

Ashley Road Depot

**Air Quality and Dust
Management Plan**

May 2023

Contents

1. INTRODUCTION	3
2.1 National Policy.....	4
2.2 Regional Policy	4
3.1. Site Details	6
3.2. Construction Works	8
4. DUST RISK ASSESSMENT – SITE CLASSIFICATION.....	13
4.1. Demolition Phase	13
4.2. Earthworks Phase	13
4.3. Construction Phase	14
4.4. Trackout Phase	14
4.5. Dust Emission Magnitude	14
5. DEFINING THE SENSITIVITY OF THE AREA	15
5.1. Dust Soiling	15
5.2. Human Health	15
5.3. Ecological Effects	16
5.4. Other Factors.....	17
6. DUST MANAGEMENT AND AIR QUALITY	18
6.1. Air Quality and Dust Risk Assessment Result	18
6.2. Dust and Emissions Control Measures	19
6.3. General Activities	19
6.4. Mitigation Measures and Management Controls.....	19
7. SITE MONITORING.....	23
7.1. Air Quality Monitoring and Locations	24
7.2. Daily and Weekly Dust Monitoring Programme (Procedures and Protocols)	25
7.3. Site Logbook.....	25
8. APPENDICES	26

Document Control Sheet

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Assessor	Edward Coate
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Disclaimer

The information contained within this Report is based on information provided by the Design Team as well as being assumed by NRG Consulting where necessary for the purpose of compliance.

NRG Consulting disclaims any responsibility to the Client and others in respect of any matters outside the intended scope of this report.

1. INTRODUCTION

NRG Consulting have been commissioned to undertake an Air Quality and Dust Management Plan (AQDMP) by Formation Design & Build Ltd (otherwise referred to as Formation) for the redevelopment of the vacant land at Ashley Road Depot (owned by the London Borough of Haringey) within the London Borough of Haringey (LBH).

The description of development is:

“The erection of 272 homes including 50% socially rented homes extending 4-13 storeys, 174sqm of flexible Use Class E floorspace along with a new vehicular access to the site, car parking and two pedestrian north south routes.”

This report has been written to address the AQDMP element of Planning Condition 25 which states:

25) Above ground works for the development hereby approved shall not commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).

d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at <http://nrmm.london>; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate.

Construction activities have the potential to cause dust nuisance and health impacts if appropriate mitigation measures are not applied. The GLA has released Supplementary Planning Guidance on the Control of Dust and Emissions from Construction and Demolition (GLA, 2014). The SPG outlines a risk assessment approach for construction dust assessments and helps determine the mitigation measures that will need to be applied. This report describes the potential risk of dust impacts associated with construction activities required as part of the proposed development.

To ensure that this document remains relevant, adequate and effective as the works progress, the Dust Management Plan will be reviewed and updated as necessary:

- Every 3 months (minimum).
- As instructed by the Project Manager.
- Following any changes to the scope of the works that have had an impact on environmental requirements.

2. POLICY CONTEXT

2.1 National Policy

National Planning Policy Framework (NPPF) – July 2021

The NPPF promotes protection of nearby habitats (ecological receptors) across the UK, especially at the early stages of planning. Specifically, paragraph 181 makes reference to:

The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

2.2 Regional Policy

The London Plan (March 2021)

The London Plan sets out the spatial development strategy for London and provides the London wide context within which individual Boroughs set their local planning policies. A key objective of the London Plan is to improve London's accessibility, which amongst other issues, includes tackling traffic congestion.

Policy T7 Deliveries, servicing and construction

A Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road.

B Development Plans, Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight strategies. These should seek to:

- 1) reduce freight trips to, from and within these areas
- 2) coordinate the provision of infrastructure and facilities to manage freight at an area-wide level
- 3) reduce road danger, noise and emissions from freight, such as through the use of safer vehicles, sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles. Such strategies should be developed through policy or through the formulation of a masterplan for a planning application.

C To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.

D Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include:

- planning history, environmental impact and its relationship to surrounding land use context – recognising that the Agent of Change principle will apply
- location, proximity to the strategic road network and existing/potential markets
- the existing and potential contribution the railhead can make towards catering for freight movements by non-road modes
- the location and availability of capacity at alternative railheads, in light of current and projected capacity and market demands. E Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.

F Development proposals for new consolidation and distribution facilities should be supported provided that they do not cause unacceptable impacts on London's strategic road networks and:

- 1) reduce road danger, noise and emissions from freight trips
- 2) enable sustainable last-mile movements, including by cycle and electric vehicle
- 3) deliver mode shift from road to water or rail where possible (without adversely impacting existing or planned passenger services).

G Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

H Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

I At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.

J Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.

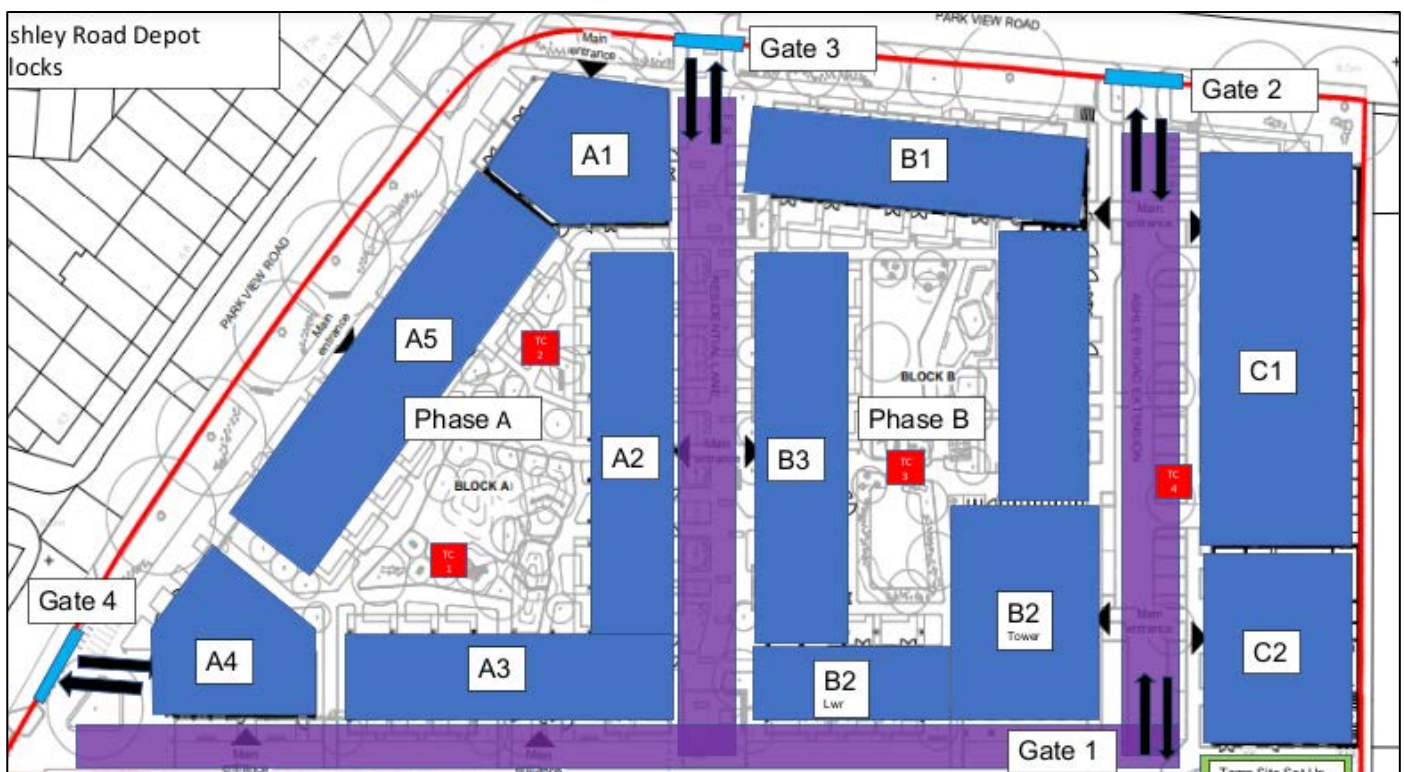
K During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

