

Compliance Assessment Report CAR_NRW0051959

Permit being assessed: TP3698FA.

For: St Davids Landfill, **held by:** Pembrokeshire County Council

At: St Davids, Pembrokeshire, SA62 6XE.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 23/04/2026.

Parts of permit assessed: Post Closure Working Plan.

NRW Lead Officer: Sally Wakeford.

Report sent to: Environmental Services Project Manager, Pembrokeshire County Council
, on 22/05/2026.

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	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
W1A	Update the Post Closure Working Plan to include the points noted above by 30 October 2026 unless otherwise agreed in writing.	30/10/2026

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

Following an inspection on 17/01/2024, you were required to provide timescales and action plans for locating and bringing back into operation the monitoring boreholes on site and providing an updated Conceptual Site Model and Hydrogeological Risk Assessment to inform the monitoring programme and management system.

A plan was submitted in February 2025 and has been assessed by the Geoscience Team and Regulatory Officers. This document was titled: "Post Closure Phase Working Plan, Conceptual Site Model and Hydrogeological Risk Assessment, St Davids Landfill, Pembrokeshire". Draft V2 dated 07/02/2025.

Geoscience Comments:

It is difficult to determine what the groundwater chemical data represent as the following is required:

- Some understanding of whether BH1, BH2, BH3 and BH4 are considered hydraulically upgradient or down-gradient. Typically, if only 4 groundwater monitoring wells are installed, 3 of the 4 would be installed down-gradient and 1 upgradient. In this case, if BH1, BH2, BH3 and BH4 have been installed as perimeter groundwater monitoring wells, there would still need to be some consideration of the concept of hydraulically upgradient or downgradient. Perimeter wells and their spacing would suggest that all groundwater monitoring wells locations are treated as being 'equal' in terms of the likelihood that they would interest polluted groundwater coming from the site. It is difficult to know if this is true for this site. No groundwater levels and hence contour maps have been provided to assist with the conceptual understanding of the site.
- Lagoons that were noted to be present on the site contained effluent and other sludges during the early 2000's but are now dry. It is unclear what has happened to the effluent.
- The site is approximately 550m in length east-west and ~600m in length north-south. This represents not an insignificant area although the text indicates that the landfilled area is 15 hectares whereas the red line is 23 hectares. The number of groundwater monitoring wells are very minimal to provide a meaningful representation of subsurface/groundwater conditions.
- There are no cross-sections that have been provided so it is difficult to understand how the groundwater monitoring wells and groundwater levels relate to the landfilled invert levels.
- There has been a significant time between when the original 4 groundwater wells were samples between 2003 and 2006 and the current year 2025. In 2025, only one well was found, BH02. This represents a significant gap in chemical data.
- It is difficult to draw meaningful conclusions about the interconnectedness between the surface water samples points, groundwater, the landfill waste materials, the landfill morphology and the degree to which there is hydraulic connection between these. It is noted that several springs were identified on the eastern area of the site

which would suggest some degree of connection between the ground surface and groundwater and that groundwater may be shallow in places. The degree of connectivity of the above to the SSSI to the south does not appear to have been explored.

Comments from Geoscience are not fully comprehensive but rather they illustrate the types of information gaps and uncertainties that exist with the CSM and the HRA. Therefore, the CSM and the HRA are not considered sufficiently robust to rely upon and to draw meaningful conclusions from.

Regulatory Officer comments:

In addition to these comments from Geoscience, we have the following observations:

- There doesn't appear to be much consideration for the requirements of monitoring or details of the capping.
- We cannot find records that the 2003 restoration plan or the previous closure plan was accepted by the EA/NRW. The Restoration Plan was submitted in 2011 along with some others to form part of the Closure Plan, however an email from PCC in 2019 stated "I understand that the closure report was not accepted as more gas monitoring needed to be carried out although we have no record of this on paper."
- Section 1.6 also details that 'This report will provide a CSM, a preliminary HRA and updated ecological survey. The report will follow the principles of Land Contamination Risk Management and BS10175. The report will also include a review of all the available historic data and information for the site. The outcomes of this report will determine a suitable monitoring programme for the site. An updated restoration plan to deal with exposed waste is also included within this report based on the results of the updated ecological survey.' The restoration plan in section 5 simply focuses on the ecological assessment. The restoration plan from 2003 does not specify the final cover, and whether the design and specification of any capping would be or was carried out under CQA. A cap is however mentioned in The Geotechnical Report prepared for PCC in September 2002 by Thyssen Geotechnical 'It was reported that a cap of imported material was present at the site'. We will need further clarification on the type of capping undertaken at the site. At present the cap does not appear to be of a quality able to avoid future disturbance of wastes. If there are no details available, you may be required to undertake a survey to demonstrate the design/thickness etc.
- In section 6.5 it states: "The ecological survey also recommended that no machinery should be used on site, with hand-based work only, further adding to the complication of installing new sampling points. It is therefore not recommended in this instance. Any final monitoring must however be agreed with NRW." The 2024 ecological assessment in Appendix E doesn't appear to contain this wording and doesn't mention the use of machinery at all, only that any groundworks or vegetation management or clearance should be undertaken during September to March to avoid disturbance.

NRW do not accept this Post Closure Working Plan as it currently stands.

ACTION: Update the Post Closure Working Plan to include the points noted above by 30 October 2026 unless otherwise agreed in writing.

Some of these requirements, such as the lack of monitoring data will be difficult to overcome at present, however the plan should include strategies as to how these will be dealt with. Please ensure the next update is prepared in accordance with relevant landfill guidance.

NRWs main concerns are over the lack of groundwater monitoring which will be required for permit surrender and the capping on the landfill. From our previous site inspection, the capping doesn't appear to be suitable in quite a number of places over the site to ensure that the waste would remain undisturbed in the future once the permit is surrendered.

END

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.