ATKINS

Member of the SNC-Lavalin Group

Challonsleigh Farm Inert Landfill

Environmental Permit Application - Supporting Information

DDE (SW) Ltd.

January 2022

5149237.CFIL01

Notice

This document and its contents have been prepared and are intended solely as information for DDE (SW) Ltd. and use in relation to the environmental permit application for Challonsleigh Farm Inert Landfill.

Atkins Limited assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents.

This document has 20 pages including the cover.

Document history

Document title: Environmental Permit Application - Supporting Information

Document reference: 5149237.CFIL01

Revision	Purpose description	Origin-ated	Checked	Reviewed	Author-ised	Date
Rev 1.0	Permit application	TSM	ATF	ATF	ATF	06/04/2021
Rev 2.0	Permit application	TSM	ATF	ATF	ATF	09/05/2021
Rev 3.0	Permit application	TSM	ATF	ATF	ATF	19/01/2022

Contents

Tables

1. Non Technical Summary

1.1. This section of the Environmental Permit application corresponds to Question 5c of Part B2 (form EPB2 Version 15, July 2019) of the application forms, which requires the provision of a Non-Technical Summary.

1.2. A Non-Technical Summary seeks to provide a concise summary of the application in non-technical language.

1.3. DDE(SW) Ltd. is seeking appropriate permission from the Environment Agency for an inert landfill granted as part of conditional planning permission by Devon County Council ref. DCC/4038/2018. That permission is for a waste transfer building and associated infrastructure, and land raise operations for the importation inert waste material over a 10 year period requiring a change of use from agriculture and incorporating landscaping.

1.4. The original planning permission showed the phasing north to south. The planning authority has advised that subject to the submission of details they would have no in principal objection to reversing the phasing from north to south to south to north. Details of the revised phasing have been submitted as part of the discharge of planning conditions which is ongoing, though the revised phasing still includes formation of a bund in the north of the site to provide future landscape screening (as northern slope can be restored and planted), prior to the start of landrising.

1.5. The proposed inert landfill site is located south of the A38 Devon Expressway at Challonsleigh Farm, Smithaleigh (near Lee Mill, Ivybridge) as shown on drawing DESSD1 Location, and is sited immediately to the east and southeast of two existing waste management facilities operated by DDE (SW) Ltd. (which were previously operated by SITA UK Ltd and Wood Yew Waste Ltd.), referred to by DDE (SW) Ltd. as site's A and B. The planned inert landfill site lies between the A38 and the waste management facility approximately 400m to the south, with that site referred to by DDE (SW) Ltd. as site C, and the planned inert landfill as site D.

Site history and proposed development

1.6. The landraise with inert waste entails filling on a total of approximately 13.5 ha of agricultural grazing land split north and south of an unnamed intermittent ordinary watercourse which will remain open, and includes filling over a previous landfill in the south which has scrub vegetation cover and is not used for agriculture. Environment Agency records indicate that landfill area to be approximately 1.8 ha, but that previous landfill forms raised ground in the south of the planned landraise area and around and under the existing waste management facility, and from the terrain and comparison to OS maps it seems likely that former landfill area underlies 2.7 ha of the planned inert landfill area.

1.7. The previous landfill area has unique reference EAHLD08685 within the Environment Agency's historical landfill dataset records, which indicate the landfill was licensed for inert and industrial, with first input June 1991. The EA dataset does not record a date for the last waste input, though Devon County Council granted conditional approval for its restoration in March 2003, and the site now has trees and dense shrub vegetation. Material to the south beyond the proposed inert landfill appears to be typical demolition rubble type material including some steel.

1.8. The planned landraise inert landfill is intended in the long term to provide an improved restoration profile and ecological land use over the historical landfill area.

Waste acceptance and permitted activities

1.9. Access to the planned inert landfill will be via DDE(SW)'s dedicated gated entrance from the first junction (roundabout) on the A38 south bound off slip at Smithaleigh just west of Ivybridge. That entrance provides the sole access to DDE(SW)'s waste management facilities which will include the inert landfill to the east of the access track.

1.10. Incoming loads will comply with the site's waste acceptance procedures and will be checked as they arrive with additional visual checks being undertaken at the point of off-loading within the inert landfill operational area.

Staffing and general maintenance

1.11. The inert landfill will only be open for operation between the following times:

- 07:30 hours to 18:00 hours - Mondays to Fridays
- 08:30 hours to 13:00 hours - Saturdays

1.12. With no operations on Sundays and Public, Bank or National Holidays, as per its planning permission condition 19.

1.13. Lockable gates will be present at the Site entrance which will be fully secured outside operational hours to prevent unauthorised access.

1.14. A noticeboard will be displayed near the Site entrance and will include: the Site name and Permit number; the name, address and emergency contact details for DDE(SW) Ltd.; and details for how to contact the Environment Agency for general enquiries or in an emergency.

1.15. All staff will have clearly defined roles and responsibilities; with a nominated Site manager having overall responsibility. Appropriate training will be provided, and written instructions will be given to all staff where necessary.

1.16. All machinery and equipment utilised within the inert landfill will be serviced and maintained in accordance with the manufacturers' recommended maintenance schedules.

1.17. Prior to exiting onto the public road network, vehicles will, if necessary, be stopped and inspected and cleaned of mud adhering to the wheels or chassis by passing through a 'sump' style wheelwash facility which is present along the access track to the existing waste management facilities.

1.18. Should it become apparent that mud has been tracked onto the public highway, sweeping of relevant areas, including the public highway, will be undertaken as soon as possible. A road sweeper will be employed, if required.

1.19. Due to the inert nature of the materials that will be received at the Site there will not be a significant odour, litter, pest, vermin or fire risk.

Site operations

1.20. The inert landfill will be operated according to the DDE(SW) Ltd.'s own management system.

1.21. Complaints, if any are received regarding operations will be recorded and investigated by the Site Manager, and action will be taken to understand and resolve them.

Operator competence

1.22. The inert landfill will be operated by DDE(SW) Ltd. which has a track record of operating waste management facilities and has not been convicted of any relevant offences or subject to insolvency or bankruptcy.

1.23. Relevant staff within DDE(SW) Ltd. who will be managing the inert landfill will be technically competent for inert waste management operations as assessed under a recognised waste operator competence scheme.

1.24. Management of environmental aspects are incorporated within DDE(SW) Ltd.'s own management system.

Environmental risk assessments

1.25. Environmental risk assessments carried out for the planning application and also for this permit, include appraisal of risk to amenity, groundwater, surface water and the atmosphere from vehicle emissions and potential ground gas.

1.26. Significant adverse effects are not foreseen.

Environmental monitoring

1.27. Regular environmental monitoring will be carried out at the inert landfill as detailed in the environmental risk assessments. That includes regular monitoring of groundwater, surface water, and ground gas.

2. Supporting Information

Pre-application discussions

2.1. Part B2 Q1a – in June 2016 there were pre-application discussions – emails and site meeting, with Samantha Oman, an Environment Officer – Devon Waste Compliance of the Environment Agency at that time, with copies to her Team Leader at that time a Dave Brogden.

2.2. However the discussions were regarding the possibility of a waste transfer station and inert landfill but mainly focussed on the permitting of the waste transfer station. For the possible waste transfer station the following reference numbers were issued: EPR/EB3309LV/A001 and EAWML 403454.

2.3. Subsequently a nature and heritage conservation screening request was made for the waste transfer station, though the screening report is titled “Nature and Heritage Conservation Screening Report: Inert landfill and non-landfill SWMAs”, reference EAWML 403713. That is a different reference number to the one previously issued.

2.4. A pre-application request – enhanced service – regarding the planned inert landfill was made in September 2020, and the advice received December 2020, reference EPR/JB3704KA/A001 is included herein as Appendix A.

