

Compliance Assessment Report CAR_NRW0050195

Permit being assessed: BP3095SR.

For: The Lodge, **held by:** Penllyn Estate LLP

At: The Lodge, Gibbots Hill, Cowbridge, Vale Of Glamorg, CF71 7FF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 02/12/2025 between 12:00 and 12:40.

Parts of permit assessed: 1. Management 2. Operation.

NRW Lead Officer: Marc Campbell, accompanied by Laoni Tye.

Report sent to: Andrew Shackell , Permit Holder, on 19/12/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2C - Waste - Operations - Operating techniques	C3 Minor	2.3.1

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
W2C	ensure food waste bins closed with a lid and stored inside a building	Already 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

On 02/12/2025, Waste and Industry Regulation Officer; Marc Campbell and Senior Waste and Industry Regulation Officer Laoni Tye attended, Penllyn Estate LLP, The Lodge, Llwynhelig, Gibbotts Hill, Cowbridge, Vale of Glamorgan, CF71 7FF to conduct a routine site inspection and to assess compliance with environmental permit: EPR-BP3095SR

The operator holds a: Bespoke Permit. This site is a transfer station.

Breaches Recorded (Category 3)

W2C - Operating techniques

Route Cause Breach: 2.3

Permit Condition 2.3.1 states:

(a) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in Schedule 1, Table S1.2, unless otherwise agreed in writing by Natural Resources Wales.

Table S1.2 states that ‘ Biodegradable kitchen and canteen waste (20 01 08) shall be stored within a building within a secure, sealed, and lidded container’. We observed two large waste food containers on site that were stored outside. One of the containers was closed and empty however the other was open and full of food waste. The permit conditions state in table s1.2 that “Biodegradable kitchen and canteen waste (20 01 08) shall be stored within a building within a secured, sealed and lidded container.

Action: As discussed with the site manager Daryl Thomas, these containers need to be stored inside and the lids closed unless they are being treated as part of the permit conditions. The issue of having food waste open to the elements outside can encourage pest like rats and flies. It can also help seal in foul odour from the decomposition of the food waste, which if not controlled could lead to complaints and further breaches. Outside storage has not been risk assessed as part of the permit determination.

We also witnessed the batteries stored inside the building did not have a lid on them, which is stated in S1.2 of your permit conditions, however Daryl did rectify this at the time of the visit.

Areas assessed as compliant and other comments can be found below.**Waste transfer station**

Whilst inspecting the site, the concrete bays where the waste is stored was tidy and no cross contamination was apparent. The bay with treated bailed waste was stored correctly and did not exceed the height and weight threshold of the permit.

The concrete surface was in good condition and not showing signs of damage or weathering.

W1A - General management

Permit condition 1.1.2 States: ***Records demonstrating compliance with condition 1.1.1 shall be maintained.***