3. SITE PROCEDURES

3.1. Site Details

The site is approximately 1.6 hectares in size and is currently operated as a municipal waste collections depot by Veolia for LBH, having previously operated as a Household Waste Recycling Centre (HWRC). The site consisted of several buildings and sheds, along with operational parking for approximately 60 Refuse Collection Vehicles (RCV) and associated staff car parking. However, the site was cleared prior to Formation taking possession and is currently a vacant site.

Access is provided from Ashley Road at the southeast of the site. An unused vehicle access is located at the southwest of the site on Park View Road.



Sensitive Receptors

Sensitivity receptors refer to locations where members of the public are expected to experience negative impacts due to changes in air quality or dust accumulation resulting from the proposed development. High sensitivity receptors typically encompass residential properties, schools, hospitals, and other similar facilities. Meanwhile, medium and low sensitivity receptors encompass workplaces and amenity areas, such as parks, respectively. The consideration of these receptors also depends on their proximity to the site.

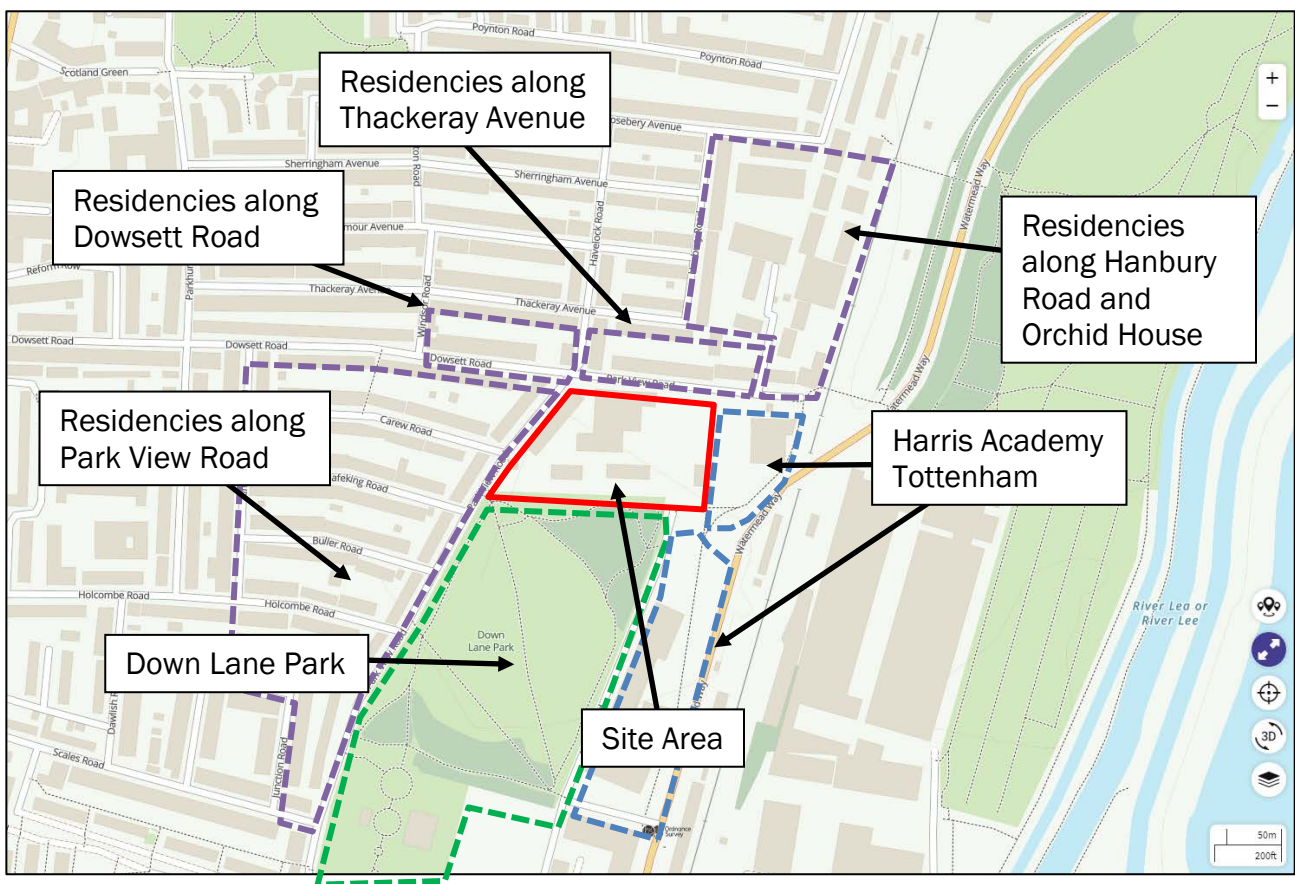
Off-Site Sensitive Receptors

The closest sensitive receptors immediately adjacent to the site are shown below. Particularly sensitive receptors are:

- Residential developments along Park View Road
- Harris Academy School
- Down Lane Park

Sensitive Receptors Locations

Below shows the location and boundary of the proposed site, as well as the location of an adjacent sensitive receptors relative to the site location,



3.2. Construction Works

Development Programme

Table 3.1: Stages of Development

Construction Stage	Start Date	End Date
Site set-up and Enabling works	May-2023	Jun-2023
Basement Excavation and Piling	Jun-2023	Oct-2023
Sub-structure- Foundation and Structural works including Roof	Aug-2023	Jan-2024
Superstructure	Nov-2023	Jun-2025
External Works	Feb-2024	Jul-2025
Fit-out/ Decoration, Testing and Commissioning	Jan-2025	Jan-2026

Proposed Development Works Scope

Table 3.2: Scope of Works

Activity	Descriptors
Demolition	N/A
Earthworks	- Freely draining slightly acid loamy soils - The total site area is approximately 13,000 m² - Maximum number of 5 earth moving vehicle on site at each time - No bunds - Works to take place in Summer
Construction	- Construction duration is 87 weeks - The estimated building volume is 20,000–50,000m³ - Traditional build including Brick, Glass, Steel - No on-site concrete batching
Trackout	Maximum of 16 vehicles visiting site during any one-day at height of development

Hours of Site Operation

- Deliveries to site will be restricted between the hours of 8:00am – 6:00pm Monday to Fridays; 8:00am – 1:00pm Saturdays, and no activities on Sundays or bank holidays

These have been proposed to be further restricted, wherever feasible to:

- Monday-Friday - 10:00-15:00
 - Saturday - 9:00-13:00
- Peak times shall be avoided wherever possible.
 - Where appropriate the principal contractor will look to agree a schedule of out-of-hours ‘early doors’ deliveries
 - Any out of hours deliveries will be agreed with the local authority in advance.

