

Compliance Assessment Report CAR_NRW0049658

Permit number	MP3330WP	Operator name	Resources Management U.K Limited
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Site name	Withyhedge Landfill
Site address	Withyhedge Landfill Bowlings House, Rudbaxton, Haverfordwest, Pembrokeshire, SA62 4DB.
Type of assessment	Site Inspection

Date of assessment	30 th September 2025	Time in	09:45	Time out	11:00
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Parts of permit assessed	Site Inspection
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NRW Lead officer	Rhodri Morgan	Accompanied By	Elliot Jones
Report sent to – Name and position	Phil Ridley – Director	Date	17 th October 2025

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR1A General Management	Assessed (A)	1.1.1
IR2C Operating Techniques	Assessed (A)	2.3.1
IR2G Landfill Engineering	Action only (X)	2.6.3
IR2K Landfill gas management	Assessed (A)	2.10.1 & 2.10.2
IR4A Records	Action only (X)	4.1.2

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

2. What action is required?

Compliance Criteria	Action needed	Complete by
IR2G	Action 49658/01 – Operator to submit CQA Plan for the installation of the gas abstraction infrastructure identified for Cell 10.	14/11/2025
IR4A	Action 49658/02 – Ensure that records required by permit condition 2.7.7 are retained and readily	31/10/2025

Compliance Criteria	Action needed	Complete by
	accessible on site, either in electronic or physical format.	

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 prosecutions 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

Resources Management (UK) Limited (RML) operates Withyhedge Landfill under the provisions of an EPR Permit (MP3330WP). The Site is a non-hazardous landfill which has been constructed in two phases. Phase 1 accepted waste from 1985 until its closure in 2006. Phase 2 is where the current active tipping area is found at the Site; specifically, Cell 9.

Introduction

A site inspection was undertaken on the 30th September 2025, to observe the initial deposit of waste within Cell 10 (Sub Cell A)

While onsite we also undertook an inspection of the Waste Transfer Station (WTS) which is operated under a separate EPR Permit (QP3098FL). NRW Officers were accompanied throughout the site visit by the Site Manager.

Site Observations

Waste Transfer Station (WTS)

Prior to the landfill inspection, NRW officers conducted an independent visual and olfactory assessment of the waste deposited in the Waste Transfer Station (WTS) bays, for eventual disposal at the landfill.

RML confirmed that non-hazardous shredded general waste (19 12 12) and Qualifying Fines (19 12 12) had been accepted throughout the day. These waste streams are listed on the EPR permit for the landfill and WTS (QP3098FL).

No malodorous emissions were detected in the deposited waste. The inspected waste did not appear to contain any materials prohibited under the conditions of either site's permit (WTS and landfill).

Operational Area (Cell 10)

Waste disposal activities have commenced within Cell 10 (Sub Cell A) following the submission and acceptance by NRW of the Construction Quality Assessment (CQA) Validation Report. The cell has been constructed as two sub cells (Sub Cells 10 A – B) which will be filled sequentially to minimise open areas of waste.

RML has prepared a waste phasing plan for the filling of Cell 10 which was reviewed and accepted by NRW (CAR_NRW0049464). The plan details how disposal activities in Cell 10 will be managed to minimise emissions of landfill gas; from the initial deposit of waste through to capping.

Capping and gas abstraction infrastructure will be installed in a phased manner as the waste mass develops. A CQA Plan for the installation of the gas abstraction infrastructure throughout Cell 10 is required.

Action 49658/01 – Operator to submit CQA Plan for the installation of the gas abstraction infrastructure identified for Cell 10.

As per the waste phasing plan, RML were in the process of installing the access ramp into the cell. This material appeared free from any wastes that could cause damage to the underlying cell drainage and lining systems. No evidence of any banned or prohibited wastes were observed in the areas that we inspected.

NRW Officers confirmed that the leachate well associated with Cell 10 (Sub Cell A) had been connected to the leachate extraction system. We also confirmed that the target pads identified for the cell had been installed.

Cell 10 (Sub Cell B) Construction Progress

Cell 10 has been constructed in a phased manner, with Sub-Cell A to the north and Sub-Cell B to the south, separated by an internal inter-cell bund.

Construction of Sub-Cell B is ongoing, with the Operator advising that poor weather conditions had delayed progress.

Cell 9

Waste disposal activities within Cell 9 have now ceased following the cell reaching its discrete capacity.

The majority of the cell has been covered with a temporary capping; leaving a plateau where final waste levels have been achieved. The uncapped area was covered with a cohesive, soil-type material. No malodorous emissions were noted during our inspection of Cell 9.

The Operator advised that a series of 15 permanent gas wells would be installed throughout the uncapped area, starting on the 20th October 2025. Following the installation of the permanent gas wells, the temporary cap would be extended to encapsulate the whole cell.

The Operator has submitted a CQA Plan for the installation of the permanent gas wells; this is under review by NRW.

Waste Records

During a site inspection on the 14th August 2025 (CAR_NRW0049131), NRW Officers identified a permit non-compliance related to record keeping (IR4A). RML were unable to produce waste records onsite, with the Operator stating the records are stored centrally at RML's registered office in Cardiff.

Following the site inspection, RML confirmed they had updated their procedures to ensure waste records are now available onsite.

While improvements have been made, with certain records available onsite, the Operator remains non-compliant with permit condition 2.7.7, which states:

"The Operator shall maintain and implement a system which ensures that a record is made of the quantity, characteristics, date of delivery and, where practicable, origin of any waste that is received for disposal or recovery and of the identity of the producer, or in the case of municipal waste and multiple collection vehicles, of the collector of such waste. Any information regarded by the Operator as commercially confidential shall be clearly identified in the record."

Action 49131/02 – Ensure that records required by permit condition 2.7.7 are retained and readily accessible on site, either in electronic or physical format.

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 in the aspects assessed.
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

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 – 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.