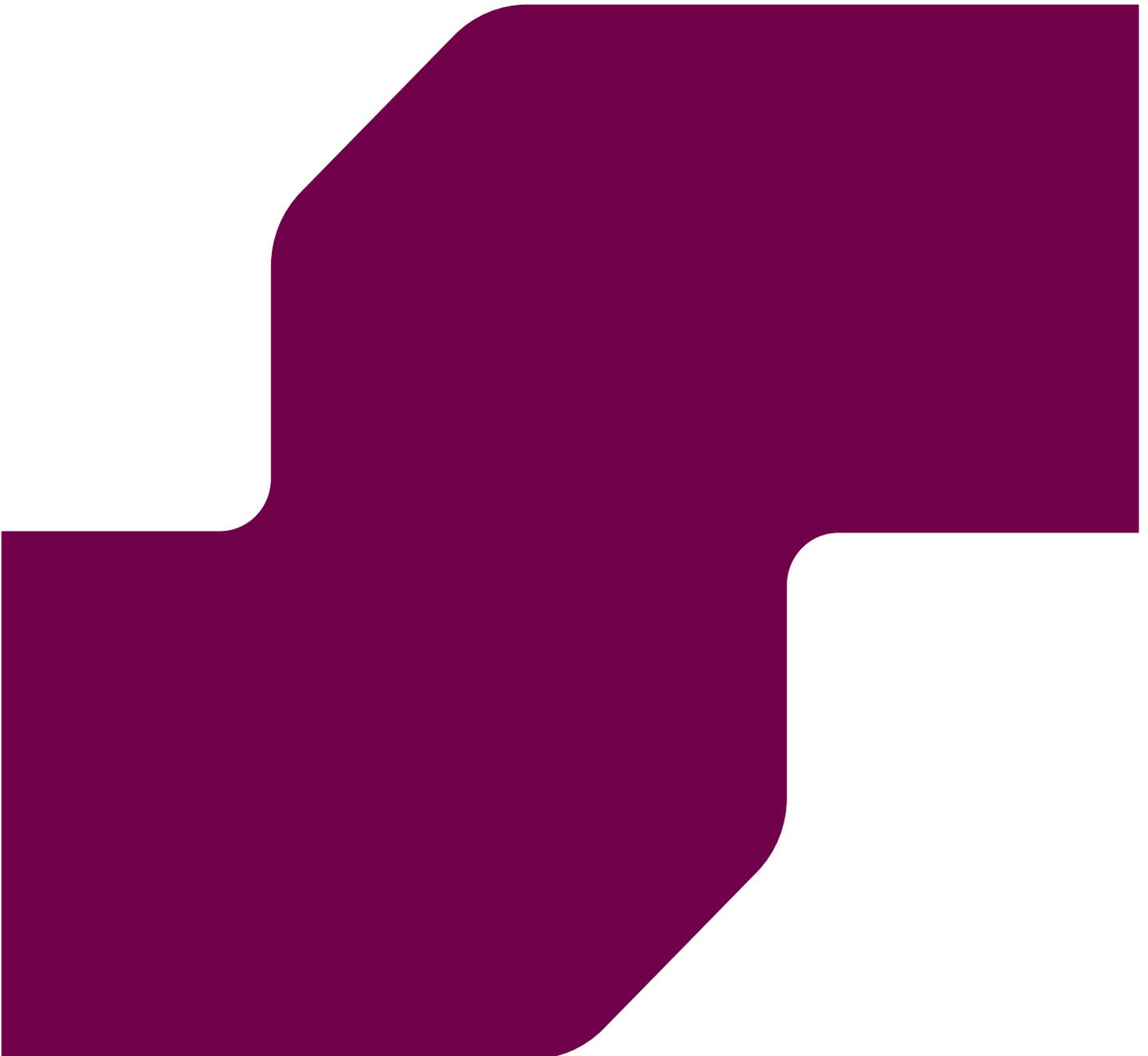


Dust Management Plan

Extraction Works – Priors Hall, Corby

For Mapa Group



Quality Management				
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1 Introduction

