AtkinsRéalis

Environmental Permit Application - Supporting Information

DDE (SW) Ltd.

26 March 2025

5149237.CFIL.01

CHALLONSLEIGH FARM INERT LANDFILL

Notice

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Client	DDE (SW) Ltd.
Project	Challonsleigh Farm Inert Landfill
Job number	
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1. Non Technical Summary

1.1 This section of the Environmental Permit application corresponds to Question 5c and 6 of Part B2 (form EPB2 Version 19, Sept 2023) of the application forms, which requires the provision of a Non-Technical Summary.

1.2 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 Site Location Plan, 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 (Wate Transfer Operation) and Wood Yew Waste Ltd (wood and plastic recycling facility.), referred to by DDE (SW) Ltd]. as Sites A and B. The planned inert landfill site lies between the A38 and the waste management facility (aggregate recycling) 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. The National Grid Reference for the approximate centre of the planned inert landfill is SX 59586,55351 (Easting 259585, Northing 055351), with the nearest post code being PL7 5FD. The planned inert landfill will complement the existing waste management facilities and utilise the existing management structures and oversight

1.3 DDE(SW) Ltd. is seeking appropriate permission from the Environment Agency for an inert land raise landfill that was granted as part of a conditional planning permission by Devon County Council ref. DCC/4038/2018. That permission is for a waste transfer building and associated infrastructure to the south (not part of this application) on an existing material processing yard, and a land raise operations for the importation of inert waste material over a 10 year period on predominately agricultural land. The material processing site to the south includes a soil processing plant which produces washed aggregates and a filter cake material. This application includes a deposit of waste for recovery application to reuse this material as an enhanced geological barrier where the underlying ground does not meet the requirements for an inert landfill. The landfill site is divided by a small stream running east to west and run off from the landfill enters this watercourse and a waste discharge, trade/ rain effluent > 5 m3 / day is also being applied for in this application to cover this discharge from the north and south.

1.4 An access track runs along the western boundary of the planned inert landfill to the Site C waste management facility, with the River Yealm close to the eastern boundary of the planned inert landfill. A small unnamed intermittent watercourse with hedgerow and trees either side, runs from west to east through the middle of the proposed inert landfill area. Filling will be set back either side of that watercourse i.e. it will not be culverted. There are two fields to the north of the watercourse where the land slopes from 71 m above ordnance datum (AOD) in the north west to 51 m AOD in the south and 44.5 m AOD in the east adjacent to the watercourse. There are two fields in a central area south of the watercourse which slope gently from around 49 m AOD in the west to 42-44 m AOD in the east to south east near the River Yealm. Further East beyond the River Yealm is Strashliegh Hams Landfill

1.5 The proposed landfill is predominantly farmland used for grazing, but with trees and dense shrub vegetation on the edge of an old historic inert landfill area to the South which forms a platform 4.5 – 5.5m deep approximately as shown on drawing DSRA 1-2. Further South under the existing Site C waste management facility (Aggregate recycling Yard) is an extant permitted inert landfill that was completed approximately 25 years ago as a restoration project and post the historic landfill.

1.6 Previously an application for a permit was made in 2021 which was subsequently withdrawn (see Section 2 Pre application discussions) which included the extant permitted landfill area which is now excluded from this application. This new application as well as excluding the extant permitted also addresses the other concerns raised by the EA in its

schedule 5 notice in particular providing a numerical Hydrological Risk Assessment, (Landsim). Further details of how these have been addressed is contained in section 2.

1.7 The original planning permission showed the phasing from north to south. The phasing has subsequently been revised from north to south to south to north. Details of the revised phasing have been agreed as part of the discharge of planning conditions, though the revised phasing still includes formation of a bund in the north of the site at the start of filling to provide landscape screening, prior to the start of the general land rising in the South.

Site history and proposed development

1.8 The proposed land raise with inert waste entails filling on a total of approximately 10.76 ha of agricultural grazing land split north and south of an unnamed intermittent ordinary watercourse which will remain open and includes filling over the edge of an historic former landfill in the south which has scrub vegetation cover and is not used for agriculture. Environment Agency records indicate 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 EA records and study of the terrain and comparison to OS maps it seems likely that former landfill area underlies 0.67 ha of the planned inert landfill area.

1.9 Part of the historic landfill to the south of the proposed landfill has an extant permit in that it is closed and cannot be used for landfill but the permit is not extinguished. This has a 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.

1.10 It is intended in the long term to provide an improved restoration profile and ecological land use over part of the extant permit area where not overlain by existing operations, by importing non waste material and is not part of this application.

Waste acceptance and permitted activities

1.11 Access to the planned inert landfill will be via DDE(SW) Ltd.'s existing 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) Ltd.'s waste management facilities which will include the inert landfill to the east of the access track.

1.12 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

1.13 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

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

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

1.16 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.

