

OUTLINE CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN (OCEMP)

Appendix 4 – Outline Dust Management Plan

HyNet Carbon Dioxide Pipeline

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8(1)(c)

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1. INTRODUCTION

1.1. PURPOSE OF THIS DOCUMENT

- 1.1.1. This document has been prepared on behalf of Liverpool Bay CCS Limited ('the Applicant') and relates to an application ('the Application') for a Development Consent Order (DCO) that has been submitted to the Secretary of State (SoS) for Energy Security and Net Zero under Section 37 of the Planning Act 2008 ('the PA 2008'). The Application relates to the Carbon Dioxide (CO₂) pipeline which constitutes the DCO Proposed Development.
- 1.1.2. The DCO Proposed Development will form part of HyNet North West ('the Project'), which is a hydrogen supply and Carbon Capture and Storage ('CCS') Project. The goal of the Project is to reduce carbon dioxide (CO₂) emissions from industry, homes and transport and support economic growth in the North West of England and North Wales. The wider Project is based on the production of low carbon hydrogen from natural gas. It includes the development of a new hydrogen production plant, pipelines, and the creation of CCS infrastructure. CCS prevents CO₂ entering the atmosphere by capturing it, compressing it and transporting it for safe, permanent storage.
- 1.1.3. The DCO Proposed Development is a critical component of the Project which, by facilitating the transportation of carbon dioxide, enables the rest of the Project to be low carbon. The hydrogen production and CO₂ capture and storage elements of the Project do not form part of the DCO Proposed Development and will be delivered under separate consenting processes.
- 1.1.4. Further details of each element of the DCO Proposed Development are set out in **Chapter 3 – Description of the DCO Proposed Development** of the Environmental Statement (ES) [APP-055] and [CR1-124].
- 1.1.5. This document sets out the results of the assessment of the risk of dust impacts resulting from the specific dust and emission generating activities that were assessed in the Environmental Statement (Volume III) Appendix 6.1 Construction Dust Assessment [APP-081]. It describes the suggested mitigation measures and will provide suggested templates for the recommended reporting required in the event of exceptional dust generating incidents, receipt of complaints or regular inspections. This document has been prepared using dust assessment guidance from the Institute of Air Quality Management (Ref. 1.1). A dust management plan as secured by Requirement 5 of the draft DCO [REP1-004] is intended as a live document and the measures within it can be applied according to the judgement of an environmental clerk of works or other Site Manager or contractor with responsibility for environmental good practice. This document should be read alongside the Outline Construction Environmental Management Plan [REP1-017 and CR1-119] and the Outline Construction Traffic Management Plan [CR1-117].

2. DUST MANAGEMENT AND MITIGATION

2.1. DUST RISK ASSESSMENT

2.1.1. The dust risk assessment was undertaken on the following specific project related construction activities:

- **Open Trench Construction**
Trench digging related to the open trench construction and pipeline laying.
- **Trenchless Crossings**
Related to the creation of a sub-surface pipeline channel without a continuous, open trench and minimal surface disruption.
- **Above Ground Infrastructure Construction**
Related to the construction of Above Ground Infrastructure (AGI) for the purposes of pipeline operation and maintenance.
- **Block Valve Station Construction**
Related to the construction of Block Valve Stations (BVSs) for the purposes of pipeline section isolation.

2.1.2. The information in **Table 2.1** summarises the results of the assessment of the risk of dust impacts from specific project related construction activities.

Table 2.1 – Summary of Construction Dust Risk Assessment

Construction Activity	Potential Impact	Earthworks	Construction	Trackout
Open Trench Construction	Dust Soiling	Low Risk	Low Risk	Medium Risk
	Human Health	Negligible	Negligible	Low Risk
	Ecological	Low Risk	Low Risk	Low Risk
Trenchless Crossing	Dust Soiling	Medium Risk	Low Risk	Medium Risk
	Human Health	Low Risk	Negligible	Low Risk
	Ecological	Medium Risk	Low Risk	Low Risk
AGI Construction	Dust Soiling	Low Risk	Negligible	Low Risk
	Human Health	Low Risk	Negligible	Low Risk

Construction Activity	Potential Impact	Earthworks	Construction	Trackout
	Ecological	Low Risk	Negligible	Low Risk
BVS Construction	Dust Soiling	Negligible	Negligible	Low Risk
	Human Health	Negligible	Negligible	Low Risk
	Ecological	Negligible	Negligible	Low Risk

2.1.3. The summary in **Table 2.1** shows that for each of the four assessed activities the largest potential risk of dust impacts is created from the trackout of construction vehicles on the public highway. During the activities of Open Trench Construction and the creation of Trenchless Crossings, the worst-case Medium Risk is to dust soiling effects on the amenity of the local area from vehicle trackout, and to dust soiling and ecological receptors as a result of earthworks from the creation of Trenchless Crossings.

