

Compliance Assessment Report CAR_NRW0049956

Permit being assessed: UB3397TY.

For: Cole Contractors Cardiff, **held by:** Cole Contractors Cardiff Ltd

At: 19 Whittle Road, Leckwith Industrial Estate, Leckwith, Cardiff, Cardiff, CF11 8AT.

Type of assessment: Site Inspection,

Reason: Routine.

On: 25/09/2025 between 12:25 and 13:10.

Parts of permit assessed: W1A, W4B, W2A, W2C, W2D, W3E.

NRW Lead Officer: Daniel Hopkin, accompanied by Craig Coleman.

Report sent to: Stephen Vickers, TCM, on 19/11/2025.

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	1.1.3
W1A - Waste - Management - General management	C3 Minor	1.1.4
W4B - Waste - Information - Reporting	C4 No impact	4.2.2

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

Total non-compliances recorded	Total non-compliance score
3	8.1

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	Please ensure a hard copy of the Environmental Permit and Environmental Management System is readily available for all staff on site at all times.	Already completed
W1A	Please send us a copy of your new certificate once you've completed the training and received the certificate.	12/12/2025
W4B	Please ensure going forward you submit your quarterly waste	Already

Criteria	Action needed	Complete by
	returns within the 1 month allowance after each quarter.	completed

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

Cole Contractors (EPR/UB3397TY) – 25/09/2025

Officers Daniel Hopkin and Craig Coleman attended the permitted facility of Cole Contractors at 19 Whittle Road, CF11 8AT, on the 25th of September 2025 to undertake a routine site inspection. Cole contractors hold a Tier 3 bespoke permit. We arrived at 12:25. The weather was dry with sun for the duration of the inspection.

Site infrastructure and drainage

The site benefits from well-maintained hard standing and impermeable surface, with no signs of damage or rutting. The drainage infrastructure was also in good condition, with no signs of water pooling. The site housekeeping was good with no loose mud or debris.

Site Paperwork

W1A General Management

Permit condition 1.1.3 states “*Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.*”

A copy of the site’s Environmental Permit and Environmental Management System (EMS) must be kept on site and always be readily available. This ensures that staff can refer to the relevant procedures and compliance requirements as needed and support effective site management. Failure to ensure these are readily available on site constitutes a category 3 (minor) breach of permit condition 1.1.3 and has been recorded under sub-criteria W1A General Management.

Action: Please ensure a hard copy of the Environmental Permit and Environmental Management System is readily available for all staff on site at all times.

Permit condition 1.1.4 states **“The operator shall comply with the requirements of an approved competence scheme.”**

It has been identified that the sites technically competent managers WAMITAB certificate had expired on the 29/03/2025. Failure to have a valid continuing competency in place constitutes a category 3 (minor) breach of permit condition 1.1.4 and has been recorded under sub-criteria W1A General Management.

However, we do acknowledge that following the inspection it has been confirmed that the operator has now booked their continued competency course for the 2nd December 2025.

Action: Please send us a copy of your new certificate once you’ve completed the training and received the certificate. Please complete this action by the 12th of December 2025.

Waste Returns

W4B -Reporting

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.”*

This requirement applies regardless of whether any waste activity has taken place during the reporting period. Therefore, nil returns must still be submitted where applicable to ensure full compliance. At the time of the inspection NRW had not received Q4 2023, Q1, Q2, Q3, Q4 2024 and Q1, Q2 2025. This constitutes a category 4 (no environmental impact) breach of permit condition 4.2.2 and has been recorded under sub-criteria W4B – Reporting. I have been informed that the missing waste returns have now been submitted and accepted by NRW.

Advice and Guidance

Please ensure going forward you submit your quarterly waste returns within the 1 month allowance after each quarter.

Request for information for end of waste criteria

This is a link to Natural Resources Wales (NRW) current document on street sweepings and gully emptying → [Waste Return Reporting](#)

While on site we discussed the EWC codes for street sweepings, we also discussed you had a permit variation to allow for mechanical treatment of the waste. When waste is de-watered, sorted and screened (multiple mechanical treatments) which your machine does it changes the waste from the 20 03 03 to a 19 12 11 (mirror hazardous code) or 19 12 12 (mirror non-hazardous code). You can decide to send the waste out under 19 12 11 as hazardous or do the testing on the waste and prove it’s not hazardous and send it out under 19 12 12. If you decide to do the testing to prove its non-

hazardous, you'll have to get a sampling plan, classification and testing documentation together, then have this sent over to NRW and we can review it. This document would be detailing information such as how you test, what procedure is done when testing and frequency of testing.

If you look through the street sweeping guidance I've linked above, there are FAQs in the document that should help you decide your best course of action if you do go down the end of waste route. Currently under section C7 of the street sweeping guidance it does say that you can in some cases put the street sweepings and gully emptying's through a treatment process that has treated it to a level that would make the recovered grit reach a classification as inert waste that could comply with the Aggregates Quality Protocol that meets end of waste criteria. The mixed road sweepings and gully emptying's must go through a treatment process that has treated it to a level that would make the recovered grit reach a classification as inert waste (EWC code 19 12 09), which would be acceptable as a source waste for the Quality Protocol. The recovered grit would also need to be tested to meet the relevant specifications for use as aggregate, which are set out in Appendix B of the Aggregates Protocol.

Here is a link to the Aggregate Quality Protocol for you to read -

[CD1.Y Quality Protocol. Aggregates from inert waste. End of waste criteria for the production of aggregates from inert waste. WRAP October 2013..pdf](#)

Thank you for your time during the inspection. The site inspection concluded at 13:10.

If you have any queries regarding this Compliance Assessment Report, please contact me on the details below.

Daniel Hopkin

Daniel.Hopkin@cyfoethnaturiolcymru.gov.uk

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.