

Compliance Assessment Report CAR_NRW0048127

Permit being assessed: CB3097TY.

For: Mobile Plant, **held by:** Mr Simon Sturrock & Mrs J Claire Sturrock

At: .

Type of assessment: Report/Data Review,

Reason: Routine.

On: 22/04/2025.

Parts of permit assessed: As below.

NRW Lead Officer: Cheryl Griffiths.

Report sent to: Mr Simon Sturrock & Mrs J Claire Sturrock, Permit holders, on 15/10/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W4A - Waste - Information - Records	Action only (X)	
W4B - Waste - Information - Reporting	C3 Minor	4.2.2

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

Total non-compliances recorded	Total non-compliance score
1	4

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
W4A	As below	10/11/2025
W4B	To submit your quarterly waste returns including nil returns since Q4 2020 to Q3 2025 to NRW.	10/11/2025

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.

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 the 30th of April 2025, NRW sent you a letter regarding your active Standard Rules (SR2010 No04) waste environmental permit referenced CB3097TY.

In your letter, we recognised that on the 1st of February 2024, you contacted us via our enquiries team in search of some advice regarding your mobile plant permit. NRW did reply to your enquiry on the 8th of February 2024 requesting for you to complete a pre-application advice service form. However, I am unable to see that you managed to get back to us, so I'm now reaching out to you to ensure that you received the advice needed last year.

The letter also confirmed that NRW have recently reviewed your permit folder and we can see that you have not submitted any of your quarterly waste returns since the first quarter (January-March) back in 2017.

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Permit condition assessed**W4B - Reporting**

As your permit condition 4.2.2 states - *Within one month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.*

W4A - Records

Your environmental permit also states under condition 4.1.1(d) – *All records required to be made by these standard rules shall be retained, unless otherwise agreed by Natural Resources Wales, for at least 6 years from the date when the records were made.*

Action: You are required to submit the missing waste returns for the following quarters, by including any nil returns to waste.returns@cyfoethnaturiolcymru.gov.uk by Monday, the 10th of November 2025 to ensure that this breach does not reoccur.

- Q4 for 2020
- Q1, Q2, Q3 & Q4 for 2021
- Q1, Q2, Q3 & Q4 for 2022
- Q1, Q2, Q3 & Q4 for 2023
- Q1, Q2, Q3 & Q4 for 2024
- Q1 & Q2 for 2025

Could I also take this opportunity to remind you that the waste returns for the **3rd quarter for 2025**

are due to be submitted to waste.returns@cyfoethnaturiolcymru.gov.uk no later than the 31st of October 2025.

A CCS Category 3 score has been issued in response to this non-compliance against permit condition 4.2.2.

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If you are no longer operating the mobile plant, NRW suggests for you to consider surrendering your waste permit. We provide a pre-application service to help you to understand the application process of surrendering your waste permit which is charged at a rate of £125 plus VAT, per hour. If you'd like to apply for our pre-application service, you can access it here on our website: <https://naturalresources.wales/permits-and-permissions/environmental-permits/pre-application-advice-for-environmental-permits/?lang=en>

Once you have accessed the service, NRW shall provide you with a 'PPN' number which you'll need to reference in any of your correspondence with us in the future.

Also, for your convenience, the guidance on how to surrender your waste permit can be found on our website. <https://naturalresources.wales/permits-and-permissions/waste-permitting/apply-to-surrender-give-up-all-or-part-of-a-waste-permit/?lang=en>

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If you have any further questions about the contents of this review report, please do not hesitate to contact us.

Yours faithfully,
Cheryl Griffiths

Waste Regulation Officer

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

END

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.