



Lime Down

Solar Park

Environmental Statement

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Appendix 15-1: Construction Dust Methodology and Assessment

1.1 Methodology

- 1.1.1 The dust risk assessment has been carried out in accordance with the Institute of Air Quality Management (IAQM) construction dust guidance (Ref 1-1). The purpose of the dust risk assessment is to determine appropriate mitigation measures relevant to the Scheme. Existing measures as outlined in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** are not considered as part of the exercise as per the guidance.
- 1.1.2 The steps for assessing dust emissions in accordance with the IAQM construction dust guidance (Ref 1-1) are detailed in the following sections.

Step 1

- 1.1.3 Step 1 screens the requirement for a more detailed assessment. Should human receptors be identified within 250m of the Order Limits or 50m from the construction vehicle route up to 250m from the Site entrance, then the assessment proceeds to Step 2. Additionally, should ecological receptors be identified within 50m of the Site or 50m from the construction vehicle route up to 250m from the Site entrance, then the assessment also proceeds to Step 2.

Step 2

- 1.1.4 Step 2 assesses the risk of potential dust impacts. A site is allocated a risk category based on two factors:
- The scale and nature of the works, which determines the potential dust emission magnitude as small, medium or large (Step 2A); and
 - The sensitivity of the area to dust impacts, which can be defined as low, medium or high sensitivity (Step 2B).
- 1.1.5 The two factors are combined in Step 2C to determine the risk of dust impacts without mitigation applied.
- 1.1.6 Step 2A defines the potential magnitude of dust emission through the construction phase. The relevant criteria are summarised in **Table 1**.

Table 1 Construction Dust - Magnitude of Emission (Ref 1-1)

Magnitude	Activity	Criteria
Large	Demolition	Total building volume greater than 75,000m ³ Potentially dusty construction material (e.g. concrete) On site crushing and screening Demolition activities greater than 12m above ground level
	Earthworks	Total site area greater than 110,000m ² Potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size) More than 10 heavy earth moving vehicles active at any one time Formation of bunds greater than 6m in height
	Construction	Total building volume greater than 75,000m ³ On site concrete batching Sandblasting
	Trackout	More than 50 Heavy Duty Vehicle (HDV) outward trips per day Potentially dusty surface material (e.g. high clay content) Unpaved road length greater than 100m
Medium	Demolition	Total building volume 12,000m ³ to 75,000m ³ Potentially dusty construction material Demolition activities 6m to 12m above ground level
	Earthworks	Total site area 18,000m ² to 110,000m ² Moderately dusty soil type (e.g. silt) 5 to 10 heavy earth moving vehicles active at any one time Formation of bunds 3m to 6m in height
	Construction	Total building volume 12,000m ³ to 75,000m ³ Potentially dusty construction material (e.g. concrete) On site concrete batching
	Trackout	20 to 50 HDV outward trips per day Moderately dusty surface material (e.g. high clay content) Unpaved road length 50m to 100m
Small	Demolition	Total building volume under 12,000m ³ Construction material with low potential for dust release (e.g. metal cladding or timber) Demolition activities less than 6m above ground level

Magnitude	Activity	Criteria
		Demolition during wetter months
	Earthworks	Total site area less than 18,000m ² Soil type with large grain size (e.g. sand) Fewer than 5 heavy earth moving vehicles active at any one time Formation of bunds less than 3m in height
	Construction	Total building volume less than 12,000m ³ Construction material with low potential for dust release (e.g. metal cladding or timber)
	Trackout	Fewer than 20 HDV outward trips per day Surface material with low potential for dust release Unpaved road length less than 50m

1.1.7 Step 2B defines the sensitivity of the area around the proposed Scheme to potential dust impacts. The influencing factors are shown in **Table 2**.

