



Dust Management Plan:

Rainbow Industrial Estate, Trout Road, West Drayton

ET Planning

8 December 2022



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This report has been prepared by Hawkins Environmental Limited for the sole purpose of assisting in gaining planning consent for the proposed development described in the introduction of this report.

This report has been prepared by Hawkins Environmental Limited with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This assessment takes into account the prevailing conditions at the time of the report and assesses the impact of the development (if applicable) using data provided to Hawkins Environmental Limited by third parties. The report is designed to assist the developer in refining the designs for the proposed development and to demonstrate to agents of the Local Planning Authority that the proposed development is suited to its location. This should be viewed as a risk assessment and does not infer any guarantee that the site will remain suitable in future, nor that there will not be any complaints either from users of the development or from impacts emanating from the development site itself.

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1. INTRODUCTION

1.1. Overview

Hawkins Environmental Limited has been instructed by ET Planning to prepare a dust management plan for the proposed redevelopment of Rainbow Industrial Estate, situated in West Drayton of the London Borough of Hillingdon.

On the 31st August 2022, planning permission was granted by LB Hillingdon (LBH) for 'Retention of entrance gates and change of use for use class sui generis including container and skip storage; open and closed storage of building, scaffolding and lighting materials; storage of aggregate materials; vehicle storage and sales; and associated installation of portacabins, container stores, transportable silos and other structures for a period of 12 months (retrospective application)', subject to planning conditions that are defined by the Local Planning Authority (LPA) (application ref: 38058/APP/2022/64).

With regards to dust, Condition 7 is of interest where it is stated that:

"Within 28 days of the receipt of planning permission, the applicant must submit in writing a Dust Management Plan to the Local Planning Authority for approval. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document). The plan shall also include details of all methods of dust management and clearance which arise from the development, including the tarmacing of all parts of the internal 'haul road' and to include a specific dust mitigation plan during times of delivery of aggregates to the site to minimise dust exposure. Following notification of approval of the condition by the Local Planning Authority, the Plan shall be implemented on site within 14 days, if not sooner. Thereafter the development shall be retained/maintained in accordance with these details for as long as the development remains in existence".

Consequently, this document summarises the dust management plan, following on from the dust risk assessment submitted with the original air quality assessment.

2. DUST MANAGEMENT PLAN

2.1. Dust Generating Activities

Parts of the proposed development would be used for the reception and storage of aggregate materials and building and scaffolding materials. The use would be for a temporary period of three years.

Up to thirty standard shipping containers for general closed storage are proposed within the site. The number of containers would be flexible depending on tenant demand and these would be located in two distinct closed storage areas.

Two areas of open storage, used for storage of building materials (marble stone, bricks etc) and scaffolding materials (poles, scaffolding canopy and decked planks and associated fittings) are also proposed. Open steel racks will be used for the storage of the materials.

The southern open storage area would also be used for the storage of aggregates. The aggregate storage would comprise of 10 mm to 20 mm shingle and sharp sand, with one load of 20 tonnes of each. There will be no processing of aggregates on site, just storage until loading onto trucks for transport offsite.

Following the issue of the Enforcement Notice, the Applicant has agreed that aggregate storage could be stored within enclosed containers, details of which could be conditioned if the Enforcement Appeal or a revised application is allowed. Additionally, an internal spine road has been constructed within the site so that vehicles are using a concreted road rather than unmade ground which again may limit dust disturbance

The following activities identified in the IAQM mineral dust guidance based on the above are relevant to this assessment:

- Materials handling.
- On-site transportation.
- Mineral processing.
- Stockpiles.
- Off-site transportation.

2.2. Identification of Receptor

High sensitivity receptors within 100 m of the site have been selected and are shown in **Figure 2.1**, below.

Figure 2.1: Receptor Locations



2.3. Mitigation

In the original dust risk assessment included with the air quality assessment submitted with the planning application, the magnitude of dust effects were shown to be negligible at most receptors, with a slight risk of adverse dust effects at Caxton House (R3) and on St Stephen's Road (R4). In order to minimise this risk, this Dust Management Plan (DMP) has been prepared.

The following measures should be included, and should provide an appropriate level of mitigation.

