The Great Grid Upgrade

Sea Link

Preliminary Environmental Information Report

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Part 3 Kent Onshore Scheme

Appendix 3.9.A Construction Dust Assessment and Methodology

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3.9.A Construction Dust Risk Assessment and Methodology

3.9.A.1 The dust risk assessment has been carried out in accordance with the Institute of Air Quality Management (IAQM) construction dust guidance (Ref. 3.9.A.1).

3.9.A.2 The steps for assessing dust emissions in accordance with the IAQM construction dust guidance are detailed in the following sections.

Step 1

3.9.A.3 Step 1 screens the requirement for a more detailed assessment. Should human receptors be identified within 250 m of the boundary or 50 m from the construction vehicle route up to 250 m from the site entrance, then the assessment proceeds to Step 2. Additionally, should ecological receptors be identified within 50 m of the site or 50 m from the construction vehicle route up to 250 m from the site entrance, then the assessment also proceeds to Step 2.

3.9.A.4 Should sensitive receptors not be present within the relevant distances then negligible impacts would be expected and further assessment is not necessary.

Step 2

3.9.A.5 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 magnitude of dust arising as: small, medium or large (Step 2A); and,
- The sensitivity of the area to dust impacts, which is defined as low, medium or high sensitivity (Step 2B).

3.9.A.6 The two factors are combined in Step 2C to determine the risk of dust impacts without mitigation applied.

3.9.A.7 Step 2A defines the potential magnitude of dust emission through the construction phase. The relevant criteria are summarised in Table 3.9.A.1.

Table 3.9.A.1 Construction Dust - Magnitude of Emission (Ref. 3.9.A.1)

Magnitude	Activity	Criteria
Large	Demolition	Total building volume greater than 75,000 m^3 Potentially dusty construction material (e.g. concrete) On-site crushing and screening Demolition activities greater than 12 m above ground level
	Earthworks	Total site area greater than 110,000 m^2

Magnitude	Activity	Criteria
		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 75,000 m^3 On site concrete batching Sandblasting
	Trackout	More than 50 HDV trips per day Potentially dusty surface material (e.g. high clay content) Unpaved road length greater than 100m
Medium	Demolition	Total building volume 12,000 m^3 to 75,000 m^3 Potentially dusty construction material Demolition activities 6 m to 12 m above ground level
	Earthworks	Total site area 18,000 m^2 to 110,000 m^2 Moderately dusty soil type (e.g. silt) 5 to 10 heavy earth moving vehicles active at any one time Formation of bunds 3 m to 6 m in height
	Construction	Total building volume 12,000 m^3 to 75,000 m^3 Potentially dusty construction material (e.g. concrete) On site concrete batching
	Trackout	20 to 50 HDV trips per day Moderately dusty surface material (e.g. high clay content) Unpaved road length 50 m to 100 m
Small	Demolition	Total building volume under 12,000 m^3 Construction material with low potential for dust release (e.g. metal cladding or timber) Demolition activities less than 6 m above ground level Demolition during wetter months
	Earthworks	Total site area less than 18,000 m^2 Soil type with large grain size (e.g. sand) Less than 5 heavy earth moving vehicles active at any one time

Magnitude	Activity	Criteria
		Formation of bunds less than 3 m in height
	Construction	Total building volume less than 12,000 m^3 Construction material with low potential for dust release (e.g. metal cladding or timber)
	Trackout	Less than 20 HDV trips per day Surface material with low potential for dust release Unpaved road length less than 50m

3.9.A.8 Step 2B defines the sensitivity of the area around the Proposed Project to potential dust impacts. The influencing factors are shown in Table 3.9.A.2.

Table 3.9.A.2 Construction Dust - Examples of Factors Defining Sensitivity of an Area (Ref. 3.9.A.1)

Receptor Sensitivity	Examples	
	Human Receptors	Ecological Receptors
High	Users expect high levels of amenity The appearance, aesthetics or value of the property would be diminished by soiling 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, 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 as part of the normal pattern of use of the land e.g. parks and places of work	Nationally designated site e.g. Sites of Special Scientific Interest 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
Low	Enjoyment of amenity would not reasonably be expected Property would not be expected to be diminished in appearance 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	Locally designated site e.g. Local Nature Reserve where the features may be affected by dust deposition

3.9.A.9 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 if relevant 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.

3.9.A.10 These factors were considered during the undertaking of the assessment.

