

Compliance Assessment Report CAR_NRW0052018

Permit being assessed: CB3797FY.

For: Unit 8, **held by:** RDR Woodchip Ltd

At: 31 Sambucus Ave, Llandow Trading Estate, Cowbridge, Vale of Glamorgan, CF71 7PB.

Type of assessment: Site Inspection,

Reason: Routine.

On: 06/05/2026 between 12:05 and 12:35.

Parts of permit assessed: W1A, W2C, W3G, W4B .

NRW Lead Officer: Daniel Hopkin, accompanied by Simon Powell.

Report sent to: Rhodri Davies , Site Owner , on 01/06/2026.

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	C3 Minor	1.1.1
W1A - Waste - Management - General management	C3 Minor	1.1.1
W2C - Waste - Operations - Operating techniques	C3 Minor	2.4.1
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	3.4.1
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
5	16.1

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	Please reinstate the perimeter netting and wind sock in line	01/07/2026

Criteria	Action needed	Complete by
	with your EMS. Please complete this by the 1st of July 2026.	
W1A	Please produce a dust management plan for the site and submit this to NRW by July the 1st 2026.	01/07/2026
W2C	Please ensure you are operating in line with your permit and install a sealed drainage system on the site. Please complete this by the 1st of July 2026.	01/07/2026
W3G	Please send evidence that the area has been cleared of all waste. Please complete this by the 1st of July 2026.	01/07/2026
W4B	Please submit quarterly waste returns for the missing periods detailed in this report continue to submit these every quarter going forward. Please complete by the 1st of July 2026.	01/07/2026

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

RDR Woodchip Ltd – EPR/CB3797FY

Waste Regulation Officer Daniel Hopkin and Enforcement Officer Simon Powell attended the permitted facility of RDR Woodchip Ltd at 31 Sambucus Ave, Llandow Trading Estate, Cowbridge, CF71 7PB on the 6th of May 2026. RDR Woodchip hold a Standard Rules SR2011 No4 permit for this site. This was a routine unannounced site inspection. We were met by a member of staff who showed us around the site and answered our questions as the TCM Dafi Davies and site owner were not available at the time. The weather was dry with little wind at the time of the visit. We arrived at 12:05.

There were breaches recorded during the visit that are detailed below.

W1A General Management – Category 3 (C3) Breach

Permit condition 1.1.1 states: ***“(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints.”***

We have issued you with a C3 breach of your permit under sub-criteria W1A General

Management, due to the dust emissions created and leaving the site.

NRW have received complaints from the public relating to dust leaving site when you are processing wood.

In your Environmental Management System (EMS) it states: *"5.1 Dust - Controls - A misting / sprinkler system may be installed around the block storage bays and at the point of loading (shredder and off-site). Concrete block walls (to 4m height) – around each storage bay with wind barriers (fine mesh screens) installed above (to 8m height). Mesh screens may be utilised if appropriate fire safety requirements are met. The site entrance and yard areas are comprised of an impermeable surface and therefore mud (that could generate dust in dry conditions) will not be present on site. If wind-blown dust is a risk from the stored shredded waste, then damping down will be carried out manually using a hand-held sprayer. A cleaning schedule will be deployed at the site as part of the EMS. The yard will be swept routinely as part of the schedule. The yard will be damped down prior to sweeping to not generate excess dust. In the event that dust generation is detected on site further cleaning will be deployed, clean water will be used as a dust suppressant to the yard area."*

During the inspection, it was identified that the perimeter netting and wind sock were missing (see photo 1 below). These have been included within your EMS as measures to mitigate against dust leaving site but are not being followed. The absence of both controls is likely to contribute to the dust issue.



Photo 1

Action: Please reinstate the perimeter netting and wind sock in line with your EMS. Please complete this by the 1st of July 2026.

Please ensure that these measures are in place and that procedures are followed whenever dust is being generated on site. You must also ensure that water misting equipment and the bowser are used effectively to minimise dust creation. Due to the nature of the operation and complaints around dust, a dust management plan must be produced and implemented.