Roles and Responsibilities

The Site Manager will be responsible for dust management and control on the development.

Table 3.3: Roles and Responsibilities of site workers

Role	Responsibilities
Site Manager	Ensure that the mitigation and monitoring requirements laid out in the AQDMP are carried out during works on site
	Ensure that staff is aware of the requirements of the AQDMP and have access to the document. Regular training of staff should be implemented
	Undertake and record dust inspections of the site as required by the AQDMP
	Ensure that site documentation (including method statements and risk assessments) includes dust mitigation
	Act on complaints and dust alerts as detailed in the AQDMP
	Maintain up-to-date site log of air quality events and complaints
	Investigate the cause of air quality events and apply additional mitigation where required
	Act as the key point of contact for queries and complaints regarding air quality emissions from site.
Site Manager Contact Details	TBC
All Site Personnel	Carry out the works in line with the AQDMP requirements
	Report observations of dust events or deviations from the DMP procedures
	Attend environmental management training

Community Liaison

Formation will designate a responsible individual as the Site Community Liaison Officer, whose name and contact details will be prominently displayed at all site entrances. The Liaison Officer will maintain regular communication with site neighbours and relevant stakeholders, aiming to inform them about upcoming construction activities and foster positive relationships.

The responsibilities of the Community Liaison Officer will include:

- Recording and addressing inquiries or complaints from the local community.
- Communicating with the local community to provide information about the nature of the construction work.
- Sharing the construction program with the local community, highlighting any activities that may result in complaints, such as dusty operations.
- Updating the local community regarding any changes in the nature or schedule of the works, as necessary.
- Establishing and nurturing good relationships with local stakeholder groups.
- Neighbouring properties situated within a minimum distance of 25 meters from the site boundary will receive advance notice of the proposed construction program and regular updates on any changes. They will be specifically informed about activities that could potentially cause nuisances or generate complaints.

As of the writing of this document, contact has been established with the adjacent Harris Academy, and they are aware of the proposed works.

Complaints Procedure

If any complaints are received, they will be investigated by the Site Manager. The Site Manager will document the complaint, determine its cause, implement appropriate measures to promptly reduce emissions, and record the actions taken in the dust complaint form. Within 24 hours, the completed form will be sent via email to the LBH Environmental Management team at pollution@haringey.gov.uk.

As part of the communication programme, the Site Manager will inform stakeholders about the complaint procedure. The complaints procedure must meet the following requirements:

- Publication of contact details for all relevant individuals, including their telephone and email information.
- Establishment and maintenance of a complaints register, which logs all communications received from the general public or stakeholders, whether verbal or written.
- Categorisation of each communication by nature (e.g., complaint, enquiry, comment).
- Completion of necessary actions and ensuring that the complaints register is updated with records of all actions and outcomes.

These measures will ensure a systematic and comprehensive approach to handling complaints and maintaining effective communication with stakeholders throughout the project.

Training

1. Site Induction and Training:

- Comprehensive training will be provided to all site personnel during the site induction process. This training will cover key aspects such as dust management, emission control, and best practices.
- The training will highlight the potential impacts of construction activities on air quality and the importance of adhering to the AQDMP guidelines.
- Training records will be maintained, documenting the date, content, and attendees of each training session.

2. Regular Toolbox Talks:

- Toolbox talks will be conducted on a frequent basis to refresh and reinforce the knowledge and understanding of site personnel regarding dust management requirements.
- These talks will be tailored to address specific activities, potential risks, and control measures related to dust generation and emission reduction.
- Attendance records will be maintained to track participation in each toolbox talk session.

3. Method Statements and Risk Assessments:

- Method statements and risk assessments will be prepared for all activities that have the potential to impact air quality on the site.
- These documents will outline the sequence of works, identify potential sources of dust and emissions, and detail the control measures and risk mitigation strategies to be implemented.
- Site personnel will be briefed on the contents of the method statements and risk assessments relevant to their respective roles and responsibilities.

Report Guidance

- The Control of Dust and Emissions during construction and demolition - Supplementary Planning Guidance (2014)
- Guidance on the assessment of dust from demolition and construction (IAQM, June 2007)
- Guidance on Monitoring in the Vicinity of Demolition and Construction Sites (IAQM, October 2018)
- 'Best in Class' Guidance on Dust and Emissions from Construction (LLECP, March 2019).
- DEFRA: Air Quality Strategy for England, Scotland, Wales and Northern Ireland – July 2007
- BRE: Controlling particles, vapour and noise pollution from construction sites, parts 1-5 – 2003

Incident Procedures

Formation will maintain comprehensive records of regular monitoring activities conducted throughout the project. In addition, an environmental incident logbook will be used to record all environmental incidents that result in air pollution, along with the corresponding remedial actions taken. Complaints received will also be diligently recorded and investigated by the Site Manager.

The following actions will be undertaken when addressing complaints:

1. Recording Complaint Details:
 - Time, date, and contact details of the complainant will be documented.
 - The wind direction, strength, and weather conditions at the time of the complaint will be noted.
 - If the complaint has been referred by the local authority, this information will also be recorded.
2. Gathering Complaint Information:
 - The complainant will be asked to describe the dust emissions in detail, including whether they are constant or intermittent, the duration of occurrence, and any specific times of the day when the issue is more pronounced.
 - Any identifiable sources of the dust emissions will be noted.
3. Site Inspection and Dust Mitigation:
 - A prompt site inspection will be conducted by the Site Manager following receipt of the complaint.
 - All dust-producing activities will be observed and documented during the inspection.
 - The dust mitigation methods being employed will be noted.
4. Remedial Actions:
 - If the complaint is related to a recent activity, any dust-producing activities that were ongoing at that time will be documented.
 - Any feasible remedial actions will be implemented promptly, if possible.
5. Verification and Communication:
 - The area from which the complaint originated will be revisited to ascertain if the problem persists.
 - After completing the initial investigations, the complainant will be contacted to explain any issues identified and the corresponding remedial actions that were taken.
6. Reporting:
 - The Council will be notified by an email to the council's air quality department, or alternatively, the notification will be sent on the next working day if the complaint is received during a weekend or bank holiday.
 - The notification will include details of the complaint, the findings of the investigation, and the remedial measures that were undertaken.

