Dust Management Plan

Newall Plant Limited

Heron Farm Recycling Facility,
Heron Farm,
Besthorpe,
Attleborough,
Norfolk,
NR17 2LN.

PROVIDING SOLUTIONS, ENSURING COMPLIANCE

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1	Original Dust Management Plan	Georgina Watkins & George Evans	Kate Brady	16 April 2020
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4	Changes to drawings: Site Location Plan Site Layout Plan	Joe Craddock	Tracey Westbury	24 March 2024

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Drawing Ref. Drawing 001	Site Location Plan
Drawing No. 19/04e 001 V3	Sensitive Receptors Plan
Drawing Ref. Drawing 002	Site Layout Plan

1. Introduction

1.1. Westbury Environmental Limited has prepared this Dust Management Plan on behalf of Newall Plant Limited (the Operator) for the site at Heron Farm Recycling Facility, Heron Farm, Besthorpe, Attleborough, Norfolk, NR17 2LN (the Site).

1.2. The location and extent of the Site is shown on Site Location Plan Drawing Ref. Drawing 001.

1.3. Planning permission 3PL/2018/1262 for the following activities was granted by Breckland Council for the Site on 3rd December 2019.

> *"Retrospective Planning Permission for Change of Use from Agricultural Land to Open Air Storage (Plant, Materials and Aggregates in Connection with the Operations of Newall Plant Ltd) and Proposed Associated Works, Including Provision of Earth Bund and Landscaping".*

1.4. A Dust Management Plan V1 was submitted to meet the requirements of Condition 5 of Planning Permission 3PL/2018/1262 on the 16 April 2020.

1.5. The waste operations will be operated in accordance with Standard Rules (2010 No. 12) Environmental Permit EPR/HB3300UH for the "*treatment of waste to produce soil, soil substitutes and aggregate*". The Permit will be regulated by the Environment Agency.

1.6. A planning is in progress for retrospective change of use of the south of the site to open-air storage, see Site Location Drawing No. Drawing 001.

1.7. This Dust Management Plan V2 has been written to support this planning application.

Content of the Dust Management Plan

1.8. Due to there being an Environmental Permit in place at the Site, there is a requirement for the Operator to have an Environmental Management System (EMS). This Dust Management Plan will form part of the EMS for the Site. Procedures and forms referenced within this Dust Management Plan are included within the EMS. Completed forms (records) will be kept, as required by conditions included in the Environmental Permit.

1.9. This Dust Management Plan is structured as follows:

- Section 2 provides a summary of the relevant environmental legislation and guidelines.
- Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
- Section 4 provides a summary of the operations carried out on the Site and the delivery of material to the Site.
- Section 5 provides information on the site management and the mitigation measures employed at the Site.
- Section 6 provides information on how dust emissions are monitored at the Site.
- Section 7 provides a summary of what happens when an alarm is triggered.
- Section 8 provides a description of how complaints can be made and how they are addressed by the site management.

2. Relevant environmental legislation

2.1. The Air Quality Strategy (AQS) for England, Scotland, Wales, and Northern Ireland fulfils the requirement under Part IV of the Environment Act 1995 for a national air quality strategy which sets out policies for improving ambient air quality and keeping these under review. The first strategy, the National Air Quality Strategy (NAQS), was published in March 1997. In January 1999, proposals to amend the strategy were put out for consultation and a consultation document was produced. Following consultation, a revised version of the strategy was published in January 2000. This was further revised in 2007 and more recently in 2019.

2.2. The AQS provides a framework for air quality control through air quality management and air quality standards and objectives for different pollutants (including particulate matter). The 2007 air quality standards and objectives were transposed into English Law by the Air Quality (Standards) Regulations 2010.

Air Quality Management Area (AQMA)

2.3. The system of local air quality management (LAQM) was introduced under the Environment Act 1995. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within the relevant time period, the authority must designate an AQMA.

2.4. The Site is not located within an AQMA.

Low Emission Zone

2.5. A Low Emission Zone (LEZ) is an area that has restrictions on the type and age of vehicles permitted in it, therefore, vehicles emitting high levels of pollution can be prevented from entering and operating within the zone.

2.6. The Site is not located within a LEZ.

3. Site location and sensitive receptors

Site Location

3.1. The Site is located within central Norfolk, approximately 3.5km east of the residential town of Attleborough which is south of the A11 bypass connecting Thetford and Norwich.

3.2. The entire Site covered by the planning application extends to approximately 1.147 ha, see Site Location Drawing Ref. Drawing 001.

3.3. The Site is located on a farm with agricultural land surrounding the Site. It is considered that agricultural activities carried out on surrounding agricultural land, seasonally, will have the potential to cause dust emissions.

Sensitive Receptors

3.4. This Dust Management Plan identifies all types of receptors within 500m of the Site that may be sensitive to dust emissions.

3.5. Locations with a high sensitivity to dust for this Dust Management Plan include residential dwellings, public rights of way, and neighbouring surface water features (habitat).

3.6. There are two ponds situated southwest of the planning boundary area, See Site Location Drawing No 001.

3.7. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from airborne dust. Concentrations of airborne dust reduce significantly further away from the source.

3.8. Due to the nature of the materials being handled on this Site the particle size of the dust emitted is of intermediate to large particles. Therefore, it can be concluded that these particles are highly likely to be deposited within approximately 50m of the source.

