



Whealdream

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# Recovery Operation

Dust Management Plan

23<sup>rd</sup> October 2025





## Notice

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## 1 Introduction

This Dust Management Plan (DMP) relates to ground modelling works at Whealdream to be carried out by A & J Land Management Ltd.

### Site Description

- 1.1 The scheme is described in full in the planning application documents for Cornwall Council planning reference [PA24/03864](#), dated 29/11/2024:

*“Construction of a golf range and associated covered bays building with cafe, together with a new 18 hole footgolf / rugbygolf course, new maintenance shed and water storage lagoon and extensive native planting scheme. Ground modelling to be undertaken using imported inert materials”.*

- 1.2 The area comprises a total of 6.94 ha of land (including the temporary haul route). The application site falls entirely within the confines of Whealdream Holiday & Leisure. The land on which the proposed ground modelling work will take place is mainly amenity grass associated with an existing par 3 course and Footgolf course.

### Site Location

- 1.3 Whealdream is located 2.6km to the northeast of Helston, Cornwall, at Grid Reference SW 66601 29309. The site is bordered on three sides by farmland, a small number of residential dwellings and agricultural buildings, as well as a large area of woodland to the Southwest. The Site is accessed from the B3297, a minor road running parallel to the Eastern boundary of the site.

### Scope of this DMP

- 1.4 The scope of this DMP is limited to matters relating to dust, including:
- the larger fractions of dust often referred to a nuisance (‘disamenity’) dust; and
  - those particles which are smaller, typically <15µm in diameter, and settle less readily.
- The smaller particles are known as Total Suspended Particulate (‘TSP’) and include PM<sub>10</sub> and PM<sub>2.5</sub>, for example.

### DMP Status

- 1.5 A DMP is intended to be a ‘live’ document which serves as a reference during daily operations, and as such is reviewed at least annually and updated where necessary or on a more frequent basis should the following occur:

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



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

### **DMP Structure**

- 1.6 A&J has developed an Environmental Management System (EMS) as part of the Environmental Permit required for the ground modelling. This DMP will form part of that EMS and be reviewed and updated as necessary.

### **DMP Availability**

- 1.7 The DMP, and the EMS, will be available to access on site when works commence.