4. DUST RISK ASSESSMENT – SITE CLASSIFICATION

The Dust Risk Assessment conducted for the project adheres to the guidelines outlined in the Mayor of London SPG 'The Control of Dust and Emissions during Construction and Demolition' (July 2014) and the Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction (January 2014). This assessment aims to classify the risk of dust impacts originating from the site and determine appropriate mitigation measures for implementation.

The assessment considers the potential for dust soiling (nuisance) and PM10 (human health) impacts within a radius of 350 meters from the site boundary or within 50 meters of roads used by construction vehicles. Receptors that may be affected by dust generation and vehicle emissions resulting from the construction activities include, but are not limited to:

- Local residents in the immediate vicinity
- Construction workers
- Visual amenity
- External surfaces and materials (through surface soiling)

Based on site activities and the sensitivity of nearby receptors, worksites are categorized into one of three tiers according to the level of dust risk. The Dust Emission Magnitude (DEM) is determined based on the scale of the anticipated works. The site will be classified according to the definitions provided by the IAQM and the London SPG."

4.1. Demolition Phase

The development site was cleared prior to Formation taking possession.

4.2. Earthworks Phase

Earthworks primarily cover excavation, haulage, tipping and stockpiling of soil type material. This includes levelling the site and landscaping.

The scale of the potential dust emissions for the site from this phase will be determined using the following criteria:

Descriptors	Result	Classification
Total Site Area	>10,000 m ²	Large
Soil Type	Loamy and clayey soils of coastal flats with naturally high groundwater	Small
Stockpile Enclosure	6 metres in height, or total material moved, <10,000 tonnes (where known)	Small
Vehicle Movements	>10 heavy earth moving vehicles active at any one time	Large
Work Times	3-4 months, during dryer periods of the year	Medium
Overall Classification	Medium	

4.3. Construction Phase

The key issues when determining the potential scale of dust emissions during the construction phase include the size of the buildings, the method of construction, the construction materials to be used and the duration of the build.

The scale of the potential dust emissions for the site from this phase will be determined using the following criteria:

Descriptors	Result	Classification
Total Build Volume	Total building volume 25,000 m ³ – 100,000 m ³	Medium
Material for Potential Dust Release	Traditional Construction, varied materials, concrete to be used on site.	Medium
Overall Classification	Medium	

4.4. Trackout Phase

Factors that will determine the risk of dust emissions from track out are vehicle size, vehicle speed, geology and duration.

Descriptors	Result	Classification
Vehicle Trips	10-50 HDV trips in one day	Medium
Site Surface	Medium potential for Dust Release	Medium
Unpaved Road Length	50m unpaved road length max.	Medium
Overall Classification	Medium	

4.5. Dust Emission Magnitude

Activity	Dust Emission Magnitude
Demolition	N/A
Earthworks	MEDIUM
Construction	MEDIUM
Trackout	MEDIUM

5. DEFINING THE SENSITIVITY OF THE AREA

The sensitivity of the area is determined by several factors, as outlined in the GLA Tables provided in Appendix 1. These factors include:

- Specific sensitivities of receptors in the area.
- Proximity and number of receptors in the vicinity.
- Local background concentration of PM10, which is a measure of particulate matter.
- Site-specific factors, such as the presence of natural shelters like trees, which can help reduce the risk of wind-blown dust.

5.1. Dust Soiling

Descriptors	Result
Density	10-100
Distance from Source	< 20 m
Receptor Sensitivity	High
Overall Risk Classification	High

Regarding site-specific factors, the area is characterised by the following:

- Users can reasonably expect a high level of amenity, including residential areas and outdoor sports facilities.
- The appearance, aesthetics, or value of properties would be negatively affected by soiling.
- People or property would be present continuously or regularly for extended periods as part of the normal land use pattern (primarily residential dwellings).

5.2. Human Health

Descriptors	Result
Density	10-100
Distance from Source	< 20 m
Receptor Sensitivity	High
PM10 Annual Average	Less than 24
Overall Risk Classification	Low

For the PM10 annual classification, the relevant locations are those where individuals may be exposed for eight hours or more in a day, such as residential properties and schools.

The predicted baseline PM10 annual mean concentration for the 1km grid square covering the site, based on DEFRA UK-AIR GIS Tool, is 21.40 µg/m³. This provides an indication of the annual mean concentrations at receptors near the development site. Referring to the matrix in Appendix 1, the surrounding area of the construction site is classified as having 'Low' sensitivity to human health effects.

5.3. Ecological Effects

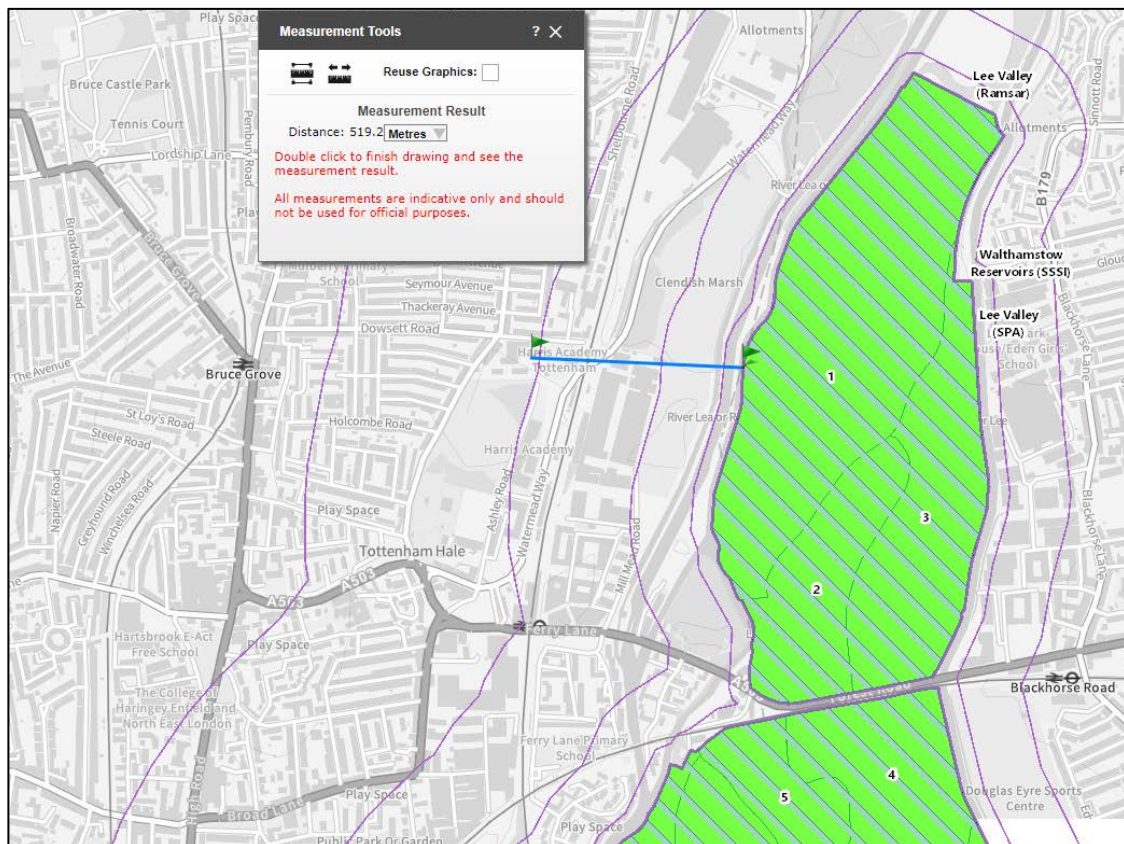
Overall Risk Classification	Low
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The guidance provided in the SPG has been adhered to in assessing the impacts of construction on ecological receptors. According to the guidance, receptors located within 350 meters of the site boundary should be taken into consideration. However, within this distance, there are no designations that meet the ecological criteria. This has been confirmed through examination of DEFRA's MAGIC database, which includes the following designations:

- Special Conservation Areas
- National Nature Reserves
- Areas of Outstanding Natural Beauty
- Ramsar Sites
- Local Nature Reserves
- Sites of Special Scientific Interest
- Special Protection Areas

Since none of these ecological designations are present within 350 meters of the site boundary, the construction project does not directly impact any of these protected ecological areas. However, there are two designations within 600m of the site, which include:

- Lee Valley RAMSAR Site
- Walthamstow Reservoir - SSSI



While these locations fall out of the range of the development's consideration area, they should be avoided for routing.

5.4. Other Factors

The following additional factors have been considered when determining the sensitivity of the area.

- Any history of dust generating activities in the area.
- The likelihood of concurrent dust generating activities on nearby sites.
- The season during which the work will take place.
- Duration of the potential impact, as a receptor, may become more sensitive over time.
- Locations with a local designation where features may be affected by dust deposition.

6. DUST MANAGEMENT AND AIR QUALITY

6.1. Air Quality and Dust Risk Assessment Result

The Air Quality and Dust Risk Assessment (AQDRA) outlined above and in Appendix 1, has determined the following.

Activity	Dust Emission Magnitude
Demolition	N/A
Earthworks	MEDIUM
Construction	MEDIUM
Trackout	MEDIUM

Dust Soiling Sensitivity	Human Health Sensitivity	Ecological Sensitivity
High	Low	Low

Therefore, the following section outlines these combined sensitivities and magnitudes.

Table 6.1: Summary of Risk of Impacts Without Mitigation

Potential Impact	Dust Risk			
	Demolition	Earthworks	Construction	Track-out
Dust Soiling	N/A	Medium Risk	Medium Risk	Medium Risk
Human Health	N/A	Low Risk	Low Risk	Low Risk
Ecological	N/A	Low Risk	Low Risk	Low Risk

The Site Manager will ensure that site personnel always follow best practice to control and limit emissions of gaseous and particulate pollutants into the atmosphere from construction activities, including from vehicles and plant.

These measures are seen in Table 6.3 (The relevant dust-controlled measures for medium risk contained within Appendix 7 of the Mayors SPG), and they are divided according to key construction stages and site risk.

The measures be implemented on site in full and will result in the impact of dust emissions during construction of the development being negligible. Both desirable and highly recommended control measures as part of Appendix 7 of the Mayors SPG are highlighted below and will be adhered to by the site.

6.2. Dust and Emissions Control Measures

An inventory and timetable of all dust and PM₁₀ generating activities are described in Table 6.2 below:

Table 6.2: Dust and Emissions Generating Activities

Phase of Works	Activities Generating Dust	Level of Risk
Earthworks	<u>Earthworks</u> Excavation, haulage, tipping and stockpiling. Levelling the site and landscaping.	<u>Earthworks</u> Medium Risk
	<u>Trackout</u> Site traffic movement onto Park View road and Ashley Road and onto surrounding roads, including all deliveries and earth movements / removal.	<u>Trackout</u> Medium Risk
Construction	<u>Construction</u> External cladding and rendering of the building.	<u>Construction</u> Medium Risk
	Stockpiling and storage of materials.	<u>Trackout</u> Medium Risk
	Concrete placing during the creation of the ground floor slab.	
	<u>Trackout</u> Site traffic movement onto Park View Road and Ashley Road	

6.3. General Activities

There are numerous activities on construction projects that if unmitigated can give rise to elevated levels of dust. This can be the movement and placing of granular materials and the excavation of foundations, poor stockpile management, site traffic movements, etc.

Dusty emissions escaping the work area may cause nuisance through, for example, surface soiling, loss of visibility due to deposition and effects on local people. Since it is difficult to suppress dust once it is airborne it is preferable, where possible, to prevent dust from being generated in the first place.

6.4. Mitigation Measures and Management Controls

The GLA SPG Dust and Emissions Control, and Institute of Air Quality Management (IAQM) guidance, will be adhered to throughout the construction works on-site. The measures adopted will be consistent with this Guidance and proportionate to the risk of dust nuisance in individual cases and will therefore, be more stringent where construction activities are closer to sensitive receptors.

Contractors will implement all necessary management and Best Practicable Means (BPM) to reduce levels of dust emissions from the Site both internally (*in situ*) and externally (off-site). Site specific control measures extend beyond those required for a negligible dusty site but will be implemented as a minimum in order to reduce the likelihood of dust nuisance from dusty operations from construction, earthworks, on-road and off-road emissions, and these will include the measures outlined below in Table 4.3.

Table 6.3: Site specific control measures

Mitigation measure – Throughout Development		Implemented on site
Site Management		
1	A stakeholder communications plan, including community engagement, will be developed and implemented prior to work beginning on site	✓
2	This AQDMP will be implemented and adhered to on-site	✓
3	The name and contact details of the individual accountable for air quality emissions and dust generated from the site will be displayed on the site boundary, along with the head or regional office contact information.	✓
4	This display will also include the head office contact information.	✓
5	A site log will be maintained to record complaints and outcomes of the site inspections in the forms in Appendix 2, 3 & 4 will be issued to the council upon request	✓
6	Record and respond to all dust and air quality pollutant emissions complaints	✓
7	A complaints log will be created and will be made available to the LBH Environmental Team at pollution@haringey.gov.uk . when asked (Appendix 2)	✓
8	Carry out regular site inspections to monitor compliance with air quality and dust control procedures, record inspection results, and create an inspection log available to the local authority when asked (Appendix 3 and 4).	✓
9	Increase the frequency of site inspections by those accountable for dust and air quality pollutant emissions issues when activities with a high potential to produce dust and emissions and dust are being carried out, and during prolonged dry or windy conditions.	✓
10	Record any exceptional incidents that cause dust and air quality pollutant emissions, either on or off the site, and the action taken to resolve the situation is recorded in the logbook (Appendix 2)	✓
Preparing and Maintaining the Site		
11	The site layout will be planned so that NRMM plant and dust-causing activities are located away as remote as practically possible from the off-site residential receptors around the development's area, including warehouses, servicing yards, and residential properties	✓
12	Erect solid screens or barriers around dust generating activities, at least, as high as any stockpiles on site	✓
13	Keep site fencing, barriers and scaffolding clean using wet methods.	✓
14	Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.	✓
15	Prevent site runoff of water or mud.	✓
16	Carry out regular dust soiling checks of buildings within 100m of site boundary and cleaning to be provided if necessary.	✓
17	Remove materials from site as soon as possible.	✓
18	Cover, seed, or fence stockpiles to prevent wind whipping.	✓
19	Agree dust monitoring locations with the LBH Environmental Team at pollution@haringey.gov.uk .	✓