- 1.1 This document sets out the Dust Management Plan (DMP) for the limestone extraction works on the Priors Hall Urban Extension, Corby. The extraction provides limestone for use as a building material, principally for road construction, as part of the outline development.
- 1.2 A DMP should describe the management and practical actions the site will use to deal with both anticipated (e.g. forecast) and actual high-risk conditions (e.g. measured dry dust winds above moderate breeze). The DMP should describe the conditions under which dust is most likely to pose a nuisance risk at sensitive receptors close to the site and set trigger levels which, when exceeded, would require further dust control measures to be implemented (i.e. over and above the routine measures) at source.
- 1.3 The scope and content of this DMP is based on the Institute of Air Quality Management (IAQM) recommendations and also has due regard for the Environment Agency's online *Control and monitor emissions for your environmental permit* guidance.
- 1.4 A DMP is a documented site-specific operational plan to prevent or minimise the release of dust from a site. The structure of this DMP is as follows:
- A process description, particularly describing dusty, or potentially dusty, activities or materials used, and materials handling, storage and use of equipment.
 - Identification of the sensitive receptors within the area of influence that could be impacted (with reference to a map/plan);
 - A description of the routine mitigation/control measures that would be used day-to-day under normal operating conditions in the absence of any unusual risk factors, together with information on how it will be ensured that any dust control equipment is designed, operated and maintained such that it operates effectively to control dust;
 - A description of the additional measures that will be applied during these periods to manage dust emissions should actual or forecast trigger levels be exceeded, other risk factors occur, or should routine visual observations show high dust emissions;
 - A description of what would trigger the further action/additional measures, such as:
 - The results of planned routine checks/inspections/surveys on site, e.g. visual inspections; and
 - Receiving a dust complaint.
 - A description of procedures to check these further dust controls have been effective and, if necessary, escalate the level of additional control or modify or temporarily suspend site operations to prevent dust nuisance;

Dust Management Plan

- A description of procedures, to investigate and take appropriate action to prevent recurrence on receipt of complaints of dust nuisance or on any elevated dust levels being present from the aforementioned checks/inspections/surveys or monitoring; and
- A description of management procedures describing the roles and responsibilities of personnel on site, staff training and competence, planned maintenance and repair, and regular review of the effectiveness of dust controls (including reviewing and updating the DMP itself).

2 Description of Site and Processes

Site Description

- 2.1 The site is split across two former local authority areas with the north of the site containing the mineral extraction areas located within the district of East Northamptonshire Council (ENC) and the south of the site within Corby Borough Council (CBC). Neither ENC or CBC have designated any Air Quality Management Areas (AQMAs). The closest AQMA is over 30 km from the site.
- 2.2 The existing site contains two locations designated as areas of potential limestone extraction. These designated extraction areas are expected to cover approximately 4.2 ha.
- 2.3 All designated extraction areas are to the north of the development located at the site boundary on the west of the site, as shown in Figure 4.1.
- 2.4 The proposed areas of extraction are as follows:
 - Area A (1.95 ha) – north west– area for future allotments/ formal open space; and
 - Area B (2.25 ha) – site of planned ‘KP4 gateway’ landscaping scheme.
- 2.5 Vehicles access the site by Kestrel Road, to the Western boundary.

Process Description

- 2.6 The activities on site will include;
 - removal and temporary storage of overburden;
 - extraction of limestone;
 - processing of minerals on site to form appropriately sized/ quality building material;
 - transportation of material within site to development area where it is required;
 - backfilling of extraction zones to original levels with engineered fill, overburden and excess clay from earthworks surcharge process elsewhere on site’.
- 2.7 The equipment on site will consist of excavators (including ripper-tooth attachment), dump trucks and graders for the crushing and grading of materials for the extraction phase. There will also be a shovel loader to assist with processing extracted material. The reinstatement phase will require dump trucks, excavators, dozers and rollers.

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- 2.8 The main potential sources or activities generating dust from the development will be:
- the removal and storage of top and sub-soils;
 - the extraction and removal of over-burden material using an excavator with ripper tooth attachment;
 - the extraction of lime by extraction with ripper tooth attachment;
 - crushing and grading of materials using dumpers and graders;
 - haulage of extracted materials to the storage areas;
 - the reinstatement phase using dumpers, excavators, dozers and rollers; and
 - the movement of vehicles and plant on access and egress routes.
- 2.9 In addition, there could potentially be fugitive releases from wind-blow across disturbed site surfaces.