3.9. The direction and distances from the Site Location to the boundary of sensitive receptors are listed in Table 3.1: Sensitive receptors and also shown on a Sensitive Receptors Plan, Drawing No. 19/004e 001.

3.10. The direction and distances from the Site Location (Site Location Plan, Drawing Ref. Drawing 001) of the Site has been considered. It is considered that sensitive receptors within 100m of operations are most likely to be affected.

Table 3.1: Sensitive receptors

Ref.	Receptor	Description	Direction from Site boundary	Distance from Site boundary
1	Newall Plant (wider Site)	The Operators Wider site.	West	0m
2	Ponds	Surface water features	Southwest	17m
3	Drain	Surface water feature	East	40m
4	Residential Property	Residential building and land.	Northwest	50m
5	Drain	Surface water feature	South	80
6	Heron Cottage	Residential building and land.	North	85m
7	Bunwell Road	Public highway connected to access track.	North	140m

Ref.	Receptor	Description	Direction from Site boundary	Distance from Site boundary
8	Flaxton Farm	Agricultural buildings with associated agricultural land.	Northwest	400m
9	Residential Property	Residential property located off Besthorpe Road	North-east-east	460m
10	Drain	Surface water feature	Southwest	460m
11	The Limes	Agricultural buildings with associated agricultural land.	North-east-east	470m

4. Meteorology

4.1. Unlike many atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.

4.2. The prevailing meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site specific, microclimatic conditions. Clearly the most significant meteorological factor is the predominant wind direction and wind speeds, and consequently data has been collected regarding the predominant wind speeds and directions appropriate to the Site.

4.3. Wind speed and direction data have been obtained from the Wilney Green observing station for the period from May 2013 to February 2020. Wilney Green observing station is located approximately 18km south of the Site and is the closest wind speed observing station to the Site with substantial data. This observing station has wind speed and direction data appropriate for characterisation of the wind climate at the Site, see **Error! Reference source not found.**.

Figure 4.1: Wind rose from Wilney Green Observing Station May 2013 - Feb 2020. Arrow indicates predominant wind direction.

4.4. The predominant wind blows towards receptors to the north-north-east of the Site which comprises of agricultural land (see

4.5. Table 3.1: Sensitive receptors). It is calculated that winds blowing towards the north-north-east account for approximately 13% of all winds recorded.

5. Operations at the Site

Waste Deliveries

5.1. Waste acceptance procedures will be applied to ensure that only suitable waste is accepted. Only those waste codes detailed in the Environmental Permit will be accepted, stored, and treated on Site.

5.2. Waste will be delivered onto the Site by Heavy Goods Vehicles. The movement of vehicles visiting the Site has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements will be enforced on the Site to help reduce the amount of dust generated by vehicle wheels.

5.3. All vehicles entering / exiting the Site will be sheeted to minimise the likelihood of dust emissions. Loaded vehicles arriving onto the Site that are not sheeted will be rejected in accordance with the Waste Rejection Procedure within the Sites EMS or be sheeted immediately.

5.4. Vehicles entering the Site will be visually inspected prior to unloading to ensure that excessively dusty loads are not accepted. Excessively dusty loads will be rejected from the Site in accordance with the Waste Rejection Procedure in the EMS.

5.5. Mud could be tracked out of the Site by vehicles potentially causing dust emissions from the road surface. In drier conditions, water sprays will be implemented across Site to reduce dust emissions, including spraying the access track to the Site and the Site surface.

Overview of Waste Processing

5.6. The operations to be carried out at the Site will include material importation and treatment to produce recycled aggregates.

5.7. Specific operations carried out on the Site are listed below with further information regarding the potential for these activities to cause dust emissions:

- Material Handling and Movement
    - Materials such as soils, concrete and recycled aggregates can all be considered to be dusty materials if they are dry, therefore movement of these materials has the potential to cause dust emissions.
    - Loading and off-loading of vehicles and equipment has the potential to cause dust emissions.
- Material Storage
    - Materials stored on Site in stockpiles. Should these stored materials become dry then they may be a potential source of dust emissions.
    - Dust emissions from stockpiles of materials may occur in the event of wind whipping.
- Material Treatment
    - Crushing and screening concrete, bricks and rubble will be carried out on the Site. These activities have the potential to cause dust emissions.

- Vehicle Movements
    - Mud could be tracked out of the Site by vehicles potentially causing dust emissions from the road surface.
    - Dust could be released directly from dry materials being carried by vehicles.

Plant and Equipment

5.8. All plant and equipment to be used on the Site for the treatment of waste will be mobile plant. The list below provides details on the mobile plant to be operated on the Site:

- 360º Excavators
- Concrete crusher
- Loading shovel
- Screeners
- Road Sweeper

5.9. All plant and equipment will be subject to maintenance checks in accordance with procedures in the EMS for the Site.

Site Layout

5.10. The Proposed Site Layout Plan Drawing Ref. Drawing 002 shows the proposed layout of the Site including the location of material stockpiles and the plant.

5.11. Waste will be stored and processed along the northern, eastern, and southern Site boundary, see Proposed Site Layout Plan, Drawing No. 19/004e 002. Mobile plant will be located in the centre of the permitted area.