2.1.4. The most sensitive areas identified in the Environmental Statement (Volume II) Chapter 6 – Air Quality **[APP-058]** are:

- Chester Road (as shown in **(Contains OS Data © Crown Copyright and data base right 2020)**)
- Figure 2-1), where there are five properties susceptible to dust soiling within 20m of the works; and
- Deeside and Buckley Newt Sites Special Area of Conservation (SAC) (as shown in **(Contains OS Data © Crown Copyright and data base right 2020)**)
- Figure 2-2), located 25m from the works.



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Figure 2-2 – Deeside and Buckley Newt Sites (SAC) Section of the DCO Proposed Development

Mitigation Measures

- 2.1.5. The results of the construction dust risk assessment as summarised in **Table 2.1** were used to define mitigation measures as described in Section 6.10 of the Environmental Statement (Volume II) Chapter 6 – Air Quality **[APP-058]**. The measures are described here and should be applied to all construction areas unless specifically identified.

Communications

- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site (**D-AQ-003** of the **REAC [REP1-015 and CR1-109]**).
- Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the Site Manager. Display the head or regional office contact information (**D-AQ-003** of the **REAC [REP1-015 and CR1-109]**).
- A Dust Management Plan (DMP) is included as a Requirement of the Draft DCO (**Document Reference: D.3.1**). This will include measures to control other emissions, approved by the Local Authority (**D-AQ-004** of the **REAC [REP1-015 and CR1-109]**).

Site Management

- Record all dust and air quality complaints, identify causes, take appropriate practicable measures to reduce emissions in a timely manner, and record the measures taken (**D-AQ-005** of the **REAC [REP1-015 and CR1-109]**).
- Make the complaints log available to the Local Authority when asked (**D-AQ-006** of the **REAC [REP1-015 and CR1-109]**).
- Record any exceptional incidents that cause dust and/or air emissions (either on or off site) and any action taken to resolve the situation in the log book (**D-AQ-007** of the **REAC [REP1-015 and CR1-109]**).

Monitoring

- Undertake daily on-site and off-site inspections up to a minimum of 50m from the site boundary, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked (**D-AQ-008** of the **REAC [REP1-015 and CR1-109]**).
- 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 (**D-AQ-009** of the **REAC [REP1-015 and CR1-109]**).
- Agree dust deposition, dust flux, or real-time PM₁₀ continuous monitoring locations with the Local Authority. Continuous monitoring will be undertaken at centralised compounds, with visual inspections elsewhere. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction (**D-AQ-010** of the **REAC [REP1-015 and CR1-109]**) (Ref. 1.2).

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 (**D-AQ-012** of the **REAC [REP1-015 and CR1-109]**).
- Where the DCO Proposed Development is constructed near sensitive receptors, solid screens or barriers should be erected around dusty activities or the site boundary that are at least as high as any stockpiles on site (**D-AQ-013** of the **REAC [REP1-015 and CR1-109]**).
- Avoid site runoff of water or mud (**D-AQ-014** of the **REAC [REP1-015 and CR1-109]**).
- Manage earthworks and exposed areas or soil stockpiles to prevent wind-borne dust. Use methods such as covering, seeding or using water suppression (**D-AQ-015** of the **REAC [REP1-015 and CR1-109]**).

Operating Vehicle/Machinery and Sustainable Travel

- Ensure all vehicles switch off engines when not in use and ensure that there is no idling (**D-AQ-016** of the **REAC [REP1-015 and CR1-109]**).
- Where reasonably practicable avoid the use of diesel- or petrol-powered generators, for example by using hybrid site generators (**D-AQ-017** of the **REAC [REP1-015 and CR1-109]**).
- Impose and signpost a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas (**D-AQ-018** of the **REAC [REP1-015 and CR1-109]**).
- The most practically sustainable form of transport for the delivery of goods and materials would be chose, so far as reasonably practicable (**D-AQ-019** of the **REAC [REP1-015 and CR1-109]**).

