

Compliance Assessment Report CAR_NRW0052110

Permit being assessed: DB3392HX

For: Springfield Nursery, **held by:** S&A Produce (UK) Limited

At: Sutton Road, Llandow, Cowbridge, Vale of Glamorgan, CF71 7PA.

Type of assessment: Audit,

Reason: Routine.

On: 15/06/2026.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Geraint Harris.

Report sent to: Environmental Compliance Consultant , Environmental Compliance Consultant , on 15/06/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
MCP1A - MCP - Management - General management	Action only (X)	

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

Total non-compliances recorded
0

2. What action is required?

Criteria	Action needed	Complete by
MCP1A	Please respond to the actions in the main text below, by the 21st September.	21/09/2026

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

Springfield Nursery's Environmental Management System Audit

The purpose of this audit was to assess how Springfield Nursery's Environmental Management System (EMS) is implemented in practice and how effectively it supports permit compliance, environmental risk management, pollution prevention, and continual improvement. The EMS for Springfield Nursery has been reviewed against the GOV.UK guidance *Develop a management system: environmental permits*, alongside supporting Natural Resources Wales (NRW) guidance on complying with environmental permits. Together, these documents set out the expectation that operators must implement a written system describing how pollution risks are identified, controlled, and minimised, with the level of detail proportionate to the complexity and risk profile of the site. Overall, the EMS demonstrates a strong level of alignment with these requirements and provides a structured and comprehensive framework for managing the permitted medium combustion plant activities.

The EMS clearly establishes its purpose and scope, linking directly to the requirements of the environmental permit and the need to minimise environmental risk. It identifies operational activities, emissions, and associated risks, and sets out appropriate control measures including maintenance, monitoring, and staff training. This aligns well with the core requirement that a management system must explain how the operator will minimise pollution risks arising from permitted activities. The document is logically organised and accessible, supporting usability, transparency, and regulatory inspection. In line with NRW expectations, the EMS reflects the general management condition by providing a framework for managing activities in a way that minimises environmental risk, although ongoing compliance will depend on how effectively these procedures are implemented and maintained in practice.

In terms of site-specific requirements, the EMS includes an appropriate infrastructure plan and identifies key environmental receptors within the surrounding area. The inclusion of a vulnerable locations map demonstrating the absence of designated ecological sites within the relevant screening distance provides assurance that environmental sensitivities have been adequately considered. Operational processes are described in sufficient detail for a site of this scale, including normal operation, emissions monitoring, and breakdown procedures. This is consistent with the expectation that operators should apply appropriate measures to prevent pollution and manage site-specific risks effectively.

The EMS performs strongly in the areas of maintenance, emissions monitoring, and record keeping. Preventative maintenance schedules, routine inspections, and servicing arrangements are clearly defined, supporting the requirement to maintain plant performance and prevent emissions incidents. Monitoring is addressed comprehensively through defined emission limits, testing frequencies, and reporting procedures, including requirements to notify the regulator and submit monitoring data within specified timeframes. Record keeping arrangements are likewise robust, with clear expectations for

retention of operational, maintenance, and emissions data in accordance with permit requirements and recognised good practice. NRW guidance reinforces that such monitoring and reporting systems must be supported by clear audit trails and accurate records to demonstrate compliance during regulatory inspections.

Arrangements for staff competence and training are also well developed. The EMS identifies responsible personnel, outlines training requirements, and provides a framework for maintaining training records. This demonstrates compliance with the expectation that staff understand their roles and responsibilities and have access to the management system. The document also confirms that the EMS is accessible to staff and available for inspection by the regulator, further supporting compliance. In line with NRW guidance, maintaining sufficient competent personnel and clear management oversight will be critical to ensuring that the EMS is effectively implemented in practice.

Despite these strengths, there are several areas where the EMS could be improved to more fully align with GOV.UK and NRW guidance. The most significant gap is the absence of a formal complaints procedure. The guidance requires operators to establish a system for receiving, recording, investigating, and responding to complaints. This functionality is not currently included within the EMS and represents a clear omission that should be addressed.