Operating Vehicle/Machinery and Sustainable Travel		
20	Ensure all non-road mobile machinery (NRMM) comply with the standards set within this guidance.	✓
21	Ensure all vehicles switch off engines when stationary – no idling vehicles	✓
22	Impose and signpost a maximum-speed-limit of 10mph on site and any adjacent hardstanding areas to or inside the site.	✓
Operations		
23	Ensure an adequate water supply on the site for effective dust/particulate matter mitigation (using recycled water where possible).	✓
Waste Management		
24	Prohibit bonfires and burning of waste materials.	✓
25	Reuse and recycle waste to reduce dust from waste materials	✓

Mitigation Measures – Specific to Earthworks		Implemented on site
1	Only remove secure covers in small areas during work and not all at once.	✓

Mitigation Measures – Specific to Construction		Implemented on site
1	Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place	✓
2	Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.	✓
3	For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust.	✓

Mitigation measure – Specific to Trackout		Implemented on site
1	Regularly use a water-assisted dust sweeper on the access and local roads, as necessary, to remove any material tracked out of the site.	✓
2	Avoid dry sweeping of large areas.	✓
3	Ensure vehicles entering and leaving the site are securely covered to prevent escape of materials during transport.	✓
4	Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).	✓
5	Ensure that the hard surfaced road between the wheel wash facility and the site exit is maintained, wherever site size and layout permits.	✓
6	Access gates to be located at least 10m from receptors where possible.	✓
7	Apply dust suppressants to locations where a large volume of vehicles enter and exit the construction site	✓
8	Ensure all non-road mobile machinery (NRMM) comply with the standards set within this guidance.	✓
9	Ensure all vehicles switch off engines when stationary – no idling vehicles	✓
10	Record all inspections of haul routes and any subsequent action in a site logbook.	✓

Dust Control Measures

When addressing dust control, it is crucial to prevent the occurrence of statutory nuisance resulting from construction works or activities that generate dust. Therefore, it is essential to adopt a philosophy focused on preventing dust formation in the first place. Dealing with dust should follow the following approach:

1. Prevention:

- Emphasise measures to prevent dust formation, as outlined in best practice guidance such as the Mayor of London SPG 'The Control of Dust and Emissions during Construction and Demolition' (July 2014) and 'Best in Class' Guidance on Dust and Emissions from Construction (LLECP, March 2019).
- Implement techniques and practices to minimise dust generation, reducing the potential for airborne emissions and nuisance.

2. Suppression:

- Employ dust suppression techniques during dusty activities and throughout the primary construction phase.
- Utilise water-based suppression methods, such as using hoses and dampening down localized areas, as recommended by guidance from the Institute of Air Quality Management (IAQM) and the Control of Dust and Emissions during construction and demolition Supplementary Planning Guidance (2014).

3. Containment:

- Implement effective measures to prevent dust from leaving the construction site boundaries.
- Conduct regular inspections and implement procedures to promptly identify and address any instances of airborne dust escaping the site, in line with best practice guidance on monitoring in the vicinity of demolition and construction sites (IAQM, October 2018).

The Site Manager will ensure an adequate water supply is available on-site, considering the need for frost protection, as recommended by best practice guidance.

The site manager will employ effective management techniques to control emissions, including:

- Proper management, supervision, and training of process operations, as advised by best practice guidance on controlling particles, vapour, and noise pollution from construction sites (BRE, 2003).
- Appropriate use and efficient operation of equipment.
- Implementation of comprehensive preventative maintenance programs for all plant and equipment associated with emission control.

At the beginning of each construction phase, the site manager will compile a list of essential items necessary for effective emission control, as recommended by best practice guidance on dust and emissions from construction (LLECP, March 2019). Additionally, a proactive approach to preventative maintenance will be applied to all aspects of the construction works, including plant, vehicles, buildings, and equipment involved in emissions control, following the guidance on controlling particles, vapour, and noise pollution from construction sites (BRE, 2003).

By prioritizing prevention, employing suppression techniques, and ensuring effective containment, the construction site aims to adhere to best practice guidance, effectively manage dust emissions, and minimize the potential for statutory nuisance and environmental impacts.

SITE MONITORING

To minimise the formation of dust and harmful emissions from the site, the following dust monitoring activities will take place:

- Two positions for Automatic Dust Monitoring using Airly PM monitors.
- Handheld Dust Monitoring will be conducted as necessary.
- Weekly Visual Inspections will be carried out once per week.

The air quality dust risk assessment has identified a Medium to Low Risk of dust soiling impacts due to construction, demolition, earthworks, and trackout activities. Dust soiling impacts typically relate to the coarser fraction of dust (PM10) and are associated with the loss of amenity and potential nuisance effects.

Regarding human health, the assessment has indicated a Low Risk of impacts from all on-site activities. However, with the implementation of the mitigation measures detailed in Section 6, the residual impacts are deemed 'not significant' for human health. Nevertheless, in accordance with the guidance provided by the Greater London Authority (GLA, 2014), it is recommended that all construction sites should be monitored for the generation of air pollution. The necessity of monitoring depends on existing air quality, air pollution risks from the development, and the practical and financial considerations of dust monitoring.

The monitoring strategy should be proportionate to the potential risk of impacts. For this site, it is appropriate to adopt monitoring requirements similar to those for Medium to High-Risk sites, taking into account PM10 levels and dust soiling concerns.

Relevant sections of the GLA's guidance for the site include:

Medium-High Risk Site (Dust Soiling/Nuisance/PM10):

- Determine the prevailing wind direction across the site using data from a nearby weather station or by setting up a weather station on-site.
- Conduct assessments of dust deposition and soiling rates following recommended procedures.
- Perform visual inspections of site activities, dust controls, and site conditions, recording the findings in a daily dust log.
- Establish a procedure to notify the local authority, enabling immediate and appropriate measures to rectify any issues. Alert mechanisms may include emails or texts.

Dust monitoring will be conducted near sensitive receptors to assess any potential impacts at these locations. Site-specific monitoring protocols and procedures are as follows:

- Consider the impact of air quality and dust on occupational exposure standards to minimise worker exposure and prevent breaches of air quality objectives beyond the site boundary, including through visual assessments.
- Maintain an accurate log of public complaints and document the measures taken to address them when necessary.
- Determine the prevailing wind direction across the site using data from a nearby weather station.
- Identify the locations that require monitoring.
- If deemed necessary, monitor dust deposition and soiling rates as indicators of nuisance effects.

