

Compliance Assessment Report CAR_NRW0048134

Permit being assessed: WP3495EH.

For: Unit 2, Sea View Bungalow, **held by:** Anthony Parsons

At: Peterstone, Wentlooge, Cardiff, Glamorgan, CF3 2TN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/03/2025 between 12:17 and 12:43.

Parts of permit assessed: all.

NRW Lead Officer: Magda Leonowicz.

Report sent to: Anthony Parsons, n/a, on 14/01/2026.

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	C2 Significant	The permit condition 1.1.1 states: 1.1.1 The activities shall be managed and operated: a) in accordance with a management system, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances and those drawn to the attention of the licence holder as a result of complaints; b) by sufficient persons who are competent in respect of the responsibilities to be undertaken by them in

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
		connection with the operation of the activities.
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	C2 Significant	The permit condition 2.1.1 Licence holder is authorised to carry out the activities specified in schedule 2, table 2.1 ('the activities'). Table 2.1 Licence activities states: Non-hazardous waste must be kept on an impermeable surface with sealed drainage. Inert wastes must be kept on hardstanding or on an impermeable surface with sealed drainage. No waste shall be kept within 7 meters of any watercourse or drainage ditch.
W4B - Waste - Information - Reporting	C4 No impact	The permit condition 4.2.2. states: A summary report of the waste types and quantities accepted and removed from the site shall be made for each quarter. It shall be submitted to the Agency within one month of the end of the quarter and shall be in the format required by the Agency.

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

Total non-compliances recorded	Total non-compliance score
3	62.1

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	<p>1. Please provide an Environment Management System (EMS) that is fully aligned with the conditions of your permit and the requirements set out in the 'How to Comply with Your Environmental Permit' guidance.</p> <p>2. Please provide the details of a person who acts up as a technically competent manager and holds up to date relevant qualifications.</p>	18/03/2026
W3B	<p>a) Please, move all waste that has been stored in breach of permit condition 2.1.1, Table 2.1 (storage on permeable surface) to a suitable location within the site boundary, or removed from the site.</p> <p>b) Please remove all unpermitted waste including but not limited to hazardous items such as contaminated paint cans, aerosols and fire extinguishers that have been stored at the site to an authorised facility.</p> <p>c) Provide waste transfer notes and consignment notes evidencing removal of any wastes from the site to an authorised facility.</p>	18/03/2026
W4B	Please provide waste returns covering the period from May 2022 to the present. If there were periods during which waste was not removed from the site, nil returns must still be submitted for those periods.	18/02/2026

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

This Compliance Assessment Report (CAR) Form has been completed following a site inspection undertaken at Unit 2, Seaview Bungalow, Peterstone, Wentloog, Cardiff CF3 2TN on the 20th of March 2025.

The visit was conducted by Magda Leonowicz, the Waste Regulation Officer and Dewi Williams, the Tackling Waste Crime Officer.

The purpose of the unannounced visit was to conduct a routine site inspection. During the visit, no operations were carried out at the site as no personnel were present.

The permit held by Anthony Parsons at the Sea View Bungalow site is for a household

commercial and industrial waste transfer station with treatment. The annual input is less than 5,000 tonnes. The permit allows for the acceptance of non-hazardous waste only.

Breaches:

1.W1A – General management – Category 2 root cause breach

The permit condition 1.1.1 states:

1. The activities shall be managed and operated:

a) in accordance with a management system, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances and those drawn to the attention of the licence holder as a result of complaints;

b) by sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.

Category 2 breach has been given for the 1.1.1. Condition of the permit under W1A - General Management because:

Environmental Management System (EMS)

Your Environmental Management System (EMS) is non-compliant as it does not contain all the information required by the How to Comply with Your Environmental Permit guidance [How to comply with your environmental permit](#).

The EMS must accurately reflect the conditions, activities, and limitations specified in your permit.

Action:

Please provide an EMS that is fully aligned with the conditions of your permit and the requirements set out in the *How to Comply with Your Environmental Permit* guidance.

