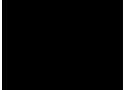


**From:** [Sam Dumbrell](#)  
**To:** [Christopher Herbert](#)  
**Cc:** [Rebecca Sprules](#); [CCD Planning Enforcement](#)  
**Subject:** RE: WSCC/104/13/SR - Condition 7  
**Date:** 21 December 2015 14:17:51  
**Attachments:**   
[151103 416.01258.00004 PMAP.PDF](#)  
**Importance:** High

---

Chris,

I write further to your resubmission received 04/01/15 to discharge condition 7, which reads:

**Dust Management Plan**

7. The development hereby permitted shall not take place, including site clearance works, until a scheme for the suppression of dust (including provision for ongoing review, and dealing with dust complaints) has been submitted to and approved in advance and in writing by the County Planning Authority. Thereafter, the approved scheme shall be implemented in full throughout the operation of the development hereby permitted.

*Reason: To accord with paragraphs 120 and 123 of the NPPF (2012) to protect the amenities of the local population and the local environment.*

I can confirm that your submitted 'Particulate Management and Action Plan' (SLR Ref: 416.01258.00004 Version No: 2: (dated November 2015)) has been approved and the pre-commencement element of this condition is discharged. In order to ensure ongoing compliance, the approved dust suppression scheme (attached) shall be implemented in full throughout the operation of the development hereby permitted.

**As this development commenced in February 2015, the approved dust suppression scheme should already be being undertaken during all works on site.**

Regards, Sam

<p><a href="#">Sam Dumbrell</a>   Senior Planner, County Planning, Residents' Services, <a href="#">West Sussex County Council</a>   Location: County Hall, Chichester, West Sussex, PO19 1RH Internal: 26947   External: 0330 222 6947   E-mail: <a href="mailto:sam.dumbrell@westsussex.gov.uk">sam.dumbrell@westsussex.gov.uk</a></p>
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**Washington Sandpit**

Particulate Management and Action Plan

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## 1.0 INTRODUCTION

Britannia Crest Recycling Ltd operate an active Sandpit quarry near Storrington, West Sussex. In 2013 planning permission was granted for the continuation of mineral extraction for a two year period and the importation of inert material over a five year period to enable the restoration of the Sandpit.

Condition 7 of the Planning Permission WSCC/104/13/SR states the following:

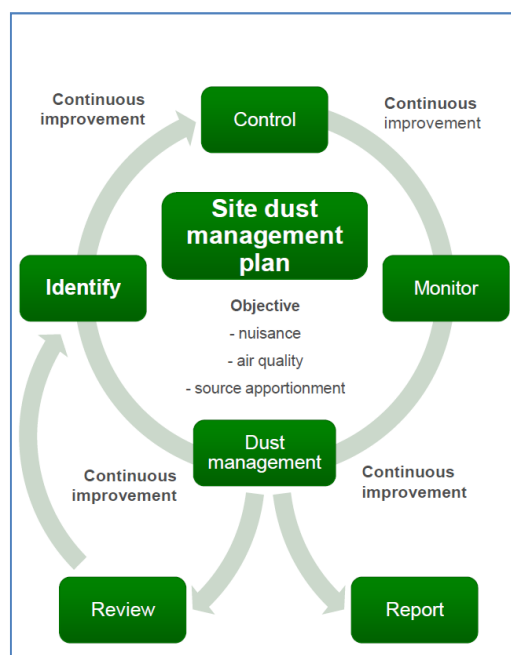
*“The development hereby permitted shall not take place, including site clearance works, until a scheme for the suppression of dust (including provision for ongoing review, and dealing with dust complaints) has been submitted to and approved in advance and in writing by the County Planning Authority. Thereafter, the approved scheme shall be implemented in full throughout the operation of the development hereby permitted.”*

This Particulate Management Action Plan (PMAP) set outs the potential sources of dust at the facility, the measures in place to control dust generation and monitor releases, and the management and monitoring actions that will be taken in response to a dust event.