6. Dust management and mitigation

Responsibility for Implementation of the Dust Management Plan

6.1. The Site Manager will be responsible for the implementation of the Dust Management Plan and for ensuring that the mitigation strategies in place are adhered to. The Site Manager is also the Technically Competent Manager (TCM) for the Environmental Permit EPR/HB3300UH and has completed the necessary assessments for providing site control measures. Therefore, the TCM is deemed competent to implement and review this Dust Management Plan. Where the Site Manager is unavailable to oversee the implementation of dust suppression measures, a suitably experienced Site Operative is allocated responsibility.

6.2. The Dust Management Plan will be reviewed every four years or when a change in operations is deemed to have a potential effect on increasing dust emissions. The review process will amend any mitigation measures that have been identified as areas for improvement in reducing dust emissions on the Site.

6.3. All staff members have the necessary training to deliver dust suppression measures detailed within this Dust Management Plan. All staff are given training on the EMS for the Site, which includes a Dust Procedure. All staff on the Site will be trained on the Dust Procedure which includes details regarding mitigation measure and monitoring/recording visual inspections. Site procedures are communicated between staff via EMS training and toolbox talks. Where new dust suppression measures are to be implemented refresher training will be provided to ensure staff remain competent. This training will be delivered by the Site Manager.

Overview of Dust Control

6.4. Newall Plant Limited have dust control measures in place to help mitigate dust emissions at the Site, see Table 6.2: Mitigation Measures. These measures will be implemented when appropriate, particularly in periods of dry weather or when dust is identified to be escaping the Site boundary. The Site boundary will be inspected regularly to identify any dust emissions / dust leaving the Site. If dust emissions are observed, then the use of water sprays will be instigated.

6.5. Bowsers and water sprays will be employed at the Site to dampen surfaces and stockpiles of material to prevent particulate matter becoming airborne. The condition and integrity of the bowsers and water sprays will be checked as part of the Inspection Checklists.

6.6. The crushing plant will have an inbuilt dust suppression mechanism, which will spray water onto the materials being crushed to reduce the dust generated. Equipment will be maintained in accordance with the manufacturer's specifications to ensure continued operation of the spray bar, in accordance with the Maintenance Procedure.

6.7. The handling height of material will be minimised at all times by all mobile plant in order to reduce the distance in which dust and particulates could be blown and dispersed by winds.

6.8. The predominant wind comes from south-south-west and therefore blows towards the north-north-east of the Site and its surroundings.

6.9. The maximum height of the stockpiles on either side of the crusher/screen will be specified within the EMS. Staff members will be trained on stockpile maintenance and Site operations in accordance with the procedures in the EMS. Staff members will monitor the height of the stockpiles to ensure that they do not exceed the height limits specified within the EMS.

6.10. Build-up of materials on the Site surface will be minimised by implementing the procedures within the EMS. A front shovel loader will be used to scrape the hardstanding surface.

6.11. The Site Manager may decide to cease operations should there be excessive dust emissions from the Site operations. Operations will resume on the Site when the circumstances causing the excessive dust emission to have been resolved. It is the Site Manager who will decide when operations will continue.

Sources and Control of Fugitive Dust Emissions

6.12. Table 6.1 details the potential sources of dust on the Site and which mitigation measures are implemented in order to break the source-pathway-receptor routes for dust emissions.

6.13. Table 6.2 lists the mitigation measures to control dust emissions at the Site.

Table 6.1: Source-Pathway-Receptor Routes

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
Mud	Transportation of dust on wheels and vehicles, then mud dropping off wheels / vehicles when dry.	Access track and Bunwell Road.	Mud on access track and Bunwell Road. Resuspension of mud as airborne particles	A road sweeping vehicle will be deployed when necessary to control the amount of mud on the public highways and minimise the generation of dust.
Debris	Falling material off lorries	Access track and Bunwell Road	Dispersion of airborne particles following impact of falling debris from lorries.	Vehicles delivering waste will be sheeted. Where debris is identified as an ongoing issue a road sweeper will be deployed. All areas will be subject to regular housekeeping.
Vehicle / Plant movements	Atmospheric dispersion	Properties off Bunwell Road and the access track, including Heron Farm and Heron Cottage.	Dispersion of airborne particles corresponding with vehicle movements as well as noise of passing vehicles.	The Site will be subject to regular housekeeping and water sprays are utilised.
Tipping and storage of materials in the open	Atmospheric dispersion	Site operatives and neighbouring residents in windy conditions.	Dispersion of airborne particles as a result of material tipping on Site.	The potential of dust emissions will be minimised by lowering drop heights. Waste may be stored in managed stockpiles which will be dampened down in periods of dry weather. It is intended for incoming waste to be deposited directly where they will be stored to avoid double handling. Operations will be halted when wind speeds are deemed to be excessive.

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
Operation of screening / crushing plant	Atmospheric dispersion	Site operatives and neighbouring residents in windy conditions.	Dispersion of airborne particles as a result of plant operations and size reduction of materials.	The potential of dust emissions will be minimised by utilising dust suppression equipment on corresponding machines. Wastes will also be dampened prior to processing – stockpiles will be dampened and if required in excessively dry conditions further sprays will be used for the feeding process of wastes.
Stockpiled materials	Atmospheric dispersion	Site operatives and neighbouring residents in windy conditions.	Suspension of airborne particles from piles of more friable and loose materials.	Dampening of stockpiles in dry weather or when excessive dust is identified to be leaving the site boundary.