### **Staff training**

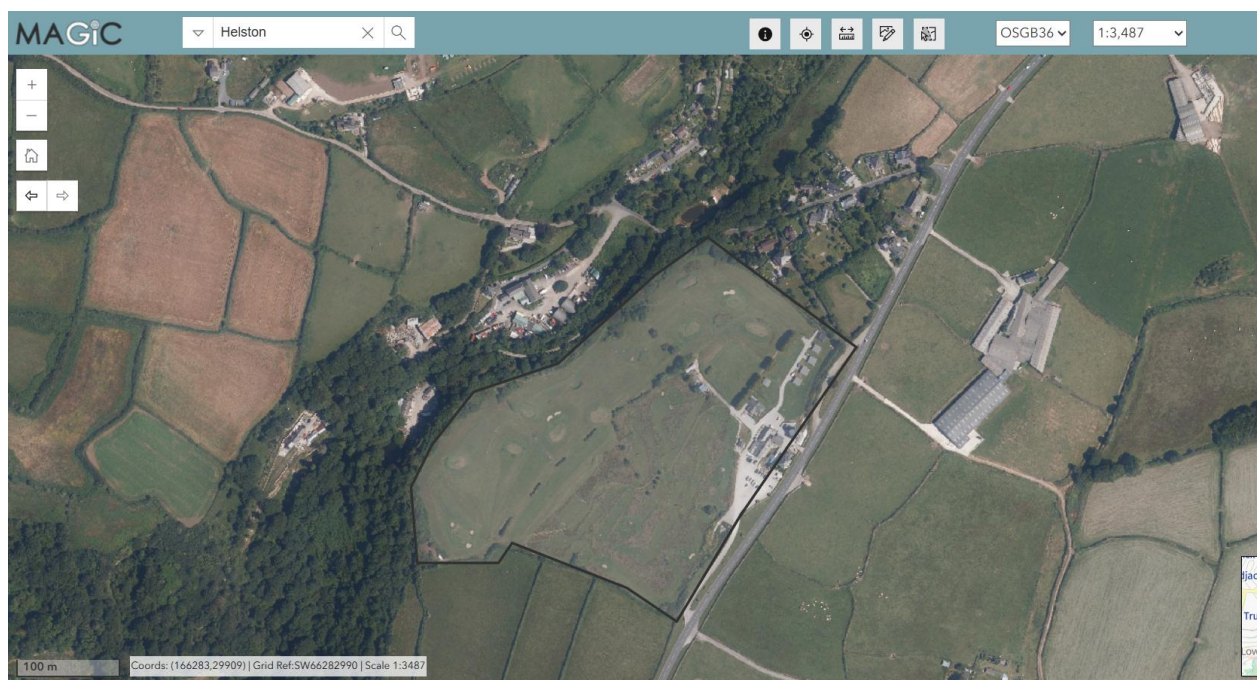
- 1.8 All employees receive appropriate training according to their specific tasks and responsibilities. They are made aware of the importance of the company's DMP. They are also advised of the need to take all reasonable measures when undertaking their duties to safeguard both the environment and the amenities of the locality.
- 1.9 According to their individual roles and responsibilities, the training of employees includes (but is not limited to):
- Access to, and familiarisation with, the environmental permit, the planning consent and this DMP as appropriate to their role;
  - An appreciation of the relevant legislation surrounding their specific role (where necessary);
  - Awareness of the relevant permitted operations at the site and associated equipment;
  - An understanding of the necessary procedures for receiving, inspecting and recording incoming waste and the management of materials being dispatched;
  - Competence in the handling, processing, inspection and recording of relevant details;
  - The need to deal appropriately with any non-compliant wastes;
  - Related housekeeping requirements, including; site tidiness, plant and equipment maintenance, site inspections and security;
  - Dealing with spillages and leaks, fires and other possible accidents / emergencies
- 1.10 A record of all staff training (internal & external), including any formal qualifications is maintained at the site and updated routinely.



## 2 Site Setting and Meteorology

### Sensitive Receptors

- 2.1 The term 'sensitive receptors' includes any persons, locations or systems that may be susceptible to changes as a consequence of the works as well as transport to and from the site. Receptors may include humans (which are potentially sensitive to health and / or disamenity impacts) and also ecology.
- 2.2 The 'study area' therefore comprises the site and also locations where sensitive receptors may exist and have the potential to be affected by the development proposals.
- 2.3 The relevant sensitive receptors include:
- Residences close to the site;
  - Ecological sites; and
  - Heritage Features.
- 2.4 The site is bordered by the Wheal Dream restaurant that is in family ownership such that there is an intrinsic link between the two. There is also on site holiday letting units which are located to the north of the restaurant. Other properties nearby to the site, these are located to the north and north-west of the site with the north-west area bordered by an existing river (the Cober) as well as the wildlife site of Cober Valley such that there is some separation.

