

**TECHNICAL APPENDIX
13.7: LOUND PFA
PROCESSING FACILITY
DUST MANAGEMENT PLAN**

Prepared for: **Lound Hive Ltd**

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1.0 Introduction

This Dust Management Plan (DMP) has been prepared in support of the Environmental Permit application for the processing of pulverised fuel ash (PFA) extracted from historic ash disposal lagoons and has also been submitted as an appendix (Volume 3, Appendix 13.7) to the Environmental Statement associated with the planning application.

The implementation of the DMP shall be under the control of the site management. This plan shall be incorporated into the site procedures and shall be revised as necessary to ensure that it remains appropriate to the activities occurring on site and that any changes in conditions relating to dust management are dealt with as part of those revisions. In particular, the monitoring procedures and compliance actions would be updated as required by the procedures within the DMP.

The location of the 'Site' is approximately 500m south of the village of Lound; 400m south east of Sutton-cum-Lound and Retford is located approximately 1.5km south.

1.1 Key Guidance and Methodology

In developing the DMP key guidance documents that have been consulted include:

- Mineral Industry Research Organisation (MIRO), *Good practice guide: control and measurement of nuisance dust and PM₁₀ from the extractive industries* (2011)¹. The guidance provides best practice in terms of dust control and content of DMPs; and
- Institute of Air Quality Management (IAQM), *Guidance on the Assessment of Mineral Dust Impacts for Planning* (2016)². The guidance includes a methodology for risk assessment of dust from mineral sites which can be used as the basis for defining appropriate mitigation.

1.2 Overview Of Operations and Structure of Dust Management Plan

The 'Proposed Development' comprises the extraction, processing, storage and transportation of PFA from the former ash disposal lagoons at the Site in order to produce a product that meets the 'end-of-waste' criteria required for its use in construction activities. The resultant lagoon voids would be progressively restored using in-situ overburden and soils.

The Proposed Development would consist of a Processing Areas 1-3 for initial pre-screening and dewatering of the extracted PFA as well as the Main Processing Site located to the south of the extraction area. The location of the Processing Areas would change as extraction progresses across the Site, hereafter referred to as 'PA1', 'PA2' and 'PA3'.

The DMP is an active document which requires periodic evaluation and updating as operations and circumstances change. The principal mechanisms of formulating and continually improving a DMP are presented in Figure 1-1.

¹ MIRO, *Good practice guide: control and measurement of nuisance dust and PM₁₀ from the extractive industries*, Issue 1 February 2011.

² IAQM, *Guidance on the Assessment of Mineral Dust Impacts for Planning*, v1.1 May 2016.

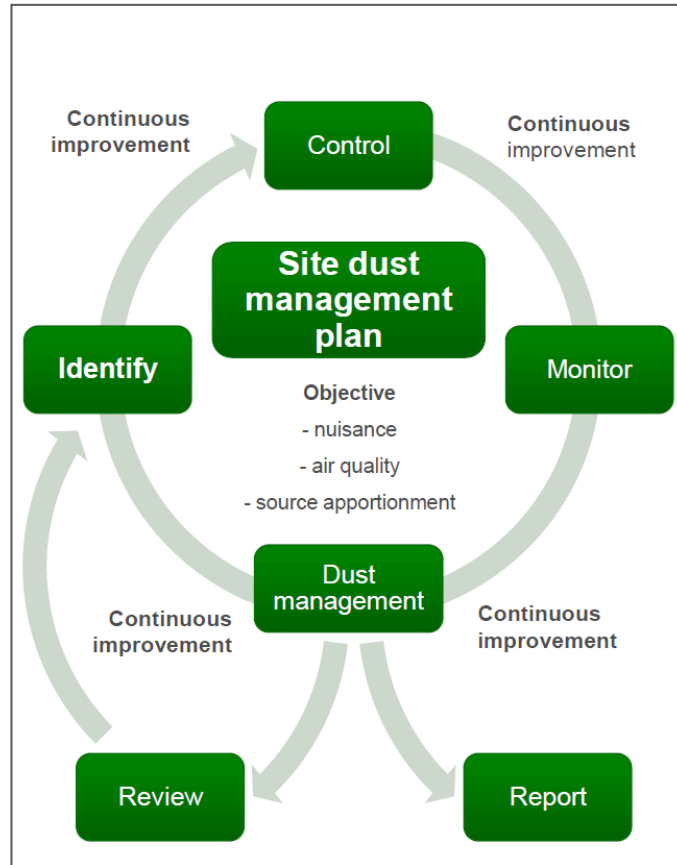


Figure 1-1
Dust Management Plan Process³

³ Reproduced from MIRO¹

2.0 Dust Sources and Influencing Factors

2.1 Site Setting and Receptors

The Site is predominantly surrounded by low-lying agricultural land with isolated properties in the locale. The villages of Lound and Sutton-cum-Lound are located approximately 500m north and 400m north west respectively.