3 Sensitive Receptors

- 3.1 Dust is the generic term used to describe particulate matter in the size range 1-75 µm in diameter [1]. Particles greater than 75 µm in diameter are termed grit rather than dust.
- 3.2 Dusts can contain a wide range of particles of different sizes. The normal fate of suspended (i.e. airborne) dust is deposition. The rate of deposition depends largely on the size of the particle and its density; together these influence the aerodynamic and gravitational effects that determine the distance it travels and how long it stays suspended in the air before it settles out onto a surface. In addition, some particles may agglomerate to become fewer, larger particles; whilst others react chemically.
- 3.3 The effects of dust are linked to particle size and two main categories are usually considered:
- PM₁₀ particles, those up to 10 µm in diameter, remain suspended in the air for long periods and are small enough to be breathed in and so can potentially impact on health; and
 - Dust, generally considered to be particles larger than 10 µm which fall out of the air quite quickly and can soil surfaces (e.g. a car, window sill, laundry). Additionally, dust can potentially have adverse effects on vegetation and fauna at sensitive habitat sites.
- 3.4 The impacts of dust decrease with distance from the source, due to dispersion and dilution. For quarries, the IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning [2] indicates that dust impacts will occur mainly within 400 m of the operation, even at the dustiest of quarries.
- 3.5 Concentration-based limit values and objectives have been set for the PM₁₀ suspended particle fraction but no statutory or official numerical air quality criterion for dust annoyance has been set at a UK, European or World Health Organisation (WHO) level. Dust assessments have tended to be risk based, focusing on the appropriate measures to be used to keep dust impacts at an acceptable level.
- 3.6 The national PPG provides little detailed guidance on identifying dust-sensitive receptors; therefore definitions and examples described in the IAQM guidance have been used. This includes, amongst others, homes, schools, hospitals, car parks/showrooms, places of work and footpaths. Receptors are categorised separately for their sensitivity to disamenity effects, health and ecological effects.
- 3.7 For disamenity dust, the IAQM categorises receptors as “*high sensitivity*”, “*medium sensitivity*”, or “*low sensitivity*” and considers “... *The sensitivity will relate to the level of amenity that can be reasonably expected.*”

- 3.8 The area to the north and east of the site is predominantly rural with the village of Deene approximately 800 m to the east. To the west of the site is a business park and car racing track.
- 3.9 Residential receptors are categorised as high sensitivity and the nearest dwelling to the part of the site boundary close to extraction activity, is Lake Drive located 225 m to the south west.
- 3.10 A data centre is located immediately to the west of the site, approximately 100 m from the site boundary. A data centre would be categorised as high sensitivity (along with housing and car show rooms) using the IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning [3]. That guidance notes, however, that some facilities sensitive to dust, such as computer chip manufacture, are already *“likely to have extensive dust filtering equipment, although the frequency of filter changes may need to be increased”* and this fact should be taken into account in the assessment on whether exposure will arise in practice. It is reasonable to expect the data centre has in place the necessary filters and/or processes to control the intake of external dust from existing sources (e.g. agricultural or from road traffic) and the type of dust generated by the development will not differ in character substantially from these existing sources of dust. On this basis, a level of dust impact that would be “not-significant” for a residential dwelling, is considered to equate to the level of amenity that can be reasonably expected for other high-sensitivity uses such as the data centre.
- 3.11 The proposed limestone extraction workings will cover an area of 4.2 ha. The extracted material will be used to supply building material for future residential dwellings on the site. Extracted material will be stored in a specified area and limestone extraction will avoid disturbing the archaeological conservation area located towards the south boundary of the site.
- 3.12 The distances from each area to the nearest sensitive receptors are shown in Table 3.1.