Air Quality Monitoring and Locations

Visual inspections will be conducted weekly in accordance with the nearest sensitive off-site receptors located within 50-100m of the site (primarily Park View Road, Harris Academy, and Downs Park) as indicated in the receptor locations figure.

Handheld monitoring will also take place at other locations on-site where there is any works taking place while the site is operational. The readings will be taken by the site manager or the designated individual responsible for monitoring visual dust levels. All findings will be reported to the LBH (London Borough of Haringey) on a monthly basis, or within 24 hours upon council request.

PM10 and dust emissions will be continuously monitored until December 2025 using real-time automatic monitors. Two PM10 monitors (Airly PM), will be installed according to the guidance provided by the Institute of Air Quality Management (IAQM). These will be positioned on the site boundaries at locations indicated by red marks.

The PM10 monitors will be strategically placed near sensitive receptors. Additionally, one of the PM10 monitoring locations will include an anemometer to monitor on-site wind conditions.

Within seven days of installing the two PM10 monitors on-site, the internet-based login details for accessing real-time PM10 monitoring data will be provided to Haringey Council via email. The council's pollution team will have access to the monitoring data platform for ongoing assessment during both the demolition and construction phases.

It is important to note that real-time PM10 monitoring locations may be subject to change due to mitigating circumstances, such as modifications to sensitive receptors or access issues. Any proposed changes to particulate (PM10) monitoring locations will be submitted to Haringey Council for written agreement prior to implementation.

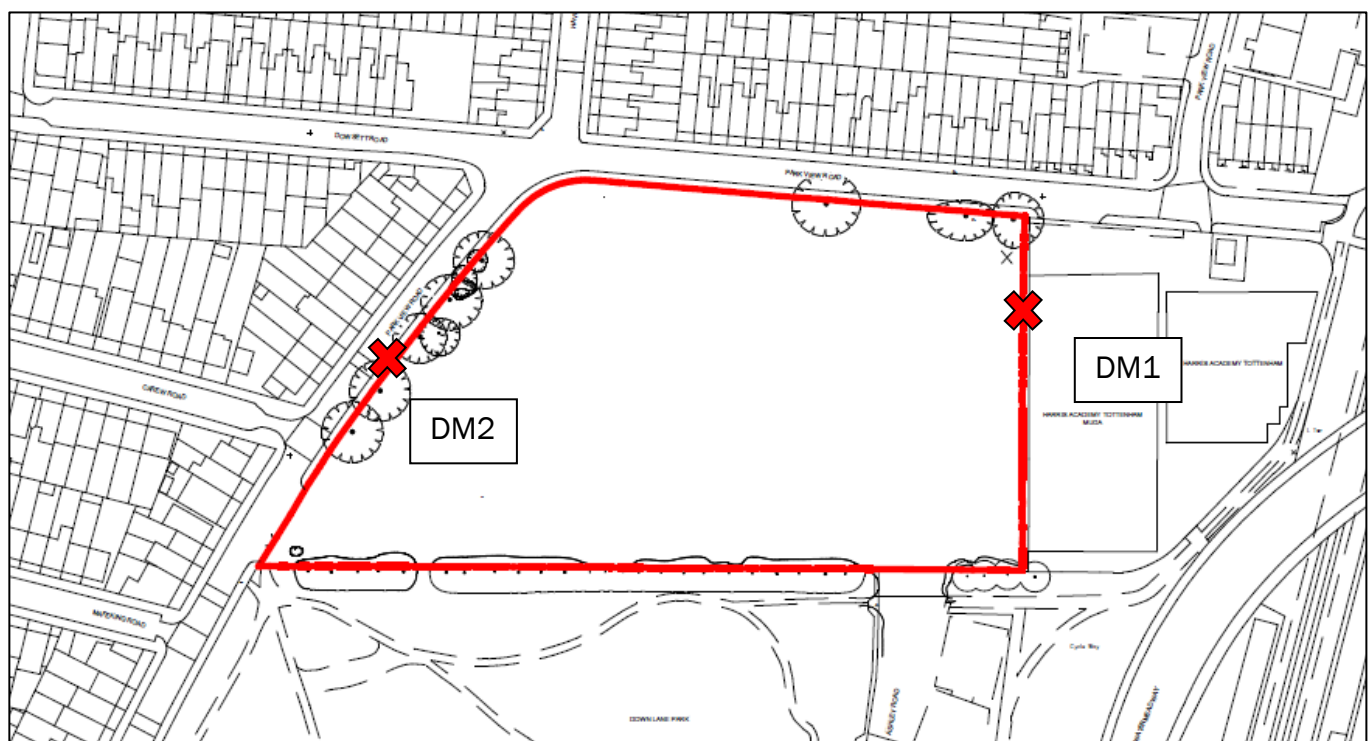


Figure 7.1: Dust Monitoring Locations

6.5. Daily and Weekly Dust Monitoring Programme (Procedures and Protocols)

The Site Manager will conduct daily visual inspections of the site using a handheld monitoring device for PM10. These inspections will take place twice daily, in the morning and afternoon. All relevant information and observations from these inspections will be recorded in the Daily Inspection checklist provided in Appendix 3. The Daily Dust logs will include the following details:

- Date, time, and location of the inspection (both on-site and off-site).
- Observations on site conditions, specifically regarding dust emissions.
- Remedial measures undertaken to ensure compliance with the Dust Management Plan (DMP) when necessary.

Additionally, a weekly inspection will be carried out, involving a perimeter walk around the site. This inspection will focus on observing dust emissions and dust soiling, particularly in upwind locations of on-site activities. Regular checks for dust soiling on surfaces such as street furniture, cars, and windowsills near the site boundary will be conducted, and cleaning will be provided if necessary. The results of the weekly inspection will be documented in the Weekly Inspection Checklist found in Appendix 4. Any specific notes regarding dust soiling or dust generating activities will be recorded using the provided record sheet in Appendix 4. The Daily and Weekly Inspection Checklists will be shared with the council upon request via email to pollution@haringey.gov.uk.

If significant dust is identified beyond the site boundary, a Dust Event Form available in Appendix 2 should be completed by the site operative who identified the issue. Immediate investigation and remedial action will be undertaken. The Site Manager will regularly review Dust Event Forms to ensure the implementation of necessary actions and identify areas where additional mitigation measures against dust emissions may be required. These forms will be shared with the council within 24 hours via email or the next working day in case of weekends or holidays.

Dust Event Forms can be completed based on information provided by nearby community members (complaints) or staff members who observe an incident or event.

In the event of complaints related to dust soiling, the Pro-Forma Complaint and PM10 trigger alert Notification Form in Appendix 2 will be completed. It will be submitted to the council within 24 hours via email or the next working day during weekends or holidays. Persistent complaints may also trigger a period of dust soiling monitoring to investigate the issue further.

6.6. Site Logbook

A site logbook will be maintained, which will incorporate the information from the forms provided in Appendix 2, 3, and 4. This logbook will document the details and actions taken in response to incidents or episodes that cause dust, as well as the mitigation measures implemented. It will serve as a comprehensive record of all relevant information pertaining to dust management on the site.