2.5. The permit application was initially submitted in May 2021 however it was not ‘duly made’ and was returned 13/10/21. That emails and subsequent correspondence to clarify a matter is included in Appendix A. The revised site phasing has been adjusted to meet the waste planning authority requirements and the data has been updated within the supporting reports for the permit application resubmission.

Technical Ability

2.6. Part B2 Q3b – for copy of relevant qualification certificate/s see Appendix B.

Management Systems

2.7. Part B2 Q3d – contents list of own management system provided in Appendix C.

Environmental Risk Assessment

2.8. Part B2 Q6 – specific environmental risk assessments have been carried out to appraise the potential risk to groundwater, to surface water and of flooding, from ground gas, of stability, and to air quality and amenity i.e. dust and noise, and also ecological and heritage. Environmental risk assessments were carried out for the development’s planning application Environmental Statement, as shown by the Environmental Statement Volume 2 and Volume 3 contents pages included in Appendix D. More detailed risk assessments have been carried out for the planned inert landfill permit application, and a summary environmental risk assessment which draws on the findings of those studies is provided herein Appendix E. The summary environmental risk assessment is also for reference by the DDE(SW) environmental management system.

2.9. As the planned duration of operation is more than 5 years a climate change risk assessment is provided in Appendix F. Climate change risk will be mitigated by design, such as of the drainage, and site management plans such as for the operation and potential dust emissions.

Waste Operations

2.10. Part B4 Q1a – the total landfill capacity is estimated as 699,113m3. Inert waste weight density is estimated as 18kN/m3, which equates to 1.835tonnes/m3. Hence the ‘annual through put (tonnes per year)’ of the planned inert landfill is estimated as 1,28287.24 tonnes per year for 10 years.

2.11. Part B4 Q1b – refer to the list of waste types in the following table:

Table 2-1 - Types of waste to be accepted

Waste Code	Description of waste	Restrictions
Waste acceptable without testing at landfills for inert waste as listed in the Landfill (England and Wales)(Amendment) Regulations 2004.		
10 11 03	Waste glass based fibrous materials	Only without organic binders.
15 01 07	Glass packaging	
17 01 01	Concrete	Selected C&D waste only[(a)]
17 01 02	Bricks	Selected C&D waste only[(a)]
17 01 03	Tiles & Ceramics	Selected C&D waste only[(a)]
17 01 07	Mixtures of concrete, bricks, tiles & ceramics	Selected C&D waste only[(a)]
17 02 02	Glass	
17 05 04	Soil and stones	Excluding top soil, peat; excluding soil and stones from contaminated sites
19 12 05	Glass	
20 01 02	Glass	Separately collected glass only.
20 02.02	Soil and stones	Only from garden and parks waste; excluding topsoil, peat.
Notes: (a) Selected construction and demolition waste (C&D Waste): with low contents of other types of materials (like metals, plastic, organics, wood, rubber, etc.) The origin of the waste must be known.		
Other wastes which may be accepted subject to compliance with the regulations and site's waste acceptance procedures:		
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07	
01 04 09	Waste sand and clays	
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)	
10 12 10	Solid wastes from gas treatment other than those mentioned in 10 12 09	
17 05 06	Dredging spoil other than those mentioned in 17 05 05	
19 02 06	Sludges from physico/chemical treatment other than those mentioned in 19 02 05	
19 12 09	Mineral (for example sand, stones)	
19 12 12	Other wastes (including mixtures of materials) from mechanical	

Waste Code	Description of waste	Restrictions
	treatment of wastes other than those mentioned in 19 12 11	

3. Closure and Aftercare Plan

Context – Environmental Permit and Planning Permission

3.1. Challonsleigh Farm Inert Landfill will have operated under planning permission South Hams District Council Application Number 1105/18/DCC Devon County Council ref. DCC/4038/2018 granted by Devon County Council in April 2020 and an environmental permit to be issued by the Environment Agency.

3.2. Under the environmental permitting regime the current steps required to progress an operational landfill site through closure to aftercare are detailed in the publication 'Additional guidance for Landfill (EPR 5.02) and other permanent deposits of waste: how to surrender your environmental permit'. There was also i.e. version issued 03/04/2018, the Environment Agency's Operational Instruction 300_05 'Progressing operational landfills to aftercare'

3.3. That guidance indicates that when the operator of an operational landfill permanently or temporarily stops accepting waste, the operator can ask the Environment Agency to agree that the site is in the aftercare phase. Sites in aftercare have a simpler environmental permit, to reflect the reduced activity on the site and operators pay a reduced subsistence charge.

3.4. An operator can start the closure process when they stop accepting waste for disposal, which may be before or after the site is full to pre-settlement levels. The operator should have a 'closure and aftercare plan' which sets out how the site will move to and be managed during aftercare. The operator must submit a closure report to show that they have followed the closure and aftercare plan and that they will manage their site in accordance with the management plans for the site.

3.5. Once the Environment Agency accepts the closure report, the area compliance officer must undertake a 'final on-site inspection' and the operator can then apply to vary its permit to remove operational conditions and include new conditions to regulate the site during the aftercare phase. The Closure and Aftercare Plan outlines the aftercare standards that the operator will apply.

Closure

3.6. Under the planning permission Challonsleigh Farm inert landfill has to cease deposit of inert materials no later than 10 years from the date on which is waste is first deposited. Assuming that occurs in 2022 then waste intake would cease by or in 2032, by which time it is assumed the landfill will have achieved the maximum allowable elevations under the planning permission and have implemented a phased restoration process.

3.7. It is possible that closure may be applied for in line with completion of phases, but if not closure for the entire landfill would be applied for on completion of the final phase.

Restoration

3.8. Restoration will be as per drawings 5149237-ATK-DR-C-DESSD5A RESTORATION and 5149237-ATK-DR-C-DESSD5B and 5C POST SETTLEMENT SECTIONS.

3.9. As an "inert" landfill, the site does not require surface sealing such as by the measures specified in the landfill regulations for a "non hazardous" or "hazardous" landfill. The final surface layer will therefore be formed using soil and stones classified as EWC codes 17 05 04 and 20 02 02, which the site is expected to be allowed to accept under its environmental permit.

3.10. Below the final surface layer could be a mixture of other inert waste types which the site was permitted to accept. However those materials will not affect the site's capability for a possible agriculture/woodland after use. As the landfill will have been carried out utilizing inert waste materials and compacted by site vehicle trafficking, only limited settlement may occur, and there will be negligible biochemical degradation of the inert materials.

3.11. The majority of the area will be seeded with species rich grassland mixture and be suitable for grazing.

Site Staff

3.12. It is envisaged the site will not have full time staff but the nominated Site Manager will be present at DDE (SW) Ltd.'s other waste management site's nearby which utilise the same access road off the A38.

Drainage

3.13. The drainage scheme comprises perimeter ditches around the site via which surface water will infiltrate or discharge via retention ponds to the River Yealm. Post 'definite closure' that system will be inspected quarterly and maintained as required.

Aftercare Maintenance Monitoring

3.14. For landscaping and restoration this will align with the planning permission conditions 33 and 34:

"33 Each phase of landscaping and restoration shall be maintained for a minimum period of five years. Any trees, plants or grassed areas, or replacement of it, that is removed, uprooted, destroyed or dies within five years of the date of planting shall be replaced with the same or similar species in the same location.

34 In the event that the inert landraise operations permanently cease prior to the approved final levels being reached, a revised restoration scheme shall be submitted to the Waste Planning Authority within three months of the Authority giving written notice of a requirement for such a scheme.
The revised restoration scheme shall be fully implemented within 12 months of the approval of the scheme by the Waste Planning Authority."