Table 2 Construction Dust - Examples of Factors Defining Sensitivity of an Area (Ref 1-1)

Receptor Sensitivity	Examples	
	Human Receptors	Ecological Receptors
High	Users expect high levels of amenity. High aesthetic or value property. People expected to be present continuously for extended periods of time. Locations where members of the public are exposed over a time period relevant to the air quality objective for Particulate Matter less than 10 microns in diameter (PM ₁₀) e.g. residential properties, hospitals, schools and residential care homes.	Internationally or nationally designated site e.g. Special Area of Conservation (SAC), and the designated features may be affected by dust soiling. Locations where there is a community of a particular dust sensitive species such as vascular species included in the Red Data List for Great Britain.
Medium	Users would expect to enjoy a reasonable level of amenity. Aesthetics or value of their property could be diminished by soiling. People or property wouldn't reasonably be expected to be present here continuously or regularly for extended periods	Nationally designated site e.g. Site of Special Scientific Interest (SSSI) with dust sensitive features. Locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown.

Receptor Sensitivity	Examples	
	Human Receptors	Ecological Receptors
	as part of the normal pattern of use of the land e.g. parks and places of work.	
Low	<p>Enjoyment of amenity would not reasonably be expected.</p> <p>Property would not be expected to be diminished in appearance.</p> <p>Transient exposure, where people would only be expected to be present for limited periods. e.g. public footpaths, playing fields, shopping streets, playing fields, farmland, footpaths, short term car park and roads.</p>	Locally designated site e.g. Local Nature Reserve (LNR) where the features may be affected by dust deposition.

- 1.1.8 The guidance also provides the following factors to consider when determining the sensitivity of an area to potential dust impacts:
- Any history of dust generating activities in the area;
 - The likelihood of concurrent dust generating activity on nearby sites;
 - Any pre-existing screening between the source and receptors;
 - Any conclusions drawn from analysing local meteorological data which accurately represent the area and the season during which works will take place;
 - Any conclusions drawn from local topography;
 - Duration of the potential impact, as a receptor may become more sensitive over time; and
 - Any known specific receptor sensitivities which go beyond the classifications given in the document.
- 1.1.9 These factors have been considered during the undertaking of the assessment.
- 1.1.10 The criteria for determining the sensitivity of the area to dust soiling effects on people and property is summarised in **Table 3**.

Table 3 Construction Dust - Sensitivity of the Area to Dust Soiling Effects on People and Property (Ref 1-1)

Receptor Sensitivity	Number of Receptors	Distance from the Source (m)			
		Less than 20	Less than 50	Less than 100	Less than 250
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

1.1.11 **Table 4** outlines the criteria for determining the sensitivity of the area to human health impacts.

Table 4 Construction Dust - Sensitivity of the Area to Human Health Impacts (Ref 1-1)

Receptor Sensitivity	Annual Mean PM ₁₀ Concentration	Number of Receptors	Distance from the Source (m)			
			Less than 20	Less than 50	Less than 100	Less than 250
High	Greater than 32µg/m ³	More than 100	High	High	High	Medium
		10 - 100	High	High	Medium	Low
		1 - 10	High	Medium	Low	Low
	28-32µg/m ³	More than 100	High	High	Medium	Low
		10 - 100	High	Medium	Low	Low
		1 - 10	High	Medium	Low	Low
	24-28µg/m ³	More than 100	High	Medium	Low	Low
		10 - 100	High	Medium	Low	Low
		1 - 10	Medium	Low	Low	Low
	Less than 24µg/m ³	More than 100	Medium	Low	Low	Low
		10 - 100	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low
Medium	Greater than 32µg/m ³	More than 10	High	Medium	Low	Low

Receptor Sensitivity	Annual Mean PM ₁₀ Concentration	Number of Receptors	Distance from the Source (m)			
			Less than 20	Less than 50	Less than 100	Less than 250
	28-32µg/m ³	1 - 10	Medium	Low	Low	Low
		More than 10	Medium	Low	Low	Low
	24-28µg/m ³	1 - 10	Low	Low	Low	Low
		More than 10	Low	Low	Low	Low
	Less than 24µg/m ³	1 - 10	Low	Low	Low	Low
		More than 10	Low	Low	Low	Low
Low	-	More than 1	Low	Low	Low	Low

1.1.12 **Table 5** outlines the criteria for determining the sensitivity of the area to ecological impacts.

Table 5 Construction Dust - Sensitivity of the Area to Ecological Impacts (Ref 1-1)

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

1.1.13 Step 2C combines the dust emission magnitude with the sensitivity of the area to determine the risk of unmitigated impacts. **Table 6** outlines the risk category from demolition activities.