General Construction Phase Works

- 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 (**D-AQ-020** of the **REAC [REP1-015 and CR1-109]**).
- Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate (**D-AQ-021** of the **REAC [REP1-015 and CR1-109]**).
- Use covered skips (**D-AQ-022** of the **REAC [REP1-015 and CR1-109]**).
- 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 (**D-AQ-023** of the **REAC [REP1-015 and CR1-109]**).

Waste Management

- Avoid bonfires and burning of waste materials (**D-AQ-040** of the **REAC [REP1-015 and CR1-109]**).

Measures Specific to Demolition (only applicable to Decommissioning)

- Ensure effective water suppression is used during decommissioning demolition operations (**D-AQ-037** of the **REAC [REP1-015 and CR1-109]**).
- Bag and remove any biological debris or damp down such material before demolition (**D-AQ-038** of the **REAC [REP1-015 and CR1-109]**).

Measures Specific to Earthworks

- Following excavation works, return subsoil and topsoil at the earliest suitable time of year after construction has been completed (**D-AQ-024** of the **REAC [REP1-015 and CR1-109]**).
- Only remove the cover in small areas during work and not all at once (**D-AQ-041** of the **REAC [REP1-015 and CR1-109]**).

Measures Specific to Construction

- Avoid scabbling (roughening of concrete surfaces) if possible (**D-AQ-025** of the **REAC [REP1-015 and CR1-109]**).
- For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust (**D-AQ-026** of the **REAC [REP1-015 and CR1-109]**).

Measures Specific to Trackout

- All construction plant and equipment will be maintained in good working order (**D-AQ-027** of the **REAC [REP1-015 and CR1-109]**).
- Use water-assisted dust sweepers on the access and local roads, to remove, as necessary, any material tracked out of the site (**D-AQ-028** of the **REAC [REP1-015 and CR1-109]**).
- Avoid dry sweeping of large areas where possible (**D-AQ-029** of the **REAC [REP1-015 and CR1-109]**).
- Ensure vehicles carrying materials are appropriately covered when entering and leaving sites to prevent escape of materials during transport (**D-AQ-030** of the **REAC [REP1-015 and CR1-109]**).
- Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable (**D-AQ-031** of the **REAC [REP1-015 and CR1-109]**).
- Record all inspections of haul routes and any subsequent action in a site log book (**D-AQ-032** of the **REAC [REP1-015 and CR1-109]**).

- Where works are undertaken in built-up areas, install haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowzers and regularly cleaned (**D-AQ-033** of the **REAC [REP1-015 and CR1-109]**).
- Access points to the local highway will be prepared with temporary hard surfacing and wheel-washing facilities (**D-AQ-034** of the **REAC [REP1-015 and CR1-109]**).

WHEEL WASHING

- 2.1.6. Wheel-washing facilities should be located a short distance from access points to local highways to enable removal of caked earth or other matter from vehicles such that trackout is minimised.
- 2.1.7. Temporary hard surfacing should be regularly washed during dry weather conditions to ensure that dust from any dried soiled water is not suspended in the air or tracked out to the local highway.
- 2.1.8. Consideration should be given to the addition of rumble strips prior to wheel washing to remove larger areas of earth soiling from vehicles before soiled water from the wheel wash is created.

CEMENT HANDLING

- 2.1.9. Where cement is used on any part of the construction additional best practice control measures from Defra Process Guidance Note 3/01(12) (**Ref 1.3**) should be considered.

