an assessment of air quality impacts prepared in line with the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Mineral Dust Impacts for Planning.

1.1.2 The application was approved, subject to conditions, by DCC on 31st July 2024. Condition 15 of the Decision Notice states the following (NB reference to noise sensitive receptors below (within the 'reason', is likely written in error and meant to be dust sensitive receptors):

*Within 6 months of the date of this permission an Updated Dust Management Plan shall be submitted to the mineral planning authority for approval. The Dust Management Plan will include details of:*

*Measures to be implemented on site to minimise the generation of dust;*

*The mechanisms to be employed to monitor dust and airborne particles including the monitoring locations and the mechanism to record the dust monitoring data, including its submission to the mineral planning authority;*

*The measures to be undertaken should the monitoring results indicate that operations on site are likely to lead to justifiable complaints; and*

*The mechanism for dealing with any complaints received either directly from members of the public or via the mineral planning authority.*

*Once approved the development shall be carried out in accordance with the proposals set out in this or any subsequent scheme as may have been submitted to and approved in writing by the mineral planning authority.*

*Reason: To protect the amenity of the nearest noise sensitive properties in accordance with Policies M17 and M23 of the Devon Minerals Plan and policies S1 (Sustainable Development Criteria) and S11 (Pollution) of the Teignbridge Local Plan.*

1.1.3 The purpose of this DMP is to provide detailed mitigation measures to ensure dust, mud and debris are controlled and mitigated during the entirety of the works. The plan is intended to cover the entire site and all potential dust generating operations. The aim of the DMP is to ensure there are no adverse dust releases during the continued operation of the quarry and should be read in conjunction with the Air Quality chapter of the ES prepared to accompany planning application DCC/4344/2023.

1.1.4 The DMP considers day-to-day operations and all foreseeable circumstances (e.g. adverse meteorological conditions) which may exacerbate dust conditions at the site.

1.1.5 The DMP has been prepared by qualified air quality professionals at Wardell Armstrong LLP. It is the responsibility of the appointed contractor(s) and site operator to ensure dust emissions are controlled in accordance with the mitigation requirements outlined in this DMP.

1.1.6 The DMP includes:



- Consideration and identification of all activities capable of generating dust and emissions to atmosphere at the site;
- Identification of sensitive receptors;
- Site- and activity-specific mitigation measures; and
- Mitigation measures, which are based on the following guidance and expertise:
  - Institute of Air Quality Management (IAQM), Guidance on the Assessment of Dust from Demolition and Construction, 2024.
  - IAQM, Guidance on the Assessment of Mineral Dust Impacts for Planning.
- In-house knowledge from registered members of the IAQM who have extensive experience of preparing DMPs.



## 2.0 Site Description

- 2.1.1 The Site lies within the central area of Bovey Basin Ball Clay Workings which is located to the north-west of Kingsteignton, Devon. Clay Lane Quarry is located north of the site boundary and Heathfield Landfill is located north-east of the site boundary. The site is bound by the B3193 to the east, with Sandygate and Lower Sandygate beyond. South of the site boundary is Preston Village, Kingsteignton and Denistone Quarry. The east of site is bound by the River Teign, with agricultural land beyond.
- 2.1.2 Bovey Basin is a complex of 11 operational quarries, 7 of which are operated by Sibelco and 4 of which are operated by IMERYS Mineral Ltd. The Site makes up the Central Area of Bovey Basin, comprising Operational Area 8 (Whitepit and John Acres Lane Quarries) and Operational Area 7 (Southacre Quarry) identified in the Review of Minerals Permissions and therefore is predominantly an operational minerals site.



## 3.0 Potential Dust Sources

3.1.1 A dust assessment was prepared as part of the Review of Old Mineral Permissions (ROMP) (c.2007), which concluded that potential impacts at the nearest residential properties were considered to be marginal. The assessment provided details of mitigation measures applying to the Southacre, Whitepit and John Acres Lane quarries, which were as follows.