Table 6 Construction Dust - Dust Risk Category from Demolition Activities (Ref 1-1)

Receptor Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium Risk	Low Risk	Negligible

1.1.14 **Table 7** outlines the risk category from earthworks and construction activities.

Table 7 Construction Dust - Dust Risk Category from Earthworks and Construction Activities (Ref 1-1)

Receptor Sensitivity	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

1.1.15 **Table 8** outlines the risk category from trackout activities.

Table 8 Construction Dust - Dust Risk Category from Trackout Activities (Ref 1-1)

Receptor Sensitivity	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

Step 3

1.1.16 Step 3 requires the identification of site-specific mitigation measures within the guidance to reduce potential dust impacts based upon the relevant risk categories identified in Step 2. For sites with negligible risk, mitigation measures beyond those required by legislation are not required. However, additional controls may be applied as part of good practice.

Step 4

- 1.1.17 Once the risk of dust impacts has been determined and the appropriate mitigation measures identified, the final step is to determine the significance of any residual impacts. For almost all construction activities, the aim should be to control effects using effective mitigation.

1.2 Assessment

Step 1

- 1.2.1 The undertaking of activities such as demolition, excavation, groundwork, cutting, construction and storage of materials has the potential to result in fugitive dust emissions throughout the construction phase. Vehicle movements both on site and on the local road network also have the potential to result in the re-suspension of dust from highway surfaces.
- 1.2.2 The potential for impacts at sensitive locations depends significantly on local meteorology during the undertaking of dust generating activities, with the most significant effects likely to occur during dry and windy conditions.
- 1.2.3 A desk-study identified sensitive human receptors within 250m of the Scheme boundary and within 50m from the construction vehicle routes up to 250m from the Sites' entrances, as shown in **ES Volume 2, Figure 15-1: Construction Dust Emissions Study Area [EN010168/APP/6.2]**.
- 1.2.4 There are several ecological sites located within 50m of the Scheme boundary which are presented in **ES Volume 2, Figure 15-1: Construction Dust Emissions Study Area [EN010168/APP/6.2]**.

Step 2A

Demolition

- 1.2.5 The Scheme does not include any proposed demolition activity, as such impacts from demolition have not been considered further in the assessment.

Earthworks

- 1.2.6 The total site area is greater than 110,000m² and the soil type mostly consists of clay. It is anticipated that there will be more than 10 heavy earth moving vehicles active at any one time. The potential dust emission magnitude for construction is therefore considered to be large.

Construction

- 1.2.7 The overall combined total building volume for the Scheme to be constructed would be greater than 75,000m³, with construction materials consisting of concrete and metal. Concrete batching is likely to be carried

out on site. As such the potential dust emission magnitude for construction is considered to be large.

Trackout

- 1.2.8 During the construction phase of the project, the maximum outward HDV movements per day is anticipated to be between 20 and 50, and the access tracks for construction HDVs will be unpaved and are anticipated to be greater than 100m in length. As such the magnitude of potential dust emissions from trackout is considered to be large, as a reasonably worst-case scenario.
- 1.2.9 The dust emission magnitude for each dust generating activity for the project is summarised in **Table 9**.

Table 9 Construction Dust – Dust Emission Magnitude Summary

Activity	Dust emission magnitude
Demolition	Not Applicable
Earthworks	Large
Construction	Large
Trackout	Large

Step 2B

- 1.2.10 Receptors sensitive to potential dust impacts during earthworks and construction activities were identified from a desktop study of the area up to 250m from the Order Limits for human receptors and up to 50m for ecological receptors. These are summarised in **Table 10**.

Table 10 Construction Dust – Earthworks and Construction Dust Sensitive Receptors

Distance from Sites (m)	Approximate Number of Human Receptors	Approximate Number of Ecological Receptors
Less than 20	10-100 with high sensitivity	1-10 with high sensitivity
Less than 50	10-100 with high sensitivity	1-10 with high sensitivity
Less than 100	>100 with high sensitivity	-
Less than 250	>100 with high sensitivity	-

- 1.2.11 Human and ecological receptors sensitive to potential dust impacts from trackout were approximated from a desktop study of the area up to 50m

from roads that would be used by construction HDVs, out to a distance of 250m from the Site entrances. These are summarised in **Table 11**.