3. MONITORING STRATEGY

3.1. SITE MONITORING

- 3.1.1. Visual site monitoring during the construction phase should be undertaken on a minimum daily basis as part of a general site walkover. This frequency should be increased during any activities with a high potential for fugitive dust generation and during any prolonged dry and windy meteorological conditions. Any observations of note should be recorded in the site log book along with any additional measures or actions taken. An example dust log report form is provided in **Annex A**.
- 3.1.2. Off-site inspections (up to a minimum distance of 50m from the site boundary) should be undertaken as appropriate to ensure that the active site mitigation measures are functioning correctly. Roads should be visually inspected for trackout debris, and where appropriate nearby residential receptors should be inspected for nuisance dust. Areas such as windows, window sills and private vehicles can be indicative areas of dust settlement. It is also advisable to have a sample smooth surface set up on-site as a visual indicator.
- 3.1.3. The site log book should contain records of all incidents, complaints and exceptional fugitive dust events.
- 3.1.4. Any dust deposition flux or continuous particulate monitoring should be implemented in coordination with the relevant local authority Environmental Health Department. The IAQM Monitoring in the Vicinity of Demolition and Construction Sites Version 1.1 guidance (**Ref 1.2**) on where and how to install particulate monitors correctly shall be followed. Any monitoring should be sited to take account of dust producing activities on the application site, the proximity of sensitive receptors, and the direction of prevailing winds. Site action levels for dust deposition from the IAQM guidance are listed as:
- 190µg/m³ 1-hour mean for continuous monitors;
 - 200mg/m²/day where deposition gauges are used; and
 - 5% Effective Area Coverage (EAC)/day for sticky pads.
- 3.1.5. Should any of these action levels be triggered site works should be paused in order to identify and mitigate the cause of excessive fugitive dust emissions before recommencing and a record made in the site log book.
- 3.1.6. All log books and incident records should be made available to relevant local authorities upon request.

