

Compliance Assessment Report CAR_NRW0049072

Permit being assessed: XP3694FN.

For: The Old Transport Yard, **held by:** Mr M R Jackson

At: Old Aston Hill, Ewloe, Deeside, Flintshire, CH5 3AH.

Type of assessment: Site Inspection,

Reason: Routine.

On: 07/08/2025 between 10:15 and 11:05.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Ian Thomas2.

Report sent to: Steven Jackson, Director and TCM, on 12/08/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2D - Waste - Operations - The site	Action only (X)	
W2D - Waste - Operations - The site	Action only (X)	
W2C - Waste - Operations - Operating techniques	C3 Minor	1.1.1 The operator shall manage and operate the activities (a) in accordance with a written management system which identifies and minimises the risk 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.
W2D - Waste - Operations - The site	C3 Minor	1.1.1 : The operator shall manage and operate the activities (a)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
		in accordance with a written management system which identifies and minimises the 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

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

Total non-compliances recorded	Total non-compliance score
2	8

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
W2D	Updated drainage plan required	30/09/2025
W2D	Access required to interceptors on site	30/09/2025
W2C	All engines and parts to be stored as per requirements	31/08/2025
W2D	Weekly checks of drains and grids across buildings to be carried out and maintained to prevent blocking	31/08/2025

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

On Thursday 7th August 2025, a routine site inspection was carried out by Waste Regulation Officer Ian Thomas. The weather at the time was overcast with some rain. I met with Mike Jackson, one of the owners of the business. Mike introduced me to Luke Jackson who is the site manager and accompanied me on the site inspection.

Prior to the visit Waste returns were checked and found to be in order. As the waste returns are due annually, the next returns are due by the end of January 2026 for the year ending 2025. On the previous visit it was found that the WAMITAB qualification for Steven Jackson as TCM had expired. This has now been rectified and the qualification is now up to date.

A walk around the site was carried out, Luke explained that most of the site has now been re-surfaced with concrete, and that the site drainage had been overhauled with a new Kingspan interceptor at the top end of the site. This should result in 4 interceptors in total. On the previous visit a request was made that once site renovation works are complete, a revised drainage plan is submitted to NRW which maps the drainage network, where the interceptors are and where the site discharges to. To date there has been no updated drainage plans submitted to NRW. **Recorded as an action to submit up to date drainage plan for the permitted site.**

On entry to the yard there were some ELVs being stored on un-made ground, these were waiting to be depolluted. Once depolluted they are then stored on the hard standing areas of the site. Where the hardstanding area began Luke showed me where one of the interceptors was positioned. Access to the interceptor was covered by vehicles. **Recorded as an action to ensure access to interceptors is available at all times, to monitor levels and for emptying when required.**



Interceptor access covered.

It was noted whilst walking the site that there are several locations where engines and parts are left outside in the elements. Luke stated that these had been depolluted and so he thought could be left outside.

It was explained that all engines and oily parts would still require a suitable storage container with weatherproof cover to ensure the minimal amount of rain ingress and subsequent contamination.

Schedule 5 of the ELV Regs 2003 states that sites are "provided with storage facilities that are appropriate for dismantled spare parts, including impermeable storage facilities for spare parts that are contaminated with oil"





Engines and parts

The issue of engines and parts stored incorrectly was highlighted on the previous two CARS forms. **As a result, the site has been scored C3 for this permit breach as it has the potential to have a minor environmental effect.**

The depollution shed had been constructed when I last visited, and at that time was tidy with no issues. It seems over time this area has been in increased use and is in need of some attention. The drain across the doors to the building are partly blocked and contaminants can be seen outside on the concrete.

The drain across the doors needs to be maintained to ensure, wherever possible, any spills or contaminants are contained. **As a result, the site has been scored C3 for this permit breach as it has the potential to have a minor environmental effect.**

The older depolluting building at the entrance to the site is in a better condition than my previous visit, but still in need of some attention. Engines and other various parts are being removed, and it can be seen on the floor that a high volume of vehicles are going in and out. There was a pile of exhaust systems with catalytic converters attached that were waiting to be collected. Again, the grid/drain across the building was partly blocked.

The site's Environmental Management System states 'All parts of the drainage system (e.g. surface water gullies & drains, and the oil content of the interceptor) are checked for correct operation on a weekly basis and any remedial corrective action is taken immediately'.

Permit Condition 1.1.1 : The operator shall manage and operate the activities (a) in accordance with a written management system which identifies and minimises the 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.

It looks as though the requirement to inspect these grids/drains is not being carried out, maintenance of these grids would improve the containment of materials which could cause contamination to the ground.



Drain across new depollution building.



Older de-polluting building oily run off.



Older de-pollution building.

Speaking with Luke, it is evident that the site wants to develop into newer areas, for instance, there has been a marked increase in selling used parts through popular online sites. This is good for re using parts and accessories but the permit conditions and maintenance of the site must be adhered to. It is advised that a review of the site Environmental Management System is carried out as the current document is from 2016, and previous to that, 1993.

Thank you for assisting with the site inspection. Should you wish to discuss or query anything in this report, please make contact using the details below. Kind Regards, Ian Thomas

Email: ian.thomas2@cyfoethnaturiolcymru.gov.uk

Post: Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

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 only relating to the activity assessment
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 – Emissions to water, air or 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.

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 to 18:00), or email 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

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.