### 1.1 Overview and Structure of Particulate Management Action Plan

The PMAP is an active document which requires periodic evaluation and updating as operations and circumstances change.

The principal mechanisms of formulating and continually improving a PMAP are presented in Figure 1-1.



**Figure 1-1  
Dust Management Plan Process<sup>1</sup>**

<sup>1</sup> Reproduced from - Report to The Mineral Industry Research Organisation (MIRO), *Good practice guide: control and measurement of nuisance dust and PM<sub>10</sub> from the extractive industries* AEAT/ENV/R3140 Issue 1 (February 2011).

The components of the PMAP are set out within this document as follows:

- Identification of dust sources and influencing factors – Section 2.2 – 2.3
- Control Measures – Section 3.1 - 3.3;
- Monitoring – Section 3.4;
- Management, Review and Reporting – Section 5.0.

## **1.2 Status of Particulate Management Action Plan**

The PMAP is a 'live document', in this respect the dust control measures and management procedures contained within it will be updated on a periodic basis.

This version (1.0) represents the situation in August 2015 that can be defined as:

- sand extraction and screening on site;
- stockpiling of extracted material and transfer offsite by heavy duty vehicles (HDVs);
- permission to import inert material for restoration purposes; and
- permission to screen imported inert material prior to deposition.

## 2.0 OVERVIEW OF DEVELOPMENT AND POTENTIAL DUST RISK

### 2.1 Site Setting and Sensitive Receptors

#### 2.1.1 Site Setting

Washington Sandpit is located directly north of the A283 and approximately 2km east of Storrington, West Sussex. The site comprises of a small active sand pit whilst to the east there is a larger sand pit operated by CEMEX.

#### 2.1.2 Human Receptors

There are a number of residential properties in close proximity to the site. Isolated properties are located along the southern and eastern boundaries of the site, along the A283 and Hampers Lane, respectively. Areas of built up residential areas are located approximately 150m to the north.

The closest receptors include the following:

- Chanctonbury Lodge (adjacent to southern boundary);
- residence on Hampers Lane (adjacent to eastern boundary);
- residence on Barns Farm lane (approx. 80m south of the site);
- residence on A283 (approx. 70m west of the site); and
- residential area along Badgers Holt (approx. 150m north of the site).

The relative sensitivity of receptors to dust has been determined with reference to examples provided in NPPF Technical Guidance<sup>2</sup>, reproduced in Table 2-1 below. The surrounding receptors are generally considered of medium sensitivity.

**Table 2-1**  
**Examples of Dust Sensitive Facilities**

High Sensitivity	Medium Sensitivity	Low Sensitivity
Hospitals and clinics	Schools	Farms
Retirement homes	Residential areas	Light and heavy industry
Hi-tech industries	Food retailers	Outdoor storage
Painting and furnishing	Glasshouses/nurseries	
Food processing	Horticultural land	
	Offices	

#### 2.1.3 Ecological Receptors

##### *European/International Sites*

Searches on the Multi-Agency Geographic Information for the Countryside (MAGIC)<sup>3</sup> website confirm that there are none of the following European or International sites located within 1km of the site boundary:

- Special Area of Conservation (SAC);
- Special Protection Areas (SPA); and

<sup>2</sup> Technical Guidance to the National Planning Policy Framework, Department for Communities and Local Government (March 2012).

<sup>3</sup> [www.magic.gov.uk](http://www.magic.gov.uk) accessed August 2015.

- RAMSAR.

### Sites of Special Scientific Interest (SSSI)

Two Sites of Special Scientific Interest are located within 1km of the Site. Sullington Warren SSSI and Chantry Mill SSSI are both located to the west of the site at a distance of approximately 550m and 800m, respectively.

### Other ecological receptors

None of the following ecological receptors have been identified within 1km of the proposed permit boundary:

- National and Local Nature Reserves
- World Heritage Sites;
- Area of Outstanding Natural Beauty;
- Woodland Trust Sites; and
- National Forest.

Three areas of ancient woodland are located within 1km of the site, the closest of which is approximately 510m northwest located within Black Park Country Park SSSI. Furthermore, the Southdowns National Park runs along the sites southern boundary.

