

Compliance Assessment Report CAR_NRW0051548

Permit being assessed: LB3933AE.

For: Thomas Skip And Plant Hire Ltd, **held by:** Thomas Skip and Plant Hire Limited

At: Unit 5b, Griffiths Crossing Industrial Estate, Caernarfon, Gwynedd, LL55 1TS.

Type of assessment: Site Inspection,

Reason: Routine.

On: 05/02/2026 between 14:05 and 15:10.

Parts of permit assessed: As below. .

NRW Lead Officer: Leon Williams, accompanied by Kieran Evans.

Report sent to: Natasha Thomas, Company Director / TCM, on 23/04/2026.

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	C3 Minor	1.1.1(a)
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	C3 Minor	2.4.1
W4A - Waste - Information - Records	Assessed (A)	
W4B - Waste - Information - Reporting	Assessed (A)	

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
W1A	Develop and implement waste storage procedures as required by permit condition 1.1.1(a). Submit the updated EMS document for review to NRW.	01/06/2026
W2D	Remove waste stored outside of sites permitted boundary.	01/05/2026

Criteria	Action needed	Complete by
	Ensure all waste storage and treatment activities remain contained within permitted site boundary. Consider permit variation to alter current site boundary.	

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Routine site inspection conducted by Natural Resources Wales (NRW) Senior Waste Regulation Officer Leon Williams and Waste Regulation Officer Kieran Evans.

Present on site on behalf of Thomas Skip & Plant Hire Ltd were company Directors Iestyn Thomas and Natasha Thomas.

The weather was dry and overcast during the inspection.

W1A – General Management

Permit condition 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, closure and those drawn to the attention of the operator as a result of complaints”.

With reference to previous Compliance Assessment Reports, CAR_NRW0045846 and CAR_NRW0048720, NRW have previously made reference to the absence of written waste storage procedures within the company's existing Environmental Management System (EMS) following site inspections conducted at Thomas Skip & Plant Hire Ltd on the 22 October 2024 and 30 June 2025.

Deadlines to complete this action have been set for the 28 February and 30 September 2025 and have not been completed by the operator.

As outlined in current "[How to comply with your environmental permit](#)" guidance, "if you store waste pending its disposal or recovery elsewhere, your management system must include:

- storage times and procedures to ensure that these times are not exceeded.
- maximum storage capacities for specified storage areas and the facility as a whole

and procedures to ensure that these capacities are not exceeded.

- maximum storage heights to prevent or minimise the emission of dust, litter and throughput management.
- procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures”.

Currently, the site does not have written site-specific waste storage procedures as required by the Environmental Management System. This means there is no formal control over waste storage locations, quantities, storage times, heights, or segregation resulting in unmanaged risks of pollution, fire, dust, and nuisance. The absence of these procedures prevents the operator from demonstrating effective control of waste storage activities and compliance with permit condition 1.1.1(a).

As a response to this non-compliance we have issued a CCS Category 3 score against permit condition 1.1.1(a).

ACTION: Following the issue of this Compliance Assessment Report, NRW will serve Thomas Skip & Plant Hire Ltd with an enforcement notice under Regulation 36 of the Environmental Permitting Regulations 2016 requiring waste storage procedures to be developed and implemented into the Environmental Management System by the 1 June 2026.

W2A - Permitted activities

Table 2.1 activities – Treatment consisting only of manual sorting or manual separation of waste into different components for disposal, (no more than 50 tonnes per day) or recovery.



At the time of the inspection, waste treatment activities were limited to the manual sorting of mixed wastes into separate streams within the transfer building in compliance with permit condition 2.1.

W2D – The Site

Permit condition 2.4.1 – the activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.

As previously identified and recorded following a site inspection at Thomas Skip & Plant Hire Ltd on 30 June 2025, as documented in Compliance Assessment Report CAR_NRW0048720, waste wood was again being stored outside the site's permitted boundary at the Griffiths Crossing Industrial Estate during the time of this inspection.

The storage of combustible waste outside the permitted boundary constitutes an unauthorised waste activity and is not covered by environmental permit EPR/LB3933AE. This increases the risk of fire and associated pollution without the benefit of approved control measures set out within the permit, EMS or site Fire Prevention and Mitigation Plan (FPMP).

Storing waste beyond the permitted boundary also presents a risk to neighbouring land and businesses, undermining effective regulatory oversight and emergency response arrangements.



As a response to this non-compliance we have issued a CCS Category 3 score against permit condition 2.4.1.

ACTION: Please ensure that all of Thomas Skip & Plant Hire Ltd's waste storage and treatment operations remain contained within the sites permitted boundary attached to permit EPR/LB3933AE.

As discussed on site, a permit variation could incorporate an extension of the currently permitted boundary.

W4A - Records

Permit condition 4.1.2 - the operator shall keep on site all records, plans and the management system required to be maintained by these standard rules, unless otherwise agreed in writing by Natural Resources Wales.

A collection of recently completed waste transfer notes for waste removed from Thomas Skip & Plant Hire Ltd were made available for inspection on site in accordance with permit condition 4.1.2.

W4B - Reporting

Permit condition 4.2.2 - within one month of the end of each quarter, the operator

shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

NRW wishes to provide further clarification on recent advice regarding the use of Chapter 19 12 wastes arising from the mechanical treatment of waste as set out in the List of Wastes Regulations 2005 when assigning List of Waste codes on waste return submissions and Duty of Care documentation.

Please note that the use of waste code 19 12 12 should be restricted to mechanically treated inert wastes and waste soils which Thomas Skip & Plant Hire Ltd have previously been segregating using an excavator and riddle bucket.

NRW does not consider that the Chapter 19 12 waste classification applies to general mixed waste streams that are manually segregated by the company into separate waste streams.

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 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.