

Compliance Assessment Report CAR_NRW0048430

Permit being assessed: QP3098FL.

For: Withyhedge Material Recycling Facility, **held by:** Resources Management U K Ltd

At: Withyhedge MRF, Bowling Farm, Rudbaxron, Haverfordwest, Pembrokeshire, SA62 4DB.

Type of assessment: Site Inspection,

Reason: Routine.

On: 28/05/2025 between 09:00 and 12:30.

Parts of permit assessed: See Compliance Assessment Report.

NRW Lead Officer: Elliot Jones, accompanied by Rhodri Morgan.

Report sent to: Phil Ridley, Director, on 12/06/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C3 Minor	1.1.1
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	1.1.2
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W4A - Waste - Information - Records	C3 Minor	4.2
W4C - Waste - Information - Notification	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
3	12

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?

Criteria	Action needed	Complete by
W1A	Operator to submit evidence, demonstrating their compliance with the drainage requirements stated within permit	31/07/2025
W1A	Undertake drain maintenance at the WTS, clearing silt deposits.	31/07/2025
W1A	Obtain an accurate up-to-date drainage plan.	31/07/2025
W1A	Perform a drain integrity survey and issue findings to NRW.	31/07/2025
W1A	Ensure any maintenance, remediation and surveys performed on the drainage system are recorded and stored appropriately.	31/07/2025
W4A	Ensure any maintenance, remediation and surveys performed on the drainage system is recorded and stored appropriately.	31/07/2025
W4C	Apply for an administrative permit variation, ensuring the transfer to the correct operators address.	30/09/2025

Compliance 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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Withyhedge Waste Transfer Station QP3098FL

Resources Management (UK) Limited (RML) operates Withyhedge Waste Transfer Station (WTS) under the provisions of an EPR Permit (QP3098FL). The WTS accepts waste ahead of disposal within Withyhedge Landfill (MP3330WP).

As the WTS is not permitted to treat wastes (other than bulking up for onwards transport), wastes are transported directly onto the landfill for disposal. The Materials recycling facility

(MRF) which is also listed within the permit is currently non-operational.

Purpose of Compliance Assessment Report

Regulatory responsibilities for the WTS (QP3098FL) have recently been transferred from the Southwest Waste Regulation Team to the Southwest Industry Regulation Team. The close connection between the WTS and the Withyhedg Landfill permit (MP3330WP) has driven the change to streamline the regulatory approach across both permits.

Following a review of previous regulatory work undertaken at the WTS, NRW officers planned a routine inspection of the WTS on the 28th May 2025.

The Inspection included an assessment of the following:

- Incoming waste at the Waste Transfer Station (WTS)
- WTS drainage infrastructure inspection.

Waste Transfer Station Observations

The wastes deposited at WTS appeared to be shredded 19 12 12 general waste and 19 12 12 qualifying fines. These waste streams are listed on the EPR permit for the WTS and landfill (MP3330WP).

Whilst visually inspecting the waste loads NRW officers did not observe any banned or prohibited waste types in the waste mass. No landfill gas odours were noted in any of the waste bays.

Permit Ownership

In preparation for the site inspection officers reviewed the permit prior to attendance. The Operator's registered address was found to be incorrect.

Action: Apply for an administrative permit variation, to ensure the correct address is listed on the permit.

WTS Drainage Inspection

Weather conditions during the site inspection were dry/overcast, however the area had experienced multiple days of rainfall prior to the visit.

Officers noted significant volumes of surface water pooling throughout the WTS. Whilst inspecting the WTS drainage infrastructure, officers discovered the drainage system to be completely overwhelmed and blocked with large accumulations of silt .

The sites oil interceptor was found to have significant silt accumulation.

We were unable to locate the final surface water manhole listed on the Operators drainage plan, and suspect that the manhole has been covered during the recent improvements

made to the access roads near the WTS.

The Operators' failure to maintain the drainage system is contrary to permit condition 1.1.1 General Management.

As a result of this, a non-compliance score of **C3** has been allocated against compliance sub-criteria **W1A (General Management)**.

Action: Operator to submit evidence, demonstrating their compliance with the drainage requirements stated within permit.

Action: Perform drain maintenance at the WTS, clearing silt deposition.

Action: Obtain an accurate up-to-date drainage plan.

Action: Perform a drain integrity survey and issue findings to NRW.