## **2.2 Process Description**

Soil and overburden are stripped in accordance with the phased programme and the principles for soil handling for later use in restoration or perimeter bunding for subsequent phases.

Sand is excavated by a track-type tractor and hydraulic excavator before being directly transferred by dump trucks via internal haulage routes to the screening plant (Warrior 1400X). The screening plant is mobile and has the advantage of being moved if required. The location of the plant aims to be central within the excavation area to maximise the distance between the plant and surrounding receptors.

Stockpiles of imported material, overburden and soils are located within the south-eastern corner of the site in proximity to the site entrance (Phase 5). It is within this area that the loading of material into dump trucks is undertaken for internal haulage to the restoration area. Stockpiles of mineral are located within the north-eastern corner of the site.

Imported inert material utilised during the restoration scheme are also screened using the onsite plant. Soils and overburden are then reinstated to allow for seeding and planting. Restoration of the site will be undertaken in a series of phases, with works commencing in the south-western corner and working in a clockwise direction.

Access to the site is at the south-eastern corner where traffic accessed from the A283. All HDV traffic is routed to the east with no HDV's travelling through the village of Storrington.

The current approved operating hours are: Week Days 08:00 – 18:00, and Saturdays 08:00 – 13:00. The site is not open on Sundays, Bank or Public Holidays.

## 2.3 Potential Dust Sources

The operation of Washington Sandpit has not given rise to problematic levels of dust due to the high level of moisture held by the sand extracted and the dust control measures in place during the excavation, processing, restoration and haulage activities.

Potential dust sources at the landfill, given the design and application of control measures, are identified in Table 2-2 below. The review of potential dust sources is used to inform the assessment of risk and the selection of appropriate controls.

**Table 2-2  
Dust Release Inventory**

<b>Dust Source</b>	<b>Potential Magnitude of Emissions</b>	<b>Reasons</b>
Screening (warrior 1400X)	Medium	Machine has in-built dust suppression
Vehicle movements – internal haul roads	Medium	Unpaved haul roads Compacted aggregate material Generation of dust from temporary road material Re-suspension of deposited particles during vehicle transit
Vehicle Movements – access road	Low	Paved access road Trackout from site Re-suspension of deposited material during vehicle transit
Soil / overburden removal, handling and storage	Medium – High	Fugitive releases during removal & transfer Wind whipping across exposed / bare soil storage areas
Landfilling with inert material	Medium - High	Fugitive releases when waste comprises of small particle sizes Drop heights minimised.
Mineral storage	Medium	Fugitive releases during periods of dry / windy weather Re-suspension of particles during movement of vehicles around the storage area
Restoration (soil and overburden)	Medium - High	Fugitive releases during transfer of soil from storage areas and deposition operations Wind whipping across exposed restored areas prior to established vegetation

## 2.4 Complaints Records

The Site currently no record of complaints being made with regard to dust emissions and dust deposition beyond the site boundary.

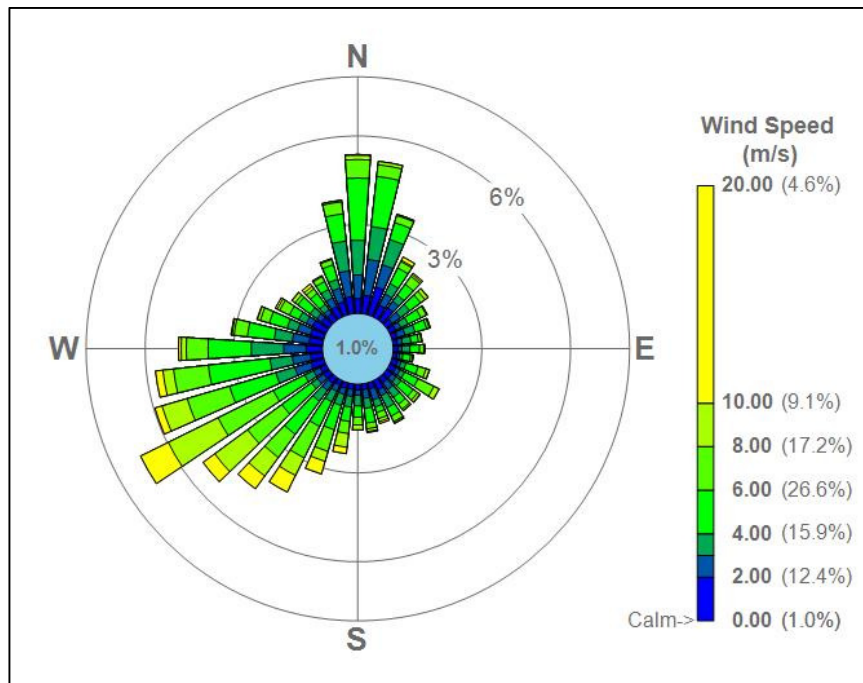
## 2.5 Prevailing Meteorological Conditions