Table 3.1 Approximate Distance (in metres) from Quarry to Existing Sensitive Receptors

Receptor ID	Receptor type	Distance (m)
Data Centre	Nearest High Sensitivity Receptor (Material Extraction)	100 m, west of the site
Lake Drive	Nearest High Sensitivity Residential Receptor (Material Extraction)	225 m, south-west of the site

- 3.13 Meteorological data collected at Wittering has been used to establish the prevailing wind direction in compiling this DMP. The wind rose for Wittering is shown in Figure 2. It can be seen that the prevailing wind direction is south westerly, so any receptors to the north east of the site are at greatest risk.

4 Routine Mitigation/Control Measures

- 4.1 The air quality section of the national PPG advises that “mitigation options where necessary will be locationally specific, will depend on the proposed development and should be proportionate to the likely impact”. In accordance with that guidance, the appropriate dust management and mitigation measures for this site have been selected taking into account the dust sources on site; the location and proximity of sensitive receptors and their sensitivity to dusts; and the weather conditions.
- 4.2 The results of an assessment of the dust impact risk are set out in RPS’ *Dust Impact Assessment*’ report, reference JAP02315, dated 12 January 2021, which accompanied the planning application. The assessment was undertaken using the *IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning* [2], with the methodology for the risk assessment presented in Section 3 of the Air Quality Assessment report. The results of the assessment are presented in Section 5; in summary, the disamenity dust effects and the PM₁₀ effects on the surrounding area as a whole were predicted to be ‘slight’ and temporary based on conservative assumptions. This level of effect was considered “not significant” and, on that basis, no additional mitigation measures were considered necessary over and above those incorporated into the design of the scheme.
- 4.3 The baseline mitigation/control measures (i.e. Those measures to be used day to day under normal operating conditions in the absence of any unusual risk factors) that will be employed at the site are listed below.
- as far as practicable, dust-generating activities will be located away from high and medium sensitive receptors;
 - haul roads, tips and mounds, and exposed areas will be located as far away as possible from sensitive receptors;
 - good standards of housekeeping to be kept with debris to be cleared away on a regular basis and the site left safe, clean, and tidy at the end of each shift or task;
 - there is a dust suppression system fitted to the crusher and spray bars that are fed from a water container to the belts;
 - a tractor and bowser are available if haul roads and working areas require dust suppression;
 - a road sweeper will be on call and utilised as and when needed;
 - no burning of waste is permitted on site;
 - site speed limits are to be observed and adhered with at all times; and
 - noise and dust pollution to be implemented as dictated in the agreed RAMS for working areas.

5 Additional Mitigation/Control Measures

- 5.1 Trigger levels have been defined to reduce construction dust effects at the nearest receptors during high-risk conditions.
- 5.2 The trigger levels established for the site include any of the following:
- Winds that are, or are forecast to be, above a moderate breeze (Beaufort scale 4 – described as conditions under which ‘dust and loose paper are raised. Small branches begin to move and are, or are forecast to be, from the east or north on days when there has been no rainfall for the last 3 days or more);
 - The chance of further daily rainfall is forecast to be below 40% on five consecutive days according to the met office website;
 - Routine checks/inspections/surveys on site have identified evidence of dust off-site;
 - A dust complaint is received; or
 - A failure in equipment or control is identified, or an abnormal/unintentional situation occurs, e.g. a spillage
- 5.3 The additional controls to be employed if a trigger level is exceeded are set out below:
- Increase frequency of use of the road sweeper, both on-site and on local roads;
 - Temporary cessation of the activities responsible for causing the dust impact until the trigger level is no longer exceeded;
 - Use of additional dust suppression measures such as dampening of specific surfaces;
 - Relocation of activities so that the distance between the source of emissions and the receptors is increased; and/or
 - In the event of an equipment or control failure, access to the site will be prevented until the issue is resolved or a spillage is cleaned-up.
- 5.4 A suitable and sufficient application of the above additional measures (either singly or in combination) will be applied as necessary to effectively control dust emissions, as evidenced by the visual and monitoring checks described in the next section.
- 5.5 The Site Manager will be responsible for implementing these risk management measures in accordance with procedures.