1.17 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.

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

1.19 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.

1.20 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.

1.21 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

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

1.23 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

1.24 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.

1.25 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.

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

Environmental risk assessments

1.27 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. This document can be found in Appendix E of this document.

1.28 Significant adverse effects are not foreseen.

Environmental monitoring

1.29 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 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.

2.2 The permit application was initially submitted in May 2021 however it was not 'duly made' and was returned on 13/10/21.

2.3 The permit application was resubmitted to address issues raised and with revised site phasing to meet the waste planning authority requirements in January 2022 and was reportedly duly made on August 2022.

2.4 Discussions were held with the Environment Agency over the need for a quantitative hydrological risk assessment and the need to cover up an extant landfill permit which although technically possible as it can still be monitored through the new landfill, it was agreed that the permit boundary would not include the existing extant landfill permit hence the boundary and the extent of filling to the south would be reduced to avoid filling over this area. A schedule 5 notice was issued on the 19 April 2023 for this former application (EPR/LB3207US/A001) which was subsequently withdrawn and this new application made with a quantitative Hydrogeological Risk Assessment (HRA) using landsim and the extant permit area removed from the application permit boundary in the south.

2.5 Below is a summary of how this application addresses the points raised.

Table 2-1 – Summary of Actions Addressing Former Schedule 5 Notice

Point Raised	How Addressed
1 Provide detailed hydrogeological cross sections for each stage of the proposed development in the direction of groundwater flow and perpendicular to the site. Also provide a related map showing their alignments and relevant features, such as groundwater contours. You must include all hydrogeological details for the sources-pathways-receptors and their linkages, including the River Yealm and other surface water courses. You must include details of the artificial geological barrier, the historic landfilled waste and leachate levels within it, and monitoring infrastructure	An additional Borehole 9 (see drawing DESSD10) has been provided to enable more accurate hydrological cross sections and sections provided for existing, during construction and post development in the HRA in CFILL 03. Monitoring of ground water levels now cover nearly 5 years of measurements from 29/07/2020 to 10/06/2025. The historic landfill is 4.5 – 5.5m deep. BH 08S which is 4.5m deep has never recorded any water in the historic landfill and maximum ground water levels below the historic landfill recorded in BH08D which is 11.5m deep are between 10.3 – 5.5m below GL see CFILL 02 see table 3.3.2. The previous HRA report was independently reviewed by Atkinsrealis Hydro team and an additional river monitoring point upstream of the site added and Location of BH09 refined, the range of allowable waste inputs has also been restricted to exclude waste like 19.12.12
2 Update the HRA to revise risk screening for groundwater and the non-hazardous and hazardous determinants that comprise inert	The previous HRA report was independently reviewed by Atkinsrealis Hydro team. Monitoring determinants were extended to include

WAC. Hazardous substances need to be assessed against the Minimum Reporting Value (MRV) or Limit of quantification (Loq), background [pre-development] quality, and not the EQS or Drinking Water Standards (DWS). This assessment should include all hazardous determinants within the proposed Waste Acceptance Criteria (WAC) – hazardous determinants within the inert landfill WAC include Arsenic, Chromium (VI), Mercury, Lead, BTEX and PAH.	antimony, chromium III, chromium VI, and BTEX compounds, the other compounds were already monitored. The risk screening as been updated and included in the HRA (CFILL 03)
3. Provide a quantitative hydrogeological risk assessment (HRA) for the whole site, including a rogue load assessment.	A rogue load assessment as been included in the new HRA (CFILL 03)
4. Review and amend your groundwater compliance limit proposals based on the output of the revised source term and HRA, and provide the raw data, ideally in a spreadsheet format, together with your calculations used to derive new groundwater compliance limits.	A new HRA (CFILL 03) has been produced with revised compliance limit proposals and a spread sheet provided under a separate cover.
5. Provide details of how you will monitor and set compliance criteria for the groundwater outflow region at the south-east boundary of the proposed landfill where it will be constructed over the historic landfill.	The proposed landfill no longer covers the deep extant permit area and an additional BH09 has been provided on the south east boundary to enable monitoring.
6. Landfill Gas Risk assessment Review and revise the landfill gas monitoring plan and provide proposals for internal gas monitoring boreholes to confirm that no biodegradable waste has been deposited, This will also need to demonstrate that there will be no unacceptable emissions from the area where the new landfill will be constructed over the top of the historic landfill	Methane has been detected in the historic landfill in BH08S and BH08D at levels between 0 and 6 (%vol) with a low gas screening value of < 0.02 l/hr The proposed landfill will be separated from the historic landfill with an enhanced geological barrier. The filling over the extant permit area has been removed and hence filling is now only over the northern fringe of the historic landfill gas and hence will be able to dissipate readily to the south and east from below the basal liner. BH08S and BH08D will be extended to the surface of the proposed landfill to enable continued monitoring. The Gas Risk Assessment CFIL 05 has been updated The proposed landfill no longer covers the deeper more recent extant permit area.