The most important climatic parameters governing the release and dispersal of fugitive dust are:

- wind speed will affect the potential for dust entrainment and the distance it may travel;
- wind direction determines the broad transport of the emission and the sector of the compass into which the emission is dispersed; and
- rainfall will naturally suppress dust generation.



Wind speed and direction data for the area is available from Shoreham Observation Station (approximately 13km south-east of the site) and is presented in Figure 2-1. The wind rose shows that the majority of winds are from the southwest, with winds from this sector occurring for approximately 45% of the year. There is also a strong component from the north, occurring for approximately 15% of the year.



**Figure 2-1**  
**Windrose – Shoreham Meteorological Station (2012)**

Research<sup>4</sup> has indicated that rainfall greater than 0.2mm per day is sufficient to effectively suppress windblown dust emissions. Average rainfall data for the area from the Metl Office indicates that the average number of rainfall days (days with >0.2mm) per year for the region is 150-160 i.e. approximately 42% of the year.

## 2.6 Assessment of Potential Risk of Dust Effects

This section presents a review of the potential risk of dust effects in the absence of mitigation and is completed in order to inform the selection of control measures and monitoring techniques required to ensure the risk of dust impacts beyond the site boundary is at an acceptable level.

The qualitative assessment of risk is based on the nature of the dust, the distance between receptor and source, and the prevailing meteorological conditions (i.e. frequency of winds affecting the receptor and the frequency of rainfall providing natural suppression). Research<sup>5</sup> has shown that winds greater than 3m/s are capable of suspending and carrying dusts, conversely rainfall of greater than 0.2mm per day is considered sufficient<sup>6</sup> to effectively suppress wind-blown dust emissions.

<sup>4</sup> Leeds University. Good Quarry. <http://www.goodquarry.com/article.aspx?id=55&navid=2>

<sup>5</sup> K. W. Nicholson (1988) A review of particle re-suspension. Atmospheric Environment Volume 22, Issue 12, 1988, Pages 2639-2651

<sup>6</sup> US-EPA, AP-42, Section 13.2.2

On the basis of the material to be handled at the site, it is considered that relatively coarse particles (>30µm in diameter, i.e. larger than a 'coarse silt') are likely to make up the greatest proportion of dust emitted from site. Research on behalf of the government<sup>7</sup> indicates that particles of this size will typically deposit within 100m if allowed to disperse.

The risk of dust emissions from the site is considered to be low given the wet nature of the material being excavated and supported by the fact that the site has not received any dust complaints. Potential for dust emissions are primarily from internal haulage routes and soil / overburden removal, transfer and storage operations.

Taking into account the prevailing winds from the southwest and the strong northerly component shown in the windrose and the proximity of receptors to the site boundary, there is considered to be a moderate risk of dust impact at the residences located along the southern and western site boundaries and the areas of housing to the north and north-west of the site.

Due to the proximity and downwind location of residential receptors to the operations, mitigation measures have been defined within this PMAP to further reduce the risk of dust impacts from all sources.