3.9.A.11 The criteria for determining the sensitivity of the area to dust soiling effects on people and property is summarised in Table 3.9.A.3.

Table 3.9.A.3 Construction Dust - Sensitivity of the Area to Dust Soiling Effects on People and Property (Ref. 3.9.A.1)

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	Low	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

3.9.A.12 Table 3.9.A.4 outlines the criteria for determining the sensitivity of the area to human health impacts.

Table 3.9.A.4 Construction Dust - Sensitivity of the Area to Human Health Impacts (Ref. 3.9.A.1)

Receptor Sensitivity	Annual Mean PM_{10} Conc.	Number of Receptors	Distance from the Source (m)				
			Less than 20	Less than 50	Less than 100	Less than 200	Less than 350
High	Greater than 32µg/m^3	More than 100	High	High	High	Medium	Low
		10 - 100	High	High	Medium	Low	Low
		1 - 10	High	Medium	Low	Low	Low
	28-32µg/m^3	More than 100	High	High	Medium	Low	Low
		10 - 100	High	Medium	Low	Low	Low
		1 - 10	High	Medium	Low	Low	Low
	24-28µg/m^3	More than 100	High	Medium	Low	Low	Low
		10 - 100	High	Medium	Low	Low	Low
		1 - 10	Medium	Low	Low	Low	Low
	Less than 24µg/m^3	More than 100	Medium	Low	Low	Low	Low
		10 - 100	Low	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
Medium	Greater than 32µg/m^3	More than 10	High	Medium	Low	Low	Low
		1 - 10	Medium	Low	Low	Low	Low
	28-32µg/m^3	More than 10	Medium	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
	24-28µg/m^3	More than 10	Low	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
		More than 10	Low	Low	Low	Low	Low

Receptor Sensitivity	Annual Mean PM_{10} Conc.	Number of Receptors	Distance from the Source (m)				
			Less than 20	Less than 50	Less than 100	Less than 200	Less than 350
	Less than 24µg/m^3	1 - 10	Low	Low	Low	Low	Low
Low	-	More than 1	Low	Low	Low	Low	Low

3.9.A.13 Table 3.9.A.5 outlines the criteria for determining the sensitivity of the area to ecological impacts.

Table 3.9.A.5 Construction Dust - Sensitivity of the Area to Ecological Impacts (Ref. 3.9.A.1)

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

3.9.A.14 Step 2C combines the dust emission magnitude with the sensitivity of the area to determine the risk of unmitigated impacts.

3.9.A.15 Table 3.9.A.6 outlines the risk category from demolition activities.

Table 3.9.A.6 Construction Dust - Dust Risk Category from Demolition Activities (Ref. 3.9.A.1)

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

3.9.A.16 Table 3.9.A.7 outlines the risk category from earthworks and construction activities.

Table 3.9.A.7 Construction Dust - Dust Risk Category from Earthworks and Construction Activities (Ref. 3.9.A.1)

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

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

3.9.A.17 Table 3.9.A.8 outlines the risk category from trackout activities.

Table 3.9.A.8 Construction Dust - Dust Risk Category from Trackout Activities (Ref. 3.9.A.1)

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

Step 3

3.9.A.18 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

3.9.A.19 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 activity, the aim should be to control effects using effective mitigation. Experience shows that this is normally possible, hence the residual effect will normally be not significant.

Construction Dust Risk Assessment

Step 1

3.9.A.20 The Kent Onshore Scheme Proposed Project has the potential to generate dust which could be harmful to human health and ecology. This construction dust assessment has been carried out to assess the risk associated with dust emissions from construction related activities associated with the Kent Onshore Scheme.

3.9.A.21 The undertaking of activities such as installing underground cables, stripping topsoil and installing access tracks has the potential to result in fugitive dust emissions throughout the construction works. 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.

3.9.A.22 This assessment has been undertaken based on the draft Order Limits for assessing earthworks and construction activities, and the permanent access routes (including permanent access routes to Minster converter station and substation) and haul routes

for assessing trackout as shown in **Figure 3.9.A.1 Kent Construction Dust Assessment Study Area.**

3.9.A.23 The desk-study using Google Earth and MAGIC (Ref 2.9.A.2) identified a number of sensitive receptors within 250m of the site boundary. As such, a detailed assessment of potential dust impacts has been undertaken.

Step 2

3.9.A.24 The following section assesses the risk of potential dust impacts of each of the four potential dust generating activities.