The River Idle runs to the east of the Site, with a number of large surface water features associated with former mineral workings alongside. The Wetlands Fishery is located immediately to the north of the Site and the Idle Valley Nature Reserve is located to the north-east. The Sutton & Lound Gravel Pits Site of Special Scientific Interest (SSSI) lies adjacent to the south and eastern boundary of the Site.

Figure 2-1, Volume 2 indicates the site setting and receptor locations within 250m of the Site boundary.

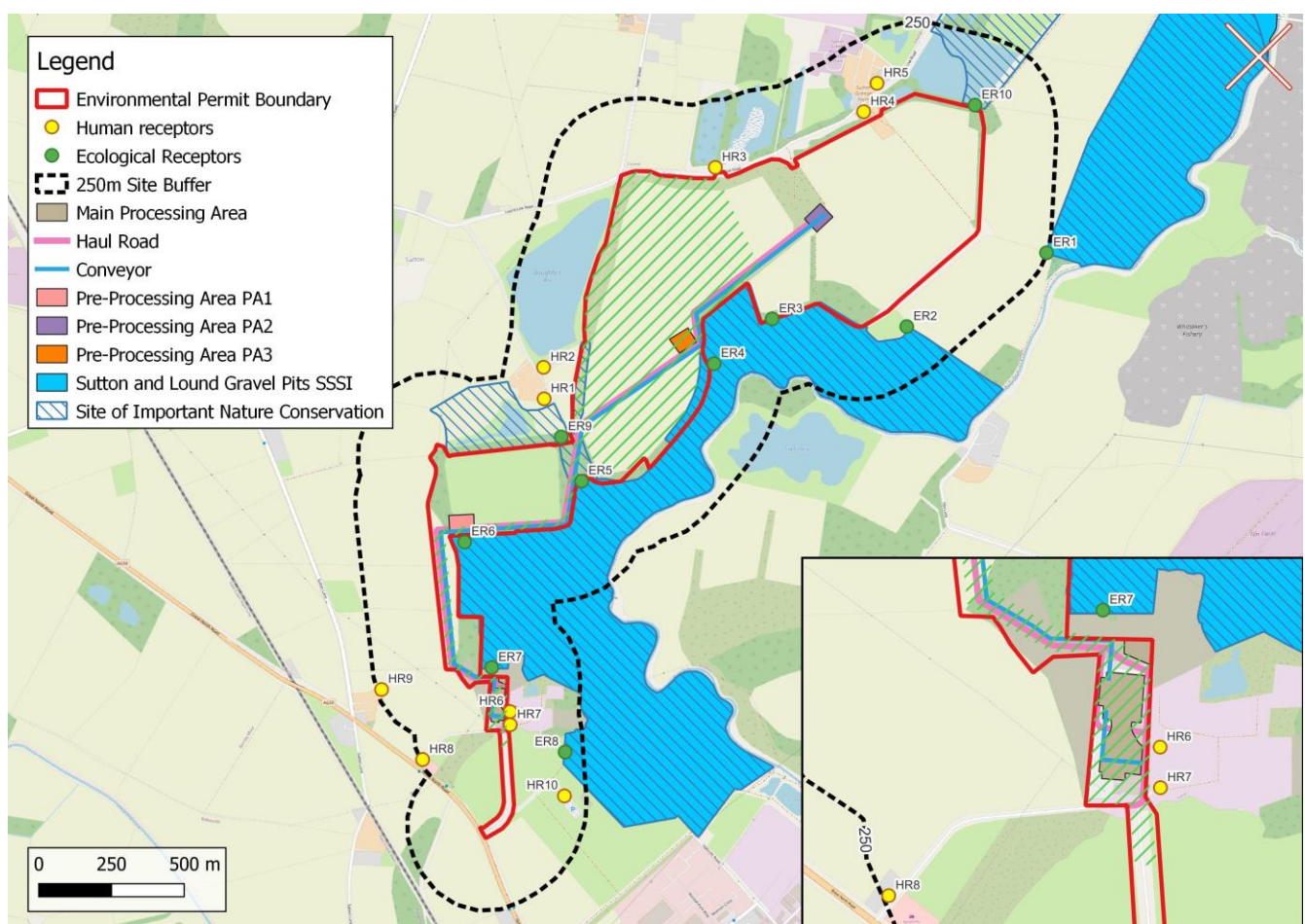


Figure 2-1
Site Setting and Receptors

2.2 Meteorological Conditions

The most important climatic parameters governing the release and dispersal of fugitive emissions from the development are wind speed, direction and rainfall:

- wind direction determines the broad direction of dispersal;

- wind speed affects ground level concentrations by increasing the initial dilution of pollutants in the emission. It will also affect the potential for dust entrainment; and
- rainfall naturally suppresses dust release.