### **2.6.1 Impact upon Ecological Receptors**

The majority of the research undertaken has focussed on the chemical effects of alkaline dusts. A summary of a review of available research on behalf of the DETR<sup>8</sup> concluded that:

*'the issue of dust on ecological receptors is largely confined to the associated chemical effect of dust, and particularly the effect of acidic or alkaline dust influencing vegetation through soils.'*

Given that the site handles only inert waste material and aggregate, there is not considered to be a risk of highly alkaline or acidic dusts being released with resulting impact upon nearby vegetation.

With regard to dust deposition an Interim Advice Note (IAN) prepared as a supplement for Volume 11, Section 3, part 1 of the Design Manual for Roads and Bridges (and now incorporated into HA207/07<sup>9</sup>) suggests that only dust deposition levels above 1,000 mg/m<sup>2</sup>/day are likely to affect sensitive ecological receptors. This level of dust deposition is approximately five times greater than the level at which most dust deposition may start to cause a perceptible nuisance to humans. It states that most species appear to be unaffected until dust deposition rates are at levels considerably higher than this<sup>10</sup>.

Due to the proximity of human receptors close to the site, by ensuring dust levels are kept to levels whereby perceptible nuisance to humans is not apparent (200mg/m<sup>2</sup>/day) this would be significantly below the suggested level at which ecological receptors would be affected so there is considered to be an insignificant impact on nearby ecological receptors.

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<sup>7</sup> Arup, The Environmental Effects of Dust at Surface Mineral Workings. (Report to the DETR 1995)

<sup>8</sup> Department of the Environment, Transport and the Regions (DETR) 1995: *The Environmental Effects of Dust from Surface Mineral Workings – Volume Two*.

<sup>9</sup> Design Manual for Roads and Bridges. Volume 11, Section 3. Part 1 HA207/07. Annex F.

<sup>10</sup> Guidance for Undertaking Environmental Assessment of Air Quality for Sensitive Ecosystems in Internationally Designated Nature Conservation Sites and SSSI's (Supplement to DMRB 11.3.1), Interim Advice Note 61/04, March 2005

### 3.0 DUST CONTROL

Measures for minimising, controlling and monitoring dust emissions from the facility are outlined in this section.

#### 3.1 Overview

The key method of controlling dust emissions is through good process and site design and subsequent good housekeeping, i.e., 'avoidance', is the key method of controlling dust emissions.

The control hierarchy has been based on:

- good operating and management practices to avoid emissions arising from activities;
- good process design to minimise emissions;
- abatement or control to reduce dust emissions, e.g., use of sprays; and
- disrupting the emission pathway to sensitive receptors, i.e., shielding receptors through the use of screening (e.g. walls and banks).

The dust control measures have been defined on the basis of the findings of the qualitative assessment of dust risk (detailed in Section 0) and regulatory guidance as follows:

- Mineral Industry Research Organisation (MIRO) Good practice guide: control and measurement of nuisance dust and PM10 from the extractive industries (AEA, 2011);
- Technical Guidance to the National Planning Policy Framework (Department for Communities and Local Government, 2012);
- Process Guidance Note 3/16 (04) Secretary of State's Guidance for Mobile Crushing and Screening (Defra, 2004); and
- Guidance for dust and particulate abatement techniques at Waste Management Facilities (Environment Agency, January 2013).

#### 3.2 Dust Control Measures

Control measures that are employed on site are detailed in Table 3-1 for the aggregate extraction, processing and inert landfilling and the mobile screener used on a campaign basis.