3.2. METEOROLOGICAL DATA

Meteorological data for Hawarden for 2021 is shown in

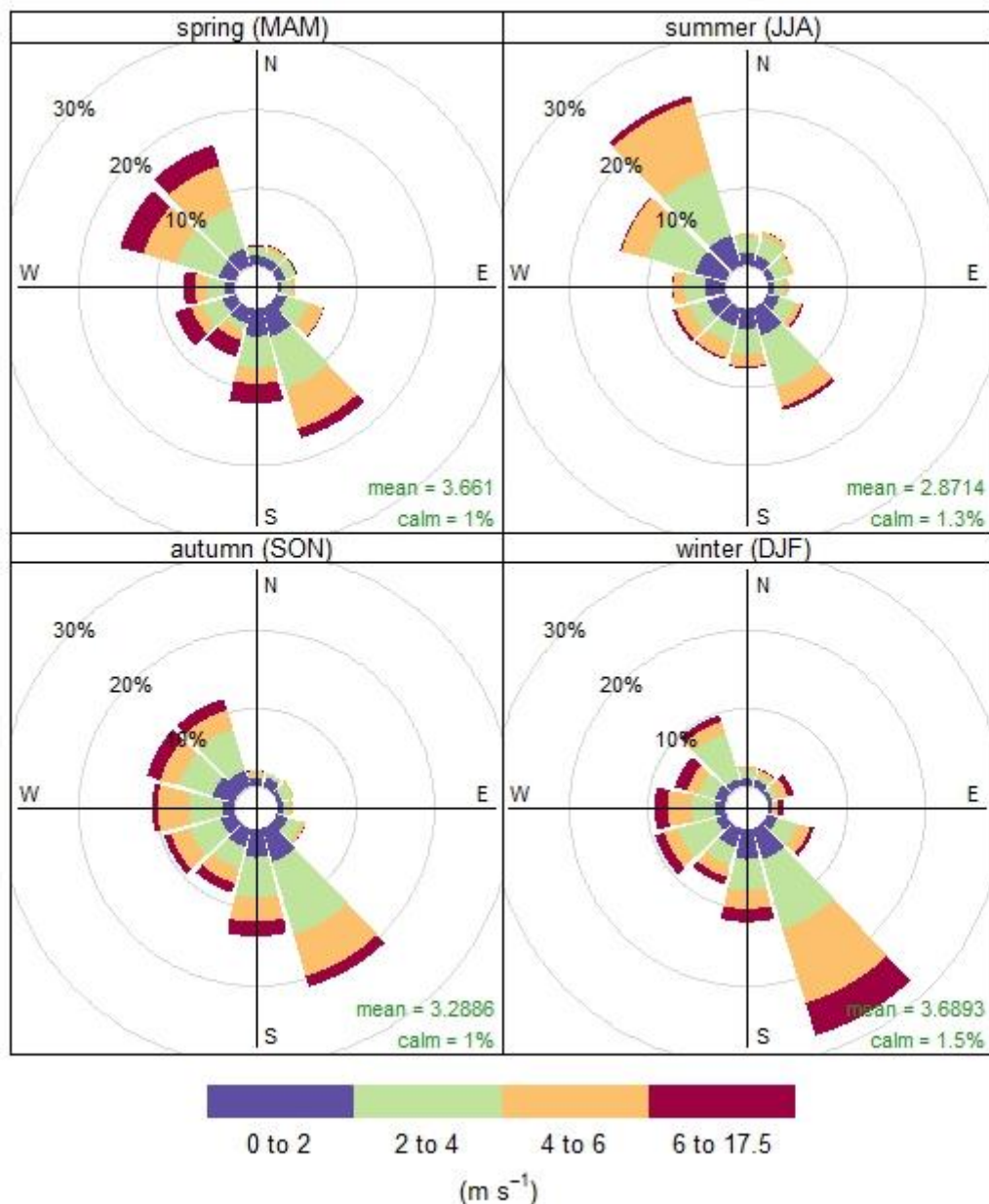


Figure 3-1 . The data is broken down seasonally due to changes in wind direction and intensity over the course of one year.