and

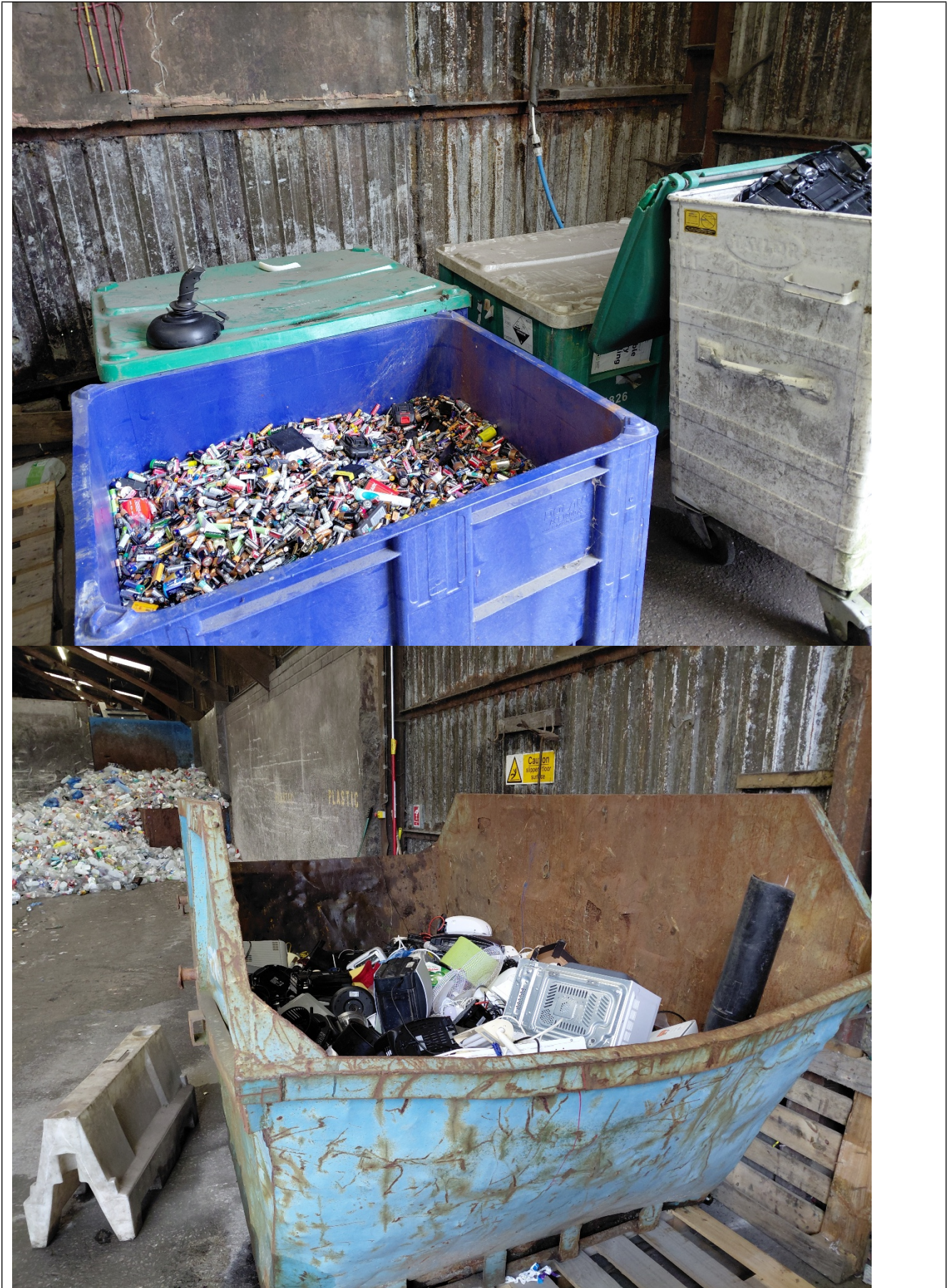
1.1.1 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