A wind rose from Doncaster, Sheffield Meteorological Station, located approximately 13.5km to the north-east of the Site, is presented in **Figure 2-2**. It is evident that winds from the south-west quadrant are predominant in the area and winds from the north-east are infrequent.

Relevant rainfall data applicable to the Site has been obtained from the Meteorological Office website of UK mapped climate averages for 1991-2020. The average annual rainfall $\geq 0.2\text{mm/day}^4$ for the area is 160 to 170 days per year, comprising 44% to 47% of the year.

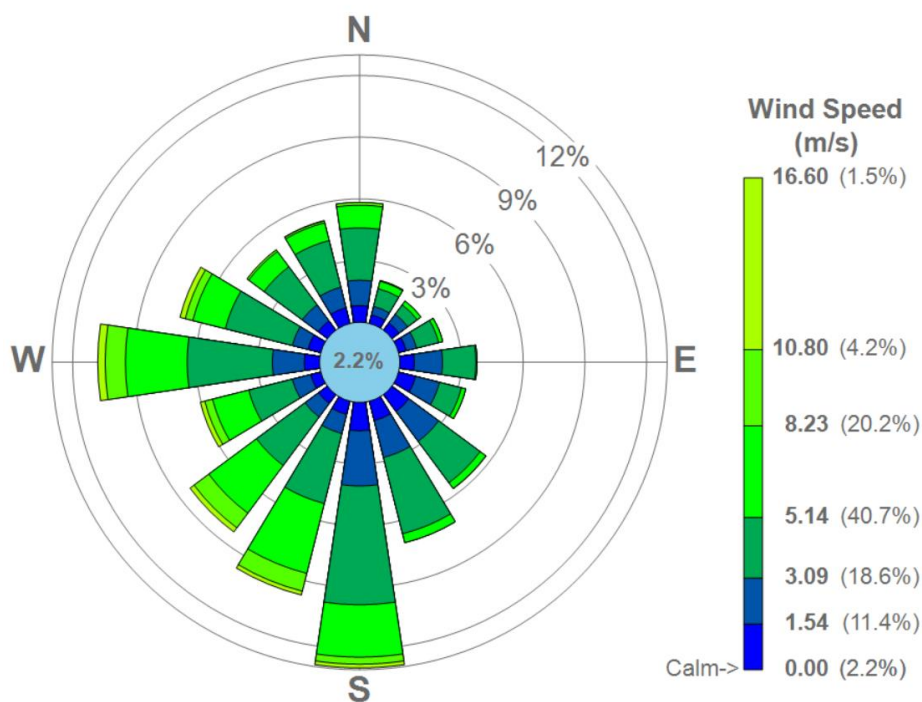


Figure 2-2
Windrose from Doncaster, Sheffield Station (2019)

2.3 Potential Dust Sources

Activities or sources with the potential to result in the release of dust at the facility are:

- on-site vehicle movements;
- material extraction;
- material handling & transfer
- materials processing;
- stockpiles; and
- off-site vehicle movements.

⁴ IAQM, Guidance on the Assessment of Mineral Dust Impacts for Planning, v1.1 2016.

Table 2-1 sets out the potential dust sources and the emission potential.