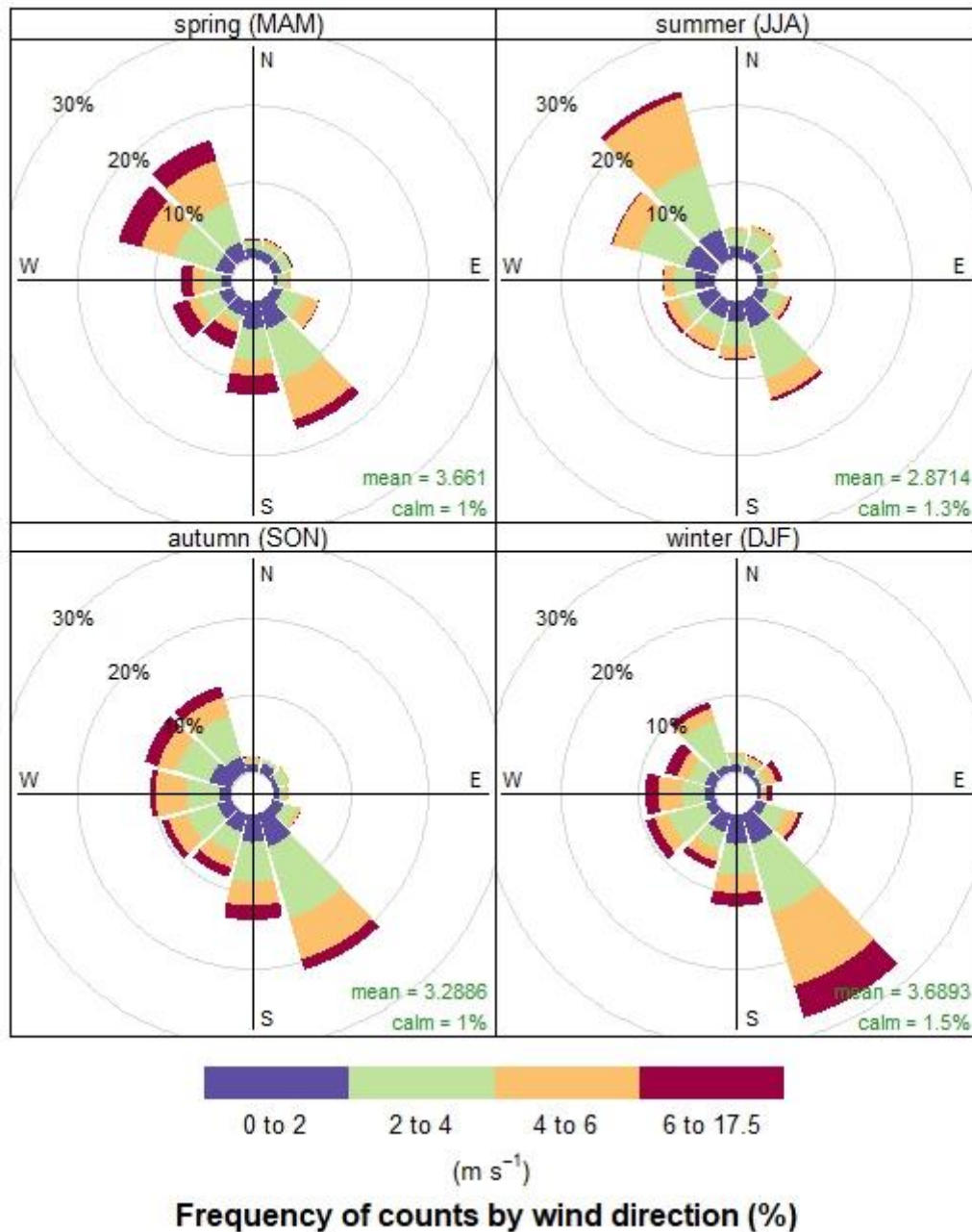


Figure 3-1 – Seasonal Meteorological Data for Hawarden for 2021

- 3.2.1. As well as informing the appropriate application of mitigation measures, meteorological data can be used to assist investigation of any complaints that arise, or the observation of fugitive dust soiling outside of the site during routine inspections.

4. COMMUNITY ENGAGEMENT

4.1. COMMUNICATION

- 4.1.1. Stakeholder communication should be undertaken regularly throughout the course of the DCO Proposed Development construction period. This will be especially necessary due to the linear nature of the DCO Proposed Development and the short timescales when work might be occurring at any one location along the pipeline. Community engagement should take the form of meetings, letter drops and notifications using social media. Communication should occur prior to the commencement of works in any given project location and should include details of the nature of the works to be undertaken and the mitigation in place to prevent nuisance and fugitive dust.
- 4.1.2. The DCO Proposed Development should be registered under a construction body with a defined code of construction conduct such that the project, its contractors and sub-contractors are transparent and accountable. Any complaints received as part of the community engagement procedure should be the responsibility of the relevant Site Manager.

4.2. COMPLAINTS PROCEDURE

- 4.2.1. All complaints should be investigated and evidence of the investigation recorded in the site records. Part of the communication procedure within the Community Engagement program should seek to inform that in order to effectively investigate complaints it is essential that the relevant site is informed immediately either by the complainant themselves or by the relevant regulating authority.
- 4.2.2. Site contact details should be clearly displayed at the site entrance and nearby local residents should be encouraged to immediately contact the site or the relevant regulating authority as part of good neighbourly practice. Contact details for the regulating authorities are:
- Environment Agency Incident (Hotline) 0800 80 70 60
 - Cheshire West and Chester Borough Council 0300 123 8123
 - Flintshire County Council 01352 703 440
- 4.2.3. All complaints should be recorded and the record kept with the site logs. The record of the complaint should include details of the complainant, site conditions, meteorological conditions at the time of the complaint and the action taken to investigate, and if necessary, mitigate the circumstances leading to the complaint have occurred. An example of a complaints form is presented in **Annex B**. Details of all complaints should be made available to the relevant authorities on request.

- 4.2.4. Where investigation of a complaint is found to be valid, the Site Manager will ensure that all proposed mitigation is in place and functioning correctly. Should the conditions leading to the complaint persist, then the Site Manager should stop the works in order to apply further mitigation. The complainant should be informed of the additional actions taken.
- 4.2.5. Where a complaint is investigated and found not to be as a result of works undertaken at the site and that all mitigation is in place and functioning correctly then the complainant should be informed of the investigations undertaken and that the site is not responsible.

5. RESPONSIBILITIES

- 5.1.1. The Dust Management Plan is a live document, and the monitoring procedures, responsibilities and compliance actions will be updated as appropriate. It is the responsibility of the Site Manager or their designated deputy to be aware of its contents, to provide relevant training to staff and to ensure that procedures are being implemented to achieve compliance with this document. This will include ensuring that all Site personnel are made aware of the scope and contents of the document. All staff will therefore be responsible for minimising any dust emissions from the Site during the construction period.
- 5.1.2. During the hours of Site operation, it will be supervised by at least one member of staff who is suitably trained and conversant with the requirements of the Outline Dust Management Plan with respect to:
- Operational controls and environmental monitoring;
 - Site maintenance (site inspection checklist);
 - Record keeping; and
 - Emergency action plans.
- 5.1.3. The Site Manager will have overall responsibility relating to air quality during the construction and demolition period and may delegate responsibilities to others.
- 5.1.4. The appropriate resources will be supplied to cover the requirements of this document and the Site Manager will ensure that these are communicated effectively and acted upon in an appropriate manner. Key roles and responsibilities relating to air quality are detailed in **Table 5.1**.