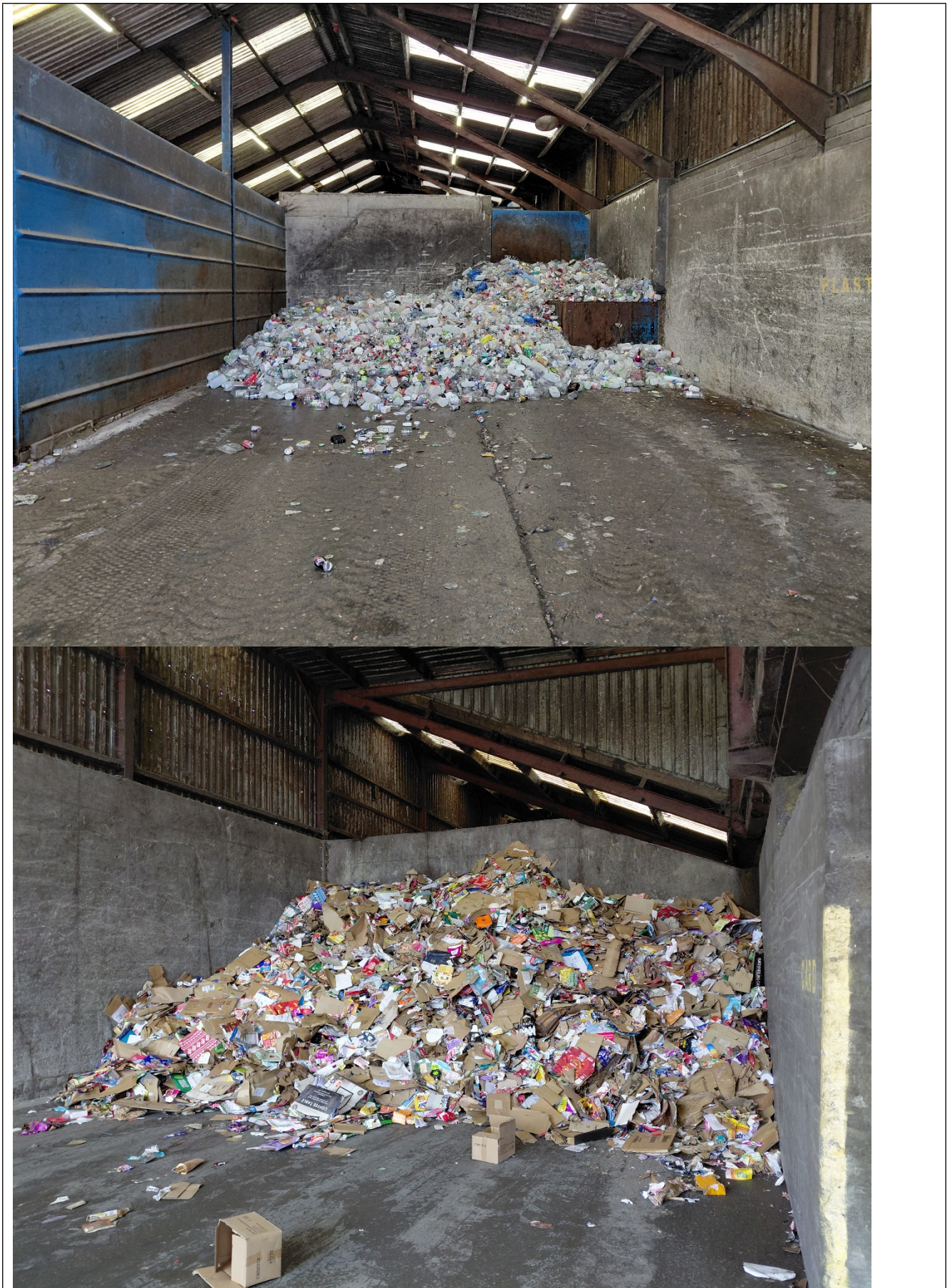
Records and Compliance

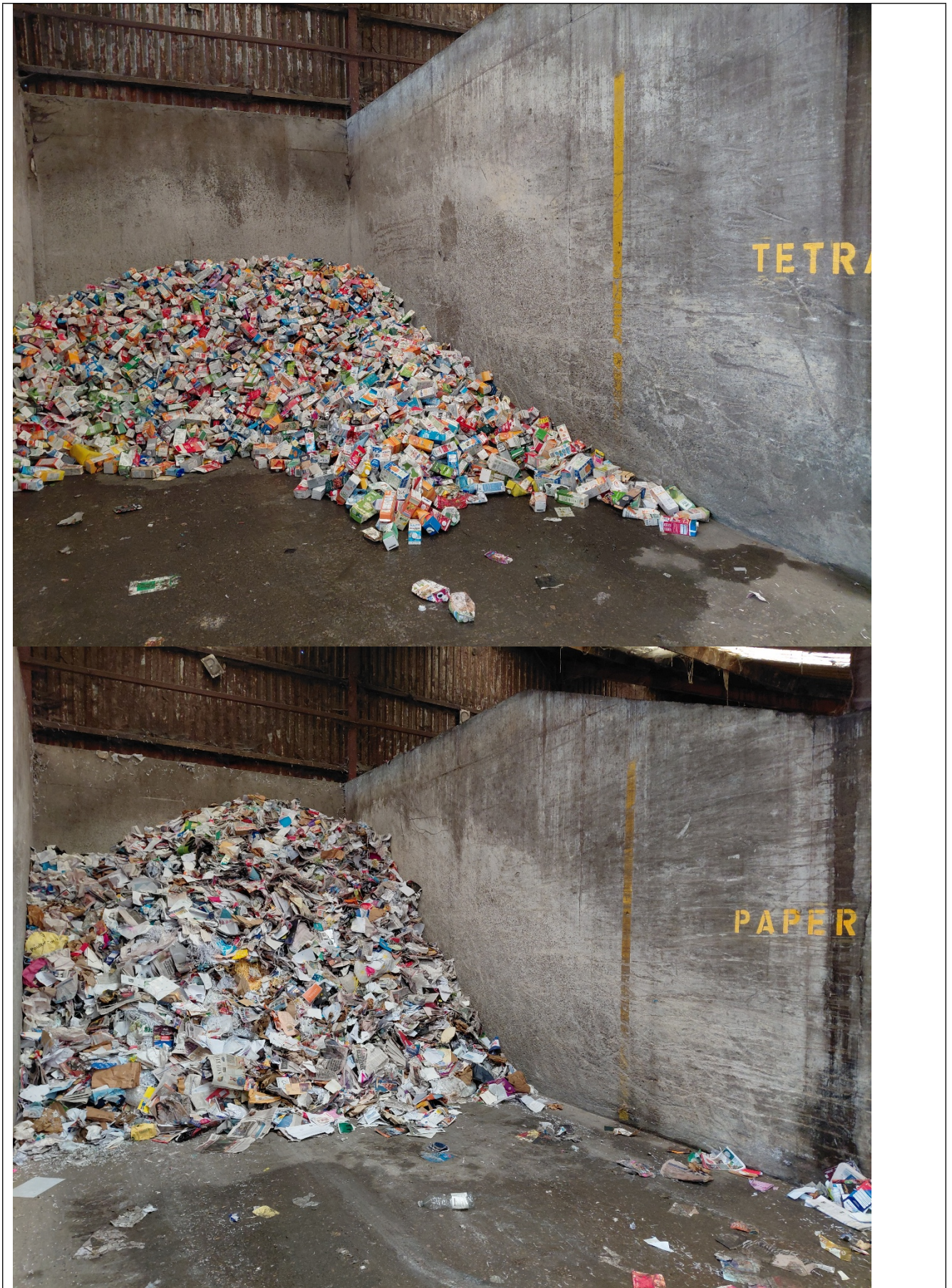
We were happy to see that records and documentation (EMS, Permit, FPMP, Waste Returns, Waste Transfer notes) were available on request at the office. The site manager wasn't able to provide me with the interceptor tanker waste transfer notes at the time, however the TCM Mr Harvey kindly provided this via email after the visit on the 2nd of December.