Table 2-1
Potential Dust Emission Sources

Source	Considerations	Potential
On-site vehicle movements	<p>Majority of onsite movements restricted to the hard paved area of the Main Processing Site, associated with offsite transfers</p> <p>Speed limit of 15mph on site</p> <p>All vehicles exiting site would utilise wheel wash</p> <p>>400m hard paved access road between Main Processing Site & local road network</p> <p>Onsite material transfers undertaken by enclosed conveyor system 'routine' site operations, ADTs only used from point of extraction to respective Processing Area.</p> <p>Tractor and Bowser on site to dampen haul roads, as required</p>	Small
Material extraction	<p>Removal of soils and overburden potentially over a large area and considered an intense but short term activity</p> <p>PFA extraction considered to have a low potential for dust generation as the PFA has a moisture content 18% - 47%, or average of 31% across the Site</p> <p><5 mobile plant in operation for each extraction location</p>	<p>Soils & Overburden: Medium</p> <p>PFA - Small</p>
Material handling & transfer	<p>PFA transfer from PA2 and PA3 to Main Processing Site utilise enclosed conveyor system (ADTs utilised as a temporary contingency plan only)</p> <p>Sites PA1, PA2 and PA3 hard paved with low number of plant (<5) required</p> <p>Extracted material has a high moisture content</p> <p>Onsite tractor and bowser to be used, as required</p> <p>Limited onsite movements using ADTs for soil / overburden transfer</p> <p>Limited onsite movements using ADTs for transfer of PFA from extraction point to designated Processing Area</p> <p>Once material is either transferred to the conveyor / material storage building, all subsequent transfer and handling operations are fully enclosed</p> <p>Transfer of final product offsite by sealed tankers (processed PFA) or sheeted arctics</p>	Small to Medium
Material Processing	<p>Limited to PA1, PA2 and PA3 (Main Processing Site - all operations fully enclosed)</p> <ul style="list-style-type: none"> - processing in the region of 1,000 tonnes per day; - mobile shredding and screening plant with fitted canvas dust covers; - drop heights <5m and 4m for mains and fines conveyor, respectively; and - hard paved concrete pad with regular sweeping and watering of surface. 	Pre-Processing Areas: Medium
Material Storage	External storage of PFA primarily limited to PA1, PA2 and PA3:	PFA: Medium

Source	Considerations	Potential
	<ul style="list-style-type: none"> - Hard paved concrete pads with regular sweeping and dampening of surface; - Stockpiles cleared at the end of each working day; - Designated storage bays with 3 retaining walls; and - Maximum stockpile of 2,000m² floorspace. <p>Limited, temporary storage of oversize fraction from PFA screening within the lagoon voids, as necessary</p> <p>External storage of soils and overburden:</p> <ul style="list-style-type: none"> - During Stages 1 to 6 only; - Designated storage areas with surfaces graded and seeded to stabilise surface; and - After Stage 6, stripped soils would be used directly in restoration. 	<p>Soils & Overburden: Small</p>
<p>Off-site vehicle movements</p>	<p>Speed limit of 15mph</p> <p>Access road >400m in length and paved (concrete)</p> <p>Restricted access from offsite vehicles beyond the hard paved section of the main processing area</p> <p>All vehicle use onsite wheel wash within Main Processing Site prior to exiting site</p>	<p>Negligible</p>

3.0 Dust Control

Measures for minimising, controlling and monitoring dust emissions from the Site are outlined in this section and have been based upon the stated guidance, the outcome of the risk assessment and the processes and equipment utilised on-site.

3.1 Overview

The key method of controlling dust emissions is through good site design, management practices and subsequent good housekeeping, i.e. ‘avoidance’ is the key method of controlling dust emissions.

The control hierarchy⁵ has been based on:

- good operating and management practices to avoid emissions arising from activities;
- good process design or revision to minimise emissions;
- abatement or control to reduce dust emissions, e.g. use of mobile dust suppression units and sprays; and
- disrupting the emission pathway to sensitive receptors, i.e. shielding receptors through the use of screening (e.g. locating stockpiles in sheltered areas as far as practicable).

