

## Compliance Assessment Report CAR\_NRW0051325

**Permit being assessed:** MP3330WP.

**For:** Withyhedge Landfill, **held by:** Resources Management U.K Limited

**At:** Withyhedge Landfill Bowlings House , Rudbaxton, Haverfordwest, Pembrokeshire, SA62 4DB.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 23/03/2026 between 12:17 and 13:29.

**Parts of permit assessed:** Site Inspection.

**NRW Lead Officer:** Elliot Jones.

**Report sent to:** Phil Ridley, Director , on 02/04/2026.

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

| Part of permitted activity assessed (compliance criteria)                                 | Assessment result | Permit condition |
|---|-------------------|------------------|
| IR1A - Installations - Management - General Management                                    | Assessed (A)      |                  |
| IR2G - Installations - Operations - Landfill engineering (only applicable to landfill)    | Assessed (A)      |                  |
| IR2H - Installations - Operations - Waste acceptance (only applicable to landfill)        | Assessed (A)      |                  |
| IR2K - Installations - Operations - Landfill gas management (only applicable to landfill) | Assessed (A)      |                  |
| IR3C - Installations - Emissions and monitoring - Odour                                   | Assessed (A)      |                  |

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?

No action required.

## 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

Resources Management U.K Limited (RML) operates Withyhedge Landfill under the provisions of an EPR Permit (MP3330WP). The Site is a non-hazardous landfill which has been constructed in two phases. Phase 1 accepted waste from 1985 until its closure in 2006. Phase 2 is where the current active tipping area is found at the Site; specifically, Cell 10.

### **Introduction**

An unannounced site inspection was undertaken on the 23rd March 2026, in response to an increase in odour complaints from the local community over the preceding weekend.

### **Odour Assessment**

NRW officer performed an offsite odour assessment in the community surrounding the landfill prior to the site inspection, locations included Crundale, Poyston and Spital.

Weather conditions were dry but overcast, 12°C with a light wind emanating from the South.

No landfill gas or waste odours were detected at any of the locations assessed.

Significant slurry tanker movements were witnessed in the Spittal area and along the A40 heading towards Haverfordwest.

### **Operational Area**

The Operator is actively depositing waste in two separate locations, southern area of the valley between Cell 9 and Cell 10A and also in eastern corner of Cell 10B adjacent to Cell 6. No evidence of banned or prohibited wastes was noted in either of the active tipping sites.

Cell 6 temporary capping is gradually being cut and removed, exposing previously deposited waste. The freshly exposed waste was inspected, despite the waste showing evidence of degradation, no landfill gas odour were detected.

An intermediate cover layer has been extended across sections of Sub Cell 10B. The

material used appears to be formed of cohesive, impermeable soils which are considered suitable for use as intermediate cover. In small areas across Cell 10B intermittent landfill gas odours were detected, although the officer did not consider this odour to be offensive or excessive.

Temporary capping has been installed and extended on the Northwestern flanks of Cell 10B.

A separation bund has been constructed in the valley between Cell 9 and Cell 7 to aid the operators management and control of leachate and surface water. A submersible pump operating on a float system is pumping the surface water collecting on the temporary capped Cell 8, directing the water towards the sites surface water system.

### **Cell 9**

The permanent gas wells recently installed on the plateau of Cell 9 are gradually and incrementally being brought online the operator confirmed that the sacrificial horizontal gas wells within Cell 9 remain operational and continue to recover landfill gas.

### **Landfill Gas Management**

Landfill gas engines were operating as expected in conjunction with a single gas flare. No issues were reported with the landfill gas collection system.

NRW Officers were informed that current flows to the Gas Utilisation Plant (GUP) are approximately 1500 m<sup>3</sup>/hr, with a H<sub>2</sub>S concentration of 1600ppm entering the gas compound.

### **AOB**

The Operator has submitted a construction quality assurance (CQA) plan for cell 11, which is currently being reviewed by NRW's Geotechnical specialist.

The Operator is in the process of shaping and contouring the footstep of Cell 11.

### **Waste Acceptance – Waste Transfer Station (WTS)**

We observed several vehicles being unloaded within the WTS and subjected to Level 3 Verification Testing. The waste appeared to be shredded general mixed waste, which is listed within the EPR Permit's for both the landfill and WTS (QP3098FL).

NRW officers completed an independent visual inspection of the waste. No evidence of any banned or prohibited wastes were observed.

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 Industry compliance criteria (used in section 1 and 2):**

#### **1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

#### **2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

#### **3. Emission and Monitoring**

- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

#### **4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – 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](mailto: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](mailto: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.