

Compliance Assessment Report CAR_NRW0050541

Permit being assessed: DB3299FV.

For: Pembrokeshire Eco Park, **held by:** Pembrokeshire County Council

At: Amoco Road, Milford Haven, Pembrokeshire, SA73 3FB.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 30/01/2026.

Parts of permit assessed: Improvement Condition IC1.

NRW Lead Officer: Angharad Clark.

Report sent to: Nigel Cole, Site Manager, on 30/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2G - Waste - Operations - Improvement programme	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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
W2G	See text below	30/04/2026

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.

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

W2G – Improvement Programme

Introduction

NRW's Air Quality and Noise Team have reviewed the assessment provided by the Waste and Resource Action Programme (WRAP) on behalf of Pembrokeshire County Council. This was in order to satisfy a Permit Improvement Condition (IC1).

The site is located approximately 3 km northwest of Milford Haven and will accept a range of wastes: approximately 74,999 tonnes of hazardous and non-hazardous waste per annum. The area to the north of the site consists of agricultural land and commercial/industrial premises are located to the south and west.

Conclusions

Our assessment is based solely on the information provided in the submitted assessment and assumes all principal noise sources have been identified by the operator and included in the assessment and modelling.

The consultant has not satisfied the Improvement Condition in full as the consultant has only assessed the Waste Transfer Station (WTS).

The consultant has not taken any measures at the receptors to determine sound levels. The consultant stated that the locations assessed were representative of receptor outdoor amenity spaces and that the site noise was mostly inaudible at either location, concluding that direct measurement at the receptors would not yield any meaningful results. This is not in-line with BS4142.

Comments

The consultant indicates that their assessment of potential noise impacts at the receptors identified in the submitted assessment meets the requirements of BS4142:2014+A1:2019 "Methods for rating and assessing industrial and commercial sound" (BS4142).

IC1 states "Following successful commissioning and establishment of routine steady operation, the Operator shall undertake a BS4142:2014+A1:2019 noise impact assessment following guidance set out in Noise and Vibration Management: Environmental Permits and Method Implementation Document (MID) for BS4142, to demonstrate that impacts do not exceed those specified on the Noise Impact Assessment and Noise Management plan V4 Final, dated October 2024 (reference 241010 416.00798.0039 NIAMP V4 Final). Upon completion of the work, a written report shall be submitted to Natural Resources Wales for approval."

The consultant has not satisfied the Improvement Condition in full, as the consultant has only assessed the Waste Transfer Station (WTS). The Waste & Recycling Centre (WRC) hasn't been constructed and is not operational, in addition the external bays used for bulk waste storage are not currently being used for the purpose outlined in the original permit

application (currently only used for storage of ancillary items – Section 2.1 of submitted report) and have not been assessed. Therefore, a direct comparison with the predicted impact in the approved NIA cannot be made.

For the assessment, receptors NSR01 and NSR05 have been focused on as they are the closest receptors to the site. This matches the initial submitted as part of the permit application.

The consultant has not taken any measurements at the receptors to determine sound levels. The consultant states that they conducted a soundwalk to listen at external locations. It should be noted that this is not a soundwalk for soundscape assessment as that was not conducted in accordance with ISO12913. Instead, the consultant has assessed the acoustic environment.

As part of this assessment the consultant stated that the locations assessed were representative of receptor outdoor amenity spaces and that the site noise was mostly inaudible at either location and, concluded that due to this direct measurement at the receptors would not yield meaningful results. This is not in line with BS4142 and is not in keeping with what the Improvement Condition is asking. Measurements at receptors should be undertaken to determine if the site is actually inaudible at the receptors. BS4142 states that if the residual and ambient sound level are within 3dB then a mixture of measurement and calculation can be used. However, the consultant has not taken any measurement and therefore cannot confirm if the site is inaudible at receptors.

The consultant conducted a survey between 12-13th March 2025 and measured sound levels of internal activities within buildings on site. The measured sound levels were then compared to the predicted sound levels used in the original modelling. The values in the revised model were updated to reflect the actual sound levels measured on site (for the main residual building).

The revised model assumes that the sound levels for the external bays and the WRC are the same as the initial modelling assessment. Even though the revised model has been updated to include the sound levels from the main and residual buildings to reflect actual operations, the WRC and storage bays have not been measured, therefore, we cannot confirm the overall impact at receptors from the site. However, the consultant has assessed what is currently operational and the predicted impacts at receptors in the initial NIA submitted as part of the original permit application, match the impacts calculated at the receptors (NSR01 and NSR05) for the submitted assessment. However, the assessment will need to be updated, if/when these areas are constructed and operational to fully satisfy the Improvement Condition.

If the residual sound and ambient sound levels are within 3dB at the receptor locations, then the methodology used by the consultant to assess impact (use of noise modelling software) is acceptable. However, to determine whether this methodology is acceptable, the consultant will need to do additional noise monitoring at the receptor locations.

To address the issue of operations being carried out with the doors of the building open, the report submitted has not assessed the operation when the doors have been open. Therefore, additional noise monitoring should be carried out to determine whether this impacts the receptors.

W2G – Improvement Programme, Permit condition 2.5.1 – ACTION ONLY

You have been marked as ACTION ONLY for permit condition 2.5.1, as the report submitted has not fully complied with the standards of BS4142.

Permit condition 2.5.1 states:

2.5.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by Natural Resources Wales.

ACTION: Undertake the required actions noted above following NRW's review of the submitted noise monitoring. Action due 30 April 2026 or as otherwise agreed in writing with NRW.

If the operator wishes to undertake the operation of the glass facility, the facility should undertake additional noise monitoring to determine the impact on receptors and include this within the resubmission of the report.

We recognise that operating with the doors open is contrary to your current management systems and standard operating techniques; however, for the specific purpose of undertaking targeted noise monitoring at agreed times, this approach is acceptable.

Please inform us in advance of when you intend to undertake this monitoring.

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.