3.15. Following planting and seeding of the restoration profile, regular visits, at least quarterly and more frequently for the weeks after sowing, to monitor the establishment of the sown sward and determine the need for cutting or spot treatment to remove undesirable weed species.

3.16. As the long term management will be agricultural, the target habitat for the bio-diversity metric is semi-improved grassland. Hence future management of the sward will be for grazing with low intensity grazing sufficient to meet the needs of the livestock while allowing natural processes to ensure a sward health for invertebrates, small mammals and birds.

3.17. Application of fertilizer will be avoided unless deemed absolutely necessary because it would encourage the rapid growth of a small number of highly competitive species at the expense of greater diversity. The need for control of invasive species will be determined during each maintenance visit, and control by the application of weedkillers will also be avoided unless deemed absolutely necessary, with preference given to use of products which are inactivated on contact with soil and broken down by soil micro-organisms.

3.18. The site will be managed by cutting or grazing to prevent the land becoming species poor and reverting to scrub. During the maintenance period light grazing rather than cutting will be the preferred choice for management, with initial grazing levels low and carefully monitored by the livestock keeper. Grazing should create more diverse conditions than cutting, and thereby benefit a wider variety of plants and animals. Trampling by stock also creates small gaps in which plants can establish. Grazing will mainly only be carried out in the late summer or autumn to avoid affecting flowering or possible ground nesting birds.

3.19. Maintenance inspections will be carried out at least annually for five years. The following tasks will be carried out during each visit bearing in mind the long term objective of ensuring the land will be capable of an agricultural/woodland use with benefit for wildlife habits:

1. Inspection of the site's final surface layer for localized settlement or erosion, with consideration of the need for their mitigation.
2. Inspection of the site's final surface layer to monitor the sward establishment and confirm the management to be applied during the year e.g. none or a further visit, invasive species removal, cutting or grazing.
3. Inspection of the site perimeter hedges, trees and fencing to ensure the site is secure and confirm the management to be applied during the year.
4. Inspection of the site drainage system, to confirm its continued satisfactory operation and the management to be applied during the year, if any.

3.20. Monitoring of the inert landfill will also continue as required by its environmental permit until is considered 'definitely closed' by the Environment Agency.

3.21. Once the closure report is accepted by the Environment Agency and the Agency has carried out a final on site inspection, DDE(SW) Ltd. will apply to vary the permit to further remove operational conditions and include conditions relating to regulation of the site during the aftercare phase.

3.22. DDE(SW)'s application to vary the permit may include proposals to vary the monitoring from that specified in the permit, such as a reducing the frequency and scope of gas monitoring and groundwater sampling dependent on the environmental risk as the aftercare phase progresses.

3.23. The Agency does not consider a site 'definitely closed' until it has varied the permit to impose aftercare conditions. It is envisaged the aftercare conditions will entail refinement of the site's permit monitoring requirements to be commensurate with the reduced site activity and environmental risk.

3.24. Hence this Closure and Aftercare Plan will be reviewed and updated once the site's permit has issued, every four years, and once the site's permit has been varied to 'definitely closed' status.

Financial Provision

3.25. Subject to detailed negotiation we suggest the following cash deposit as an alternative to a renewable bond:

Deposits into the Account

- The Permit holder on each and every anniversary of the start of filling operations for the first five years would deposit one fifth of the agreed financial provision (Currently £125,010) (see CFIL 06) in an account nominated by the Environment Agency.

Payment of Interest

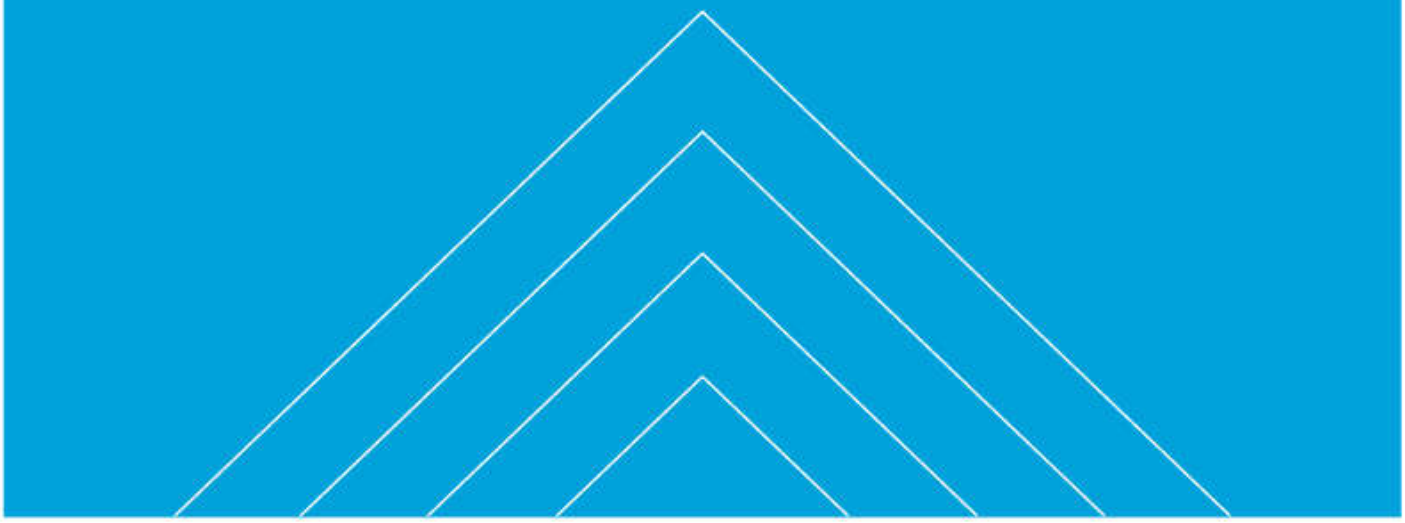
Interest payable

- Interest to be paid into the account annually by the account holder at a minimum of the relevant Bank of England Bank Rate over the annual deposit period.

Withdrawal of Funds

- The Environment Agency are only to withdraw funds for the purposes of rectifying defaults in fulfilling permit requirements by the permit holder. The funds would be held by the Environment Agency until waste was no longer to be accepted at the facility. The Permit holder would then subject to their being no enforcement action regarding ongoing maintenance and closure requiring use of the deposit would require the Environment Agency to return the deposit held on each anniversary post cessation of acceptance of waste in 10 equal annual instalments. Return of the funds would be subject to the land being restored to final contours and planted to the agreed planning conditions prior to the first annual repayment

Appendices



Appendix A. Correspondence with Environment Agency

Morgan, Tim

From: Oman, Samantha
Sent: 22 June 2016 13:10
To: Green, Thomas
Cc: janineanning1@gmail.com
Subject: [Not Virus Scanned] RE: Challonsleigh Farm
Attachments: Fire Prevention Plan - Pre-app document Final V1 Appendix 1 (2).pdf

Good Afternoon

Following our meeting this morning I have been researching the outstanding queries. Unfortunately there does not appear to be a Standard Rules Permit that allows anymore than 10 tonnes of asbestos to be stored on site at any one time, SR2015 No.8 does however allow 75kte of total waste a year, I had managed to pick up an old version of the rules sorry. If 10 tonnes is not enough then the only option is a Bespoke Permit.

With regard the inert landfill – I have sent a query to the permitting team to get a definite answer and I will contact you as soon as I have it.

I have attached Appendix 1, which is the Environment Agency Guidance on Fire Prevention Plans,

Regards
Sam

Samantha Oman
Environment Officer - Devon Waste Compliance
Environment Agency

☎ 02084747077
samantha.oman@environment-agency.gov.uk
Manley House, Kestrel Way, Exeter, Devon, EX2 7LQ

Please note I do not work on Mondays or Fridays.

please consider the environment- do you really need to print this email

We are working hard to produce less waste in our offices. In 2011/12 we produced a third less waste than in our baseline year, but we still sent 48,000 kgs of waste to landfill. Please continue to play your part by using the right bin to recycle your waste - think before you throw!