3.2 Dust Control Measures

3.2.1 Environmental Design Measures

The extraction, processing and storage PFA has the potential to create dust emissions. A range of dust mitigation measures have been incorporated into the scheme design, which are as follows:

**Table 3-1
 Designed In Mitigation Measures**

Site Operation / Area	Dust Control Measures
Pre-Processing Areas	Pre-processing areas located >250m from any residential receptors Finley Screen (or similar) supplied with canvas dust covers on mains and fines conveyor Constructed hard standing area of ~6,000 sqm 3-sided bays for storage and turning of PFA No stockpiles of PFA to remain at the end of each working day
Main Processing Site	Hard paved to allow surface to be swept and effectively watered Designated collection area Enclosed material storage building, kept under negative pressure with extraction system fitted with filters All processing plant fully enclosed, with exhausts from dryers passing through cyclone and fabric filters prior to release to atmosphere/condenser. PFA transfers fully enclosed via covered conveyors / piping

⁵ MIRO, Good practice guide: control and measurement of nuisance dust and PM₁₀ from the extractive industries, Issue 1 February 2011.

Site Operation / Area	Dust Control Measures
Material transfer	Transfer of PFA done by fully covered conveyor under normal operations (with exception of optimisation phase in HR P1)
General	Water availability at all times on site with a dust suppression system utilising a tractor and bowser for all internal roads, stockpiles and surfaces, as required. Working of the land on a phased basis with progressive restoration of all phases (also referred to as 'cuts') in order to minimise the exposed surface areas that may be subject to erosion and lead to dust generation. All trees, hedgerows and shrubs on the periphery of the Site shall be retained and protected.
Soil and overburden storage	Designated areas on site Graded and vegetated at the earliest opportunity
On-Site transportation	Minimal use of internal unpaved haulage route following the completion of the optimisation phase (PFA haulage undertaken by covered conveyor) Material transfer using articulated dump truck only to be utilised during optimisation phase (HR P1) and as contingency scenario
Off-site transportation	All vehicles exiting site to utilise wheel wash >400m of hard paved access road between wheel wash and local road network No road-bound vehicles to access unpaved roads on site (i.e. areas north of the Main Processing Site) All material transferred off site contained either by powder tankers or sheeted wagons Road sweeper on site for use on local road network, access road and main processing area, as required

3.2.2 Management Actions and Dust Control Techniques

Control measures that would be employed on Site are detailed in Table 3-2 below.

**Table 3-2
Recommended Mitigation Measures**

Site Operation	Dust Control Measures
Design and Location of Dust Generating Activities	PFA stockpiles located as far from sensitive receptors as possible (i.e. a minimum of 200m from offsite residential receptors).
	Haul roads within the extraction void designed to minimise distance to the respective Processing Area and to locate routes away from offsite residential receptors where practicable.
Monitoring	Daily visual monitoring at selected boundary locations in the locale of the current site activities.
Operation Planning	Activities in close proximity to offsite residential receptors would be planned only during favourable weather conditions. Where possible, potentially dusty activities, such as soil stripping, would be avoided during extended periods of dry and windy conditions.

Site Operation	Dust Control Measures
Soil & Overburden Stripping	Vegetation removal & soil stripping would be undertaken in discrete phases
Onsite Transportation	Wetting of unpaved haul roads would be undertaken in dry conditions using a towed water bowser with a frequency sufficient for the ground conditions
Processing	Drop heights of material would be minimised and whenever possible loading shall take place at sheltered points around the stockpile
Stockpiles	Long-term stockpiles of oversized PFA in lagoon voids – material shall be covered to prevent any wind whipping, or dampened down until a surface crust has been formed
General	Any accidental spillage of materials shall be cleared up as soon as possible and reused within the activity
	Maintain good standards for all plant and equipment, ensuring all servicing and routine inspections are undertaken as required and recorded in the site log book.

3.3 Monitoring

3.3.1 Meteorological Conditions

Weather forecasts would be monitored on a daily basis to predict weather conditions such as prolonged dry, hot spells or significantly strong winds which may generate elevated levels of dust. Using this information, the necessary precautionary measures would be employed on the Site, or certain activities suspended if necessary.

3.3.2 Visual Dust Monitoring

Dust monitoring shall be undertaken visually by site personnel throughout the working day, i.e. routine vigilance. In addition, the Site Manager would provide observations which are recorded in a Site Log Book.