6 Procedures to Check the Dust Controls/Mitigation are Effective

- 6.1 The Site Manager is responsible for the implementation of the DMP. In practice some tasks may be delegated to other members of staff; however, the ultimate responsibility lies with the Site Manager. If the Site Manager is not on site, the responsibility for the implementation of the DMP will be delegated to a nominated deputy.
- 6.2 The Site Manager will be responsible for the continual review and update of the DMP. It is anticipated that this will be done on an annual basis; however this does not preclude a necessary update at other times.

Monitoring

- 6.3 The Site Manager will make daily inspections at the site boundary to ensure that visible dust is not leaving the site. Particular attention will be given to the western part of the site boundary, closest to the residential properties identified as being most susceptible to nuisance dust.
- 6.4 The results of the inspections will be recorded in a site log and using the visual monitoring form shown in Table 6.1.
- 6.5 The prevailing weather conditions and the activities undertaken at the time of the inspection will also be recorded in the site log.
- 6.6 If any of the trigger levels in section 5 are exceeded and additional measures are employed, the frequency of the visual site boundary inspection will increase to twice daily until such time as no dust is visible at the site boundary. If after two days, the results of such monitoring indicate that the additional control measures are not effective, the Site Manager will instruct all site operatives that the operations will cease until the issue can be resolved.

Table 6.1: Daily Dust Inspections Sheet

Dust Inspections sheet			Date		
Time of test					
Location of test e.g. street name etc					
Weather conditions (dry, rain, fog, snow etc):					
Temperature (very warm, warm, mild, cold, or degrees if known)					
Wind strength (none, light, steady, strong, gusting) Use Beaufort scale if known					
Wind direction (e.g. from NE)					
Duration (of test)					
Constant or intermittent in this period or persistence					
Receptor sensitivity (see below)					
Is the source evident?					
Any other comments or observations					

Monitoring Dust Complaints

- 6.7 Quite separate from the procedural response to a received complaint (covered later in section 7) is the monitoring of complaints levels. Reliable complaints should be considered a form of monitoring and complaints should be treated as if they were monitoring data.
- 6.8 Complaints are a very important indicator of community dissatisfaction (although not the only one) and the technique of complaints monitoring is a powerful tool. However, it is important to bear in mind that complaints are only a symptom of annoyance or nuisance; there are various reasons why complaint level is not an exact indicator of dust annoyance or nuisance itself. Nevertheless, the collection, maintenance and analysis of complaints records is an important method of indicating the effectiveness or otherwise of measures implemented to reduce nuisance due to dust.
- 6.9 The site manager will implement a system of complaints monitoring and analysis. Complaints are collected, registered and validated as described in Section 7 of this DMP. The record of complaints received at the end of each calendar quarter will be reviewed with a view to identifying:
- Trends, in terms of the subject, cause or origin of complaints.
 - Aspects experienced at one location that could apply to other locations.
- 6.10 Any action deemed necessary as a result of the analysis shall be identified and discussed in order to programme a course of corrective actions.

7 Complaints Action Procedure

Receipt of a Complaint

- 7.1 If a complaint is made by a member of the public about any matter associated with the construction of the facility, Mapa Group will give notice in writing to North Northamptonshire Council no later than the next working day after the complaint is received. This written notification will normally be in the form of an email. The notification will include a description of the complaint, the name and address of the person making the complaint and the action proposed as a result. Depending on the nature of the complaint, it will not always be possible to resolve the matter within this short timescale. In such cases an indication will be given that further investigations are necessary.
- 7.2 Once a complaint has been received, the complaint details will be registered.

Complaint registration

- 7.3 Mapa Group should maintain a record of all complaints received. In the event that a complaint alleging potential dust nuisance from the site:
- The complaint will be fed into a registration system
 - Complaints data should be recorded in a systematic way, enabling comparison with standard dust descriptors, with wind direction and with site work activities.
- 7.4 A standardised form can be used for recording this information and entering it into the registration system, shown in Table 7.1.