- Use of mobile water spray on site
- No site mobile plant to be fitted with downward pointing exhausts
- Internal haul roads to be wetted to prevent excessive dust emission
- Provision of a complaints recording and investigation system
- Minimise dust entrainment from mineral and waste stockpiles where possible by storage of material in sheltered locations or existing void spaces, supplemented by wetting during dry weather periods
- Restrict speeds of vehicles on haul roads
- Ensure that deposits of material around site entrances and on public highway are cleaned at regular intervals.
- Discussion with the operator also confirms that shredding activities are undertaken in enclosed buildings and Personal Protective Equipment (PPE) is issued to all employees.

3.1.2 The existing mitigation measures will continue to be implemented under the consolidated planning permission.



## 4.0 Potentially Sensitive Receptors

- 4.1.1 Sensitive receptors have been selected based on the screening criteria from the Institute of Air Quality Management ‘Guidance on the Assessment of Mineral Dust Impacts for Planning’ 2016<sup>1</sup>. Figure 2 of this guidance includes a screening flow chart outlining a 250m screening distance for soft-rock quarries and a 400m screening distance for hard-rock quarries. These distances were determined by the authors of the guidance and are based on a literature review, the sources for which are available in Appendix 2 of the guidance.
- 4.1.2 The IAQM Mineral Guidance recognises that the majority of dust emitted from a site is likely to deposit within 100m of the source and that some finer dust will deposit up to a distance of 250m (from a soft rock quarry). Dust may remain airborne beyond 250m, however beyond this distance the concentration of dust is generally not discernible and typically not capable of causing a nuisance.
- 4.1.3 The DMP has been designed based on the sensitivity and risk associated with the nearest sensitive receptors. By association, a comprehensive DMP which protects these residents, will also protect those further afield from dust effects.
- 4.1.4 The existing dust-sensitive receptors (EDSRs) located within 250m of the dust-generating operations are outlined in Table 1 and illustrated on Figure ST21706-001.

**Table 1: Sensitive Receptors in Proximity of the site**

Receptor Address	Type of receptor (sensitivity)	Direction from the site	Approximate distance from site (m)
EDSR 1 (The Haven, Clay Pits Way)	Residential (High)	North-east	30
EDSR 2 (Sandygate Pig Farm)	Residential (High)	East	115
EDSR 3 (1 Charlotte’s Oak)	Residential (High)	East	210
EDSR 4 (Lower Sandygate)	Residential (High)	East	225
EDSR 5 (Five Lanes)	Residential (High)	South-east	220
EDSR 6 (Lower Preston)	Residential (High)	South-west	65
EDSR 7 (1 Summer Lane)	Residential (High)	West	180

<sup>1</sup> Institute of Air Quality Management, Guidance on the Assessment of Mineral Dust Impacts for Planning, May 2016



## 5.0 Dust Mitigation Measures

### 5.1 Introduction

5.1.1 This section includes site-specific mitigation required to control, minimise, reduce and limit dust generation at the site. Each specific mitigation activity is outlined, in addition to general measures covering all operations which may occur. The prevailing wind is generally from the southwest.

### 5.2 Site Dust Management Plan Responsibility

5.2.1 The site operator will nominate appropriate members of staff to enforce this DMP. This will, as a minimum, include the site manager. At any one time, two members of staff should be present at the Site who have been trained to carry out the requirements of this DMP.

### 5.3 Visual Inspection and Record Keeping

5.3.1 The Site Manager (or an appointed employee) shall carry out at least one daily visual inspection to assess the effectiveness of the primary mitigation measures. Such inspection should cover the working areas, along the southern boundaries where sensitive receptors are present, and the site access roads and site exit. The visual inspection shall consider, as a minimum, the following:

- A 15mph speed limit will be enforced. Signage to this effect on the entry gates and in the site will be maintained at all times.
- If any visible, airborne dust is identified near to current dust generating activities, the dust source will be identified and mitigation at source will be carried out where possible, including increased dampening and frequency of dampening until the issue has been rectified.
- Any airborne dust seen to leave the quarry boundaries will be reported to the site manager immediately. The site manager will investigate the cause and arrange immediate mitigation actions to reduce emissions. This will include identifying the source of dust, mitigation of the release, and undertaking a follow up observation to confirm that dust is no longer leaving the site.
- Visual inspections are undertaken daily, and the site is cleaned based on the findings of the daily inspections. Employees are instructed to be proactive and to clean as soon as build-ups of dirt, mud or dust become evident. Mitigation shall be carried out at any time during day-to-day operation of the site, following employees' observations. The required activity will be specified as and when it is carried out by the appointed employees listed in this DMP. Materials will be prevented from drying out by periodic dampening activities dependent on the daily circumstances.
- Machinery will be cleaned frequently or when instructed by an employee listed in this DMP.
- Mud accumulation will be monitored, and the site frequently cleaned to prevent debris being carried out beyond the wheel wash and up to / onto the public highway. If required, a mechanically propelled road sweeper will be called to clean the tarmac surface from the wheel wash to site entrance, and any mud accumulation on the public highway near the site entrance.
- Ensure employees are carrying out the actions outlined in this DMP.
- Details of daily activities and schedules shall be recorded to show the activities that were occurring at the time of the inspection.



- 5.3.2 The results of the visual inspection shall be recorded in an Environmental Logbook which will be kept on site. The information from the Environmental Logbook will be made available to the regulatory body upon request.
- 5.3.3 Information which should be recorded in the Environmental Logbook includes quality assurance details (date, time, signature of completion and inspector), a record of the activities being carried out on-site, meteorological conditions and the results of the visual check and actions taken (if necessary), and any information relating to dust management implemented that differs from day-to-day operation. A site inspection form included as Appendix A could be used for the inspection and appended to the Environmental Logbook.
- 5.3.4 Additional mitigation will include the increased frequency of use of measures outlined in this DMP. As a minimum, upon identifying and reacting to an adverse dust situation, increased water suppression and dampening shall be undertaken. If the emissions are not curtailed with the use of dust suppression, the Site Manager will suspend or cease the operations in that area/or all Site operations until the source of dust is investigated, and the adverse conditions become manageable and are no longer a risk.
- 5.3.5 In the event of the failure of equipment that is vital for dust suppression, additional mitigation will be employed until replacement equipment is sourced. The additional mitigation will be maintained on site until such time that the equipment is repaired or replaced.

## 5.4 Wind Speed Monitoring

- 5.4.1 During operational hours, an awareness of meteorological conditions will be maintained. Prolonged dry periods and moderate to high winds can increase dust generation which may then become airborne and carried off-site by winds.
- 5.4.2 The weather forecast will be checked daily, and a trigger system will be adopted to identify the conditions when there is a likelihood of increased or high risk of wind-blown dust (i.e., predicted periods of windy weather). The trigger levels are detailed below in
- 5.4.3 Table 2.

**Table 2: Trigger Levels for Identification of Potential Dusty Conditions**

Wind speed			Precipitation		
m/s	Beaufort Scale		Dry	Showers	Heavy Rain
>5.5 (>12 mph)	4+	Dust and loose paper raised. Small branches begin to move	<b>Red</b>	<b>Amber</b>	<b>Green</b>
1.6-5.4 (3.5 – 12 mph)	2-3	Wind felt on exposed skin. Leaves rustle. Wind vanes begin to move.	<b>Amber</b>	<b>Green</b>	<b>Green</b>
0+1.5 0 – 3.4 mph)	0-1	Smoke drift indicates wind direction. Leaves and wind vanes are stationary	<b>Green</b>	<b>Green</b>	<b>Green</b>