Targeted visual dust monitoring may be undertaken as part of responses to incidents or contingency actions. Observations are to be recorded in a Site Log Book. The following details are recorded:

- weather conditions (wind speed (qualitative i.e. strong/light), wind direction, rainfall);
- current site operations;
- identification of any significant dust potential on site; and
- additional mitigation measures put in place if required.

In the event of a complaint, more frequent or off-site visual monitoring would be undertaken if required until any issue is resolved, as described in the Dust Action Plan contingency measures; although the proposed management measures should avoid this if effectively applied

3.3.3 Monitoring Impacts

Monitoring of impacts would be achieved by recording and monitoring complaints. Complaints may be reported directly to the Site, or via the Mineral Planning Authority or Local Environmental Health Department.

Complaint records would include: the date and time, nature of complaint, locality of complaint, name of complainant (if available), a summary of investigation and actions taken and the outcome. The complaint response and investigation procedure are provided in Section 4.2.

4.0 Dust Action Plan

4.1 Contingency Plans

The contingency plans have been defined to react to situations where monitoring indicates that a potential dust source is not completely under control, control measures have failed, or that an adverse impact has/or may occur.

This includes incidents that have the potential to cause an unacceptable impact on the local community.

Contingency measures for the following events have been defined in **Table 4-1**:

- malfunction in mobile dust suppression units rendering in-effective;
- malfunction of wheel wash rendering in-effective;
- failure in water supply;
- visual monitoring indicating dust generation in significant quantities, that is either likely to or is actually leaving the Site boundary in quantities likely to cause nuisance to sensitive receptors;
- weather monitoring indicates potential dust generation issues, i.e. prolonged dry spell followed by high winds; and
- complaints received from members of the public or neighbouring businesses.

Table 4-1
Contingency Plans

Event	Malfunction in mobile dust suppression units rendering in-effective
Contingency Actions	Notify management of malfunction so repairs can be made, engineer called out, or plant hired. Determine whether the bowser is required that day given meteorological conditions. If not, continue operation but continually monitor operations and meteorological conditions. If dust is likely to leave the Site boundary in sufficient quantities as to be unacceptable apply further controls: as required apply manual hosing, use of road sweeper on access road, hire dust suppression units from off-site, move operational area. If impact is considered likely to occur, then cease operations until dust suppression unit is available.
Comment	Record details in Site Log Book.
Event	Malfunction of Conveyor System
Contingency Actions	Notify management of malfunction so repairs can be made, or an engineer called out. Use onsite ADTs to transfer PFA from Processing Areato the Main Processing Site. If required, increase frequency of water application on haul road using tractor and bowser. If required, based on meteorological conditions, consideration given to sheeting of ADTs for the internal material transfers.
Comment	Record details in Site Log Book.
Event	Malfunction of wheel wash rendering in-effective
Contingency Actions	Notify management of malfunction so repairs can be made, or an engineer called out. Use manual hosing/jet wash as required on vehicles. Use road sweeper more frequently on access road.

	If mud is being tracked out onto the public highway in quantities likely to be a nuisance or a danger, then cease exports until effective wheel washing is reinstated.
Comment	Essential spares to wheel wash should be retained on Site. Record details in Site Log Book.
Event	Water supply failure
Contingency Actions	Determine through visual monitoring and weather forecast whether the application of water represents essential mitigation to continue operations. If 'yes' cease operations until a water supply is available. Notify relevant parties at earliest opportunity (site management, engineers, utility company)
Comment	Record details in Site Log Book.
Event	Visual monitoring indicating dust leaving Site boundary in quantities and direction likely to cause nuisance
Contingency Actions	Notify management and record observations in Site Log Book (e.g. Pro-forma Appendix A) Continue to monitor situation. Investigate and identify dust source. If dust is from a particular source (e.g. haul road, stockpile, crusher etc) then review mitigation options. Review application of dust minimisation control measures. Apply appropriate contingency measures as required e.g.: <ul style="list-style-type: none"> • more frequent/effective application of mobile dust suppression units to problem areas • more frequent, additional sweeping of the access road • move operational area • review stockpile locations Ultimately cease identified operation if it cannot be effectively controlled.
Comment	Record details in Site Log Book. DMP may require updating on the basis of results of investigations.
Event	Weather monitoring indicates potential dust generation issues
Contingency Actions	Anticipate level of abatement required (i.e. bowser use), including the hire of additional equipment if necessary. Increase frequency of visual dust monitoring; management to advise all staff of greater vigilance. If dust is seen to be crossing the Site boundary follow contingency measures as detailed above. If water supply runs out, follow contingency measures as detailed above.
Comment	Record details in Site Log Book.
Event	Complaint received from members of the public or neighbouring businesses
Contingency Actions	Notify management. Follow complaint reporting and investigation procedure.
Comment	Complaints reported to the relevant authorities in accordance with any relevant permit requirements. DMP may require updating on the basis of results of investigations.