From: Green, Thomas [mailto:Thomas.Green@atkinsglobal.com]
Sent: 20 June 2016 13:36
To: Oman, Samantha
Cc: janineanning1@gmail.com
Subject: Challonsleigh Farm

Dear Sam,

Further to Fridays email and head of Wednesdays meeting regarding Challonsleigh Farm please find attached Operator Certification along with a selection of DRAFT Risk Assessments and Method Statements.

Kind regards,

Tom Green BSc (Hons) MSc MCIWEM
Environmental Engineer, Development Services, Infrastructure

ATKINS
Find out more about what we do and how we do it – www.atkinsglobal.com

The Octagon, Pynes Hill Court, Rydon Lane, Exeter, EX2 5AZ | Tel: +44 (0)1392 352 900 | Tel (DD): +44 (0)1392 352 962
Email: Thomas.green@atkinsglobal.com | Web: www.atkinsglobal.com | Careers: www.atkinsglobal.com/careers

Please consider the environment before printing this e-mail

Morgan, Tim

From: Oman, Samantha
Sent: 22 June 2016 13:23
To: Green, Thomas
Cc: janineanning1@gmail.com
Subject: Technical Competence

Apologies, I forgot to add some extra information on Technical Competence. As we discussed, for both permits you will require a Technically Competent Person who is present on site for a minimum amount of time, having looked at the WAMITAB qualification for Terry Quarmby it would not be enough for either of the new permits, which are deemed more high risk. If you look at the WAMITAB website, link below, it should be clear which certificate is required. This will be needed on application of the permit for it to be duly made.

http://www.wamitab.org.uk/pg/risk-tier-table-april-2016

Hope this helps

Sam

Samantha Oman
Environment Officer - Devon Waste Compliance
Environment Agency

☎ 02084747077
samantha.oman@environment-agency.gov.uk
Manley House, Kestrel Way, Exeter, Devon, EX2 7LQ

Please note I do not work on Mondays or Fridays.

please consider the environment- do you really need to print this email

We are working hard to produce less waste in our offices. In 2011/12 we produced a third less waste than in our baseline year, but we still sent 48,000 kgs of waste to landfill. Please continue to play your part by using the right bin to recycle your waste - think before you throw!

Morgan, Tim

From: Oman, Samantha
Sent: 27 June 2016 10:33
To: Green, Thomas
Cc: janineanning1@gmail.com
Subject: RE: Technical Competence

Good morning

I have obtained the pre-application number which you will need when you complete the application form for the Waste Transfer Station and Asbestos storage permit, there will be a separate number for the landfill. On that note I can confirm that as long as the waste coming into the landfill is inert (not non- hazardous) then a Bespoke permit is fine to any tonnage, if you require to fill with non-haz waste as well as inert then you will need a PPC permit.

Waste Transfer Station/Asbestos Storage Application No.:
EPR/EB3309LV/A001
EAWML 403454

Sam
Samantha Oman
Environment Officer - Devon Waste Compliance
Environment Agency

☎ 02084747077
samantha.oman@environment-agency.gov.uk
Manley House, Kestrel Way, Exeter, Devon, EX2 7LQ

Please note I do not work on Mondays or Fridays.

please consider the environment- do you really need to print this email

We are working hard to produce less waste in our offices. In 2011/12 we produced a third less waste than in our baseline year, but we still sent 48,000 kgs of waste to landfill. Please continue to play your part by using the right bin to recycle your waste - think before you throw!

From: Oman, Samantha
Sent: 22 June 2016 13:23
To: 'Green, Thomas'
Cc: janineanning1@gmail.com
Subject: Technical Competence

Apologies, I forgot to add some extra information on Technical Competence. As we discussed, for both permits you will require a Technically Competent Person who is present on site for a minimum amount of time, having looked at the WAMITAB qualification for Terry Quarmby it would not be enough for either of the new permits, which are deemed more high risk. If you look at the WAMITAB website, link below, it should be clear which certificate is required. This will be needed on application of the permit for it to be duly made.

http://www.wamitab.org.uk/pg/risk-tier-table-april-2016

Hope this helps

Sam

Samantha Oman
Environment Officer - Devon Waste Compliance
Environment Agency

☎ 02084747077
samantha.oman@environment-agency.gov.uk
Manley House, Kestrel Way, Exeter, Devon, EX2 7LQ

Please note I do not work on Mondays or Fridays.

 please consider the environment- do you really need to print this email

We are working hard to produce less waste in our offices. In 2011/12 we produced a third less waste than in our baseline year, but we still sent 48,000 kgs of waste to landfill. Please continue to play your part by using the right bin to recycle your waste - think before you throw!

Morgan, Tim

From: Morgan, Tim
Sent: 01 November 2016 10:02
To: Oman, Samantha
Subject: RE: EAWML 403713

Sam,

No its not for the landfill site yet, but for the waste transfer station on the land just to the south of the landfill.

I have received the screening information and it has reference numbers EAWML 403713 and EPR/EB3705GF/A001.

As I was out of the office when I sent the screening request in I was not able to check previously, but Tom Green has since advised that he thinks the reference numbers you issued for the WTS are EPR/EB3309LV/A001, EAWML 403454 ?

He doesn't seem to think we have an EA reference number for the landfill yet – are you able to issue one, and confirm the application reference for the WTS ?

The screening will most likely provide information which covers the two sites, but initially we are just trying to move things forward for the WTS and I thought it sensible to utilise the screening service.

There have been delays regarding planning, but we'll be in touch if we have queries regarding the application.

Regards, Tim

Tim S. Morgan
Geotechnical and Environmental Engineer, Infrastructure

ATKINS

Find out more about what we do and how we do it - www.atkinsglobal.com

The Octagon, Pynes Hill Court, Rydon Lane, Exeter, EX2 5AZ | Tel: +44 1392 352954 | **Fax**: +44 1392 352999
Email: tim.morgan@atkinsglobal.com | Web: www.atkinsglobal.com | Careers: www.atkinsglobal.com/careers

---

From: Oman, Samantha [mailto:samantha.oman@environment-agency.gov.uk]
Sent: 01 November 2016 09:42
To: Morgan, Tim <Tim.Morgan@atkinsglobal.com>
Subject: EAWML 403713

Good morning

I have been contacted to say that you have applied for the screening service for a new bespoke permit. Can I confirm is this for the landfill we met about a few months ago?

If you have any further questions please get in touch

Sam

Samantha Oman
Environment Officer, Devon, Cornwall and the Isles of Scilly
Environment Agency | Manley House, Kestrel Way, Exeter, EX2 7LQ

samantha.oman@environment-agency.gov.uk
External: 020 847 47077
Working days: Monday to Thursday

From: Wagstaff, Georgia
Sent: 31 October 2016 10:58
To: 'tim.morgan@atkinsglobal.com' <tim.morgan@atkinsglobal.com>
Subject: Nature and heritage conservation screening

Dear Mr Morgan

Thank you for requesting a nature and heritage conservation screen for the following:

Permit type: Bespoke Environmental Permit - Waste Operations, including inert landfills and non-landfill SWMAs
Reference: EAWML 403713
NGR: SX 59575 55075
Date screen completed: 31 October 2016

The screening results are attached to this e-mail.

Please note we have screened this application for protected and priority sites, habitats and species for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be required.

We strongly advise that you have a pre-application discussion with us before preparing and submitting an application. This should help you get your permit application right first time and raise issues early, ultimately saving you time and money.