Technical Ability

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

Management Systems

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

Environmental Risk Assessment

2.7 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.

Waste Operations

2.8 Part B4 Q1a – the total landfill capacity above the enhanced geological barrier, excluding the topsoil covering is estimated as 591,000m^3. Inert waste weight density is estimated as 18kN/m^3, which equates to 1.835 tonnes/m^3. Hence the 'annual through put (tonnes per year)' of the planned inert landfill is estimated as 108,500 tonnes per year for 10 years.

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

Table 2-2 - 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.

Waste Code	Description of waste	Restrictions
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. C & D waste polluted with inorganic or organic dangerous substances are not allowed unless it is made clear that the demolished construction has not been significantly polluted. C & D waste which has been treated, covered or painted with materials containing dangerous substances in significant amounts are also not allowed		

3. Closure and Aftercare Plan

Context – Environmental Permit and Planning Permission

3.1 Challonsleigh Farm Inert Landfill will be constructed 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 2026 then waste intake would cease by or in 2036, 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 be staffed full time when deposits are being made but at other times the nominated Site Manager will be present at DDE (SW) Ltd.'s other waste management sites also based at Challonsleigh which utilise the same access road off the A38 and weighbridge.

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', drainage 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) Ltd.'s application to vary the permit may include proposals to vary the monitoring from that specified in the permit, such as a reducing of 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 a renewable bond:

APPENDICES

Appendix A. Correspondence with Environment Agency

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/

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At Atkins - member of the SNC-Lavalin Group, we work flexible hours around the world. Although I have sent this email at a time convenient for me, I don't expect you to respond until it works for you.

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

Our web content has moved to www.gov.uk/environment-agency

Help us to improve our service and complete our customer survey -
http://www.smartsurvey.co.uk/s/NPScustomer/

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**

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- 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.

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

Yours sincerely,

Joel Robson
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Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

The Company Director and/ or Secretary

DDE (SW) Limited
Bank House
Southwick Square
Southwick
West Sussex
BN42 4FN

Application number: EPR/LB3207US/A001

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 03/08/2022.

Send the information to either the email or postal address below by 14/06/2023. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: psc@environment-agency.gov.uk.

Postal address:
Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Name	Date
Selina Franklin	19/04/2023

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Schedule

Hydrogeological Risk Assessment [HRA]

1. Provide detailed hydrogeological cross sections for each stage of the proposed development in the direction of groundwater flow and perpendicular to the site. Also provide a related map showing their alignments and relevant features, such as groundwater contours. You must include all hydrogeological details for the sources-pathways-receptors and their linkages, including the River Yealm and other surface water courses. You must include details of the artificial geological barrier, the historic landfilled waste and leachate levels within it, and monitoring infrastructure.

Reason:
Whilst cross-sections are presented, the application requires more detailed sections to accurately depict the hydrogeological site conceptual model. Detailed cross sections that accurately depict the hydrogeological conditions and flow paths prior to landfill development, during landfill construction, and post in-filling are required. These cross sections will form the basis of the conceptual models for each area in the various stages of landfilling, and a quantitative risk assessment.

2. Update the HRA to revise risk screening for groundwater and the non-hazardous and hazardous determinants that comprise inert WAC. Hazardous substances need to be assessed against the Minimum Reporting Value (MRV) or Limit of quantification (Loq), background [pre-development] quality, and not the EQS or Drinking Water Standards (DWS). This assessment should include all hazardous determinants within the proposed Waste Acceptance Criteria (WAC) – hazardous determinants within the inert landfill WAC include Arsenic, Chromium (VI), Mercury, Lead, BTEX and PAH.

Reason:
Groundwater is a receptor. It is also a pathway to the River Yealm. The HRA must show that the waste acceptance procedures will ensure that the waste does not cause pollution by non-hazardous pollutants, and that there will be no discernible discharges of hazardous substances. The HRA [Table 2-1] has not assessed non-hazardous pollutants against the lower of the background, drinking water standard or the EQS. It has not assessed hazardous substances within the proposed WAC against the minimum reporting value. You must assess, not only the waste composition, but also the geological barrier material if it is proposed that waste will be used to construct it.
Guidance on the tiers of risk assessment that are appropriate are given at https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit#generic-quantitative-risk-assessment). We expect you to have screened your waste acceptance criteria against appropriate water quality standards for the receptors identified (for example minimum reporting values, Drinking Water Standards or Environmental Quality Standards from the Water Framework Directive) or background concentrations if these are significantly lower, to identify which substances may pose a risk to the water environment. https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit#qualitative-risk-screening. We would then expect you to provide suitable assessment of those substances that exceed the water quality standards using calculations to show that the criteria proposed will not cause pollution.