The site logbook will be made available to the Council upon request, and it will be shared with them via email. This logbook ensures transparency and provides a means for the Council to access and review the information related to incidents, dust-causing episodes, and the corresponding mitigation measures taken at the site.

7. APPENDICES

The following Dust Risk Assessment in Appendix 1 has been carried out in accordance with the Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction (January 2014).

Appendix 1: Air Quality and Dust Risk Assessments (AQDRA) - Dust Emission Magnitude, Human Health Impacts, Ecological Impacts, Risk of Impacts – Demolition, Risk of Impacts – Earthworks, Risk of Impacts – Construction, Risk of Impacts – Track out, Summary.

Appendix 2: Pro-Forma Complaint and PM10 trigger alert Notification Form

Appendix 3: Daily Inspection Checklist

Appendix 4: Weekly Inspection Checklist

APPENDIX 1: Air Quality Dust Risk Assessment (AQDRA)

Dust Emission Magnitude

Dust and Soiling effects on people and property

Receptors and their sensitivity and respective distance from the proposed development are used on the table below to determine the area sensitivity. The area is considered of High Sensitivity.

Table A1– Sensitivity of the area to dust and soiling effects on people and property

Receptor Sensitivity	Number of Receptors	Distance from the Source (m)			
		Less than 20	Less than 50	Less than 100	Less than 350
High	More than 100	High	High	Medium	Low
	10-100	High	Medium	Low	Low
	1-10	Medium	Low	Low	Low
Medium	More than 1	Medium	Low	Low	Low
Low	More than 1	Low	Low	Low	Low

**Adapted from Table 2 - IAQM Guidance on the assessment of dust from demolition and construction report January 2014*

Human Health Impacts

Receptors and their sensitivity and respective distance from the proposed development are used on the table below to determine the are sensitivity. The area is considered of High Sensitivity.

Table A2 – Sensitivity of the area to human health impacts

Receptor Sensitivity	Annual Mean PM10 Concentration $\mu\text{g}/\text{m}^3$	Number of Receptors	Distance from the Source (m)				
			Less than 20m	Less than 50m	Less than 100m	Less than 200m	Less than 350m
High	More than 32	More than 100	High	High	High	Medium	Low
		10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
	28-32	More than 100	High	High	Medium	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	High	Medium	Low	Low	Low
	24-28	More than 100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	Less than 24	More than 100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	-	More than 10	High	Medium	Low	Low	Low
	-	1-10	Medium	Low	Low	Low	Low
Low	-	1-10	Low	Low	Low	Low	Low

*Adapted from Table 3 - IAQM Guidance on the assessment of dust from demolition and construction report January 2014

Ecological Impacts

Receptors and their sensitivity and respective distance from the proposed development are used on the table below to determine the area sensitivity. The area is considered of Low sensitivity.

Table A3 – Sensitivity of the area to Ecological Impacts

Receptor Sensitivity	Distance from Source (m)	
	Less than 20m	Less than 50m
High	High	Medium
Medium	Medium	Low
Low	Low	Low

**Adapted from Table 4 - IAQM Guidance on the assessment of dust from demolition and construction report January 2014*

Risk of Impacts

The dust emission magnitude determined above is combined with the sensitivity of the area to determine the risk of impacts with no mitigation applied. The Risk tables below will be used to calculate the Risk of Dust Impacts for each of the four phases, i.e., demolition, earthworks, construction and Track-out.

**Adapted from Table 6 - IAQM Guidance on the assessment of dust from demolition and construction report January 2014*

Demolition – No demolition.

Table A4.3 – Risk of Dust impacts – *Earthworks*

Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

*Adapted from Table 7 - IAQM Guidance on the assessment of dust from demolition and construction report January 2014

The Earthworks phase Risk matrix for the Receptors/Sensitivity of Area/Dust Emission Magnitude is as follows:

Table A4.4 – Risk of Dust impacts on Receptors during *Earthworks Phase*

Receptors	Area Sensitivity	Dust Emission Magnitude	Risk of Dust Impacts Earthworks
Dust Soiling	High	Medium	Medium Risk
Human Health	Low	Medium	Low Risk
Ecological	Low	Medium	Low Risk

Table A4.5 – Risk of Dust impacts – *Construction*

Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

*Adapted from Table 8 - IAQM Guidance on the assessment of dust from demolition and construction report January 2014

The Construction Phase Risk Matrix for the Receptors/Sensitivity of Area/Dust Magnitude is as follows:

Table A4.6– Risk of Dust impacts on Receptors during *Construction Phase*

Receptors	Area Sensitivity	Dust Emission Magnitude	Risk of Dust Impacts Construction
Dust Soiling	High	Medium	Medium Risk
Human Health	Low	Medium	Low Risk
Ecological	Low	Medium	Low Risk

Table A4.7 – Risk of Dust impacts – Track-out

Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Low Risk	Negligible
Low	Low Risk	Low Risk	Negligible

*Adapted from Table 9 - IAQM Guidance on the assessment of dust from demolition and construction report January 2014

The Track-out Phase Risk Matrix for the Receptors/Sensitivity of Area/Dust Emission Magnitude is as follows:

Table A4.8 – Risk of Dust impacts on Receptors during Track-out Phase

Receptors	Area Sensitivity	Dust Emission Magnitude	Risk of Dust Impacts Track-out
Dust Soiling	High	Medium	Medium Risk
Human Health	Low	Medium	Low Risk
Ecological	Low	Medium	Low Risk

The results are summarized on the dust Risk Table below.

Table A5 – Summary Dust Risk Table with no mitigation measures applied, to Define Site-Specific Mitigation

Potential Impact	Dust Risk			
	Demolition	Earthworks	Construction	Track-out
Dust Soiling	N/A	Medium risk	Medium Risk	Medium Risk
Human Health	N/A	Low Risk	Low Risk	Low Risk
Ecological	N/A	Low Risk	Low Risk	Low Risk

APPENDIX 2: Pro-Forma Complaint and PM10 trigger alert Notification Form

Reference Number:		Date:		Time:	
Monitoring Location					
Level of dust emission					

Complaint Notification (Yes/No)					
Date:		Time:		Received by:	
Complainants Name:					
Telephone Number:					
Address:					
Weather Details:					
Description of complaint / incident:					
Investigative action taken:					

Details of best practice mitigation in place:			
Remedial action taken:			
Preventative measures implemented to prevent further complaints/incidents/exceedance:			
Is the complaint considered (please tick):	Justified	Unsubstantiated	Unfounded
Signed:			
Print name:			
Position:			
Date:			

APPENDIX 3: Daily Inspection Checklist

[illegible]

APPENDIX 4: Weekly Inspection Checklist

Week Commencing:								
Inspected Items	Frequency	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Person completing the checklist	Initials							
Dust being controlled correctly by personnel	Daily							
Visual inspection of mud/debris on haul routes	Daily							
Visual inspection of dust soiling on local streets, cars and window sills	Daily							
Visual observation of dust generation from earthworks and construction	Daily							
Wind direction	Daily							
Wind speed	Daily							
Weather forecast	Daily							