Table 6.2: Mitigation Measures

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
Preventative Measures					
Site speed limit, “no idling” and minimisation of vehicle movements on the Site.	Engine idling creates unnecessary noise pollution. All vehicle movements have potential to create dust dispersion in dry hot conditions.	Vehicle activities on Site will be minimised (no double handling of materials) to lower noise pollution and also potential dust dispersion from vehicles in dryer conditions.	5mph speed limit signage. Enforcement of speed limit by Site Manager and constant observation and reminders by Site operatives.	Site signage. Correct planning and communication of all material transfers via staff training on the EMS.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered. If there is mud on the access road, then a road sweeper/mobile bowser will be deployed to clean and dampen the surface. If excessive dust emissions from vehicle movements continue after these measures, then operations shall cease.
Minimising drop heights for material.	Dropping materials can create impact dusts if materials are dusty and/or friable in nature. Reduction of this should reduce the distance over which dust could be blow and dispersed by winds.	The EMS requires that the handling of waste material on Site should be minimised at all times. Staff will be trained with regard to minimising drop heights.	This measure will be implemented whenever the Site is operational i.e., whenever material is being moved.	Drivers will be informed if they are required to reduce drop heights prior to Site entry.	Water sprays will also be available to dampen surfaces and stockpiles to reduce dust generation. If excessive dust emissions continue after these measures, then operations shall cease.

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
Good housekeeping.	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.	The EMS implemented on the Site has a specific procedure for enforcing good housekeeping. On-site litter will be collected and disposed of daily by a Site Operative to keep the Site tidy. The waste types to be accepted at the Site will contain very little, if any, litter. Due to the presence of hedging / fencing around the perimeter of the Site there is little risk of litter from the waste operations leaving the Site.	These measures will be implemented whenever the Site is operational.	Good housekeeping is implemented by following the housekeeping procedure within the EMS and by carrying out site inspections.	If excessive dust emissions are continued to be observed leaving the Site boundary, then further mitigation measure(s) will be triggered e.g., water suppression.
Sheeting of vehicles.	Vehicles carrying materials have potential to drop or disperse dusty or larger particles of materials from the vehicle during transportation. Therefore, sheeting should prevent this escape and dispersal.	The EMS states that all vehicles entering / exiting the Site must be sheeted to minimise the likelihood of dust emissions. Excessively dusty loads will not be accepted onto the Site.	Loading of potentially dusty materials on to a vehicle will be followed by closing of the sheet covers on that vehicle. Visual observation of incoming vehicles will take place. All vehicles carrying waste to the Site will be sheeted at	The sheeting equipment will be activated and checked to ensure proper coverage before the vehicle is allowed to leave the site. Incoming vehicles that are not sheeted will be rejected from the Site or sheeted immediately.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered. Materials may be dampened.

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
			all times unless being loaded or unloaded.		
Ceasing operations during high winds and/or exceptionally dry conditions.	Mobilisation of dust and particulates is likely to be greater during periods of strong winds or exceptionally dry conditions and hence ceasing operation at these times may reduce peak pollution events.	During exceptionally dry and/or windy conditions, if any operations / Site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormal dust emissions are observed within the Site, Site waste operations may be suspended to avoid further dust emissions. The weather conditions at the Site will be considered and recorded at the start of each working day so that the day's work may be planned with regards any potential dust emissions. If the wind speed and direction are likely to increase the risk of nuisance to neighbouring receptors, then operations may be temporarily stopped. There is no specific wind speed limit and/or no specific criteria for this to occur, as dust is dependent on other conditions such as rain.	If excessive dust is being generated by the operations, then the Site Manager will notify staff and operations may be temporarily ceased. Operations commence once the wind has subsided and/or the area is dampened down. Prevailing weather condition monitoring (Visual observation) including wind strength, wind direction and rainfall. This monitoring will be recorded on the Inspection Checklists.	The Site Manager makes the decision to cease activities that are causing the dust emissions.	N/A

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
		The Site Manager will decide whether to cease operations as a result of weather conditions. This decision is based on a combination of factors, including those mentioned above. The conditions are recorded on the Inspection Checklists. The record includes an overall description of the weather conditions including, but not limited to, wind strength (e.g., windy, not windy), wind direction (e.g., towards northern boundary) and rain.			
Minimisation of storage heights on the Site.	Minimising stockpile heights should reduce the distance over which debris and dust could be blown and dispersed by wind.	The EMS will include a Storage and Handling Procedure which will outline the maximum height and volume allowed for the stockpiles present on Site, in order to reduce the potential for excessive dust emissions. The stockpiles will not exceed the heights stated in the EMS.	These measures will be implemented whenever the Site is operational.	The Site Manager keeps a record on the Inspection Checklists to ensure stockpiles do not exceed the heights specified in the EMS.	If excessive dust emissions are continued to be observed leaving or have the potential to leave the Site boundary, then the further mitigation measure(s) is triggered. E.g., Use of water suppression or cessation of dusty activities.