- 5.4.4 As the closest sensitive receptors are located to the south and east, winds passing the Site from the north to west, and vice versa, have a risk of transporting dust directly to a sensitive receptor location.
- 5.4.5 The trigger levels provided in the table above will be interpreted as follows:
- **Red:** All exposed areas of loose bare ground (i.e. unsurfaced haul roads and stockpiles) will be inspected and treated as necessary in accordance with Sections 5.2 and 5.3. Regular dampening of surfaces is required.
  - **Amber:** Loose bare ground (i.e. unsurfaced haul roads and stockpiles) will be inspected at regular intervals to establish whether water suppression is necessary.
  - **Green:** Wind-blown dust not likely to occur.
- 5.4.6 During Amber to Red risk wind conditions, appropriate water-suppression measures will be used throughout the day to ensure the surfaces do not dry out and/or when airborne dust is observable from a source.
- 5.4.7 Whilst it is recognised that windblown dust is unlikely to occur in Green risk wind conditions, it is nevertheless recommended that measures are implemented to suppress dust from vehicle movements even in Green risk conditions. This may include, as appropriate, dampening of haul roads during dry conditions, the use of wheel washing for vehicles leaving the site and fitting of rumble grids on the access road to prevent vehicles tracking material onto the public highway.
- 5.4.8 In the event that the primary dust control measures fail or are insufficient during conditions of high wind, and dust is visibly being transported off site, works shall be suspended until a time when wind conditions lessen, or the dust control measures stop off-site dust emissions.
- 5.4.9 All quarry staff at supervisor level and above are trained to SHE NVQ Level 3 and above, and senior management are currently working towards additional WAMITAB qualifications. All operatives are provided with RAMS training (dust and environmental control) at Induction stage and all staff receive annual inhouse training via a documented toolbox talk on ISO14001 requirements, permit requirements, planning requirements and relevant environmental legislation. In the event that the operator's quarry staff were mitigating for a quarry dust emission event, then as a minimum staff would be issued coveralls, full face respirator (HEPA 3) and dust resistant gloves.
- 5.4.10 Specialist Contractors will be responsible to follow the terms of their own Safe Systems of Work/RAMS in terms of PPE and specialist training.

## 5.5 General Dust Control & Mitigation Measures

- 5.5.1 The following general mitigation measures for the facility should be implemented, building on the existing mitigation measures referenced at Section 3.1.1, which have been enhanced where it is considered that additional detail may be necessary.
- The quarry manager will refer to the planning conditions and this scheme to determine his or her response to potential or actual dust emissions, taking into account current and forecast weather conditions. Visual assessments of emissions will be made frequently and at least three times a day during operations.
  - Soil stripping and placement should be undertaken in low-risk weather conditions. Visual inspection of storage areas and stockpiles should be undertaken daily and water suppression employed if required.
  - Loading and tipping shall be carried out in such a manner as to minimise drop heights from loading shovels and tipping heights.



- Visual inspection of storage areas and stockpiles should be undertaken daily and water suppression employed if required.
- The effects of windblow across stripped surfaces and bare ground will be minimised by ensuring that loose soils and other materials are not left untreated on the ground. During dry conditions, water will be applied as necessary to stabilise any loose bare surfaces.
- The mitigation of fine particle emissions will be achieved primarily by means of the standard mitigation measures for general dust outlined above.

## 5.6 Water Suppression

- 5.6.1 A continuous water supply will be maintained for dust suppression, which is sourced from mains supply. Dampening activities will be through manual means and carried out at frequent intervals during day-to-day working and following the results of the daily visual inspection.
- 5.6.2 Periods of prolonged dry conditions require additional dampening activities. The determination for this action will be when the meteorological risk is amber or red (from Table 2 observations taken daily and on a reactive basis), there is a known drought or prolonged warm conditions (advised through national weather or Government services) and/or the daily visual inspections identify action required on a day-to-day basis.
- 5.6.3 A water bowser will be maintained on-site at all times and used, as and when necessary, to damp down stockpiles, haul routes, access routes and the exposed surfaces in the void / working area. The water bowser will be filled from a mains supply and will be kept full at all times when not in use to ensure timely execution when needed.
- 5.6.4 Dampening activities will be required during unloading and material handling activities. The visual inspection and day-to-day observations during working shall inform when and whether these dampening activities are required.
- 5.6.5 Suppression should be used as and when dust is visually seen in the airflow. The water dampening activities are used following the requirements of this DMP (i.e. daily inspection, proactive / reactive, dust event). The dampening actions are logged in the Environmental Logbook.