- Much of surface at the site is hard surfaced, and vehicles leaving the site will travel across a clean, hard surface before joining Trout Road;
- Hard surfaces would be regularly swept using road sweeping plant, with water suppression used as necessary;
- Aggregate storage bays will be high sided and enclosed,
- Aggregates will be dampened as necessary during dry weather;
- Drop heights will be minimised;
- A speed limit of 10 mph will limit resuspension of dust;
- Vehicles bringing in or taking out dusty materials will be sheeted; and
- Water suppression will be used as necessary.

- During prolonged periods of dry weather or high winds, additional water suppression will be used to prevent dust emissions from the site.
- Activities with the potential to cause dust emissions will be monitored, and should visible dust be generated, action is to be taken, including the use of water suppression.

2.3.1. Roles and Responsibilities

- Day-to-day operations on site would be the responsibility of the Site Manager.
- All operational staff members and sub-tenants would be responsible for minimising emissions from the site and would be trained in their responsibilities with regards to dust.
- When abnormal dust emissions are observed, staff/tenants would be instructed to report this to the Site Manager without delay.
- It would be the responsibility of the Site Manager to organise action to mitigate emissions of fugitive dust.

2.3.2. Monitoring

- All site personnel will be responsible for reporting dust problems to the Site Manager immediately.
- Daily visual inspection will be carried out by the Site Manager, or an appropriately trained member of staff. The inspection will consist of a walk around potentially dust emitting areas with observations made of any dust emissions detected. Particular attention will be paid to any areas where there is a greater risk of dust emissions, such as the aggregates stockpiles. A record of the inspection will be maintained in a site logbook.
- If significant dust is identified beyond the site boundary, immediate investigation/remedial action will be taken and this will be recorded in the site logbook.
- The Site Manager will review the logbook regularly to ensure that any necessary actions have been implemented, and to identify problem areas where more may need to be done to mitigate against further dust emissions.
- During adverse meteorological conditions, when it is dry and/or windy, additional inspections shall be carried out downwind of any dust generating activities.
- The council shall be informed if dust emissions are likely to have an effect on the local community.

2.3.3. Trigger Levels and Corrective Action

In the event that the following conditions are experienced on site, additional mitigation measures will be employed:

- A complaint regarding dust is made; or
- Observations of dust due to site operations extending beyond the site boundary.

The additional measures will include:

- Immediate identification of the source of the dust;
- Cleaning up any spillages of potentially dusty materials;
- The liberal use of water suppression; and
- Covering or sheeting sources of unacceptable dust emissions (where possible);

If unacceptable dust emissions continue, despite the additional mitigation measures, consideration should be given to modifying site operations and temporarily suspending dust generating operations until the issue can be resolved.

2.3.4. Record Keeping and Auditing

A notice will be displayed at the site entrance displaying:

- The name of the site operator; and
- An emergency contact name and telephone number;
- Complaints made directly to the site will be recorded in the site logbook and the Site Manager informed. The dust emission source will be investigated immediately, and remedial action taken. The Site Manager will determine appropriate actions to prevent further occurrences.
- The Site Manager will try to establish what on-site activity was going on at time the complaint was made and review the meteorological conditions at the time of the complaint. The Site Manager will then determine appropriate actions to prevent further occurrences.
- Records of complaints and investigations will be stored by the Site Manager and made available to the council upon request.

2.3.5. Communications

- Following investigation of the complaint, feedback will be provided to the complainant outlining the findings of the investigation, and the remedial actions taken, as well as apologising and explaining the commitment to prevent further occurrences. A record of the feedback given will be retained in the site logbook.

2.3.6. DMP Audit

The Site Manager will review the DMP once a year, in light of any complaints or issues that have been identified during the previous year. The following issues will be considered during the review:

- Effectiveness of mitigation measures employed;
- Additional mitigation measures implemented within the previous 12 months;
- Complaints received in relation to dust impacts at offsite receptors;
- Review of any dust events recorded within the previous 12 months;
- Review of the effectiveness of the visual monitoring scheme; and

- Review of the effectiveness of personnel training on dust awareness.

Should any control measures be shown to be failing, or should a need for further control measures be identified, new controls will be agreed and implemented in an updated DMP.