**Table 3-1  
Dust Control Measures**

Potential Dust Source	Management Action / Dust Control Technique
Screening Plant	Plant not located adjacent to southern or western boundary (i.e. away from closest receptors). Plant operated within capacity (no overloading of the plant). Plant dust suppression sprays always operated when plant in use. Plant product conveyor is fully skirted to contain dust emissions from the crushed material.
Vehicle movements – internal haul roads	Vehicle speed restriction of 5mph on all haul roads on site Internal haul routes made up on compacted material. Frequent inspections of integrity of internal haul roads and maintenance undertaken as required. Road surfaces will be regularly graded to improve the surface and the edges clearly delineated. During dry conditions, frequent application of water using tractor and bowser

	<p>Unsurfaced haul roads well maintained and compacted to minimise spillages from passing vehicles and erosion of road surface                  Internal roads designed to avoid sharp corners and steep gradients where practicable that would encourage sharp braking</p>
Vehicle Movements – access road	<p>Wheel wash located at site access to be used by all vehicles that have access unpaved areas prior to leaving site                  Paved access road to eliminate the source of surface erosion                  All loaded vehicles leaving site carrying dusty material will be covered                  A site speed limit of 10mph on site access road.</p>
Soil removal, handling and storage	<p>Water suppression using tractor and bowser during periods of extreme dry / windy weather                  Soils in long term storage mounds or bunds seeded as soon as practicable to prevent dust emissions                  Soil handling restricted in adverse weather conditions                  Double handling of stripped materials minimised wherever possible                  Soil mounds to be a maximum of 2m in height                  No heavy machinery to run over in-situ, undisturbed or replaced soils</p>
Landfilling with inert material	<p>Minimise drop heights during transfer of material                  Cease operations during periods of adverse weather when dust emissions can be seen to be crossing the site boundary</p>
Mineral storage	<p>During dry conditions, frequent application of water using tractor and bowser on storage areas                  Stockpiles marked to prevent vehicles tracking over                  Reduced drop height of material to minimise dust creation</p>
Restoration	<p>Progressive restoration to minimise areas exposed to wind erosion                  Handling operations kept to a minimum                  Soil replacement activities planned to take into consideration seasonal weather variations and seeding seasons for restoration scheme                  No heavy machinery to run over in-situ, undisturbed or replaced soils                  Access to restore areas by machinery restricted other than for purpose of maintenance</p>

## 4.0 MONITORING

### 4.1 Meteorological Conditions

Weather forecasts are monitored on a daily basis to predict weather conditions such as prolonged dry, hot spells or significantly strong winds which may generate elevated levels of dust. Using this information, the necessary precautionary measures are employed on site, or suspension of certain activities if necessary.

### 4.2 Dust Monitoring

Visual monitoring of dust emissions is undertaken daily as part of routine operations by experienced site operatives.

Additional visual monitoring would be undertaken where:

- particularly dusty conditions are detected on site by operational staff;
- dust emissions are evident near the boundary during any activity;
- in response to complaints being received – in this situation off site monitoring is also carried out at appropriate conditions.

During the visual dust monitoring observations, attention is paid to:

- potential for dust emissions from internal haulage routes (e.g. dry disaggregated (loose) dust);
- potential for dust emissions from stockpiles (e.g. high proportion of fines);
- potential for dust emissions from paved access road (e.g. loose dust with the potential to be tracked out onto local highway);
- airborne dust within site boundary; and
- airborne dust crossing site boundary.

**Table 4-1  
 Visual Dust Monitoring Criteria**

Parameter	Limit	Method	Frequency	Location
Deposited Dust or Airborne Dust	Dust crossing the Site Boundary	Visual Assessment	Daily by site operatives	On-site

Results of the visual dust monitoring are recorded in the Site Log Book which is kept in the site office (example *pro-forma* is included within Appendix A). The following details are recorded:

- weather conditions (wind speed (qualitative i.e. strong ,light etc.), direction, rainfall);
- current site operations;
- identification of any significant dust on site or dust dispersion beyond the site boundary; and
- additional mitigation measures put in place if required.

In the event that a complaint is received or monitoring identifies dust being transported beyond the site boundary and mitigation measures fail to resolve the issue, all dust generating activities shall cease until the source of the dust has been identified and steps taken to prevent the off-site emissions.

### **4.3 Complaint Monitoring**

Monitoring of impacts will be achieved by recording and monitoring complaints. Complaints may be reported directly to site, via Local Environmental Health, or the Environment Agency (24-hr complaint reporting system).