Table 11 Construction Dust – Trackout Dust Sensitive Receptors

Distance from Sites (m)	Approximate Number of Human Receptors	Approximate Number of Ecological Receptors
Less than 20	10 - 100 with high sensitivity	0
Less than 50	10 - 100 with high sensitivity	0

- 1.2.12 In accordance with the IAQM construction dust guidance (Ref 1-1), the highest level of sensitivity should be recorded from the criteria outlined in the guidance.
- 1.2.13 The IAQM construction dust guidance (Ref 1-1) defines residential properties as being high sensitivity receptors to dust soiling impacts and therefore the sensitivity of the surrounding area for dust soiling impacts has been determined based on the number of high sensitivity receptors and the distance of the receptor from the source.
- 1.2.14 To determine the sensitivity of the receiving environment for human health effects, the maximum background 2025 PM₁₀ background concentration within 250m of the Scheme was obtained from the Defra website (Ref 1-2) and is 13.1µg/m³. Therefore, in accordance with the IAQM construction dust guidance (Ref 1-1) health impacts should be determined based on the criteria within the less than 24µg/m³ category (refer to **Table 4**). There are residential properties within the Construction Dust Study Area (**ES Volume 2, Figure 15-1: Construction Dust Emissions Study Area [EN010168/APP/6.2]**), as such, the sensitivity of the receptor is considered to be high and therefore the sensitivity of the surrounding area for human health impacts has been determined based on the number of high sensitivity receptors within the less than 24µg/m³ background PM₁₀ category and the distance of the receptors from the source.
- 1.2.15 In accordance with the IAQM construction dust guidance (Ref 1-1) internationally and nationally designated sites such as Special Protection Area (SPA), RAMSAR and SSSIs are defined as high sensitivity for ecological impacts. Harries Ground SSSI is located within 20m of the Order Limits and therefore the sensitivity of the area to ecological impacts has been determined based on the high receptor sensitivity category (refer to Table 5). There are no ecological sites within the Trackout Dust

Study Area (ES Volume 2, Figure 15-1: Construction Dust Emissions Study Area [EN010168/APP/6.2]).

- 1.2.16 The sensitivity of the receiving environment to specific dust impacts is summarised in **Table 12**.

Table 12 Construction Dust – Summary of the Sensitivity of the Area

Potential Impact	Sensitivity of the surrounding area		
	Earthworks	Construction	Trackout
Dust Soiling	High	High	High
Human Health	Low	Low	Low
Ecology	High	High	-

Step 2C

- 1.2.17 The risk of effects in the absence of environmental measures was then defined based upon the interaction between the magnitude of emission and the highest level of area sensitivity (determined in Steps 2A and 2B, respectively) for each dust generating activity. The risk of dust effects was determined, as presented in **Table 13**.

Table 13 Construction Dust – Summary of the Risk of Dust Effects

Potential Impact	Risk		
	Earthworks	Construction	Trackout
Dust Soiling	High Risk	High Risk	High Risk
Human Health	Low Risk	Low Risk	Low Risk
Ecology	High Risk	High Risk	-

- 1.2.18 As indicated in **Table 13**, the potential risk of dust soiling is high for earthworks, construction and trackout. The potential risk of human health impacts is low for earthworks, construction and trackout. The potential risk of dust impacts on ecological sites is high for earthworks and construction.
- 1.2.19 It should be noted that the potential for impacts depends significantly on the distance between the dust generating activity and receptor location. Risk was predicted based on a worst-case scenario of works being undertaken at the edge of the Order Limits. Therefore, actual risk is likely to be lower than that predicted during the majority of the construction phase as most construction activity would not take place at the edge of the Order Limits.

Step 3

- 1.2.20 The IAQM construction dust guidance (Ref 1-1) provides potential mitigation measures to reduce impacts as a result of fugitive dust emissions during the construction phase. These have been adapted for the Scheme based on the risk of dust effects (**Table 13**) and are summarised in **Table 14**.