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
Remedial Measures					
Road sweeper	Road sweeping of access road and surrounding roads, when necessary, will reduce the impact of dust, mud and debris on all vehicles using the access roads to the Site.	A road sweeping vehicle will be deployed to control the amount of mud on local roads and minimise the generation of dust when appropriate. The road sweeper will be deployed when the access road and/or Bunwell Road is observed to be muddy or dusty. The road sweeper will be maintained in accordance with the manufacturer's specifications. A Planned Preventative Maintenance List included in the EMS will be populated with items on the Site that are required to be maintained on a scheduled basis, such as the road sweeper. The cleanliness of roads in the vicinity of the Site entrance are checked as part of the maintenance	Visual observation of the state of the access road and local roads – findings will be recorded on the Inspection Checklists in the EMS. This identifies the need for the use of the road sweeper. Constant observation by all operatives on the Site. The Site Manager will check on the state of the road at least once daily and if mud is visible on the road, which has been tracked out from the Site, then the road sweeper will be deployed.	Road sweeper will be deployed to clean the access road and local roads (Bunwell Road). Site management will instruct the relevantly trained site operative to carry out the road sweeping. The Site will be swept at the end of each working day by default.	N/A

Mitigation Measure	Description / Effect	Use on Site	Trigger for Implementation	How is it implemented?	Further mitigation to be implemented if not effective
		procedure and included on the Inspection Checklists. If the Inspection Checklist identifies a requirement for the road sweeper to be used, then a road sweeper will be deployed and used by a trained member of staff.			
Water suppression	Water suppression can be used throughout the Site to restrict and limit dust emissions produced on Site.	Sprays from the water bowser will be in use at the Site to dampen surfaces and stockpiles of material to prevent dust emissions. The condition and integrity of the 2000 litre water bowser and sprays will be checked as part of the Inspection Checklists.	Use of water sprays on the Site will be used to minimise dust emissions unless the Site is not operational or there is wet weather.	The water levels in the bowsers will be monitored by Site Operatives to ensure that there is a sufficient supply available for the water sprays.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) is triggered (Cease operations causing the dust emission).

Other Considerations

Water Availability

6.14. A mains water supply is available on Site for use in dust suppression measures. This water supply is also used for municipal use on Site and is marked on the Proposed Site Layout Plan, Drawing No. 19/004e 002.

6.15. To prevent dust generation stockpiles are dampened down using a water bowser and hose. The water for the bowser is sourced from the mains water supply. The water bowser is checked daily to ensure it is full and readily available to provide dust suppression.

6.16. The spray bar within the plant will be checked as part of the Daily Inspection Checklist to ensure that there is a sufficient water supply to suppress any dust emissions.

6.17. There are ponds located adjacent to the Site which can also be utilised in emergency situations. An agreement for this has been reached between the owner of the lakes and the Site Manager.

In the event of a drought

6.18. During exceptionally dry and/or windy conditions, if any operations / site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormally high dust emissions are observed within the Site, site operations may be suspended to avoid further dust emissions. This is decided by the Site Manager.

6.19. Depending on the severity of the drought conditions, restrictions may be in place on the amount of water available for use on Site from the supplier. In this case, operations may be reduced or suspended in order to comply with any water usage restrictions.

7. Monitoring

Visual Dust Monitoring

7.1. Dust emissions from the Site will be assessed by visual observation. Assessments will be recorded daily on the Daily Inspection Checklists in the EMS. It will be every member of staff's responsibility to continually monitor the emission of dust from the Site. Monitoring of dust will be carried out by visual assessment, and this can take place anywhere within the Site boundary.

7.2. If dust emissions are perceived to be leaving the Site boundary, then the Site Manager will establish what is causing the excessive dust emission to be generated and will take remedial action. The results of the investigation and what action was taken will be recorded and retained.

7.3. The prevailing weather conditions at the Site will be considered and recorded at the start of each working day so that the day's work may be planned as appropriate regarding potential dust emissions. The prevailing conditions will be recorded on the Daily Inspection Checklists. Information on the Daily Inspection Checklists will contain an overall description of the weather conditions including, but not limited to, wind strength (e.g., windy, not windy), wind directions (e.g., towards northern boundary) and rain.

7.4. Table 6.2 states the mitigation measures that will be in place in case of excessive dust emissions on the Site.

Monitoring Location

7.5. There is no particulate matter monitoring equipment located on the Site. Only visual monitoring of dust emissions takes place. Visual monitoring will take place whenever the Site is operational and from anywhere within the Site boundary and the vicinity.

Operation of the PM Monitoring Equipment

7.6. There is no particulate matter monitoring equipment located on the Site. Only visual monitoring of dust emissions takes place.

Quality Assurance/Quality Control and Record Keeping

7.7. There is no particulate matter monitoring equipment located on the Site. Only visual monitoring of dust emissions takes place.

Equipment and Data Management

7.8. There is no particulate matter monitoring equipment located on the Site. Only visual monitoring of dust emissions takes place.

Reporting of Data

7.9. There is no particulate matter monitoring equipment located on the Site. Only visual monitoring of dust emissions takes place. No data from equipment is therefore reported to the Environment Agency.

Additional Detailed Monthly Reporting

7.10. There is no particulate matter monitoring equipment located on the Site. Only visual monitoring of dust emissions takes place. No data from equipment is therefore reported to the Environment Agency.

8. Actions when alarm is triggered

8.1. There is no specific dust monitoring equipment on the Site with trigger alarms. Monitoring is carried out by visual observation and assessing whether dust emissions are excessive i.e., leaving or with the potential to leave the Site boundary. If dust emissions are perceived to be excessive, then the Site Manager establishes what is causing the excessive dust emission to be generated and takes remedial action.

8.2. The remedial measures are stated in Table 6.2: Mitigation Measures.

9. Reporting and complaints response

9.1. The EMS on Site has a procedure for responding and dealing with complaints. A complaints form is available on Site and must be filled in and kept on file whenever a complaint is received in accordance with the EMS complaints procedure.