4.2 Dust Complaints Procedure

Complaints may be notified to the Site Management either during or after an event, directly by the complainant or indirectly through a regulator (such as the Mineral Planning Authority or Environmental Health Department) who was notified.

Complaints would be reported to the relevant authorities by the operator in accordance with any relevant permit requirements.

Complaint records would include the following (recorded in the Site Log Book):

- date, time, and name of complainant (if given);
- nature of complaint;
- locality of complaint; and
- a summary of investigation and actions taken and the outcome.

Complaint response would have the objective of investigating the incident and preventing any continuing issue, for example by putting in place additional control or management measures to prevent re-occurrence of the incident and updating the DMP. Complainants would be informed of the findings of investigations and the actions taken (if contact details are provided at the time the complaint is made).

Investigations would include but not be limited to:

- visit by site personnel to location of complainant to verify issue (if the complaint is made 'after' rather than 'during' a dust event this may not be possible);
- review of Site activities at time of incident to investigate potential sources;
- if dust event is occurring or a recurring event undertake more frequent targeted on-site and off-site visual monitoring and record findings;
- review of control measures and management actions at the time of the incident;
- review of meteorological conditions at the time of the incident; and
- reporting of findings (either in a pro-forma or Site Log Book).

An example Dust Event Form is included in Appendix A.

5.0 Management

5.1 Dust Control Responsibilities

There would be a competent person on Site during working hours responsible for dust management measures. Responsibilities are allocated to specific personnel to ensure dust generation is effectively controlled (see Table 5-1).

Table 5-1
Dust Management Responsibilities

Actions	Responsibility
Monitoring Meteorological Forecast	Site Manager / Supervisor
Routine Visual Dust Monitoring	Site Manager / Supervisor
Coordinating Access Road Cleaning	Site Manager / Supervisor
Application of Plant / Working Area Dust Suppression	Operatives
Completing Dust Event Forms	Site Manager
Liaison with Public and Regulator	Site Manager / Other Management Personnel
Coordinating Dust Management Plan Updates	Site Manager / Environment Manager

5.2 Training

All personnel on Site would understand their responsibility to ensure the generation of dust is minimised. Each employee would be made aware of the importance of dust control and the most effective measures available to minimise such emissions.

Plant and equipment operators would be trained and experienced in the plant that they operate. Certification would be held on the Site and available for inspection.

5.3 Liaison with Community and Regulators

The Site Manager (or nominated representative) would act as liaison with the regulator and local community for issues relating to dust nuisance.

The nominated representative shall respond promptly to all complaints by undertaking an investigation into the dust event, including weather conditions, operations on the Site and mitigation measures in place at the time of the complaint. Complainants would be informed of the outcomes of the investigation.

Following the receipt of a complaint, a dust event form shall be completed, and the results of the subsequent investigation kept in the Site Log book.

5.4 Record Keeping

The operator shall keep records of all dust monitoring, dust contingency actions, investigations, and complaints on Site in accordance with the DMP. These shall be made available to the regulator to examine on request.

5.5 DMP Update and Review

This DMP is a controlled document, and forms part of the site management documentation. The DMP is intended to serve as a reference during daily operations, and would be updated should the following occur:

- significant changes are made to the plant or operational practices;
- the regulator requests that the DMP is updated; or
- complaints are received, which on subsequent investigation results identify further control measures or remedial action, in addition to those set out within this DMP.

APPENDIX A

Example – Dust Event Form

Dust Event Form	
Name of Author	
Description of Event ^(a)	
Date / Time	
<u>Activities taking place during time of event</u>	
<u>Dust mitigation techniques employed at time of event</u>	
<u>Summary of weather conditions leading up to and during the event</u>	
<u>Details of corrective actions</u>	
Notes	
^(a) e.g. complaint registered (name and address) or visible dust crossing site boundary during visual assessment	

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