We did briefly discuss the potential for the site to fall under a Metals Recycling Facility (MRF). Here is the link to the self-assessment page to determine if you fall within the criteria: [Natural Resources Wales / Check, notify, sample and report a materials facility](#)

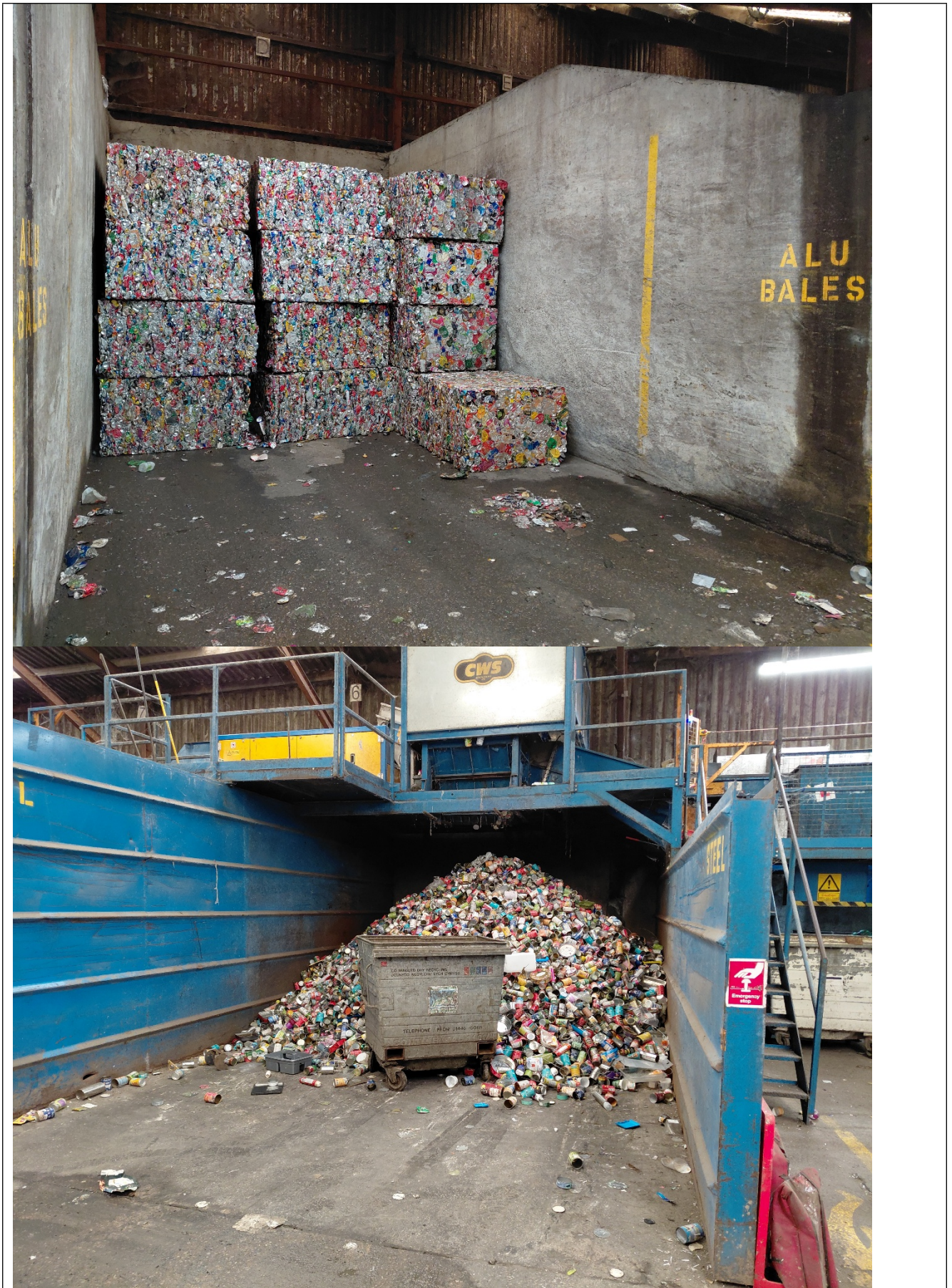
Photographs from visit:



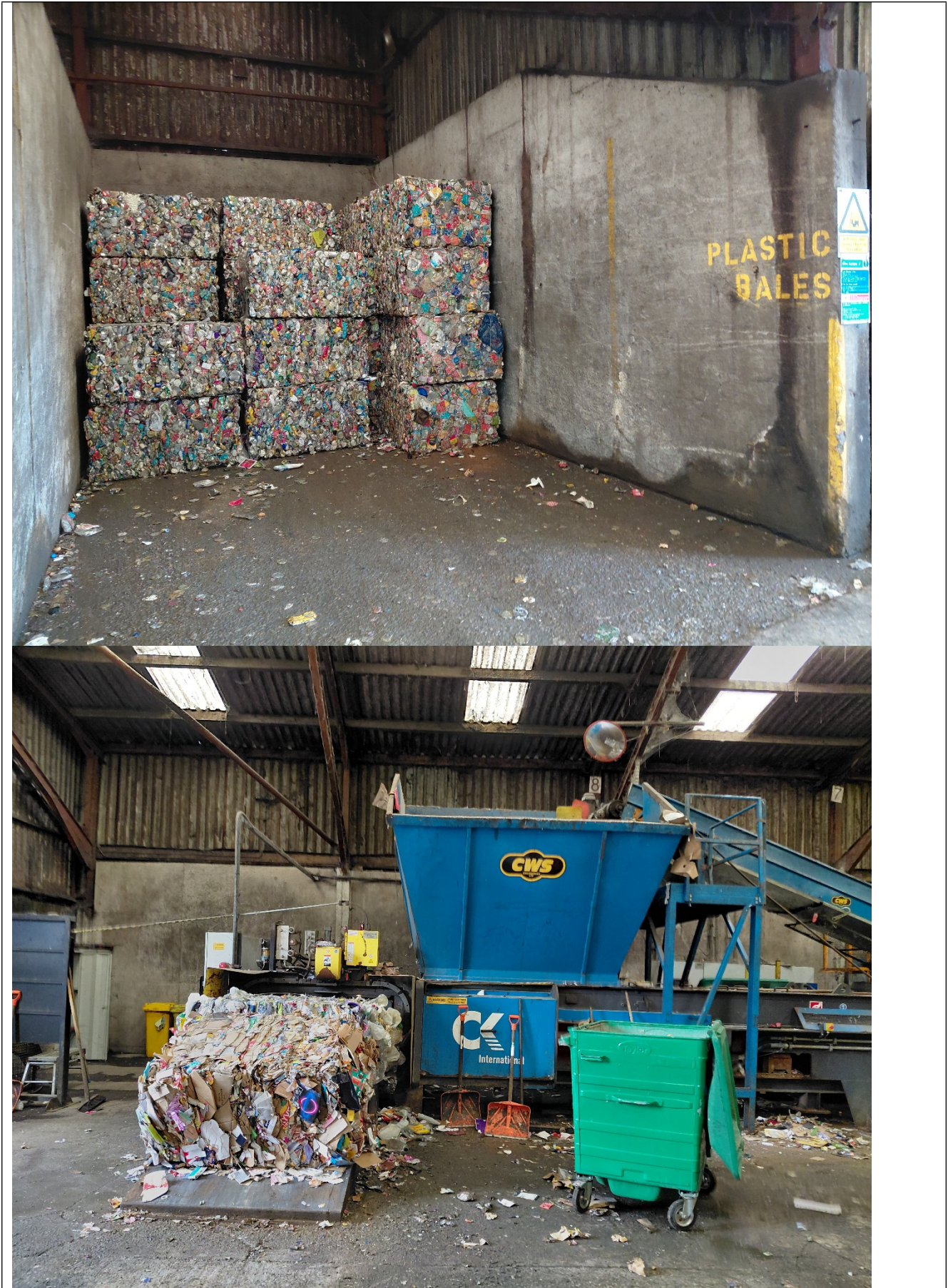














We would like to thank the site manager Daryl for showing us around the site and answering our questions.

If you have any queries relating to this report, please do not hesitate to contact myself on the details below.

Marc Campbell

Email: Marc.campbell@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.