

Compliance Assessment Report CAR_NRW0052198

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: Report/Data Review,

Reason: Routine.

On: 26/06/2026.

Parts of permit assessed: Cell 8 - Waste Phasing Plan.

NRW Lead Officer: Rhodri Morgan.

Report sent to: Phil Ridley, Director, on 26/06/2026.

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)	
IR2C - Installations - Operations - Operating techniques	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)	

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

The operator has submitted proposals to recommence waste disposal activities within Cell 8. The cell was temporarily capped in May 2024, following the uncontrolled release of landfill gas, which contributed to off-site odour pollution.

The proposals are outlined in the following document:

- “*Geotechnology Report Number 2563r1v3d0626 – Cell 8 And Cell 8/9 Valley*”. Dated: June 2026.

The document includes:

- An analysis of landfill gas trends from May 2024 to present.
- A waste phasing plan for Cell 8.
- Proposals for sacrificial and permanent gas abstraction infrastructure within Cell 8.
- Emergency procedures to be followed in the event of the risk of offsite pollution.
- Plans for odour monitoring.

Landfill Gas Trends

NRW has reviewed the landfill gas data within the document, along with subsequent data provided within the site’s quarterly returns.

Hydrogen Sulphide (H₂S) levels within Cell 8 have steadily reduced from in excess of 10,000ppm in September 2024 to < 700ppm in March 2026. H₂S levels throughout Cell 8 are now lower than the neighbouring operational cells (Cells 9 and 10).

The volume of gas being generated has also significantly reduced, with direct measurements taken between September and December 2024 showing a reduction in gas volumes from approximately 600 m³/hr to 170 m³/hr as the cell has stabilised.

NRW considers that landfill gas emissions from Cell 8 are manageable, provided appropriate control measures are maintained by RML. It is recognised that the disturbance of previously capped waste may alter gas generation and emission characteristics, which therefore requires careful control and monitoring.

Waste Phasing Plan

The waste phasing plan sets out how disposal activities in Cell 8 will be managed to minimise landfill gas emissions; from the initial removal of the temporary cap through to the installation of permanent capping and gas abstraction infrastructure.

The temporary cap will be removed incrementally, with only small areas exposed at any time and fresh waste placed immediately to minimise emissions.

Permanent capping and sacrificial gas abstraction infrastructure will be installed in a phased manner as the waste mass develops.

Waste Acceptance Procedures

Since the temporary closure of the cell, revised waste acceptance procedures have been implemented to exclude waste streams associated with elevated hydrogen sulphide generation.

These controls appear to have been successfully implemented in Cells 9 and 10, where no odour issues have been identified.

Monitoring

Monitoring includes on-site gas measurements, surface emission surveys, and continuous hydrogen sulphide monitoring at the site boundary and within the local community.

Emergency Procedures

The Operator has outlined emergency procedures that will be followed in the event of the uncontrolled release of landfill gas from the cell.

This includes the temporary or permanent capping of the cell, depending on the severity of the event. Sufficient capping materials will be retained onsite to facilitate the rapid capping of the cell if required.

NRW is satisfied with the operators proposals to recommence waste disposal activities within Cell 8, subject to the following conditions:

- NRW's decision is based on the continued effective operation and maintenance of the gas management system and associated monitoring infrastructure.
- Should monitoring indicate an increased risk of off-site emissions or odour, the operator must implement appropriate mitigation measures without delay, including reduction or cessation of waste inputs where necessary.

This document will now form part of the permit; incorporated under Operating Techniques. The waste phasing plan should be regularly reviewed to ensure it remains appropriate as the filling of the cell progresses. Any proposed revision must be submitted to NRW for acceptance.

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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

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.