Table 5.1 – Key Roles and Responsibilities Relating to Air Quality

Role	Responsibilities
Site Manager	Ensure that the mitigation and monitoring requirements laid out in the Outline Dust Management Plan are carried out during works on site.
	Ensure that staff are aware of the requirements of the Outline Dust Management Plan and have access to the document. Regular training of staff will be implemented.
	Undertake and record dust inspections of the site as required by the Outline Dust Management Plan.
	Ensure that site documentation (including method statements and risk assessments) includes dust mitigation.
	Act on complaints and dust alerts as detailed in the Outline Dust Management Plan.

Role	Responsibilities
	Maintain up-to-date site log of air quality events and complaints.
	Investigate the cause of air quality events and apply additional mitigation as required.
	Act as the key point of contact for queries and complaints regarding air quality emissions from Site.
All site personnel	Carry out the works in line with the Outline Dust Management Plan requirements.
	Report observations of dust events or deviations from the Outline Dust Management Plan procedures.
	Attend environmental management training.

6. SUMMARY

- 6.1.1. This Outline Dust Management Plan has been produced as part of the suite of measures to minimise the environmental impact of works at the site. It draws information from the Environmental Statement (Volume II) Chapter 6 – Air Quality **[APP-058]** and the Environmental Statement (Volume III) Appendix 6.1 Construction Dust Assessment **[APP-081]** on the activities to be undertaken on site and presents the result of the assessment of the risk of dust impacts.
- 6.1.2. Mitigation measures from the Environmental Statement (Volume II) Chapter 6 – Air Quality **[APP-058]**, the Environmental Statement (Volume III) Appendix 6.1 Construction Dust Assessment **[APP-081]** and the REAC **[REP1-015 and CR1-109]** which are to be applied at all locations where construction activities are undertaken.
- 6.1.3. The Dust Management Plan is intended to be a flexible, working document that will be available on site to all personnel with a responsibility for management of dust creating activities. The contents of the Dust Management Plan may be subject to review by the Site Manager or site environmental manager following any dust producing incidents or receipt of complaints regarding dust that are upheld following investigation.
- 6.1.4. All updates to the Dust Management Plan are to be agreed with the Site Manager, Site Environmental Manager and the relevant regulating authority.

7. REFERENCES

Ref 1.1 – Institute of Air Quality Management (2016). Guidance on the assessment of dust from demolition and construction. Available at:

[REDACTED]