In these discussions we can give you advice on:

- how to prepare your application;
- what guidance is available;
- what type of information you need to provide to show us that your proposals will protect the environment and will not harm human health.

Your application reference number is EPR/EB3705GF/A001. I will now arrange for a local officer to get in touch.

Kind regards,

Georgia Wagstaff

Permitting Support Advisor
Part of National Operations
National Permitting Service (part of National Services E&B)

☎ External: 02030253757 ☎ Internal: 53757

✉ Land Team, Environment Agency, Quadrant 2, 99 Parkway, Avenue, Sheffield, S9 4WF
✉ Email: georgia.wagstaff@environment-agency.gov.uk
✉ Email: PSC@environment-agency.gov.uk

Help us to improve our service and complete our customer survey - Click NPS Survey

Click an icon to keep in touch with us:-

Mr T Morgan

Our reference: EPR/JB3704KA/A001

Date: 09/12/2020

By email only

Dear Mr Morgan

Pre application advice – Enhanced service

Site: Challonsleigh Farm Inert Landfill, Smithaleigh, Devon, PL7 5AZ

Thank you for your pre-application enquiry on 28/09/2020.

Based on the information contained in the enquiry form you submitted and the email dated 20/10/2020 I can provide the following advice:

The applicant should refer to guidance at https://www.gov.uk/guidance/landfill-operators-environmental-permits/landfills-for-inert-waste for what is required for their inert landfill application.

With regard to construction over the closed landfill the applicant should refer to sections 2.10 to 2.18, and 9.5 - 9.17 within the guidance document Understanding the Landfill Directive, Regulatory Guidance Series LFD1 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296536/LIT_8286_f89fa7.pdf. These detail landfill boundaries and what is to be considered when tipping over previously deposited wastes.

There is no absolute legal bar to the grant of a landfill permit involving 'piggybacking'. Instead the legal validity of such a proposal depends on whether the areas are able to operate independently as functionally self-contained landfills.
In addition to the issues normally considered, the following points need to be specifically addressed in an application for a piggy back landfill:

- compliance with the lining requirements of the Landfill Directive;
- functionality, stability, and durability of the engineered separation structure of the installation;
- effect on the existing waste mass and any degradation by-products produced within that waste mass including appropriate management and monitoring;
- management and monitoring of waste degradation by-products from the overlying waste mass;
- ability to monitor outside the proposed landfills; and
- the degradation by-products from both the existing and overlying waste must be capable of being managed and monitored independently and there must not be

movement of leachate and landfill gas across the engineered separation at levels that would compromise this.

Where the degree of independence is insufficient to establish or maintain self-contained landfills throughout the life cycle of both sites, then the areas will constitute a single landfill and we will be unable to grant a separate landfill permit for the overlying waste.

Where an existing area of the landfill is giving rise to an unacceptable discharge to groundwater it may be possible to grant a landfill permit that includes the existing area and a new area of landfill. This is provided that the further deposits of waste will not cause or increase an unacceptable discharge from the existing landfill area.

The new area of landfill must not itself give rise to an unacceptable discharge, and must be designed so that appropriate and proportionate action can be taken to mitigate an unacceptable discharge from existing areas. An applicant for a permit must be able to demonstrate all these criteria are met through a quantitative risk assessment. This should include the impact from the release of leachate from the pre-existing waste as a result of placing further waste above it.

Where the operator is responsible for the existing and new landfill, they must propose actions so that the discharges from the old landfill area comply with or get as close as possible to compliance with the Groundwater Directive by applying all technically feasible and proportionate measures. Where the operator of the existing and new landfills are different, each will be responsible for compliance with the Groundwater Directive by applying appropriate technically feasible and proportionate measures.

Where the operator proposes to dispose of waste over completed cells that have permanently stopped taking waste, they will need to apply for a new permit or vary an existing permit. Where it is intended to dispose of waste and the existing engineering does not meet the standards required by the Landfill Directive, the operator must separate the proposed over-tip waste from the existing waste.

If the existing landfill operator is different to that applying for the new landfill (the existing permit is currently in the name of R J L Hall), they will still need to be able to continue to comply with all the conditions of their permit, which may include leachate or gas management or monitoring. The existing landowner will also need to consider what information they would need to include in a surrender report for a surrender application for the site. Guidance on the surrender of landfill permits is given in How to surrender your environmental permit: The Landfill Sector (EPR 5.02) and other permanent deposits of waste at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/321656/LIT_5144.pdf
The Environment Agency will require a construction quality assurance (CQA) plan where the new landfill may affect the landfill infrastructure of the existing site, for example, the cap or monitoring and extraction boreholes/ wells. (https://www.gov.uk/guidance/landfill-operators-environmental-permits/construction-quality-assurance-cqa).

Usually the easiest approach is for the existing permit to be transferred (through a transfer variation application) to the applicant for the new site, and then the permit varied (through application for a new inert landfill) to allow a landfill directive standard landfill to be constructed. The applicant would then be responsible for the surrender of the whole site area.

In terms of the waste codes, the waste acceptance procedures will need to show that the waste has been classified correctly as non-hazardous through the process given in Waste Classification Technical Guidance WM3 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719394/Waste-classification-technical-guidance-WM3.pdf and meets the inert waste acceptance criteria. The waste acceptance procedures should detail what basic characterisation information will be assessed, what checks will be put in place and what quarantine requirements will be made, as well as what validation testing will be carried out and its frequency. More detail is provided at: https://www.gov.uk/guidance/dispose-of-waste-to-landfill

Discharge advice

I can confirm that the proposed discharge will be classed as two activities. Taking into account the information you have provided, the application fee table row in this case is 1.3.13, with a total fee for the water quality determination of £5,117.20. This would be a result of a full application fee of £4,652 for the first activity and £465.20 for the second activity a reduction of 90% (further details on how we apply reductions can be found in our charging guidance). As this is classed as two activities it will incur two annual subsistence charges of £718 (table 2.3.70). To apply for the discharge element of your proposal, please complete and include with your waste application form B6 and also include the discharge activity with the waste activities on form F1.

Form Part B6 and accompanying guidance can be found at the following link: https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b6-new-bespoke-water-discharge-activity-and-groundwater-point-source-activity

Form Part F1 can be found at the following link: https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f1-opra-charges-declarations

What happens next?

If you submit an environmental permit variation application then please quote this pre-application reference number: EPR/JB3704KA/A001

Please send your completed application documents via email to: psc@environment-agency.gov.uk

Dealing with the impact of COVID-19

We are following Government advice to manage the risks of Coronavirus to our organisation, to protect the health, safety and wellbeing of our staff and sustain our critical operations.

We are doing all we can to maintain our service, however it may take us longer than usual to respond to you. It is important that you inform us of any applications that are critical to maintain national resilience, national infrastructure and critical environmental protection.

Our current queues are large and we are taking longer than usual to allocate work for duly made checks. Please see the table below for current average queue times.

Application type	Average time on queue
New standard rules	7-9 weeks
New Bespoke	10-12 weeks
Admin variation	2-4 weeks
Minor variation	6-8 weeks
Normal variation	9-11 weeks
Substantial variation	9-11 weeks
Transfer	6-8 weeks
Surrender	6-8 weeks

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

If you have any questions please find my contact details below.

