

Compliance Assessment Report CAR_NRW0046643

Permit being assessed: BB3296ZM

For: HMS Cambria, held by Reserve Forces and Cadets Association for Wales

At: Land off Cargo Rd, Cargo Road, Cardiff, CF10 4RP.

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

On 20/03/2025, between 10:00 and 10:20.

Parts of permit assessed: All

NRW Lead Officer: Harry Warburton.

Report sent to: Karen Osmond, Regional support manager, on 24/03/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B2 - Water Quality - Operations - The site	Action only (X)	
WQ-A1 - Water Quality - Management - General management	C4 No impact	1.1.1: The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C4 No impact	3.3.1 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by Natural Resources

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-D1 - Water Quality - Information - Records	C4 No impact	Wales. 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by Natural Resources Wales.

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-B2	Have the treatment system serviced and desludged yearly as part of routine maintenance.	26/05/2025
WQ-A1	Produce a written management system for the permit, guidance can be found here: https://www.gov.uk/guidance/develop-a-management-system-environmental-permits	30/06/2025
WQ-C1	Provide an accessible sampling point location at the end of the treatment system to allow for monitoring of emission limits to assess compliance.	30/06/2025
WQ-D1	Keep on site all maintenance and servicing records for the treatment system.	30/06/2025

Action criteria codes are listed in the 'Important information' section below.

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

Compliance inspection undertaken by Environment Officer Harry Warburton to assess discharge permit BB3296ZM. Weather and the time was dry and sunny.

I arrived on site at HMS Cambria Naval facility at Cardiff Docks, they have had a discharge permit for the site since 2019.

No one on site knew much about the treatment facility, it was mentioned it has never been serviced, maintained or desludged. It is recommended to service and desludge treatment systems yearly to ensure the system is operating as it should be and treating the effluent to

the required limits prior to discharge.

The treatment system is set in the ground and is only visible by lifting covers. No one on site knows of how to lift the covers for inspection, nor has it ever been done.

Due to the lack of maintenance there is no management system for the site as per permit condition 1.1.1: *The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints.*

A management system will have to be created to be compliant with this condition, information on how to do so can be found here:

[Develop a management system: environmental permits - GOV.UK](#)

Due to the lack of routine maintenance it is unknown as to whether the site is compliant with its discharge emission limits. Samples should be arranged to be taken at the site a few weeks after a service and desludge to ensure this remains compliant. Information on how to comply can be found here:

[Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

Since the covers could not be lifted on site or anyone having the means to lift the covers on site a representative sample is not able to be taken of the discharge. A monitoring point will have to be maintained at the end of the final treatment in the treatment system. As mentioned in permit condition 3.3.1 *Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by Natural Resources Wales.*

Also due to the lack of routine maintenance there are no records available on site for the treatment system as per condition 4.1.2 *The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by Natural Resources Wales.*

The site has mechanical access boxes for the treatment system with an alarm on top, this was not operating at the time of attendance.

Actions:

- Have the treatment system serviced and desludged and supply the notes to NRW once completed.
- Produce a written management system for the site.
- Provide an accessible sampling point location at the end of the treatment system to allow for monitoring of emission limits to assess compliance.
- Keep on site all maintenance and servicing records for the treatment system.

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

If your assessment result in Section 1 is suspended, what does this mean?

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

Full list of water quality action criteria (used in section 1 and 2):**WQ A: Management**

- WQ-A1 General management

WQ B: Operations

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

WQ C: Emissions and monitoring

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

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 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

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.