In addition, while the EMS includes procedures for adverse events and incident reporting, it does not present a structured accident prevention and management plan. The guidance expects a systematic approach, including identification of potential accident scenarios, assessment of their likelihood and consequences, and clearly defined preventative and mitigation measures. Furthermore, NRW guidance emphasises the need to apply appropriate measures to manage both routine and non-routine risks, including emissions not specifically controlled by emission limits, such as fugitive releases or abnormal operating conditions. The current document would therefore benefit from a more explicit, risk-based framework covering foreseeable incidents such as LPG leaks, equipment failure, or fire.

In addition, NRW guidance highlights the importance of actively managing changes in operation, including modifications to plant, equipment, or procedures. While the EMS includes general review mechanisms, a more explicit change management procedure would strengthen compliance by ensuring that environmental risks are reassessed whenever operational changes occur.

While monitoring and reporting arrangements are well established, there is limited explicit evidence that emissions monitoring itself is subject to systematic audit or independent assurance. Both MCPD and Environment Agency guidance require monitoring to produce “reliable, representative and comparable results.” In this context, NRW requires further clarity on how robustness and representativeness of emissions monitoring is ensured.

In particular, further information is required on how the operator ensures that:

- Third-party emissions monitoring is conducted under conditions representative of normal plant operation
- Plant load and operating profiles during testing reflect typical operating regimes and permit assumptions
- Controls are in place to prevent non-representative test conditions, including load reduction

during monitoring

- Testing contractors are subject to appropriate oversight and verification, including:
 - Confirmation of MCERTS accreditation and scope
 - Review of sampling methodologies and test conditions
 - Verification that testing is undertaken under stable, steady-state conditions
- Emissions data generated by third parties is subject to internal quality assurance, including review of:
 - Process conditions during testing (e.g. load, fuel input, oxygen levels)
 - Alignment with normal operational data (e.g. SCADA trends)
 - Any anomalies or deviations from expected performance

Strengthening arrangements in this area would improve confidence that monitoring results are reliable and representative, in line with regulatory expectations.

To complete the review further information is required.

Action 1:

Please provide evidence demonstrating how emissions monitoring results are assured, verified, and confirmed as representative.

This should include:

- Definition of representative operating conditions during testing
- Evidence that plant load during testing reflects normal operation including evidence of recording of engine tuning parameters such as air:fuel ratio, ignition timing (where relevant).
- Controls to prevent non-representative testing
- Contractor competence assurance (e.g. MCERTS scope)
- Contractor performance audits
- Internal review of test reports, including:
 - Operating conditions
 - Consistency with plant/process data
 - Investigation of anomalies

Action 2:

Please demonstrate how emissions monitoring data is:

- Reviewed and trended over time

- Used to optimise combustion performance
- Used to support emissions reduction and pollution prevention
- Linked to objectives, targets, or maintenance activities

In conclusion, the Springfield Nursery EMS represents a well-developed and largely compliant management system that meets the majority of the expectations set out in GOV.UK and NRW guidance. It is particularly strong in its treatment of maintenance, monitoring, record keeping, and staff competence. However, to achieve full alignment with best practice, improvements should be made in relation to complaints handling, accident prevention planning, climate change adaptation, and management of operational changes. These enhancements would further strengthen the EMS and provide greater assurance that it is not only compliant in structure but effective in practice.

Next Steps

Please provide the requested information by the 21st September to enable completion of the audit review.

If any of the requested information is not available, please confirm and provide an explanation.

If helpful, I am happy to discuss any of the requirements further.

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
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

Full list of Medium Combustion Plant and Specified Generator compliance criteria
(used in section 1 and 2):**1. Management**

- MCP1A – General management
- MCP1B – Energy efficiency
- MCP1C - Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- MCP2A – Permitted activities
- MCP2B – The site
- MCP2C – Operating techniques
- MCP2D – Improvement programme
- MCP2E – Pre-operational conditions

3. Emission and Monitoring

- MCP3A – Emissions to water, air or land
- MCP3B – Emissions of substances not controlled by emission limits
- MCP3C – Odour
- MCP3D – Noise and vibration
- MCP3E – Monitoring
- MCP3F – Fire

4. Information

- MCP4A – Records
- MCP4B – Reporting
- MCP4C – 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.