Yours sincerely

Helen Gregory
Permitting Officer

helen.gregory@environment-agency.gov.uk

From: PSC Land <PSC@environment-agency.gov.uk>
Sent: 13 October 2021 11:42
To: Fletcher, Tony T <at.fletcher@atkinsglobal.com>
Subject: Returning your permitting application EPR/JB3704KA/A001

Dear Mr Fletcher,

Returning your permitting application

Application reference: **EPR/JB3704KA/A001**
Operator name: **DDE (SW) Limited**
Facility name: **Challonsleigh Farm Inert Landfill**

Thank you for your application received 20 May 2021. Unfortunately the application is missing the following information:

- Waste recovery plan for engineered barrier, and associated fee.
- Expenditure plan in excel format.
- Dust management plan and associated fee (ERA refers to DEMP, but none supplied and fee not paid) .
- Damien Pemberton original Wamitab cert for inert landfill.
- Include the following receptors in your Environmental Risk Assessment (you can use Magic Map to check their location)
  - Protected species sites
  - Local wildlife site (Mackarell Parks, Southwood Woods and Strashleigh Ham)
  - Ancient woodland (Southwood Wood)
- HRA
  Include GW data spanning a minimum time period of 12 months in excel format.

  HRA must include justified monitoring proposals for substances in groundwater, in accordance with our guidance, and in line with the groundwater monitoring data presented for the site.
- Site plans
- The top and bottom elevation heights of the landfill engineering infrastructure, including base and sidewall levels.
- Groundwater elevations.
- Monitoring infrastructure for landfill gas and groundwater.

This means we're unable to determine your application and so we must return it to you as 'not duly made'.

If you want to continue with your proposals, you will need to re-apply. We recommend that you talk to us before re-submitting your application. We offer limited pre-application advice on how to prepare your application at no extra charge. If more help is needed, we also offer a discretionary enhanced pre-application service. This service is chargeable at a rate of £100 an hour plus VAT.

For further details of pre-application advice, including a link to the request form, please see our website:
https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form

If you would prefer a paper copy of the pre-application request form, please phone our Customer Contact Centre on 03708 506 506.

We'll send you a full refund of your application charge separately. **In order for us to do this, please provide the name, number and sort code of the relevant account.**

If you operate a regulated facility without a permit, you would be committing an offence and would be liable to prosecution.

If you have any questions please phone Dan Makeham on 02030258186 or email daniel.makeham@environment-agency.gov.uk.

Yours sincerely,

Joel Robson
Permitting Support Advisor
Permitting & Support Centre
Environment Agency

02030253785

http://www.smartsurvey.co.uk/s/NPScustomer/

From: Makeham, Dan <daniel.makeham@environment-agency.gov.uk>
Sent: 03 November 2021 16:18
To: Fletcher, Tony T <at.fletcher@atkinsglobal.com>
Subject: RE: Returning your permitting application EPR/JB3704KA/A001

Dear Mr Fletcher

You are indeed correct about the recovery aspect of the engineering barrier not requiring a waste recovery plan, apologies for the confusion there, my mistake.

However, the primary reason for returning that application was that the HRA was below acceptable standard, did not provide accompanying monitoring data, and did not propose compliance limits based on that monitoring data. Please provide this data in line with our HRA guidance on any resubmitted application.

Yours sincerely

Dan Makeham
Senior Permitting Officer | National Permitting Service
Environment Agency

daniel.makeham@environment-agency.gov.uk
Phone: 020 302 58186
Mobile: 07825 696891

From: PSC Land
Sent: 03 November 2021 14:11
To: Makeham, Dan <daniel.makeham@environment-agency.gov.uk>
Subject: FW: Returning your permitting application EPR/JB3704KA/A001

Hi Dan

I have saved the below query to DMS.

Are you able to advise on the below query?

Kindest regards

Tchale Lymer
Permit Support Advisor
Permitting and Support Centre

Land Team (Waste, Installation & Deployment)
Environment Agency
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

☎**02030253898 07342 087194**

tchale.lymer@environment-agency.gov.uk
External: 02077 122 777 | **Internal:** 22777

From: Fletcher, Tony T [mailto:at.fletcher@atkinsglobal.com]
Sent: 02 November 2021 19:23
To: PSC Land <PSC@environment-agency.gov.uk>
Cc: Morgan, Tim <Tim.Morgan@atkinsglobal.com>; Duke Harvey <duke@dortongroup.com>; Janine Banks <janinebanks@gmail.com>
Subject: RE: Returning your permitting application EPR/JB3704KA/A001

Thank you for your time to discuss this, although as stated we consider it to be very harsh.

It is unfortunate that it has taken so long to return the permit application EPR/JB3704KA/A001, given the Environment Agency is supposed to raise queries during the 'short' period when an application goes through the duly made checks, particularly given that info within the application could have been easily supplied in an alternative electronic format without delay, and missing info identified by the duly made process could also have been supplied with minimal delay.

Nevertheless the intention is to provide the required data within four weeks, for which the main matter we require clarification is regarding whether there is a requirement for a waste recovery plan because that request seems to contradict the online guidance which says:
"You do not need a separate waste recovery plan where the proposal relates directly to the landfill containment system. However, the Environment Agency must make sure you are recovering waste based on information that you include in your construction proposals and CQA plan".

The proposed inert landfill includes an artificially established geological barrier to be formed using recovered fines from the aggregate recycling plant at the waste management facility to the south, or incoming suitable inert waste soil or site won recompacted soil, but as that artificially established geological barrier will form part of the landfill containment system (as the barrier will have lower permeability than the natural ground) the relevant information was included in the construction proposals and CQA plan within the application, and therefore a waste recovery plan is not required. Please confirm that is the correct interpretation of the online guidance.

From: PSC Land <PSC@environment-agency.gov.uk>
Sent: 13 October 2021 11:42
To: Fletcher, Tony T <at.fletcher@atkinsglobal.com>
Subject: Returning your permitting application EPR/JB3704KA/A001

Dear Mr Fletcher,

Returning your permitting application

Application reference: **EPR/JB3704KA/A001**
Operator name: **DDE (SW) Limited**
Facility name: **Challonsleigh Farm Inert Landfill**

Thank you for your application received 20 May 2021. Unfortunately the application is missing the following information:

- Waste recovery plan for engineered barrier, and associated fee.
- Expenditure plan in excel format.
- Dust management plan and associated fee (ERA refers to DEMP, but none supplied and fee not paid) .
- Damien Pemberton original Wamitab cert for inert landfill.
- Include the following receptors in your Environmental Risk Assessment (you can use Magic Map to check their location)
  - Protected species sites
  - Local wildlife site (Mackarell Parks, Southwood Woods and Strashleigh Ham)
  - Ancient woodland (Southwood Wood)

- HRA
  Include GW data spanning a minimum time period of 12 months in excel format.

  HRA must include justified monitoring proposals for substances in groundwater, in accordance with our guidance, and in line with the groundwater monitoring data presented for the site.

- Site plans

- The top and bottom elevation heights of the landfill engineering infrastructure, including base and sidewall levels.
- Groundwater elevations.
- Monitoring infrastructure for landfill gas and groundwater.

This means we're unable to determine your application and so we must return it to you as 'not duly made'.

If you want to continue with your proposals, you will need to re-apply. We recommend that you talk to us before re-submitting your application. We offer limited pre-application advice on how to prepare your application at no extra charge. If more help is needed, we also offer

a discretionary enhanced pre-application service. This service is chargeable at a rate of £100 an hour plus VAT.

For further details of pre-application advice, including a link to the request form, please see our website:
https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form

If you would prefer a paper copy of the pre-application request form, please phone our Customer Contact Centre on 03708 506 506.

We'll send you a full refund of your application charge separately. **In order for us to do this, please provide the name, number and sort code of the relevant account.**

If you operate a regulated facility without a permit, you would be committing an offence and would be liable to prosecution.

If you have any questions please phone Dan Makeham on 02030258186 or email daniel.makeham@environment-agency.gov.uk.