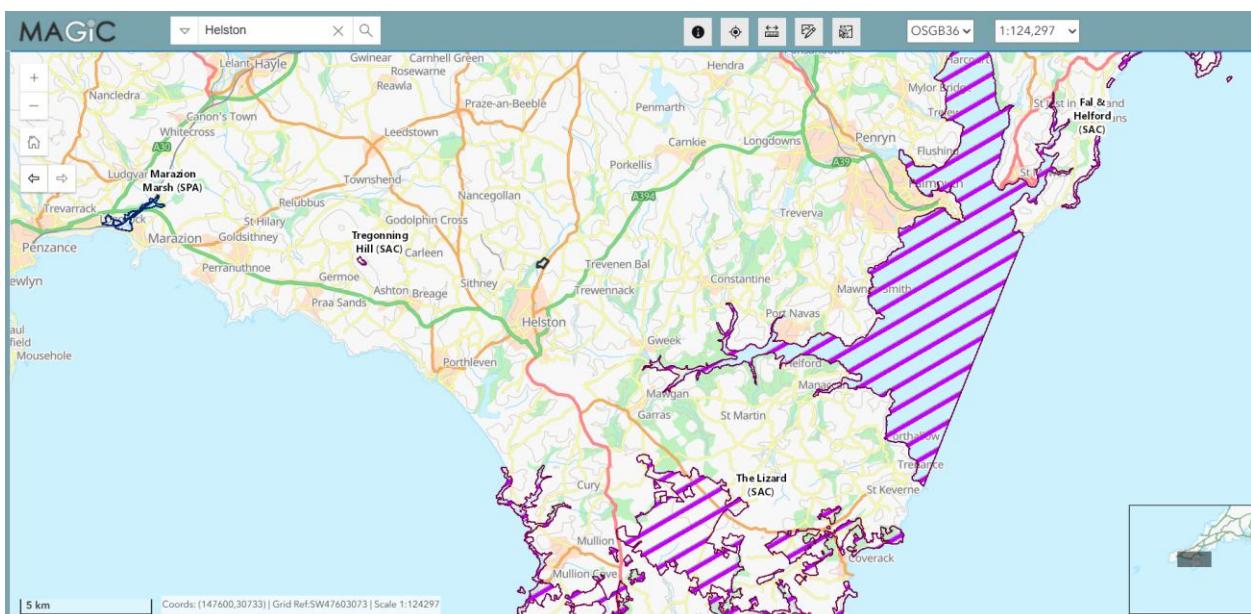


Extract from Magic.

### Statutory Sites of Nature Conservation Interest of International Importance

2.5 The planning process identified three statutory sites designated for nature conservation of international importance within 12.5 km of the site consisting of:

- Fal & Helford Special Area of Conservation (SAC) lies approximately 5.3 km to the east-southeast of the site.
- Tregonning Hill SAC approximately 6.4 km to the west of the site; and,
- The Lizard SAC and National Nature Reserve (NNR) lies approximately 7.9km to the south and southeast.



*Extract from Magic.*

### Statutory Designated Sites of Nature Conservation Interest of National Importance

2.6 A desk study revealed no statutory designated sites for nature conservation within 2 km of the site.

### Non-statutory Designated Sites

2.7 The information provided as part of the planning process identified eleven non-statutory designated sites within a 2 km radius consisting of:

- An unnamed Ancient Woodland;
- South Porkellis Moor County Wildlife Site (CWS);
- Lower Cober Valley CWS;
- Upper Cober Valley CWS;



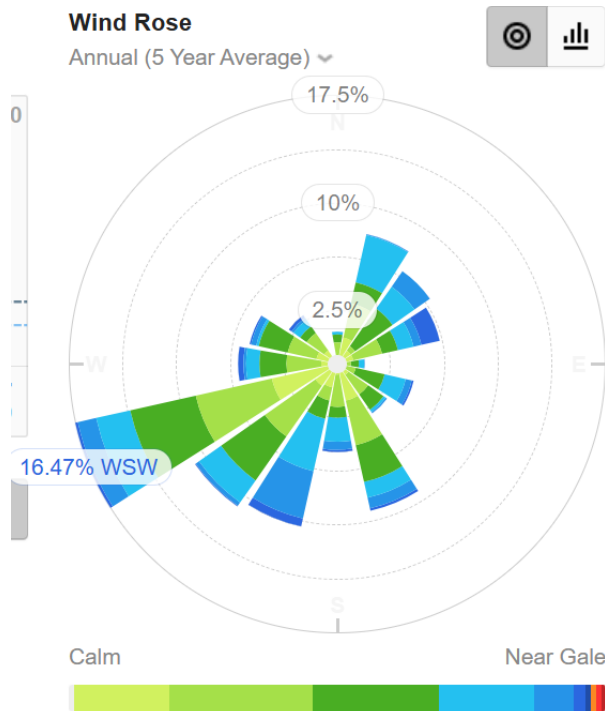
- Truthall Wood CWS;
- Trennack Downs CWS;
- Bodily Valley CWS;
- Penrose National Trust Land;
- Coverack Bridges TPO Site;
- King John's Wood Woodland Trust Reserve; and,
- Coose Trannock Woodland Trust Reserve.

#### Heritage

- 2.8 There are five Listed Buildings (all Grade II) and one World Heritage Site within 500m of the site. There are no Scheduled Monuments, no Registered Parks and Gardens, and no Registered Battlefields within 500m of the site.