## 5.7 Road Surfaces and Trackout

- 5.7.1 Particular care will be required in respect of site haulage to control the occurrence of dust emissions. Standard good practices include:
- avoiding abrupt changes in horizontal and vertical alignment;
  - compaction, grading and maintenance of haul routes;
  - setting an appropriate speed limit of 15mph;
  - fitting all site vehicles and plant with upswept exhausts and radiator fan shields;
  - evenly loading vehicles to avoid spillages and;
  - dust suppression by regular spraying in dry conditions.
- 5.7.2 All site traffic will keep to the designated haul routes to reduce the comminution and subsequent entrainment of fine material into the atmosphere.
- 5.7.3 Loaded vehicles leaving the site will be inspected for cleanliness by the driver prior to leaving the site. The recently surfaced access road will be regularly damped down and swept as necessary to ensure effective dust control.
- 5.7.4 The hardcore and tarmac surfaces shall be maintained and kept in good repair.



- 5.7.5 The access route shall be kept in a clean state and any deposits of mud and dust shall be removed. The route would be inspected daily and cleaned when necessary using equipment available at the quarry. Over prolonged use, it may be necessary to remove build-up and visible deposits of mud with a mechanical road sweeper. The use of a road sweeper is left to the discretion of the Site Manager during the day-to-day operation of the quarry.
- 5.7.6 Spillages or mud deposits will be cleaned up immediately using the equipment available e.g. shovel or water bowser. Each employee will be suitably trained, through internal training, to carry out the clean-up of spills.

## 5.8 Monitoring

- 5.8.1 As noted above Condition 15 states that the DMP should include "mechanisms to be employed to monitor dust and airborne particles including the monitoring locations and the mechanism to record the dust monitoring data", but does not specify a method or timeframe for monitoring.
- 5.8.2 It should be noted that the Bovey Basin Central Area is not a new facility but an existing operational quarry and no increase in the existing scale of works is proposed – the current works have been undertaken to consolidate the site's complex planning history under a single up-to-date permission. The most recent monitoring of PM10 (detailed in the ES submitted with the planning application) concluded in 2017 and confirmed that PM10 concentrations in the vicinity of the site were well below the limit value (40 µg/m<sup>3</sup>) and below the 17 µg/m<sup>3</sup> screening value in the IAQM mineral guidance.
- 5.8.3 It is initially proposed that monitoring by visual observation during operation, and recording of instances of dust crossing site boundaries and the use of additional mitigation measures, will be sufficient to meet the condition. It is considered that options for more detailed monitoring of disamenity dust and/or PM10 could be reserved in the event of complaints being reported.

## 5.9 Responsibilities

- 5.9.1 The roles and responsibilities of the Site Manager and the project staff, with regard to the implementation of the DMP both in relation to construction and operation are shown below:

### Site Manager

- Ensure the DMP is communicated to all project employees, including subcontractors;
- Ensure construction activities are carried out in accordance with this DMP;
- Inspect the site daily to inspect potentially dust generating operations and deploy staff to implement appropriate management/mitigation measures as necessary. This is communicated through the Environmental Logbook as well; and
- Supervise any complaint investigations and implement additional measures to avoid reoccurrence.

### All Construction and Operational Staff (including Subcontractor employees)

- Carry out their operations in accordance with the requirements of this DMP; and
- Provide support to the Site Manager in implementing the management measures, using the Environmental Logbook.

## 5.10 Complaints

- 5.10.1 In the event that any complaints are received, details of the complaint will be recorded through the Environmental Logbook and potential sources or occurrences on site will be investigated.



Records of all complaints and remedial action taken shall be recorded through the Environmental Logbook.