Action: Please produce a dust management plan for the site and submit this to NRW by July the 1st 2026.

W2C Operating Techniques – Category 3 (C3) Breach

Permit condition 2.4.1 states: ***“The activities shall be operated using the techniques and in the manner described in Table 2.4 below.”***

Table 2.4 Operating techniques

1. When located within Groundwater Source Protection Zone 1 or 2 the waste shall be stored and treated on an impermeable surface with sealed drainage system.
2. When located outside Groundwater Source Protection Zones 1 or 2 waste shall be stored and treated on hard-standing or on an impermeable surface with sealed drainage system.

We have issued you with a C3 breach of your permit under sub-criteria W2C Operating Techniques, due to the site not having a sealed drainage system.

As your site is located outside a Groundwater Source Protection Zone, waste must be stored on hardstanding or on an impermeable surface with a sealed drainage system.

During the inspection, it was identified that there is no sealed drainage system present on site.

Your Fire Prevention and Management Plan (FPMP) states: *“6.6.4 – A drainage system has been installed to collect run-off water and recycle it into the interceptor tank. The drain is installed across the yard and involves a series of shallow ACO-type drains to direct water to the interceptor. This water can be pumped directly out of the interceptor onto stockpiles in re-circulation. All surfaces on site are concreted.”*

and

“6.6.5 – A 10 m³ interceptor will be located at the margins of the storage area to capture run-off from storage and processing areas.”

However, during the inspection, the ACO drains and interceptor described above were not identified on site.

Additionally if there was a fire to occur on the site the water from the fire could not be contained as there is no sealed drainage system. Your FPMP also states: *“6.7.1 - The site features two containment systems for fire and surface waters. These systems comprise: a primary surface water interceptor (buried) and a secondary perimeter bund wall for containment of overland flow of fire-waters. Total surface water containment capacity of both is presented in Table 2.”*

In the How to Comply with your environmental permit document it states: *“A sealed drainage system is a drainage system with impermeable components which does not leak and which will ensure that no liquids will run off a surfaced area other than via the system. Except where they are lawfully discharged, all liquids entering the system should be collected in a sealed sump.”*

Action: Please ensure you are operating in line with your permit and install a sealed drainage system on the site. Please complete this by the 1st of July 2026.

W3G Fire – Category 3 (C3) Breach

Permit condition 3.4.1 states: ***“The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance.”***

We have issued you with a C3 breach of your permit under sub-criteria W3G Fire, due to waste being stored in your site’s fire quarantine area.

During the inspection we identified that chipped wood was being stored in the quarantine area waiting to be transported from site (see photo 2 below).



Photo 2

Your FPMP states: ***“6.4.1 - The designated quarantine area will be kept empty at all times. The quarantine will be able to hold a minimum of 50% of the volume of the largest waste pile.”*** The quarantine area must remain clear on site at all times, in the event of a fire this will be used to store waste to minimise the spread of the fire across the site.

Action: Please send evidence that the area has been cleared of all waste. Please complete this by the 1st of July 2026.

W4B Reporting – Category 4 (C4) Breach

Permit condition 4.2.2 states: ***“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.”***

We have issued you with a C4 breach of your permit under sub-criteria W4B Reporting, due to the site not submitting quarterly waste returns.

Following the inspection a review of your waste returns has been undertaken, NRW have not received any quarterly waste returns from you since June 2023. Here is a list of waste returns required to remain compliant.

- July – September 2023
- October – December 2023
- Jan - March 2024
- April – June 2024
- July – September 2024
- October – December 2024
- Jan - March 2025
- April – June 2025
- July – September 2025
- October – December 2025
- Jan - March 2026

Action: Please submit quarterly waste returns for the missing periods detailed in this report and continue to submit these every quarter going forward. Please complete by the 1st of July 2026.

Thank you for your time during the inspection. The site inspection concluded at 12:35.

If you have any queries regarding this Compliance Assessment Report, please contact me on the details below.

Daniel Hopkin

Daniel.Hopkin@CyfoethNaturiolCymru.gov.uk

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.