Complaint records will include: date and time, nature of complaint, locality of complaint, name of complainant (if available), a summary of investigation and actions taken and outcome. The complaint response and investigation procedure is provided in Section 5.1.

## 5.0 MANAGEMENT

### 5.1 Dust Complaints Procedure

Complaints may be notified to the Site Management either during or after an event, and directly by the complainant or indirectly through a regulator who was notified.

Complaints will be reported to the relevant authorities by Britannia Crest Recycling Ltd and will include the following (recorded in the Site Log Book):

- date, time, and name of complainant (if given);
- nature of complaint;
- locality of complaint; and
- a summary of investigation and actions taken and outcome.

Complaint response will have the objective of investigating the incident and preventing any continuing issue by putting in place additional control or management measures to prevent re-occurrence of incident and updating the PMAP. Complainants will be informed of findings of investigation and actions taken.

Investigations will include but not be limited to:

- visit by site management to location of complainant to verify issue (if the complaint is made 'after' rather than 'during' a dust event this may not be possible);
- review of site activities at time of incident to investigate potential sources;
- if dust event is occurring or a recurring event undertake more frequent on-site and instigate off-site visual monitoring and record findings;
- review of control measures and management actions at time of incident;
- review of meteorological conditions at time of incident;
- reporting of findings (either in pro-forma or Site Log Book).

An example Dust Event Form is included in Appendix B.

### 5.2 Dust Control Responsibilities

There shall be a trained site supervisor / manager on site during working hours responsible for dust management measures. Responsibilities are allocated to specific personnel to ensure dust generation is effectively controlled (see Table 5-1).

**Table 5-1  
 Dust Management Responsibilities**

Actions	Responsibility
Monitoring Meteorological Forecast	Site Manager / Supervisor
Routine Daily Visual Dust Monitoring	Site Manager / Supervisor
Routine Monthly Visual Dust Monitoring	Site Manager / Supervisor
Coordinating Tractor & Bowser Applications	Site Manager / Supervisor
Coordinating Plant area Cleaning	Site Manager / Supervisor
Application of plant dust suppression	Site Manager / Supervisor
Completing dust event forms	Site Manager / Supervisor
Liaison with Public and Regulator	Managing Director
Coordinating Dust Management Plan Updates	Managing Director

### **5.3 Training**

All personnel on site shall understand their responsibility to ensure the generation of dust is minimised. Each employee will be made aware of the importance of dust control and the most effective measures available to minimise such emissions.

### **5.4 Liaison with Community and Regulators**

The Managing Director (or nominated representative) will act as liaison with the regulator and local community for issues relating to dust nuisance.

The nominated representative shall respond promptly to all complaints by undertaking an investigation into the dust event, including weather conditions, operations on site and mitigation measures in place at the time of the complaint. Complainants will be informed of the investigation.

Following the receipt of a complaint, a dust event form shall be completed and the results of the subsequent investigation kept in the Site Log Book.

### **5.5 Record Keeping**

The operator shall keep records of all dust monitoring, dust contingency actions, investigations, and complaints on site for a minimum period of two years (or in accordance with Permit), these shall be made available to the regulator to examine on request.

### **5.6 PMAP Update and Review**

This PMAP is a controlled document, and forms part of the site management documentation.

The PMAP will be reviewed on an annual basis. However, the PMAP is intended to be a 'live' document which serves as a reference during daily operations, and as such will be updated on a more frequent basis should the following occur:

- significant changes are made to the plant or operational practices;
- the regulator requests that the PMAP is updated; 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 PMAP.





**Appendix B: Example - Dust Event Form**

<b>Dust Event Form</b>	
<b>Name of Author</b>	
<b>Description of Event</b> (Note a)	
<b>Date / Time</b>	
<b><u>Activities taking place during time of event</u></b>	
<b><u>Dust mitigation techniques employed at time of event</u></b>	
<b><u>Summary of weather conditions leading up to and during the event</u></b>	
<b><u>Details of corrective actions</u></b>	
Notes	
(a) e.g. complaint registered (name and address) or visible dust crossing site boundary during visual assessment	

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