Table 14 Construction Dust – Proposed Dust Mitigation Measures based on IAQM Guidance

Mitigation Measure	High Risk Measures. H=Highly Recommended. D=Desirable
Communications	
Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.	H
Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundaries. This may be the environmental manager, construction project manager or the site manager.	H
Display the head or regional office contact information.	H
Dust Management	
Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the relevant local authorities.	H
Site Management	
Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.	H
Make the complaints log available to the local authority when asked.	H
Record any exceptional incidents that cause dust and/or air emissions, either on- or off-site, and the action taken to resolve the situation in the logbook.	H
Hold regular liaison meetings with other high risk construction sites within 500m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes.	H
Monitoring	
Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust,	H

Mitigation Measure	High Risk Measures. H=Highly Recommended. D=Desirable
record inspection results, and make the log available to the local authorities when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and windowsills within 100m of site boundary, with cleaning to be provided if necessary.	
Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authorities when asked.	H
Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.	H
Agree dust deposition, dust flux, or real-time PM ₁₀ continuous monitoring locations with the local authority. Where possible, commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences.	H
Preparing and maintaining the site	
Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.	H
Erect solid screens or barriers around dusty activities or the site boundary so that are at least as high as any stockpiles on site.	H
Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.	H
Avoid site runoff of water or mud.	H
Keep site fencing, barriers and scaffolding clean using wet methods.	H
Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site, cover as described below.	H
Cover, seed or fence stockpiles to prevent wind whipping.	H
Operating vehicle/machinery and sustainable travel	
Ensure all off-road vehicles comply with the requirements of the Non-Road Mobile Machinery (NRMM) standards, where applicable. Use stage 4 NRMM as a minimum and stage 5 where possible.	H

Mitigation Measure	High Risk Measures. H=Highly Recommended. D=Desirable
Ensure all vehicles/machinery are switched off when stationary/not in use.	H
Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable.	H
Impose and signpost a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas (if long haul routes are required, these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authorities, where appropriate).	H
Produce a Construction Traffic Management Plan to manage the sustainable delivery of goods and materials.	H
Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).	H
Signs to direct construction vehicles associated with the Scheme will be installed along the construction traffic route.	H
<p>Vehicles will be correctly maintained and operated in accordance with manufacturer's recommendations and in a responsible manner. All plant and vehicles will be required to switch off their engines when not in use and when it is safe to do so. In addition, plant and vehicles will conform to relevant applicable standards for the vehicle type as follows:</p> <ul style="list-style-type: none"> - Euro 4 (Oxides of Nitrogen (NOx)) for petrol cars, vans and minibuses; - Euro 6 (NOx and PM) for diesel cars, vans and minibuses; and - Euro VI (NOx and PM) for lorries, buses, coaches and Heavy Goods Vehicles (excluding specialist abnormal indivisible loads). 	H
Operations	
Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.	H
Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.	H

Mitigation Measure	High Risk Measures. H=Highly Recommended. D=Desirable
Use enclosed chutes and conveyors and covered skips.	H
Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.	H
Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.	H
Waste Management	
No bonfires or burning of waste materials.	H
Earthworks	
Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.	H
Use Hessian, mulches or tackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.	H
Only remove the cover in small areas during work and not all at once.	H
Construction	
Avoid scabbling (roughening of concrete surfaces) if possible.	H
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.	H
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.	H
For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust.	D
Trackout	
Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site.	H
Avoid dry sweeping of large areas.	H
Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.	H

Mitigation Measure	High Risk Measures. H=Highly Recommended. D=Desirable
Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	H
Record all inspections of haul routes and any subsequent action in a site logbook.	H
Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowzers and regularly cleaned.	H
Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).	H
Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.	H
Entrance gates to be located at least 10m from receptors where possible.	H

- 1.2.21 The measures outlined in **Table 14** have been incorporated into the **Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]**. With the implementation of these measures, the residual effect from all dust generating activities is predicted to be not significant.

1.3 References

- Ref 1-1 Institute of Air Quality Management (2024) Assessment of Dust from Demolition and Construction V2.2.
- Ref 1-2 Department for Environment, Food and Rural Affairs. (2025) UK AIR. Retrieved from <https://uk-air.defra.gov.uk/> [Accessed May 2025].