Technically competent manager

Our records show that the technically competent manager certificate expired on 20/02/2020 and NRW has not been provided with an up to date document since that date. As a result the site is not managed by a technically competent person, which is a breach of the permit conditions 1.1.1.b).

Action:

Please provide a copy of the certificate for the person acting as the Technically Competent Manager, confirming that they hold current and relevant qualifications.

General management, permit condition 1.1.1 is also being considered as the root cause of other breaches identified on site which are detailed below. The number of non-compliances and the ongoing issues around waste storage volumes and the environmental risk it poses has led to a category 2 breach being scored. It is reasonably foreseeable that should an incident occur on site, such as a fire, due to the way the site is managed there is the potential for a significant environmental impact to occur.

2. W1A – General management Category 2 breach

The permit condition 2.1.1 Licence holder is authorised to carry out the activities specified in schedule 2, table 2.1 ('the activities').

Table 2.1 Licence activities states:

Non-hazardous waste must be kept on an impermeable surface with sealed drainage.

Inert wastes must be kept on hardstanding or on an impermeable surface with sealed drainage.

No waste shall be kept within 7 meters of any watercourse or drainage ditch.

Category 2 breach has been given for the 2.1.1. Condition of the permit under W1A - General Management because:

Waste acceptance and storage

Upon entering the site, the officers observed a large pile of unsorted/mixed waste. The waste consisted of a mixture of plastic, metals, paper, soil, inert waste, and unpermitted hazardous waste such as paint cans, aerosols, fire extinguishers as shown of the photographs 01, 02, 03 and 04 below:



Photograph 01



Photograph 02



Photograph 03



Photograph 04

The waste pile was located on an permeable surface, which could allow any liquids such as contaminated rain water to percolate through to the ground and potentially reach nearby watercourses. The pile was also overgrown with grass, suggesting that the waste had been stored there for several weeks or longer. Please see the Photograph 05 below:



Photograph 05

Officers observed that skips filled with mixed waste were being stacked on top of one another as shown on Photographs 06, 07 and 08. The skips were placed directly on grass without any cover, allowing rainwater to enter freely, and percolate through to the soil and nearby watercourses.



Photograph 06



Photograph 07



Photograph 08

A pile of burnt waste was observed at the site, indicating that burning had taken place. Please note that the permit does not allow any form of burning. See Photograph 09 below.



Photograph 09

Potentially hazardous liquids, such as used car oils in containers, were stored on grass less than 7 m from the surrounding watercourses. No secondary containment was in place, which increased the potential risk of pollution to the ground and surface water. Please see the photographs 10 and 11 below.



