

Compliance Assessment Report CAR_NRW0049718

Permit being assessed: JP3239ST.

For: Lamby Way Landfill Site EPR/JP3239ST, **held by:** The County Council of the City and County of cardiff

At: Lamby Way Landfill Site Lamby Way , Cardiff, Cardiff, CF3 8EQ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 09/10/2025 between 09:00 and 12:00.

Parts of permit assessed: 4.2 Reporting.

NRW Lead Officer: Brigid Armstead, accompanied by Alexis Alders.

Report sent to: Contract Manager, Lamby Way Landfill, on 21/10/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.3

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
IR1A	Please provide copies of a schedule and procedure(s) specific to ensuring compliance with the reporting requirements of the permit.	09/11/2025

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

NRW officers BA and AA visited Lamby Way Landfill site on Thursday 9th October 2025 for a review of reporting provisions in the sites EMS as well as an inspection of the surface water monitoring points on site. NRW Officer TW joined the initial discussions via a Teams video call.

Lamby Way landfill has been fully capped since 2017. The site is restored and is in the process of moving into definite closure. A revised closure report was submitted in 2023 and work is ongoing to bring the site into compliance with Permit conditions.

CCC provided the following updates:

- Leachate levels have been decreasing across the site and the installation of a solar powered leachate pumping station appears to be improving these levels.
- Background perimeter CO₂ levels are currently being reviewed by a specialist consultant.
- A tidal influence investigation has been undertaken and is now being used to review the site conceptual model.
- The draft Climate Change Risk Assessment has raised concerns over the location of the Effluent Treatment Plant (ETP). This is being further reviewed and may lead to a relocation of the ETP.

NRW recommended that the Operator should apply for a normal variation that includes the following factors:

- The ETP is included as a listed activity under 5.4A(1)a of the EPR in Table S1.1 of the permit.
- Removal of leachate quality limits in Table S4.7
- Tidal influence on groundwater, water balance and review of CSM and HRA
- Update the external landfill gas limitss in Table S4.5 to reflect the agreed GRA, and remove CO₂ limits from the permit in accordance with the perimeter soil gas ICoP. 
- Incorporate any other agreed limits and monitoring locations since the permit was issued into the latest landfill permit template.

Review of reporting provisions

A review of reporting provisions was arranged due to recent non compliances with reporting conditions as detailed in CAR_NRW0049112

At the time of visit, CCC advised that there was no reporting procedure in place and that the scheduling is managed by correspondence with the monitoring consultants.

CCC advised that they have been working with their monitoring consultants to agree new monitoring and reporting dates. The consultant is in the process of moving to a new data

management system which should allow for real time notification of results and non compliances. This will improve CCCs ability to submit schedule 6 notifications in a timely manner.

It is important that the conditions of Permit JP3239ST are integrated into the Environmental Management System for Lamby Way Landfill. Permit condition 1.3 requires that the operator implements a written management system sufficient to achieve compliance with the conditions of the permit.

The lack of written schedule and procedure for monitoring is considered the root cause for the reporting non compliances detailed in CAR_NRW0049112. A **category 3 non compliance** with condition 1.3 is therefore assigned.

Action: Please provide copies of a schedule and procedure(s) specific to ensuring compliance with the reporting requirements of the permit. **Due 9th November 2025**

Surface Water Monitoring Point Inspection

Surface water monitoring points SW1-SW6 were visited during the site visit. All monitoring points could be seen to be draining from the site perimeter drainage channels and out-letting to the river or estuary. Surface water flow was very low at the time of visit and SW1 was visibly dry. All surface water monitoring points were easily identifiable and easily accessible.

It was confirmed that SW6, previously referred to as Outfall D, is a surface water outfall and should continue to be monitored regularly.

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

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.