Engagement with the Community

9.2. A Site Notice Board will be located at the Site entrance.

9.3. The Site Notice Board will include the following information:

- The Permit holder's name (Newall Plant Limited).
- The operators name (Newall Plant Limited).
- An emergency contact name and telephone number.
- A statement that the Site is permitted by the Environment Agency
- The Environmental Permit Reference.
- The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).

9.4. The provision of the above information will ensure that members of the community can contact Newall Plant Limited should they be concerned by dust emissions or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

Reporting of Complaints

9.5. Should a complaint regarding dust be received by the Site, the complaint will be recorded on the Complaints Form in the EMS and investigated in accordance with the Complaints Procedure within the EMS. The Complaints Form will record who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again.

9.6. The Site Manager will identify what caused the excessive dust emission to be generated. This generation may have been caused by failure of Site machinery or dust procedures. If the excessive dust emission has been caused by a procedure not being carried out properly, then staff will receive further training on the dust procedures and site management. If the excessive dust emission has been caused by plant failure, then the plant will be repaired as soon as possible.

9.7. All complaints will be acknowledged and investigated, with resultant actions reported to the complaint. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day.

Management Responsibilities

9.8. Site staff are responsible for dust management issues and detecting/reporting dust emissions. All members of staff are given training on the EMS for the Site, which includes a Dust Procedure. All staff on the Site are trained on the Dust Procedure which includes details regarding mitigation measures and monitoring/recording visual inspections.

9.9. On receipt of a complaint the Site Manager investigates and establishes the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant is contacted with details of the actions to be implemented and the estimated timescales for completion. The maximum response time for investigating the cause of the complaint and contacting a complainant is two working days.

9.10. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) will be investigated in accordance with the Accidents, Incidents & Complaints Procedure within the EMS. Operations on the Site will cease, should excessive dust emissions be seen leaving the boundary, following the implementation of additional mitigation measures or when instruction from the Environment Agency to cease operations has been received.

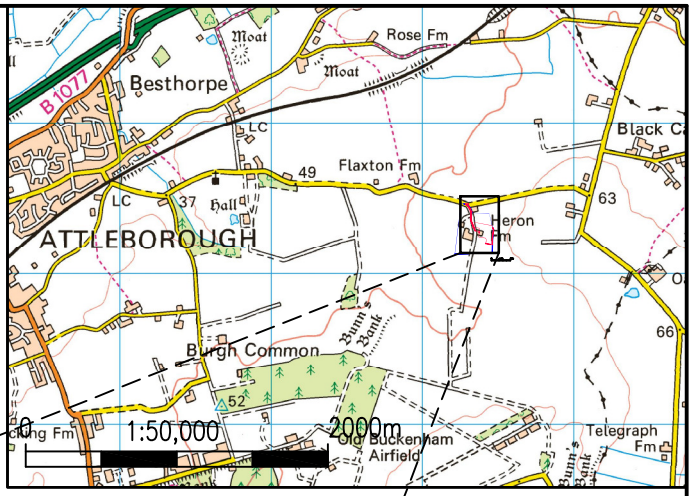
Drawings

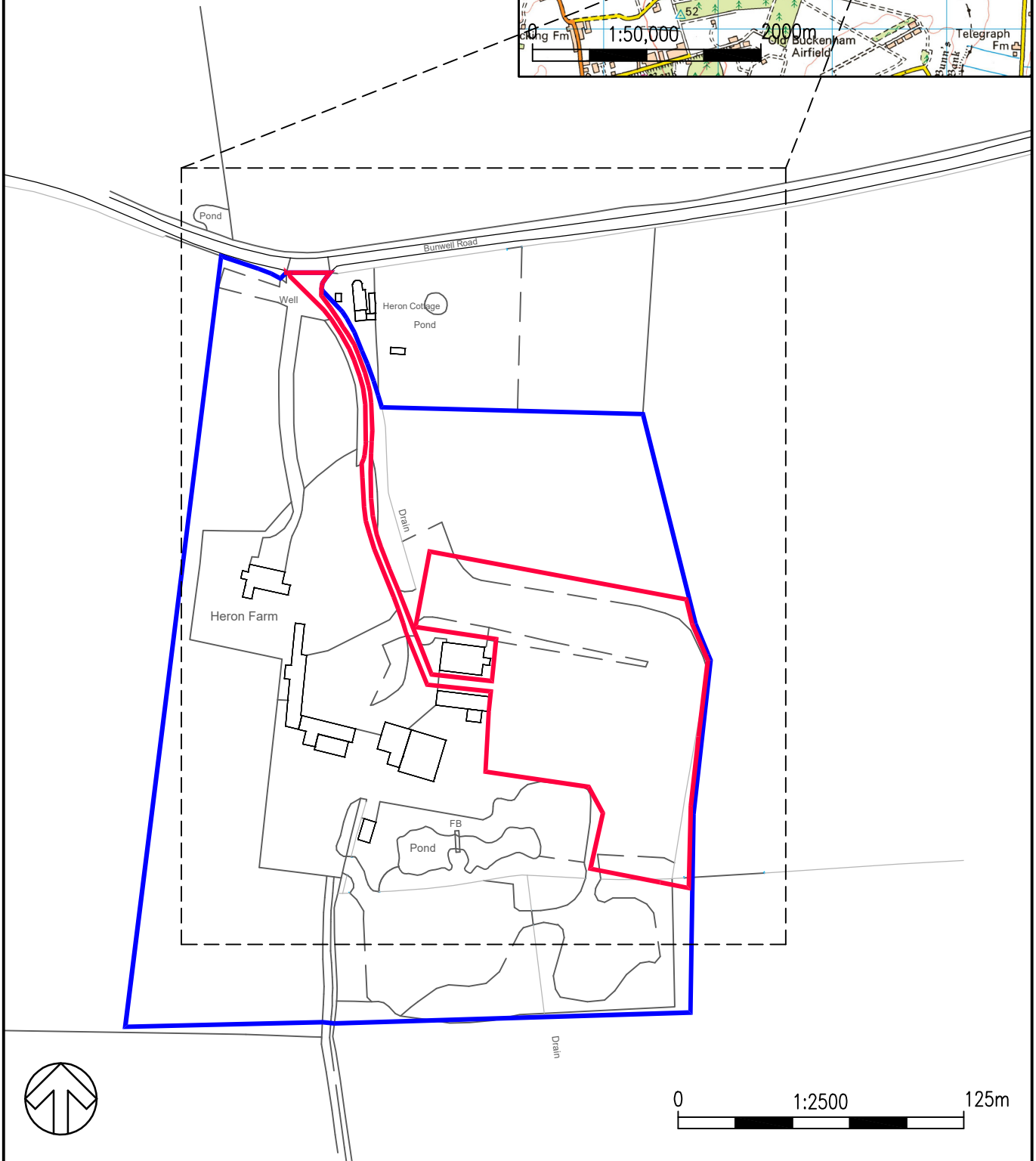
Drawing Ref. Drawing 001	Site Location Plan
Drawing No. 19/004e 001 V3	Sensitive Receptors Plan
Drawing Ref. Drawing 002	Proposed Site Layout Plan