Photograph 10



Photograph 11

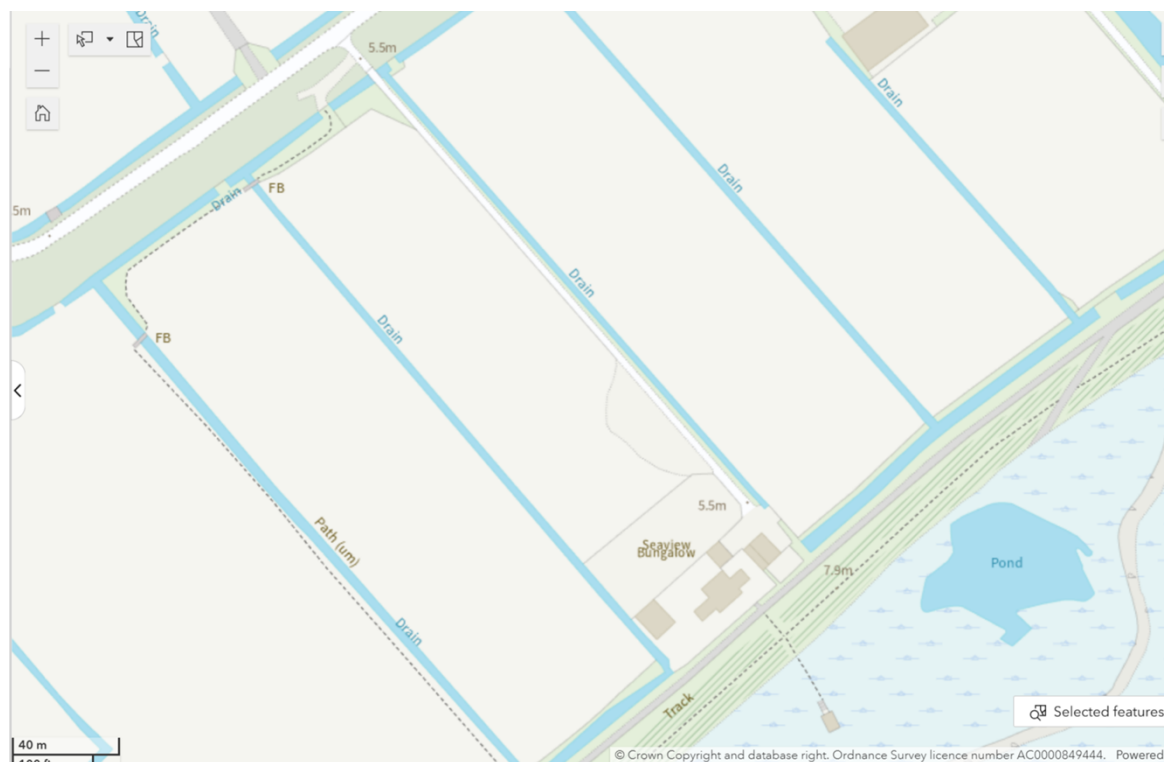
The site is surrounded by drains, as shown on Map 01 below. The entire area forms part of a designated Site of Special Scientific Interest (SSSI) – Gwent Levels. This site is of national importance for its wildlife. Storing waste without implementing protective measures poses a risk of contamination and harm to the surrounding environment and features of the Gwent Levels site.

Action:

- a) Please, move all waste that has been stored in breach of permit condition 2.1.1, Table 2.1 (storage on permeable surface) to a suitable location within the site boundary, or removed from the site.
- b) Please remove all unpermitted waste including but not limited to hazardous items such as contaminated paint cans, aerosols and fire extinguishers that have been stored at the site to an authorised facility.
- c) Provide waste transfer notes and consignment notes evidencing removal of any wastes from the site to an authorised facility.

The root cause of this breach has also been identified above, relating to Condition

1.1.1 of the permit around general management.



Map 01

3. W4B Reporting – category 4 breach

The permit condition 4.2.2. states:

A summary report of the waste types and quantities accepted and removed from the site shall be made for each quarter. It shall be submitted to the Agency within one month of the end of the quarter and shall be in the format required by the Agency.

A category 4 breach has been given for the W4B Reporting criterion because:

The last waste returns were provided to NRW on 02/05/2022.

Action:

Please provide waste returns covering the period from May 2022 to the present. If there were periods during which waste was not removed from the site, nil returns must still be submitted for those periods.

4. Advice and Guidance - Fire Prevention and Mitigation Plan (FPMP)

Fire Prevention and Mitigation Plan (FPMP)

As part of the Environmental Management System, you must state the risk that arise from all the activities carried out at the site. Poorly managed waste sites may pose a high risk of fire, which is likely to cause air, land, or water pollution.

To minimise the risk of fire, you should have and adhere to a written Fire Prevention and Mitigation Plan. The best available guidance we have is the Fire Prevention and Mitigation Plan guidance [Natural Resources Wales / Fire prevention and mitigation plans](#) and we therefore recommend you utilise this for your plan.

Action:

Please provide a written Fire Prevention and Mitigation Plan using our best available guidance. The plan should be produced as a standalone document.

Once you provide the Fire Prevention and Mitigation Plan, I will assess it as part of the Environment Management System review.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.