#### **Meterology**

- 2.9 With regard to dust, fugitive dust emissions occur when particles are disturbed and released by physical activities (i.e. excavating, loading, tipping and transport). Stronger winds (often regarded as those greater than 5 m/s, for example) across fine material can cause windblown dust emissions. The most important climatological parameters governing the dispersion of dusts are therefore wind speed and direction.
- 2.10 The prevailing wind direction is from the south-west. The nearest available contemporary dataset for the site is RNAS Culdrose approximately 2.9 miles south east of the site. The wind rose diagram is presented below. On the information shown locations to the north and east of the site had the highest potential for dust impacts.



Source

2.11 Rainfall is also an important climatological parameter in the generation of dust; rainfall will suppress dust at the source. According to Arup (1995) rainfall greater than 0.2mm per day is sufficient to suppress dust emissions. On these days disamenity dusts will be naturally suppressed. Observed weather for 2024, confirms that the area experiences higher than UK average rainfall.

### 3 The Operations

- 3.1 The area comprises a total of 6.94 ha of land (including the temporary haul route).. The land on which the proposed ground modelling work will take place is mainly amenity grass associated with an existing par 3 course and Footgolf course. The existing topography slopes from the northeast corner of the Site and falls away to the west, from 117 AOD to 104AOD.
- 3.2 Cornwall Council have granted planning permission ref: PA24/03864, dated 29/11/2024, for *“Construction of a golf range and associated covered bays building with cafe, together with a new 18 hole footgolf / rugbygolf course, new maintenance shed and water storage lagoon and extensive native planting scheme. Ground modelling to be undertaken using imported inert materials”*
- 3.3 The proposed landform and development is shown in Final Masterplan ref: 901.17, with an excerpt below:



Figure 1 - Excerpt from Final Masterplan ref: 901.17 to show the approved development.



- 3.4 Volumetric calculations and a cut/fill analysis, have determined that a volume of approximately 102,000m<sup>3</sup> of material is required to achieve the approved landform. This equates to approximately 163,200 tonnes of inert waste but obviously both the conversion factor and the total amount needed to achieve the permitted landform will be subject to a degree of fluctuation depending on ground conditions and types of waste received. The development is seeking to achieve a precise landform, not manage a specific amount of waste. The estimated volumes and tonnages will be subject to change.
- 3.5 The importation of inert materials will commence in Phase 2 when the infrastructure including an access road and construction compound have been created. Storage of imported materials may occur when weather conditions prevent work, or to deal with fluctuations in supply.
- 3.6 There are in essence three phases of the site as shown on approved drawing no 901.45. it is estimated that the importation of materials will take two years, but there is no prescribed time limit.



## **4 Dust and Particulate Management.**

- 4.1 Dust Management is addressed in the CEMP as agreed with the Planning Authority. The measures agreed are set out below noting they apply to a wider set of works (construction but not involving imported wastes) than those covered by the Permit and this EMS DMP.
- 4.2 Impacts on air quality may arise from the operation of construction plant associated with on-site activities and from journeys to and from the site by construction related traffic and the construction workforce.
- 4.3 During the construction phase, there will be various construction activities undertaken which all have the potential to generate dust and particulate matter.
- 4.4 The land use surrounding the site is a mix of residential, and agricultural. Although sensitive receptors are nearby, the low intensity of the works are not anticipated to cause significant dust emissions.

### *General Provisions*

- 4.5 The operator will ensure that air quality impacts (principally dust) from construction-related activities and construction traffic are controlled through careful planning of works and effective site management. With respect to general provisions, the operator will as far as practicable:
- ensure that the site is managed in accordance with the requirements of the Permit, CEMP and relevant legislation (including health and safety);
  - ensure all operatives are aware of the sensitivity of land uses to dust emissions
  - from the site activities, in particular haul routes. Works will be carefully supervised and designed to prevent significant fugitive emissions in these areas;
  - ensure appointed person(s) will be responsible for controlling activities and handling complaints.
  - all complaints will be recorded, investigated at the earliest opportunity
  - -undertake regular liaison with the local authorities and other relevant parties regarding the air pollution control measures implemented and their effectiveness;
  - and operate a 'no burning' policy.
- 4.6 The main sources of particle emissions during construction activities will include;
- Haulage routes, vehicle and construction traffic
  - Materials handling, storage and spreading



- Site preparation and restoration on completion

4.7 The operator will adopt the following measures to prevent/mitigate dust and particulate matter generation;

*Monitoring*

4.8 Daily site inspections will be undertaken of potentially problematic areas (e.g. unloading areas and internal site haul route), of the site and boundary by site staff during normal operations. This will consist of visual inspections of areas.