KEY

Site Boundary

Ownership Boundary





0 1:2500 125m

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Environmental Consultancy

TITLE:

Heron Farm
Attleborough
Site Location Plan

FIGURE No:

Drawing 001
12.10.2022 Rev B

NEWALL PLANT

Client: Newall Plant Ltd

Title: Sensitive Receptors Plan

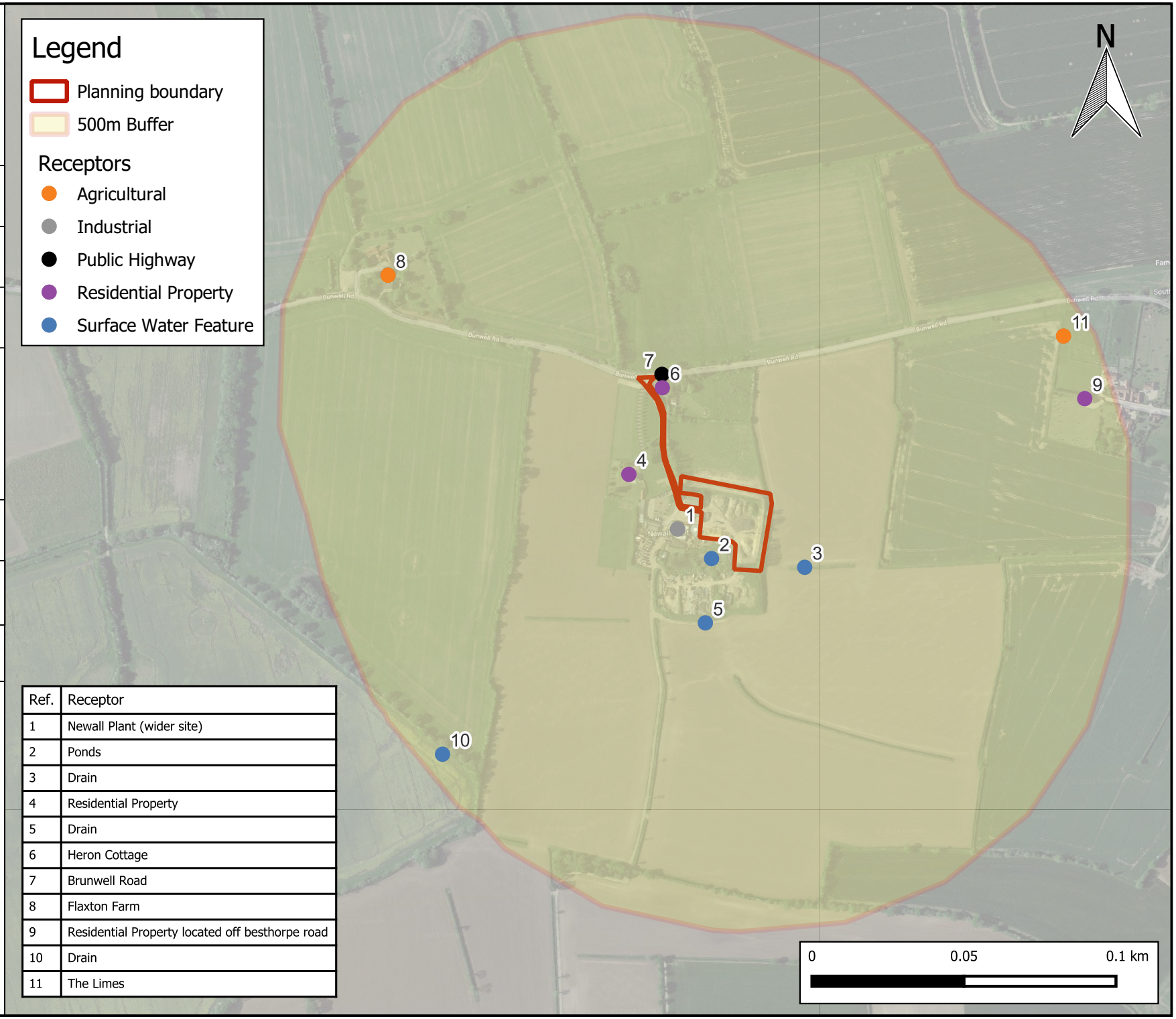
Reference: 19/004e 001 V3

Site:
Heron Farm Recycling Facility,
Besthorpe, Attleborough,
Norfolk,
NR17 2LN

Date: 24 October 2022

Produced by : BS
