

## Compliance Assessment Report CAR\_NRW0045943

**Permit being assessed:** SP3998FQ.

For: Pope Hill 1, held by Lawrence D H & G L

At: Johnston, Haverfordwest, Pembrokeshire, SA62 3NX.

**Type of assessment carried out:** Site Inspection, Reason: Routine.

On 03/01/2025 between 14:30 and 15:00.

Parts of permit assessed: General Site Inspection

**NRW Lead Officer:** Sally Wakeford, accompanied by Michael Edwards.

**Report sent to:** Guy Lawrence, Operator on 10/01/2025.

### 1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

### 2. What action is required?

No action required.

### 3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

**At this time, we do not intend to take any further action.**

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

### 4. Details of our assessment

On 03 December 2024 a site inspection was undertaken at Pope Hill Landfills, the site hosts 3 landfill permits, EPR/SP3998FQ (Pope Hill 1), EPR/CP3398FR (Pope Hill 2) and EPR/HP3598FM (Pope Hill 3). All assessments for each of the permits was carried out at the same time. The weather was dry and cold.

**Site History**

Pope Hill 1 permit EPR/SP3998FQ (formerly EAWML 34056) was issued in 1992 for the inert arisings of waste from Pope Hill Farm. Only top soil and sub soil were permissible under the permit. A subsequent variation in 1993 of the permit allowed for brickwork, stone, set concrete, clay and sand to also be allowed for deposit, and removing the condition of only waste arising from Pope Hill Farm could be deposited.

The 1999 modification required provision of information of waste accepted to the site.

On 25 September 2003 a letter from the Environment Agency confirmed that the restoration of the site was almost complete, and the site is now considered closed and entering post closure status.

No waste activities are currently being undertaken on the landfill.

**Observations during site inspection.**

The sides of the landfill are steep, however no evidence of slippage was noted during the inspection. The requirements of the permit are a fall of 1m over every 3m. This was not measured on the day of the inspection.

The stream running along the northern boundary of the site was inspected for impact from the landfill, no impact was observed.

There is no monitoring required by the permit, and none is being undertaken or reported.

No breaches of permit were observed during the inspection.

**Surrender**

You may wish to consider surrendering the permit. Additional guidance for the surrender of landfills can be found here:

[how-to-surrender-your-environmental-permit-additional-guidance-for-landfill-and-other-permanent-deposits-of-waste-saesneg-yn-unig.pdf](#)

The type of surrender and amount of monitoring required for the site will vary depending on the types of waste imported and the compliance history of the site.

You may be able to apply for a “low risk” surrender due to the inert nature of the site however, I have not had the opportunity to look into the history of the site compliance to be completely certain of the type required.

For sites (or parts of sites) where wastes were deposited to Pre-Landfill Directive standards you should review the information that you have on that waste to determine whether the site is in a suitable condition for a surrender application to be made. You will need to:

- assess the waste deposited
- assess the sensitivity of the site and its surrounding location

Section 4.2 of the above guidance can assist you in understanding the requirements of the

surrender of your permit.

If you wish to explore the option of surrendering the permit any further please don't hesitate to contact the officer.

**END**

**Any compliance criteria not highlighted in the above summary should be considered as not assessed.**

**In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012.**

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

## Important information

### Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

### Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

### How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

**What are suspended scores?**

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

**Full list of Industry and Waste action criteria (used in section 1 and 2):****A: Permitted activities**

- A1 Specified by permit

**B: Infrastructure**

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

**C: General management**

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

**D: Incident management**

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

**E: Emissions**

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

**F: Amenity**

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

**G: Monitoring and records, maintenance and reporting**

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

**H: Resources efficiency**

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

## Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

## Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

## Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

## What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto:ask@ombudsman.wales)

## Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.