Yours sincerely,

Joel Robson
Permitting Support Advisor
Permitting & Support Centre
Environment Agency

02030253785

http://www.smartsurvey.co.uk/s/NPScustomer/

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Appendix B. Copy of relevant qualification certificate(s)

62(a) LIN – LANDFILL – INERT WASTE

62(b) TSNH – TRANSFER – NON HAZARDOUS WASTE

62(c) TMNH – TREATMENT – NON HAZARDOUS WASTE

Continuing Competence Certificate

This certificate confirms that

Damien Pemberton

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 16/12/2020

LIN	Landfill - Inert Waste
TSNH	Transfer - Non Hazardous Waste
TMNH	Treatment - Non Hazardous Waste

Expiry Date: 16/12/2022

Verification date: 11/12/2020

Authorised:

Director of Qualifications and Standards

Learner ID: 29064

Certificate No.: 5172811

Date of Issue: 16/12/2020

CIWM Chief Executive Officer

The Chartered Institution of Wastes Management

00165756

wamitab

Qualification Title:

WAMITAB Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer

Qualification Accreditation Number:

601/8528/4

This Certificate is awarded to

Damien Pemberton

Verification date: 19/10/2020

Authorised:

Katie Cockburn
Director of Qualifications and Standards

Learner ID: 29064

Certificate No.: 5170378

Date of Issue: 19/10/2020

BF4D051D-4C66-49A8
97EC-854A87034D75
AuthentiQual.com

ofqual REGULATED register.ofqual.gov.uk

Corff dyfarnu cydnabyddedig
Cymwysterau Cymru Qualifications Wales
Recognised awarding body

cea Regulation

The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland. Qualifications Wales regulates this qualification where it is awarded to learners assessed wholly or mainly in Wales.

wamitab

Units achieved by

Damien Pemberton

Units gained:

		Level
A/508/0756	Maintain health and safety in the waste resource management industry *	
F/508/0757	Manage the environmental impact of work activities *	
F/508/0760	Manage the movement, sorting and storage of waste	L4
J/508/0887	Manage the reception of non-hazardous waste	L3
K/508/0980	Manage transfer and disposal from non-hazardous waste treatment and recovery operations *	
M/508/0995	Manage site operations for the treatment of non-hazardous waste *	

Verification date: 19/10/2020

Authorised:

Learner ID: 29064

Certificate No.: 5170378

Date of Issue: 19/10/2020

*Unit/s marked with an asterisk have been achieved previously

Katie Cockburn
Director of Qualifications and Standards

ofqual REGULATED
register.ofqual.gov.uk

Corff dyfarnu cydnabyddedig
Cymwysterau Cymru Qualifications Wales
Recognised awarding body

The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland. Qualifications Wales regulates this qualification where it is awarded to learners assessed wholly or mainly in Wales.

Operator Competence Certificate

Title:

Non-Hazardous Waste Treatment and Transfer

This Certificate is awarded to

Damien Pemberton

Verification date: 19/10/2020

Authorised:

Director of Qualifications and Standards

Learner ID: 29064

Certificate No.: 5170378

Date of Issue: 19/10/2020

CIWM Chief Executive Officer

The Chartered Institution of Wastes Management

This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator Competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.

Appendix C. Contents list of own management system

Das- Dre- Dde-

DORTON GROUP

de-construction engineers

ENVIRONMENTAL MANAGEMENT SYSTEM

BS EN ISO 14001:2015

Issue 12: December 2018

Dorton Group, Station Goods Yard, Station Road, Burgess Hill, RH15 9DG
Challonsleigh Recycling Centre, Dre Yard, Smithaleigh, Plymouth, PL7 5AX

CONTENTS

EP/OP/011	Pipe purging and Tank / Vessel Removal
	Appendix 1 Flow chart
EP/OP/012	Dust Control
EP/OP/013	Storage of Materials and Labelling
	Appendix 1 Flow Chart
EP/OP/014	Register of Environmental Legislation
EP/OP/015	Control of Substances Hazardous to Health
	Appendix 1 COSHH Assessment Flow chart
EP/OP/016	Noise Control
EP/OP/017	Control of Asbestos Removal Operations
	Appendix 1 Flow Chart

Appendix D. Environment Statement Volume 2 and 3 Table of Contents

Table of Contents

Table of contents

Appendix E. Summary Environmental Risk Assessment

Challonsleigh Farm - planned inert landfill

Environmental Risk Assessment (template as for generic risk assessment for standard rules permits)

Facility / Operation:	Planned inert landfill
Location:	Challonsleigh Farm, Smithaleigh near Ivybridge
Location of environmentally sensitive sites (km / m):	Unamed intermittant ordinary watercourse in middle of site and River Yealm 50m to the east. Two county wildlife sites within 500m: New England Fields CWS and Mackerell Parks, Southwood Woods & Strasheligh Ham CWS.
Risk assessment carried out by:	Atkins Ltd.
Date:	14-Jan-22
Scope:	Assessment of sources of risk to non employees and environmental receptors.

Data and information				Judgement				Action (by permitting)	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).**
Surface water - unnamend watercourse in middle of site	Inert waste - unexpected leaching of substances therein	Pollution	Runoff from inert landfill	Very low	Very low	**Very Low**	Planned surface water management. Engineered bund will prevent runoff reaching the watercourse.	Regular inspection and maintainenance of the surface water management system.	Very Low
Surface water downstream - River Yealm	Inert waste - unexpected leaching of substances therein	Pollution	Via discharge from the inert landfill	High	Low	**Medium**	ESSD re Surface water quality risk assessment.	Maintenance and surface water quality monitoring.	Low
Site infrastucture and downstream.	Excess rainfall.	Flood	Via discharge from the inert landfill	High	Low	**Medium**	ES Flood Risk Assessment, & ESSD re Surface water managment	Attenuation storage and controls and bunding will prevent excess discharge. .	Low
Groundwater	Inert waste - unexpected leaching of substances therein	Pollution	Migration through unsaturated ground	Very low	Low	**Low**	HRA, site will have an enhanced geological barrier.	CQA during construction, phased restoration & groundwater monitoring.	Low
River Yealm	Inert waste - unexpected leaching of substances therein	Pollution	Migration in groundwater	Low	Low	**Low**	HRA, site will have an enhanced geological barrier.	Groundwater monitoring.	Low

Data and information				Judgement				Action (by permitting)	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).**
Unamed ordinary watercourse & River Yealm	Inert waste - unexpected movement.	Pollution	Rapid slope failure	Very low	Low	**Low**	Easement to receptor(s) and SRA shows slopes will be stable,	Adhere to safe slope gradients detailed in SRA.	Very Low
Atmosphere	Landfill gases emitted from the inert waste	Emission of greenhouse gas	Dispersion in air movement from the site	Very low	Very low	**Very Low**	GRA, site waste acceptance procedures will ensure only inert waste disposed.	Strict adherence to site waste accpetance procedures.	Very Low
Nearest dwellings (see ESSD & GRA)	Landfill gases emitted from the inert waste	Explosion, loss of conciousness.	Migration through ground.	Very low	Very low	**Very Low**	GRA, site waste acceptance procedures will ensure only inert waste disposed.	Strict adherence to site waste accpetance procedures.	Very Low
Local human population	Noise	Nuisance, loss of amenity, loss of sleep.	Noise through the air.	Very low	Low	**Low**	ES noise impact assessment. Controlled working environment with easement to off site receptors.	Check monitoring.	Very Low
Local human population	Vibration	Nuisance, loss of amenity, loss of sleep.	Vibration through the ground.	Very low	Very low	**Very Low**	ES vibration impact assessment. Controlled working environment with easement to off site receptors.	Check monitoring.	Very Low
Local human population	Dust	Nuisance, loss of amenity.	Wind blow through the air.	Very low	Low	**Low**	Controlled working environment with easement to off site receptors.	Adherence to dust management controls, spot monitoring.	Very Low
Local human population	Odour	Nuisance, loss of amenity.	Odour through the air.	Very low	Very low	**Very Low**	Controlled working environment with easement to off site receptors.	Adherence to site waste management procedures.	Very Low