The operator was unable to provide any maintenance or inspection records for the drainage system. This is considered contrary to permit condition 1.1.2 as the Operator has failed to demonstrate that activities onsite have been managed and operated in accordance with a written management system.

As a result of this, a non-compliance score of **C3** has been allocated against compliance sub-criteria **W1A (General Management)**.

The Operators inability to provide any site maintenance records or plans is considered contrary to permit condition 4.1.2. As a result of this, a non-compliance score of **C3** has been allocated against compliance sub-criteria **W4A (Records)**.

Action: Ensure any maintenance, remediation and surveys performed on the drainage system are recorded and stored appropriately.

Site Inspection Photos



WTS/MRF channel drainage



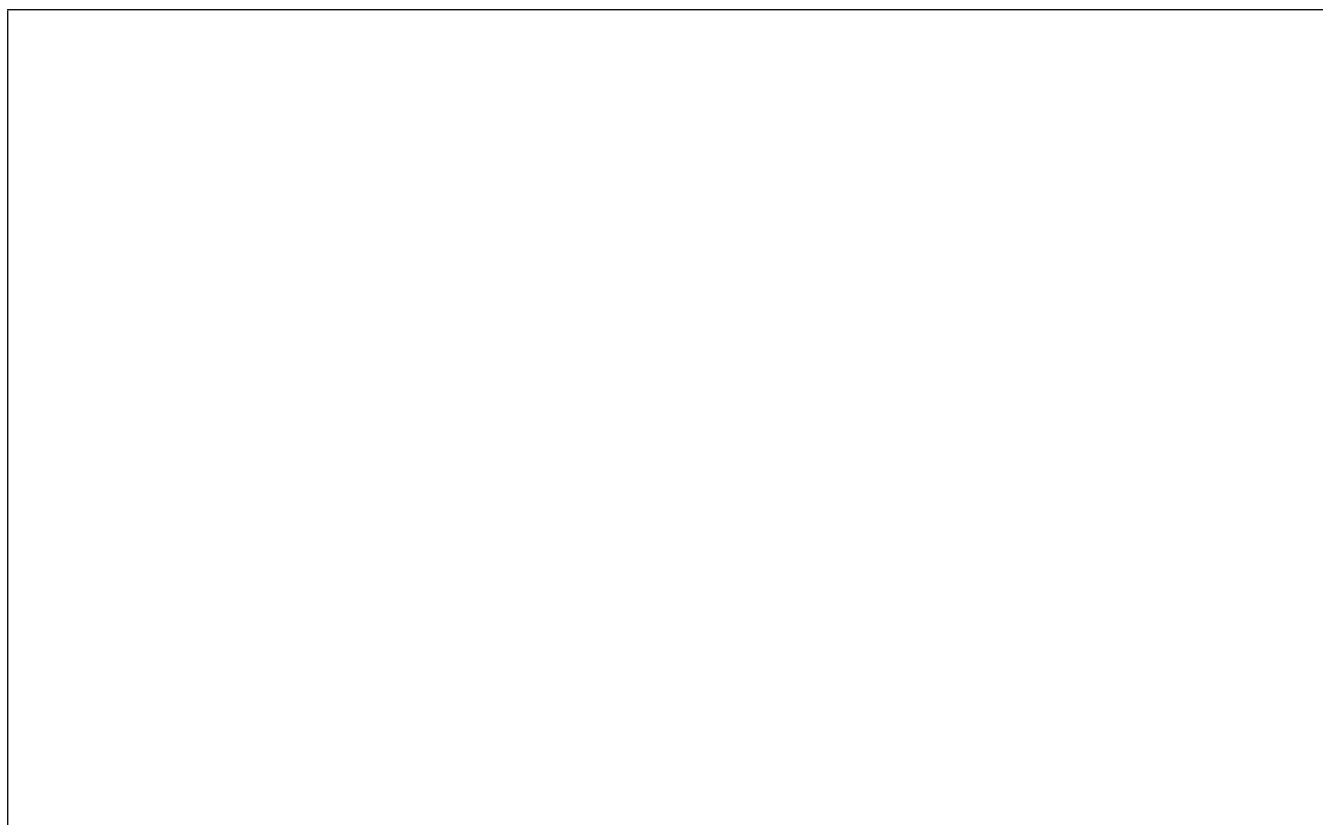
WTS drain sump



WTS Linear drain



Oil Interceptor Chamber 1



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.

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

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.