Demolition

3.9.A.25 No demolition is proposed for the Kent Onshore Scheme therefore demolition is not considered in the rest of the assessment.

Earthworks

3.9.A.26 The total area of the site where earthworks are being undertaken is between 18,000 m^2 and 110,000 m^2, the soil type includes clay which has potential to be dusty when disturbed. On this basis, the potential magnitude of dust emissions from earthworks is expected to be **medium**.

Construction

3.9.A.27 The total building volume is likely to be greater than 75,000 m^3 and construction materials will include concrete and aggregates which have the potential to be dusty. Information about onsite concrete batching is as yet unknown, but based on the size and material types, the potential magnitude of dust emissions from construction is considered to be **large** as a worst case.

Trackout

3.9.A.28 In the peak construction year (2029), there are likely to be days when there are over 50 HDV movements on site, according to the preliminary traffic data. All of these movements will access the site from Bellmouth K-BM02 in the peak year. The access routes are likely to be surfaced and therefore limit dust suspension, but risk is still considered **large** due to the number of HDV movements.

3.9.A.29 The dust emission magnitude for each dust generating activity is summarised in Table 3.9.A.9.

Table 3.9.A.9 Construction Dust - Magnitude of Emission

Activity	Dust Emission Magnitude
Demolition	N/A
Earthworks	Medium
Construction	Large
Trackout	Large

3.9.A.30 Receptors sensitive to potential dust impacts were approximated from a desktop study of the area up to 350m from the site boundary for earthworks and construction (**Figure 3.9.A.2 Construction Dust Receptor Distance Bands for Earthworks and Construction Activities**), and up to 50m from the road network within 500m of the site access for trackout (**Figure 3.9.A.3 Construction Dust Receptor Distance Bands for Trackout Activities**), based on the site being classed as large in size (trackout may occur up to 500m from large sites, 200 m from medium sites and 50m from small sites, as measured from the site exit(s) in accordance with the IAQM construction dust guidance (Ref. 3.9.A.1). These are summarised in Table 3.9.A.10 below.

Table 3.9.A.10 Approximate Number of Dust Sensitive Receptors

Distance from Site (m)	Approximate Number of Human Receptors and Sensitivities	Number of Ecological Receptors and Sensitivities
Earthworks and Construction		
Less than 20	>1 Receptor(s) with High Sensitivity	>1 Receptor(s) with High Sensitivity
Less than 50	>1 Receptor(s) with High Sensitivity	>1 Receptor(s) with High Sensitivity
Less than 100	>1 Receptor(s) with High Sensitivity	
Less than 200	10 to 100 Receptor(s) with High Sensitivity	
Less than 350	10 to 100 Receptor(s) with High Sensitivity	
Trackout		
Less than 20	>1 Receptor(s) with Low Sensitivity	>1 Receptor(s) with Medium Sensitivity
Less than 50	>1 Receptor(s) with High Sensitivity	>1 Receptor(s) with Medium Sensitivity

3.9.A.31 Using the number of receptors and receptor sensitivities determined in Table 3.9.A.10 and the criteria outlined in Table 3.9.A.3, Table 3.9.A.4 and Table 3.9.A.5, the overall sensitivity of the receiving environment to specific dust impacts is summarised in Table 3.9.A.11. In accordance with the IAQM construction dust guidance (Ref. 3.9.A.1), only the highest level of area sensitivity from the able needs to be considered. As such, as residential properties are present (high sensitivity), lower levels of sensitivity, such as farmland and footpaths, have not been considered for earthworks and construction.

Table 3.9.A.11 Summary of the Sensitivity of the Study Area

Potential Impact	Sensitivity of the surrounding area		
	Earthworks	Construction	Trackout
Dust soiling	Medium Sensitivity	Medium Sensitivity	Low Sensitivity
Human health*	Low Sensitivity	Low Sensitivity	Low Sensitivity
Ecological	Medium Sensitivity	Medium Sensitivity	Medium Sensitivity

**Based on the maximum background concentration being less than 24µg/m³ (Table 3.9.16 Volume 1, Part 3, Chapter 9)*

Table 3.9.A.12 Summary of the Risk of Dust Effects

Potential Impact	Potential Risk		
	Earthworks (Medium)	Construction (Large)	Trackout (Large)
Dust soiling	Medium Risk	Medium Risk	Low Risk
Human health	Low Risk	Low Risk	Low Risk
Ecological	Medium Risk	Medium Risk	Medium Risk

3.9.A.32 As indicated in Table 3.9.A.12, the potential risk of dust soiling is medium for earthworks and construction and low for trackout. The potential risk of human health impacts is low for all activities. The potential risk of ecological impacts is medium for all activities. The assessment has therefore indicated that the risk of dust effects is medium as a worst case for the Kent Onshore Scheme.