Checked by: KB

Scale: 1:7,000



Ref.	Receptor
1	Newall Plant (wider site)
2	Ponds
3	Drain
4	Residential Property
5	Drain
6	Heron Cottage
7	Brunwell Road
8	Flaxton Farm
9	Residential Property located off besthorpe road
10	Drain
11	The Limes

WESTBURY ENVIRONMENTAL

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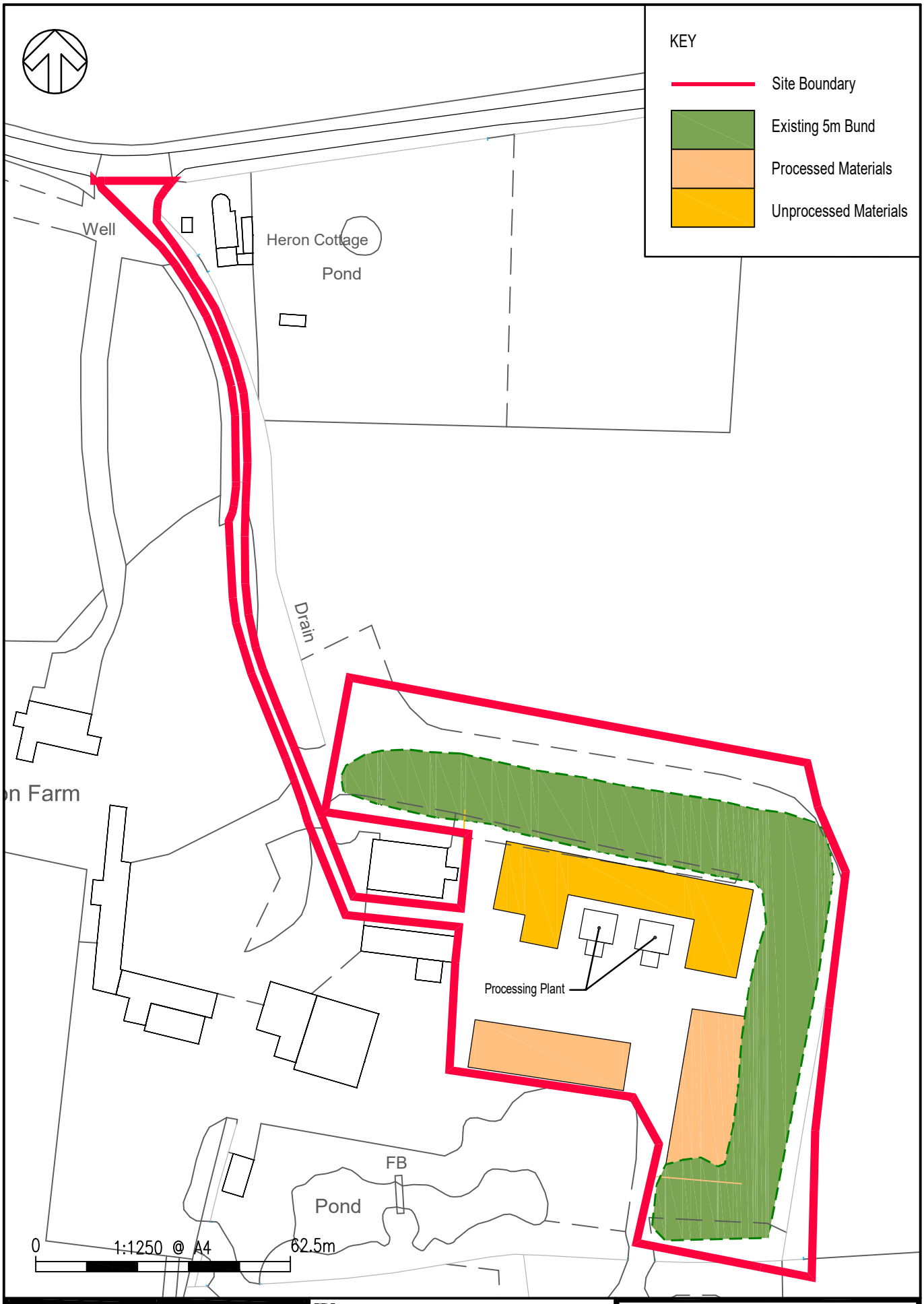

ECON ENVIRONMENTAL
Environmental Consultancy

TITLE:
Heron Farm
Attleborough
Site Layout

FIGURE No:
Drawing 002
09.11.2022 Rev D