Data and information				Judgement				Action (by permitting)	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).**
Local human population	Vehicle emissionss	Nuisance, loss of amenity.	Dispersion through the air.	Low	Low	**Low**	Controlled working environment with easement to off site receptors.	Planning permission limits opening times and vehicle movements, avoid vehicle idling.	Very Low
Archaeologiy / heritage assets.	Inert landfill construction.	Damage to asset	Direct physical contact.	Very low	Low	**Low**	ES archaeological impact assessment and subsequent investigations. During landfill operation there will be a controlled working environment.	Prior archaeological investigations.	Very Low
Ecological habitat and trees at or adjacent the site.	Inert landfill construction.	Damage.	Direct physical contact.	Medium	Medium	**Medium**	ES Ecological Impact Assessment and Tree Survey. During landfill operation there will be a controlled working environment.	Ecological management plan including for restoration, tree protection plan.	Low
Nature conservation site - Mackarell Parks, Southwood Woods & Strasheligh Ham CWS (largely a woodland site with a derelict quarry and quarry lake).	Dust, noise, contaminated run-off leachate etc.	Harm to protected sites through contamination, smothering, disturbance etc.	Dust wind blown through the air, nosie transmission via air, run-off via River Yealm.	Low	Low	**Low**	ES air quality, noise and drainage assessments. During landfill operation there will be a controlled working environment with easement to off site receptors.	Adherence: to dust management controls, planning limits opening times and vehicle movements, avoid vehicle idling conditions, regular inspection and maintainenance of the surface water management system.	Low
Nature conservation site - New England Fields CWS - marshy grassland.	Dust, noise, contaminated run-off leachate etc.	Harm to protected sites through contamination, smothering, disturbance etc.	Dust wind blown through the air, nosie transmission via air, run-off via River Yealm.	Very low	Low	**Low**	ES air quality, noise and drainage assessments. During landfill operation there will be a controlled working environment with easement to off site receptors.	Adherence: to dust management controls, planning limits opening times and vehicle movements, avoid vehicle idling conditions, regular inspection and maintainenance of the surface water management system.	Very Low
Ancient semi-natural woodland - within Mackarell Parks, Southwood Woods & Strasheligh Ham CWS.	Dust, noise, contaminated run-off leachate etc.	Harm to protected sites through contamination, smothering, disturbance etc.	Dust wind blown through the air, nosie transmission via air, run-off via River Yealm.	Low	Low	**Low**	Emissions to air may cause harm to and deterioration of nature conservation sites. Vehicles moving on and around site causing disturbance through noise. Potential for run-off and siltation of habitats etc.	Adherence: to dust management controls, planning limits opening times and vehicle movements, avoid vehicle idling conditions, regular inspection and maintainenance of the surface water management system.	Low

Data and information				Judgement				Action (by permitting)	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).**
Protected species within 500m, reptiles at site, one record of slow worm 252m east of site and one record of hedgehog 377m west of site (ref. Challonsleigh Farm Ecological Impact Assessment, Dec 2017).	Inert waste placement using machinery and vehicles.	Harm to protected species.	Direct physical contact at site.	Low	High	**Medium**	Challonsleigh Farm Ecological Impact Assessment, Dec 2017.	Ecological management plan including prior inspection by ecologist and protective fencing e.g. for otters.	Low
Visiting personnel	Machinery and vehicles.	Bodily injury	Direct physical contact	Low	Medium	**Medium**	During landfill operation there will be a controlled working environment.	Method statements & H&S plans.	Low
Local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	Through the air.	Very low	Very low	**Very Low**	During landfill operation there will be a controlled working environment.	Adherence to site waste management procedures. Staff training and monitoring.	Very Low

Notes: Red triangle indicates comment containing supporting information

Yellow columns contain drop down menus. Evaluation of risk is in green column. Overall risk matrix is shown below.

		Consequence		
	Very Low	Low	Medium	High
Probability	Magnitude of Risk			
Very Low	Very Low	Vew Low or Low	Low	Medium
Low	Very Low or Low	Low	Low or Medium	Medium
Medium	Low	Low or Medium	Medium	High
High	Medium	Medium	High	Very High

Appendix F. Climate Change Risk Assessment

South west England river basin district: climate change risk assessment worksheet

Name (as on your part A application form): DDE(SW) Limited

Our permit reference number (if you have one): EPR/JB3704KA/A001

Your document reference number: CFIL01 Challonsleigh Supporting Info App F

Risk assessment worksheet for the 2050s

South west England river basin district

You must carry out a climate change risk assessment for any new bespoke waste and installations permit applications if you expect to operate for more than 5 years. Use the user guide to complete the table. You can add in extra pages if necessary.

Consider how your operations will be affected by the changes in weather and climate described in the table. Consider any changes to average climate conditions that may impact on your operations, for example extreme rainfall.

Also consider:

- critical thresholds - where a 'tipping point' is reached, for example a specific temperature where site processes cannot operate safely
- changes to averages - for example an entire summer of higher than expected rainfall causing waterlogging
- where hazards may combine to cause more impacts

You can add in other climate variables if you wish.

If you have stated on your application form that you do not expect to be operational in 2050, you must still consider climate change risks for the time you do intend to operate. Whilst the variables are for the 2050s, this is an estimated date and you may experience these conditions before then.

This worksheet will sit in your management system. It must appear on the management system summary you submit with your application, even if you do not need to submit the whole risk assessment with your application.

If your pre-mitigation risk score (column D) is 5 or higher, you must complete columns E to H.

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
1. Summer daily maximum temperature may be around 7°C higher compared to average summer temperatures now.	Drying conditions could lead to a higher propensity for dust emissions from inert waste or vehicle trafficking.	3	2	6	Adhere to Dust Management Plan with regular review of site activities and dust controls.	2	1	2
2. Winter daily maximum temperature could be 4°C more than the current average, with the potential for more extreme temperatures, both warmer and colder than present.	No negative impact anticipated.	1	1	1	No mitigation required as very low risk.	1	1	1

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
3. The biggest rainfall events are up to 20% more intense than current extremes (peak rainfall intensity)*.	Surface water drainage system may become overloaded.	4	2	8	Considered by flood risk assessment and surface water drainage strategy and design. Ditches and attenuation ponds have freeboard and land within the site can flood (if occurs during site operation). After restoration flood would be within flood plain of the River Yealm.	3	1	3
4. Average winter rainfall may increase by 41% on today's averages.	As above	4	2	8	As above.	3	1	3
5. Sea level could be as much as 0.6m higher compared to today's level *.	Inland site so no adverse impact.	0	0	0	Monitor for changes to River Yealm levels and flow, and plan for potential flood event.	0	0	0
6. Drier summers, potentially up to 45% less rain than now.	Drying conditions could lead to a higher propensity for dust emissions from inert waste or vehicle trafficking.	4	2	8	Adhere to Dust Management Plan with regular review of site activities and dust controls.	3	1	3
7. At its peak, the flow in watercourses could be 40% more than now, and at its lowest it could be 80% less than now.	River flooding would temporarily prevent discharge from the site.	3	2	6	During operation land near attenuation ponds will be the last to be fill so can flood temporarily.	2	1	2

*Indicates data has come from climate change allowances as part of the spatial planning process. Evidence from your planning submission is acceptable evidence for this worksheet.

Atkins Limited
The Octagon
2nd floor, Pynes Hill Court
Rydon Lane
Exeter
EX2 5AZ

Tel: +44 (0)1392 352900
Fax: +44 (0)1392 352999