

Compliance Assessment Report CAR_NRW0050456

Permit being assessed: NB3597TA.

For: Caerwent Training Area, **held by:** Simon Stone

At: Caerwent, NP26 5XL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 14/01/2026 between 12:00 and 12:30.

Parts of permit assessed: Various.

NRW Lead Officer: Carla Curtis, accompanied by Cerys Phillips.

Report sent to: Simon Stone, Director, on 23/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2D - Waste - Operations - The site	Assessed (A)	
W4A - Waste - Information - Records	Action only (X)	
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
1	0.1

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
W4A	Please send an up-to-date copy of your WAMITAB certificate	28/02/2026
W4B	Submit all outstanding waste returns for 2024/2025	28/02/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

This report details the site visit made on the 14 January 2026 to Crownhill Topsoil at Caerwent Army Training Estate, Permit Number EPR/NB3597TA held by Simon Stone. Natural Resources Wales (NRW) Officers Carla CURTIS and Cerys Phillips attended the permitted facility for an announced routine site inspection. Officers arrived at around 12.00, The weather was dry, overcast, and cold.

Officers met with Environmental Consultant, Julian Gregory and the Site Manager who showed officers around the site.

Site Operations

The Permit is not currently operational, and no material is being stored or processed at the location. It was mentioned they might look to surrender the permit, please see information below.

Information regarding permit surrender

You will need to establish what type of surrender application you are eligible to apply for - further details can be found on our website:

[Natural Resources Wales / Apply to surrender \(give up\) all or part of a waste permit](#)

The cost for a basic or normal surrender is calculated using our Charging Guidance Scheme and your OPRA score. More information can be found on Our Charges section of our website:

[Natural Resources Wales / Our charging schemes](#)

You will also need to complete a Site Condition Report (SCR) to show evidence as to how the site can meet the requirements of a low-risk surrender. The SCR will include information such as...

- Pollution incident history and how any pollution incidents were rectified.
- Compliance with the permit and Environmental Management System as well as any Compliance Assessment Reports (CAR)
- Any submitted waste returns

As part of the surrendering process, NRW Environment Officers would be required to conduct a final site inspection to ensure that there has been no fly-tipping on the land and that we are satisfied that the site has been cleared to a reasonable standard. This final site inspection report will form part of the surrendering process.

Site Condition Report Template – [SCR template](#)

Site Condition Report Guidance –

[Environmental Permitting Regulations, Guidance for applicants H5, Site Condition Report, Guidance and Template](#)

Until the permit is surrendered you will continue to pay the annual subsistence fees for the permit, we would advise that it is in your best interest to submit a surrender application.



Photo 1 – showing empty site

Technical Competency

ACTION – Please send an up-to-date copy of your WAMITAB certificate to NRW officer following the issue of this CAR form so we can save this on file.

Deadline by 28 Feb 2026.

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Waste Returns

Waste Returns have not been received since the October 2024. NRW Officers informed site staff that all outstanding waste returns for this permit must be submitted as this permit is still active, even if it is a null return.

Permit condition 4.2.2 requires the operator to submit a quarterly summary record of the waste types and quantities accepted and removed from the site within one month of the end of each quarter.

4.2.2 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.

The above breach of Condition 4.2.2 has been scored a Category 4 breach under W4B – Reporting

ACTION – Submit outstanding waste returns for 2024/2025.

Deadline by 28 February 2026.

If you have any issues with this report, please contact Carla Curtis on carla.curtis@naturalresourceswales.gov.uk Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

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.