Table 7.1: Form for the recording of a dust-related complaint

Dust Complaint Report Form		Sheet No	
Date:		Time:	
Name and address of complainant:			
Tel no. of complainant:			
Time and date of complaint:			
Date, time and duration of offending dust:			
Location of dust, if not at above address:			
Weather conditions (i.e., dry, rain, fog, snow):			
Wind strength (light, steady, strong, gusting) or use Beaufort scale:			
Wind direction:			
Complainant's description of dust (e.g. colour, particle size):			
Has complainant any other comments about the dust?			
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure)			
Any other relevant information:			
On-site activities at time the dust occurred:			
Operating condition at time nuisance dust occurred/identified.			
Actions taken:			
Form completed by		Signed	

Responding to the Complainant

- 7.5 In the case of answer phone messages and complaints submitted by email or by letter, an acknowledgement and initial response will be given by telephone or by email within 48 hours, provided that telephone or email contact details have been given by the complainant. The site manager will respond as rapidly as possible to the complaint to maximize the opportunity for identifying the source of the nuisance dust. Where possible, the site manager, or an appropriate representative of the site manager, will inspect the nuisance dust location referred to in the complaint.
- 7.6 Where complaints cannot be resolved on initial contact and further investigations are required, a written response will be made within 10 working days of submission of the complaint although sometimes longer may be needed. The complainant will be told if this is the case and how long it will take to give a response.
- 7.7 The primary reasons for further investigation of complaints are to assess potential nuisance and identify the likely cause and source of the dust so that nuisance can be reduced or stopped. In the case of further investigations, Mapa Group will communicate to the complainant the course of actions likely to be taken. In summary, the response will include:
- The reason for the nuisance dust event;
 - The likely duration of the nuisance dust event;
 - What plan is in place to end the nuisance dust event;
 - What preventative plan will be implemented to prevent a re-occurrence; and
 - What grievance procedure the aggrieved party can take.

Investigation of Dust Complaints

- 7.8 A manager will investigate the complaint and will provide a response. This can be by letter or email or, if preferred, a telephone call.
- 7.9 The investigation will aim to establish whether the nuisance dust identified is attributable to the site activities. The form is designed to capture sufficient information about the nuisance dust event to determine whether the source of the dust is the site activities.
- 7.10 If the source of the nuisance dust is deemed to be the site activities, the information recorded should also assist in identifying a failure in the existing mitigation/control measures or the need for a new mitigation/control measure. If a new mitigation/control measure is required, the site manager will update the DMP.

8 Management Procedures

Roles and responsibilities

- 8.1 The Site Manager is responsible for the implementation of the DMP. In practice, some tasks may be delegated to other members of staff; however, the ultimate responsibility lies with the Site Manager. If the Site Manager is not on site, the responsibility for the implementation of the DMP will be delegated to a nominated deputy.
- 8.2 The Site Manager will be responsible for the regular review and update of the DMP.

Training and competence

- 8.3 All staff on the site will be made fully aware of the need to be constantly vigilant regarding site dust control and management procedures. New staff will be trained to deal with dust management issues and will be made aware of the DMP during the induction process. All staff will be made aware of the details of changes to the DMP.
- 8.4 The Site Manager will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.
- 8.5 Any sub-contractors working on site will be made aware of the DMP and will always be expected to comply with the DMP.

