

## Compliance Assessment Report CAR\_NRW0048073

**Permit being assessed:** CG0410601  
**For:** JH WILLIS LTD, held by R H WILLIS  
**At:** GRESFORD BANK, VICARAGE LANE, GRESFORD, WREXHAM, LL12 8UT.

**Type of assessment carried out:** Unknown, Reason: Incident Response (Incident number: 2501182).

On 10/04/2025.

Parts of permit assessed: all

**NRW Lead Officer:** Libby Hughes.

**Report sent to:** Environment Manager, Environment Manager, on 10/04/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Water Quality - Management - General management	C3 Minor	1.1.1 The operator shall manage and operate the activities: (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 and those drawn to the attention of the operator as a result of complaints; and (b) using sufficient competent persons and resources.
WQ-C2 - Water Quality - Emissions and monitoring - Emissions to land	C3 Minor	3.1.2 The limits given in schedule 3 shall not be exceeded
WQ-D2 - Water Quality - Information - Reporting	C3 Minor	4.3.1 The Environment Agency shall be notified without delay following the detection of: (a) any

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
		malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution; (b) the breach of a limit specified in the permit; or (c) any significant adverse environmental effects. (d) any emergency discharge that has occurred.

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

## 2. What action is required?

Criteria	Action needed	Complete by
WQ-A1	Review the written management system and on-site management of the soakaway to ensure compliance.	02/05/2025
WQ-C2	Bring the soakaway back into compliance	02/05/2025
WQ-D2	In future inform NRW of any pollution incidents as detailed under this permit condition.	Already completed

Action 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

You were contacted by NRW on 31st January to inform you that an incident had been reported to us concerning your soakaway being overwhelmed, and a pool of standing water being present on the surface.

Table 3.1 states that you would be considered to be operating in compliance with your permit if there is no significant visible trace of discharge to land.

**Table S3.1 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements**

Emission point ref. & location	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Compliance statistic
Outflow from an Oil Interceptor prior to discharge into land	Visible oil or grease	No significant trace present	Instantaneous (spot sample)	N/A	No significant trace

At the time you were asked via email to reduce the level of the soakaway and investigate the cause of the issue.

You were also asked to provide waste transfer notes showing where the excess water was being taken.

This was followed up with a phone call when NRW was advised by yourselves that the level of the soakaway had dropped slightly, but that drier weather would be needed to investigate the soakaway.

If you have not already done so, please complete the following actions, and send to NRW the required paperwork by 2nd May 2025 at the latest.

**Action 1:** Reduce the level of the soakaway to within permitted levels. Provide NRW with photographic evidence by 2nd May to show that the soakaway is operating in compliance with the permitted limits.

**Action 2:** Provide NRW with copies of the waste transfer notes to evidence the quantities of excess water removed, and its destination by 2nd May.

**Action 3:** Carry out an inspection of the soakaway to assess whether any maintenance or improvements are required to ensure the soakaway operates in compliance with the permit. Carry out any maintenance identified. Provide a report to NRW by 2nd May detailing the outcome of the investigation and records of any maintenance carried out to the soakaway.

**Action 4:** Review your written management system, and update as required. Provide NRW with a copy of the updated management system by 2nd May.

If you have any queries regarding any of the above, please don't hesitate to contact your Environment Officer [Libby.Hughes@cyfoethnaturiolcymru.gov.uk](mailto:Libby.Hughes@cyfoethnaturiolcymru.gov.uk) . Please forward all the required paperwork to [wrexhamflintshireenvironmentteam@cyfoethnaturiolcymru.gov.uk](mailto:wrexhamflintshireenvironmentteam@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 to 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 only relating to the activity assessment
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

### If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend non-compliance for up to six months to allow time for remedial action to be taken. These will be re-instated if the action is not completed.

**Full list of water quality action criteria (used in section 1 and 2):****WQ A: Management**

- WQ-A1 General management

**WQ B: Operations**

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

**WQ C: Emissions and monitoring**

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Installation of monitoring boreholes

**WQ D: Information**

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

**Enforcement response**

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

**What do I do if I disagree with the report or have a complaint?**

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto: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.