3.9.A.33 It should be noted that the potential for impacts depends upon 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 boundary of the draft Order Limits closest to each sensitive area. Therefore, actual risk is likely to be lower than that predicted during the majority of the construction phase.

Step 3

3.9.A.34 The IAQM construction dust guidance (Ref. 3.9.A.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 Proposed Project based on the risk of dust effects for each activity and for the overall site (Table 3.9.A.12) and are summarised in Table 3.9.A.13 These measures have been incorporated into the CoCP.

Table 3.9.A.13 Proposed Dust Mitigation Measures based on the IAQM Construction Dust Guidance for the Kent Onshore Scheme

Mitigation Measure	H=Highly Recommended D=Desirable N=Not Required	CoCP Measure Reference Number
Communications		
Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.	H	GG27
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.	H	GG04
Display the head or regional office contact information.	H	GG10
Dust Management		
Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority.	H	AQ01
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	GG27
Make the complaints log available to the local authority when asked.	H	GG27
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 log book.	H	AQ01
Monitoring		
Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the Local Authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of site boundary, with cleaning to be provided if necessary.	D	GG04, AQ02
Carry out regular site inspections to monitor compliance with the DMP, record inspection	H	AQ01

Mitigation Measure	H=Highly Recommended D=Desirable N=Not Required	CoCP Measure Reference Number
results, and make an inspection log available to the local authority when asked.		
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	AQ02
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. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction.	H	AQ02
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	AQ009
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	AQ01
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	AQ01
Avoid site runoff of water or mud.	H	GG16
Keep site fencing, barriers and scaffolding clean using wet methods.	H	GG26
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	AQ06
Cover, seed or fence stockpiles to prevent wind whipping.	H	GG20
Operating vehicle/machinery and sustainable travel		

Mitigation Measure	H=Highly Recommended D=Desirable N=Not Required	CoCP Measure Reference Number
Ensure all on-road vehicles comply with the relevant standards, where applicable	H	AQ07
Ensure all vehicles switch off engines when stationary - no idling vehicles.	H	GG13
Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.	H	AQ03
Impose and signpost a maximum-speed-limit on unsurfaced haul roads and work areas-.	D	AQ04
Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.	H	GG30
The CTMP will set out measures to reduce route and journey mileage to and from and around site and includes measures to support and encourages sustainable travel (public transport, cycling, walking, and car-sharing).	D	TT01
Operations		
Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.	H	GG19
Use enclosed chutes and conveyors and covered skips.	H	AQ05
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	AQ05
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	GG28
Waste Management		
Avoid bonfires and burning of waste materials.	H	GG21
Earthworks		

Mitigation Measure	H=Highly Recommended D=Desirable N=Not Required	CoCP Measure Reference Number
Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.	D	GG20
Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.	D	AQ06
Construction		
Avoid scabbling (roughening of concrete surfaces) if possible.	D	AQ06
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	AQ07
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.	D	AQ06
For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust.	D	AQ06
Trackout		
Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.	H	GG19
Avoid dry sweeping of large areas.	H	GG19
Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.	H	AQ05
Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	H	AQ04
Record all inspections of haul routes and any subsequent action in a site log book.	H	AQ04

Mitigation Measure	H=Highly Recommended D=Desirable N=Not Required	CoCP Measure Reference Number
Where required, install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.	H	GG18
Where required, implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).	H	GG18
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	GG17
Access gates to be located at least 10 m from receptors where possible.	H	GG126

Step 4

3.9.A.35 Assuming the relevant mitigation measures outlined in Table 3.9.A.13 are implemented, the residual effect from all dust generating activities is predicted to be **not Significant** for the Kent Onshore Scheme.

References

Ref. 3.9.A.1 Institute of Air Quality Management (2023) Assessment of Dust from Demolition and Construction V2.1.

Ref. 3.9.A.2 Department for Environment, Food & Rural Affairs (2023) MAGIC Map. [online] Available at: https://magic.defra.gov.uk/MagicMap.aspx [Accessed 18 April 2023].

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