- 5.10.2 On receipt of a complaint, the dust complaint log (Appendix B) will be completed, a similar version of which is available through the Environmental Logbook. Details of the complaint will be noted, and an immediate investigation will be completed. The investigation will identify the potential dust source and the issue will be mitigated as soon as possible, usually within 24 hours.
- 5.10.3 Details of the investigation and any action taken will be reported back to the complainant within one working day by a member of the DMP team, unless they have chosen to be anonymous or have requested not to be contacted.
- 5.10.4 The results of the complaint investigation and the measures taken to resolve the complaint will be made available to the Regulator upon request.
- 5.10.5 Additional mitigation will be employed as and when necessary to resolve the complaint(s).

## 5.11 Distribution & Training

- 5.11.1 A physical copy of the DMP will be kept on site at all times and made available to employees. A digital copy will also be held at the head office. The DMP shall be made available to the Regulator on request.
- 5.11.2 The site manager will ensure each employee and subcontractor at and/or arriving to the site are familiar with the control measures and procedures outlined in this plan and are aware of their individual role in reducing dust emissions. Personal protective equipment shall be provided as necessary for employees and visitors.
- 5.11.3 Upon arrival at the site and/or beginning of employment the employee will be trained and familiarised to carry out the mitigation actions required of their role. The training will make the employee aware of the wider dust management controls active at the site. Suitable training may include a site-specific toolbox talk and annual refresher sessions.

## 5.12 Review and Responsibility

- 5.12.1 The DMP will be reviewed by the site manager annually. New versions of this DMP will be issued as and when necessary, with mitigation and/or operational changes outlined. The version history shall be updated each time.
- 5.12.2 Reviews will also be carried out to reflect any changes in legislation, standards and guidance or other issues such as complaints.
- 5.12.3 It is the responsibility of operator and the site manager to ensure the DMP is enforced and that all employees are suitably trained. Failure to do so could result in adverse environmental conditions and enforcement by the Regulator.

SLR Consulting Ltd



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Technical Director





# Appendix A Site Inspection Form

## Dust Management Plan

**Bovey Basin Central Area**

**Sibelco UK Limited**

SLR Project No.: 439.V21706.00WA1

8 October 2025

Appendix A Site Inspection Form

Details of Visit
Time started:
Wind speed:
Wind direction:
Time end
Temperature:
Weather conditions:

Dust Suppression in Operation/Available

Appendix A Site Inspection Form

Area:		Contractor/Contact Details:				
Date:						
Item of Interest	1	2	3	4	5	6
Location, Identifier or operation						
Time						
GPS						
Adverse or potentially adverse? (Y/N)						
Location Description						
Comments						



# Appendix B Dust Complaint Form

## Dust Management Plan

**Bovey Basin Central Area**

**Sibelco UK Limited**

SLR Project No.: 439.V21706.00WA1

8 October 2025

### Dust Complaint Form

Time and Date	
Name and Address of Complainant (or general location)	
Telephone Number of Complainant	
Date and Time Dust was Detected by Complainant/registered	
Location of Dust Sources and Survey Locations	
Description of Dust (visible deposits on road? airborne dust?)	
Weather Conditions During Survey (e.g. rain/fog etc.). Refer to Table 4 Wind Conditions and the anemometer readings	
Temperature	
Wind Direction and speed	
Details of Investigation and Action Taken	
Surveyor Completed by:	