Minimum Reporting Values (MRV) for hazardous substances are provided at https://www.gov.uk/government/publications/values-for-groundwater-risk-assessments/hazardous-substances-to-groundwater-minimum-reporting-values. Where a substance is not on this list we would expect you to use the Limit of quantification provided in the UKTAG Technical report on Groundwater Hazardous Substances: https://www.wfduk.org/sites/default/files/Media/UKTAG_Technical%20report_GW_Haz-Subs_ForWebfinal.pdf or contact us and we will formulate the MRV for you.

3. Provide a quantitative hydrogeological risk assessment (HRA) for the whole site, including a rogue load assessment.

Reason:

You have provided a qualitative HRA only. A Quantitative Risk Assessment (QRA), generic or detailed, has not been presented. Due to of the lists of wastes (see section 1.13) included, for example, 19 12 12, and

because the proposed deposit in part overlays an historic landfill, you need to provide a QRA, and justify the level of risk assessment applied.

A QRA HRA is required, as per guidance https://www.gov.uk/guidance/landfill-operators-environmental-permits/landfills-for-inert-waste, www.gov.uk/guidance/landfill-developments-groundwater-risk-assessment-for-leachate and www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit#qualitative-risk-screening *….due to the increased risks associated with:*

- *the potential for accepting waste that is not inert (e.g, 19 12 12);*
- *your proposal to use fines from the recycling plant to construct the basal artificial geological barrier;*
- *the provision of pathways through the Devonian strata to the River Yealm;*
- *the lack of any significant natural attenuation given the sub-water table environment;*
- *risks associated with landfilling over the historic landfill.*

The HRA should also consider a rogue load risk assessment for accepting waste that is not inert for example, contaminated soil, or non-inert waste concealed within a load of waste that appears to be inert. The rogue load risk assessment should be carried out to see how a few loads of poorly WAC assessed waste will affect the potential impact on groundwater. This can be done through the modelling by including higher input parameters for some key contaminants. You must fully describe and justify your approach to the rogue load assessment.

The risk assessment must include the possible effect of accidents, for example fuel spills, run-off to surface water, etc.

4. Review and amend your groundwater compliance limit proposals based on the output of the revised source term and HRA, and provide the raw data, ideally in a spreadsheet format, together with your calculations used to derive new groundwater compliance limits.

Reason:
Determinants selected for groundwater compliance limits need to be consistent with the revised HRA, and fully described and explained.

5. Provide details of how you will monitor and set compliance criteria for the groundwater outflow region at the south-east boundary of the proposed landfill where it will be constructed over the historic landfill.

Reason:

A monitoring borehole is required at the south-east boundary to monitor groundwater in the outflow region prior to it reaching the River Yealm. Compliance criteria are also required. This is because it is possible that there will be an impact on groundwater and the River Yealm by constructing a new landfill over the top of the historic waste. This must also be assessed in the HRA QRA.

Landfill gas risk assessment

1. Review and revise the landfill gas monitoring plan and provide proposals for internal gas monitoring boreholes to confirm that no biodegradable waste has been deposited, This will also need to demonstrate that there will be no unacceptable emissions from the area where the new landfill will be constructed over the top of the historic landfill.

Reason:
Your landfill gas monitoring plan proposes monitoring at perimeter boreholes. In-waste gas monitoring is usually required for inert waste sites. Particular risks are associated with the construction over old landfills and adequate details are missing of how you will monitor gas associated with the historic waste against gas associated with the proposed new landfill.

Appendix B. Copy of relevant qualification certificate(s)

CIWM

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 18/12/2024

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

Expiry Date: 18/12/2026

Verification date: 16/12/2024

Authorised:

Responsible Officer

Learner ID: 29064

Certificate No.: 5270106

Date of Issue: 18/12/2024

CIWM Chief Executive Officer

The Chartered Institution of Wastes Management

Scan code on reverse to authenticate that this is a genuine paper

00225557

Appendix C. Contents list of own management system

Das- Dre- Dde-

DORTON GROUP

De-construction engineers

OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM

BS ISO 45001:2018

Issue 6: JANUARY 2025

Dorton Group, Nailards Wood, Cross Colwell Lane, Bolney, RH17 5RU
and
Dre Yard, Recycling Way, Smithaleigh, Plymouth, PL7 5AX

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Das- Dre- Dde-

DORTON GROUP

de-construction engineers

QUALITY MANAGEMENT SYSTEM

BS EN ISO 9001:2015

Issue 21: JANUARY 2025

Dorton Group,
Head Office, Nailards Wood, Cross Colwell Lane, Bolney, RH17 5RU
and
Dre Yard, Recycling Way, Smithaleigh, Plymouth, PL7 5ax

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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:	20-May-25
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 perimeter 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

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