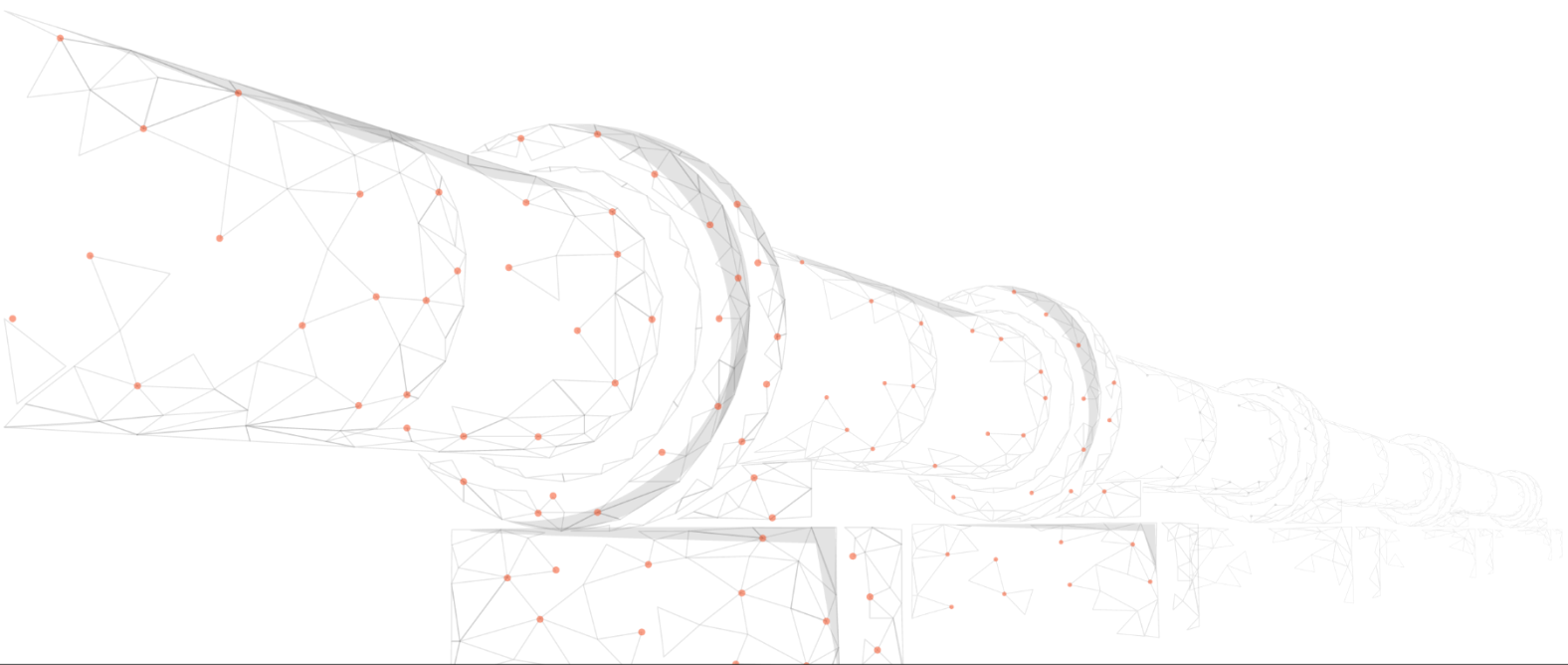
Ref 1.2 – Institute of Air Quality Management (2018). Guidance on air quality monitoring in the vicinity of demolition and construction sites. Available at:

[REDACTED]

[REDACTED]

Ref 1.3 – Defra (2012). Process Guidance Note 3/01(12) Statutory guidance for blending, packing, loading, unloading and use of cement. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573004/blending-packing-loading-unloading-and-use-of-cement-process-guidance-note-3-01_12_.pdf

Annexures



Annex A

DUST LOG REPORT FORM

Dust Log					
Date Site Name	Weather	Dry		Wet	
	Wind Direction (from)	N	S	E	W
		NE	NW	SE	SW
	Wind Speed	Calm	Low	Moderate	High
Daily Site Activities <i>This section should outline the planned daily activities on the site for the day.</i>					
Incidents/Complaints/Alerts <i>Record details of the incident/complaint/alert, to whom and how it was reported and what time. What was the cause of the incident/complaint/alert and where did it take place? Add detail to Dust Complaint Form.</i>					
Action Undertaken <i>Who undertook the site inspection, at what time and was the elevated dust due to site activities or off-site activities? What was done to minimise the dust levels and was this effective?</i>					
Follow-Up Action <i>Where there any follow up actions undertaken such as informing stakeholders, re-training staff, request for an updated to the DPMP or contacting the complainant if necessary?</i>					

Annex B

DUST COMPLAINTS FORM

Incident Details	
Complainant Name	
Address	
Postcode	
Complainant Contact Details	
Tel	
Email	
Date	
Complaint Ref Number	
Complaint Details	
Investigation Details	
Investigation carried out by	
Position	
Date & time investigation carried out	
Weather conditions	
Wind direction and speed	
Investigation findings	
Feedback given to Environment Agency and/or local authority	
Date feedback given	
Feedback given to public	
Date feedback given	
Review and Improve	
Improvements needed to prevent a reoccurrence	
Proposed date for completion of the improvements	
Actual date for completion	
If different insert reason for delay	
Does the dust management plan need to be updated	
Date that the dust management plan was updated	
Closure	
Site Manager review date	
Site Manager signature to confirm no further action required	