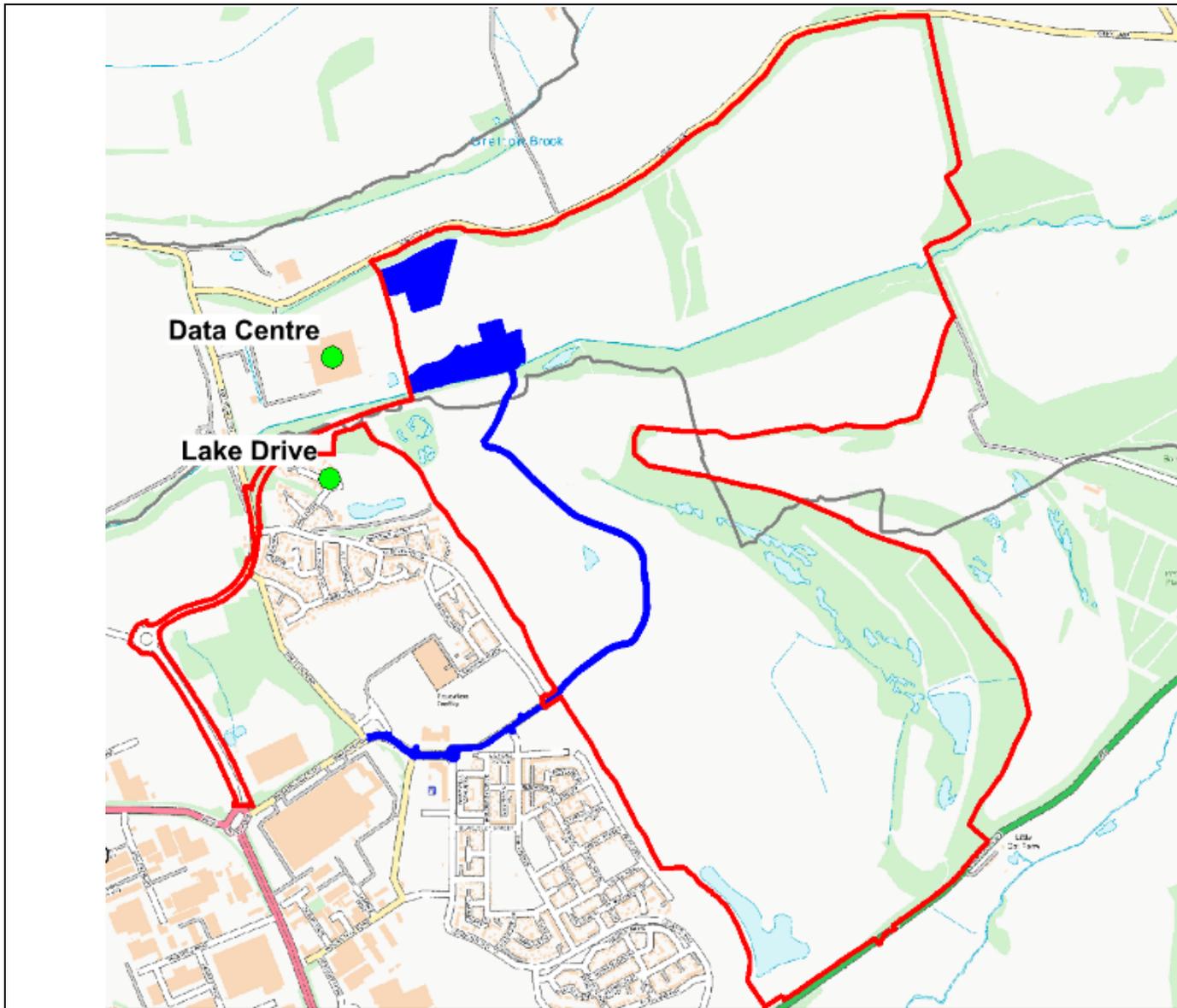
Maintenance and repair

- 8.6 Staff responsible for the operation, maintenance or repair of dust suppression systems will be trained and competent. Training records will be maintained, demonstrating compliance with this.
- 8.7 A list of approved repair contractors will be kept in the site office and relevant site operatives will be made aware of the existence and the location of the list. Where appropriate, essential spare parts will be kept on site.

Glossary

Deposited Dust	Dust that has settled out onto a surface after having been suspended in air.
DMP	Dust Management Plan
Dust	Solid particles suspended in air or settled out onto a surface after having been suspended in air
Effect	The consequences of an impact, experienced by a receptor
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
Impact	The change in atmospheric pollutant concentration and/or dust deposition. A scheme can have an 'impact' on atmospheric pollutant concentration but no effect, for instance if there are no receptors to experience the impact.
Receptor	A person, their land or property and ecologically sensitive sites that may be affected by air quality
Risk	The likelihood of an adverse event occurring

Figures



- High Risk Receptors
- Full Site Area
- Application Area
- Local Authority boundaries

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Notes

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Project: Priors Hall, Corby	
Job Ref: JAP02315	
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Date: 04/05/21	Rev: 0
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Figure 1: Site and Nearest Sensitive Receptors