# Drawings

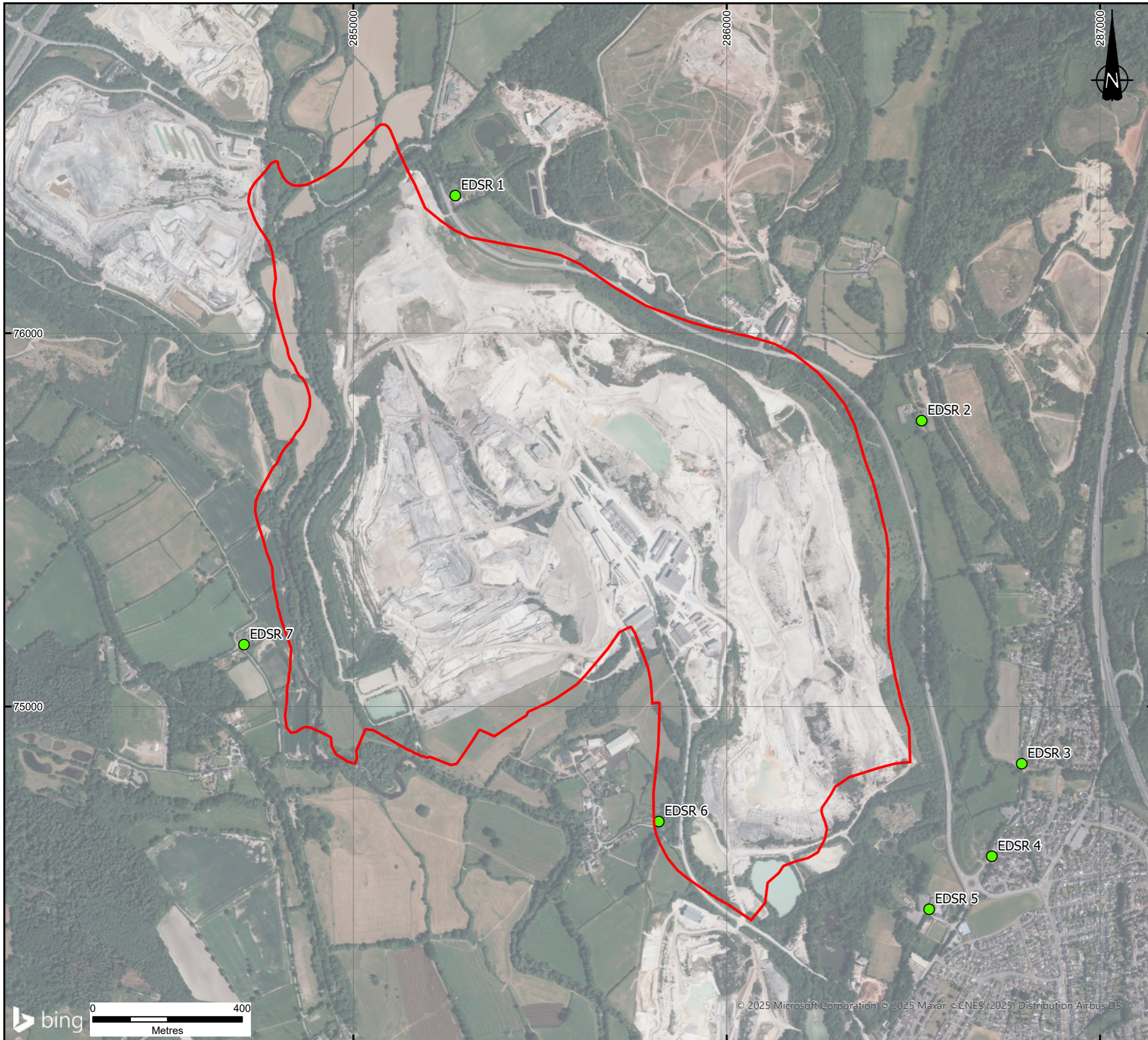
## **Dust Management Plan**

**Bovey Basin Central Area**

**Sibelco UK Limited**

SLR Project No.: 439.V21706.00WA1

8 October 2025



**KEY**

- Site Boundary
- Air Quality Receptor Location

**Notes:**

Boundaries are indicative. Aerial imagery shown for context purposes only.

B	UPDATED PROJECT NAME	10/25	BCB	PS	MW
A	FIRST ISSUE	05/25	CP	PS	MW
REVISION	DETAILS	DATE	DRAWN	CHKD	APPD

CLIENT	SIBELCO UK LIMITED
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PROJECT	BOVEY BASIN CENTRAL AREA
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DRAWING TITLE	AIR QUALITY RECEPTOR PLAN
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DRG No.	ST21706-001	REV	B	SUIT. CODE	---
DRG SIZE	A3	SCALE	1:10,000	DATE	02/10/2025
DRAWN BY	CP	CHECKED BY	PS	APPROVED BY	MW



