

Compliance Assessment Report CAR_NRW0052125

Permit being assessed: CB3694ZT.

For: Carew Pavilion, **held by:** Pembrokeshire Metal Recycling Limited

At: Carew Airfield, Tenby, SA70 8SX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 05/06/2026 between 11:15 and 12:15.

Parts of permit assessed: W1, W2, W3.

NRW Lead Officer: David Morgan, accompanied by Hugh Martin.

Report sent to: Matthew Jones, Director, on 17/06/2026.

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	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	3.5.2 (b)

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

Total non-compliances recorded	Total non-compliance score
1	4

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
W3G	Store waste in line with your Fire Prevention and Mitigation Plan	27/08/2026

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

A routine site inspection was undertaken on Friday 5th June 2026. The following observations were made:

General Management (W1A)

Site Layout & Waste Storage

At the time of the inspection the site appeared to be at full capacity. Large volumes of scrap metal waste and depolluted vehicles are being stored on site with limited workable space. It is noted that the intention is to extend the site and a planning application has been submitted to the local authority planning department.

Following determination of the planning application, you must apply to vary your Environmental Permit. You must also alter your management systems, specifically the Environment Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP) to reflect changes to operations.

On 5th June 2026, waste storage practices did not appear to be compliant with the site layout in the EMS (page 33). There was little, if any separation between waste stacks. While storage of waste in this manner was not perceived to be having a detrimental impact on the environment, this does pose a risk of impacting response in the event of a potential fire incident (please see 'Fire W3G' section below).

Site Surfacing & General Housekeeping

Excessive amounts of waste were being stored on site, but operations were not having a detrimental impact on the environment. Some damage/wear and tear of the concrete site surface, with ponding of surface water, was noted and highlighted to on-site operatives. Surface water did not appear to contain oils (iridescence) or other visible polluting material.

There were no signs of leaks/spillages and no oils present in waste treatment and storage areas which suggests all vehicles are depolluted in a manner that prevents pollution.

General housekeeping on site was at a standard that prevents potential pollutions.

Technical Competent Manager (TCM) Attendance

It was noted that the Technical Competent Manager's (Mathew Jones - Director) continuing competence qualification has expired. Technical Competence for the site is now managed by a consultant.

Please be aware that the TCM is required to spend a certain amount of time on site. Currently, operations are largely compliant, and activities do not pose a significant environmental risk, however, you must ensure a TCM is present on site for the minimum required time as set out in guidance 'How to Comply with Your Environmental Permit'.

Waste Acceptance (W2E)

All waste present on site complied with the list of acceptable waste in the Environmental Permit.

End-of-life Vehicles, both polluted and depolluted, were present on site but were clearly segregated.

It was noted that there were no visible items of Waste Electrical and Electronic Equipment (WEEE) in general scrap so operations were compliant with the WEEE Directive.

Emissions (W3)

At the time of the inspection, operations did not appear to be having a detrimental impact on the local amenity.

All waste and general scrap was contained on site and no waste was escaping the site boundary.

Although undertaking normal activities (scrap metal waste treatment/movements around site) from outside the site, the noise was not at a level deemed to be having a detrimental impact to the environment.

Fire (W3G)

One aspect of concern during the inspection was the excessive volumes of waste currently stored on site.

Depolluted vehicles were stored 5-6 vehicles high and sometimes 2 vehicles deep. There were large volumes of scrap metal on site and there were not clearly defined stacks.

The site Fire Prevention and Mitigation Plan contains the following storage arrangements.

Table 3-1 Typical Waste Storage Arrangements

Waste type and form	Amount received daily	Amount typically in storage (maximum stack size)	Typical time in storage	Storage arrangement	Maximum Stack Dimensions	Separation distance	Applicable GN16 guidance
Ferrous scrap metal	20t	3 stockpiles each 79m ³	<4 weeks (scrap removed weekly)	Loose stockpiles outdoors on impermeable surface with sealed drainage. See layout in Figure 1.	3 conical stockpiles ~10m diameter and upto 3m high (each 79m ³)	See Figure 4	10m diameter stockpiles ~7m apart 10m diameter stockpiles ~9m from building
Non-ferrous scrap metals (copper, lead, brass)	<500kg	3t	<4 weeks (scrap removed weekly)	Within separate pallet boxes in non-ferrous storage shed	<1m ³ / pallet box	1m free air gap between boxes	
Polluted ELVs - typically whole vehicles	2	~13 tonnes/ 150m ³ (10 cars with each car occupying ~15m ³)	<4 weeks	Stacked outdoors on impermeable surface with sealed drainage. See storage area on Figure 1.	Each car ~4.7m long, 1.7m wide and 1.8m high (~15m ³) Each stack (60m ³) capable of holding 4 ELV Each stack 4.7m long, 3.4m wide x 2 vehicles high. Each vehicle accessible from at least 3 sides.	See Figure 4	Max. 6 months storage Max. 2 vehicles deep & 3 vehicles high Each vehicle accessible from at least one side.
Depolluted ELVs	0	~13 tonnes/ 150m ³ (10 cars with each car occupying ~15m ³)	<4 weeks	Stacked outdoors on impermeable surface with sealed drainage. See storage area on Figure 1.	Depolluted ELV either placed back into ELV storage stack or into scrap metal pile	See Figure 4	

The above listed storage arrangements are not a reflection of how waste is stored on site. Operations are not compliant with the FPMP and a non-compliance has been recorded.

A non-compliance (Category 3 – Minor)(ref:W3G) was recorded against Condition 3.5.2 (b) of the Environmental Permit.

You must store waste in line with the FPMP for the site. In the event of an emergency/fire incident, efforts to manage the incident would be hindered by the lack of workable space on site.

You must reduce volumes of waste currently stored on site. Failure to do so by the date listed above (Thursday 27th August 2026) will result in a notice being issued to enforce compliance with the permit.

Summary

Excessive volumes of waste are currently being stored on site. This is not having a detrimental polluting impact on the environment, but it could hamper any emergency response in the event of an incident. You must reduce volumes of waste on site.

At the time of the inspection, the Technical Competent Manager was not present. It is

recommended that you hold refresher training or 'toolbox talks' with onsite staff to increase awareness of actions to take in the event of an incident. Generally, you must ensure all staff are aware of what actions to take should a fire occur on site.

If waste volumes are not reduced by the time of the next inspection (provisionally planned for Thursday 27th August 2026) then it is likely Natural Resources Wales will serve a notice enforcing compliance with the permit.

Activities likely to be assessed during the next inspection:

- Further assessment of site drainage
- Assessment of depollution process
- Review of FPMP compliance
- Review of Staff training records

END OF REPORT

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.