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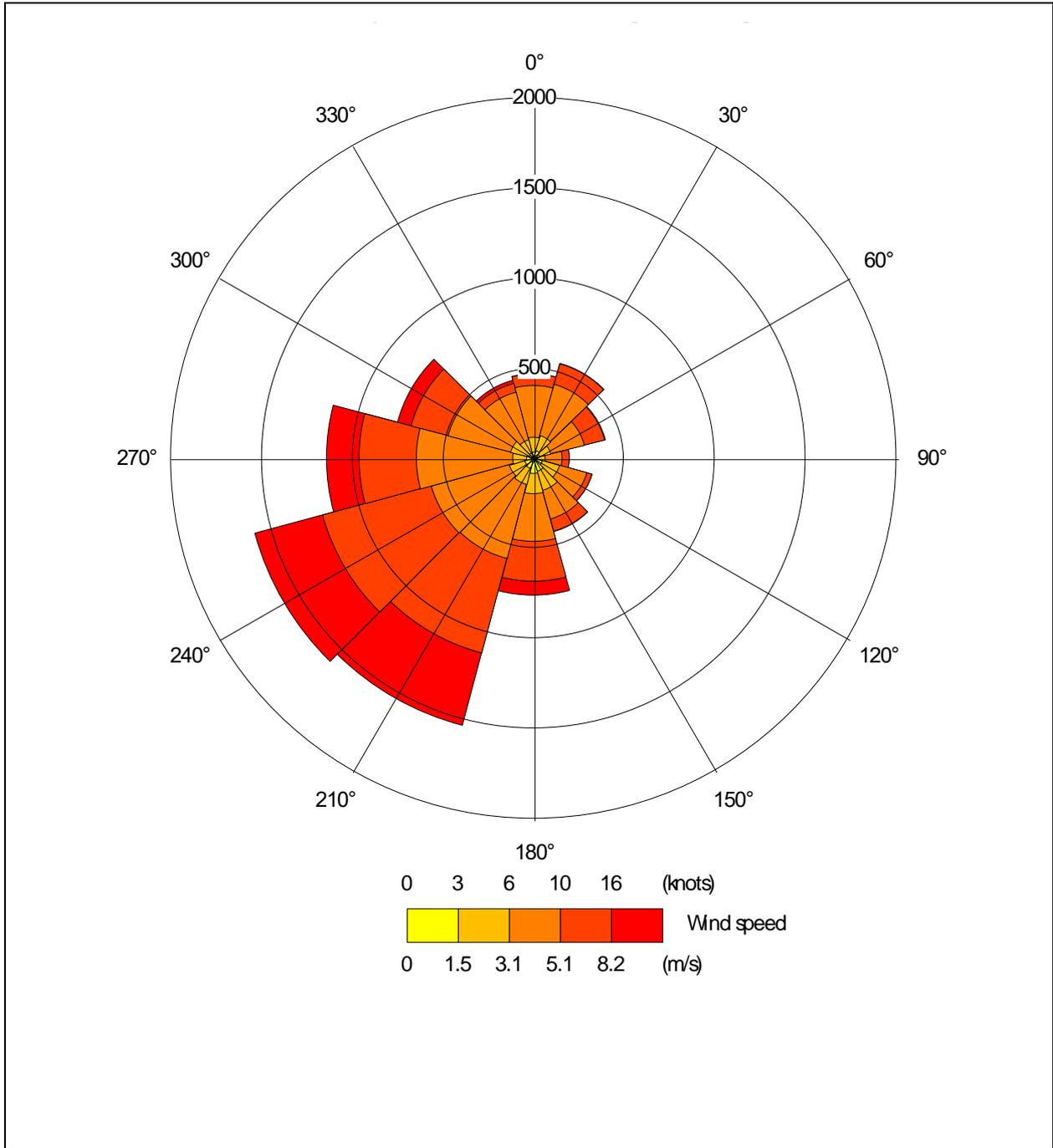


Figure 2: Wind Rose, Wittering, 2015

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- 1 British Standard Institute (1983) BS 6069:Part 2:1983, ISO 4225-1980 Characterization of air quality
- 2 IAQM (2016) Guidance on the Assessment of Mineral Dust Impacts for Planning.
- 3 IAQM (2016) Guidance on the Assessment of Mineral Dust Impacts for Planning.

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