4.9 Dust control within the sites will incorporate the following measures:

- Material will be directly placed and formed to the required shape.
- Material drop heights from plant and equipment will be minimised during loading/unloading;
- Inspections will be recorded in the Daily Site Diary.
- No fires shall be lit on the site.

4.10 The hardcore surfaced access haul roads will be maintained between the main compound and exit on to the public highway. This will ensure mud is removed from wheels and chassis before exiting on to the highway. Importation of plant and fill material will only be on the surfaced haul route. Internal haul routes will be re-graded regularly, as necessary.

4.11 Surfaced and un-surfaced roads will be dampened during dry periods using bowsers to minimize dust. Regular checks on the wind direction will dictate areas of fill. Alternative “fall back” fill areas will always be available to provide immediate alternative solutions if activities are causing concern.

4.12 All deliveries to site will be required to be sheeted (automatically retracting design will be required to allow ease of inspection). Any lorries arriving at site without being sheeted will be turned away and banned from site.

4.13 Entrance areas will be regularly inspected throughout the day and cleaning carried out as required. Speed restrictions shall be enforced along the access road to minimise dust generation. Any drivers of vehicles waiting to enter or leave the site will be required to switch off. Water suppression will be used as required and on a proactive basis,

*Construction Plant and Equipment*



4.14 To minimise emissions from construction plant and equipment, the operator will ensure that as far as practicable:

- all plant and equipment will be routinely serviced in line with the manufacturers' guidance or in the event that either a site inspection or a review of an incident identifies a malfunction;
- no vehicle or equipment emitting visible black smoke from its exhaust system other than during ignition will be used on the construction site; and plant will not be left idling when not in use or, where this is not practicable, reduced to the lowest setting.

*Management of Unforeseen Incidents*

4.15 If significant fugitive dust emissions are being generated at the site, monitoring indicates elevated standards, or a complaint is received, the following corrective measures will be implemented:

- The cause of the elevation will be immediately identified and reviewed; relevant operations will be suspended whilst control is applied; appropriate corrective measures will be applied. This may include, for example; the increased use of bowsers or replacement of faulty machinery
- Visual inspection frequency will be increased to twice daily to assess whether the measures are effective and will not be reduced until measures are successful; and the actions undertaken will be recorded in the Site Diary.



## **5 Site Responsibilities, Training and Complaint Management.**

- 5.1 Direct responsibility for the DMP is held by the Operator, who is also responsible for managing the technically competent staff.
- 5.2 The Operator will undertake an annual audit of the DMP to ensure the site is operating effectively. Interim informal audits will also take place in response to changes to the site's operation, permit, company changes, incident/accidents, complaints, legislation and use of new plant or techniques.

### **Operational Staff**

- 5.3 The Site Staff involved in the operations will be fully conversant with the contents of the Management System as relevant to their daily duties.

### **Training**

- 5.4 The Operator will ensure that the Technical Competency is maintained in accordance with industry requirements. Suitably qualified staff will be brought in to manage the Site if this is not the case.
- 5.5 Site Staff will be suitably trained in their roles and responsibilities with on-Site training by technically competent management to ensure that they conduct their duties in compliance with the Management System.

### **Complaints**

- 5.6 Any complaint received at the site will be immediately investigated by the Operator. Where appropriate, remedial action will be taken.
- 5.7 Site Staff will report any complaint to the Operator within 24 hours. The original complainant will be informed of the outcome of the investigation of the complaint and any actions taken within 5 working days.
- 5.8 Details of each complaint, including the complainant's details, actions taken and outcomes will be recorded in the Site Diary.