

Compliance Assessment Report CAR_NRW0051749

Permit being assessed: JP3694FP.

For: S And K Matthews Skip Hire, **held by:** S And K Matthews Skip Hire

At: Minera, Wrexham, Clwyd, LL11 3YQ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 08/05/2026 between 12:05 and 12:20.

Parts of permit assessed: waste acceptance, waste returns, TCM, EMS.

NRW Lead Officer: Boguslawka Pierzchala.

Report sent to: Neil Matthews , Owner, on 27/05/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2E - Waste - Operations - Waste acceptance	C4 No impact	6.1.2
W2E - Waste - Operations - Waste acceptance	C4 No impact	6.1.2
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W4B - Waste - Information - Reporting	C4 No impact	6.2.2
W4B - Waste - Information - Reporting	C4 No impact	6.2.2
W1A - Waste - Management - General management	Action only (X)	

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	Condition B Part 3 (1) of The Environmental Protection Miscellaneous Amendments) (England and Wales) Regulations 2018.
W1A - Waste - Management - General management	C3 Minor	Condition B Part 3 (1) of The Environmental Protection Miscellaneous Amendments) (England and Wales) Regulations 2018.

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

Total non-compliances recorded	Total non-compliance score
6	4.2

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
W2E	Please confirm if the ELV has been removed from site. If it hasn't been removed, please remove by the 3rd of June 2026. Provide duty of care documents by the 3rd of June 2026.	03/06/2026
W2E	Please confirm if the ELV has been removed from site. If it hasn't been removed, please remove by the 3rd of June 2026. Provide duty of care documents by the 3rd of June 2026.	03/06/2026
W2E	Please confirm what waste is being stored in a pile on site as described in the CAR form. Please provide EWC for this waste.	03/06/2026
W2E	Please confirm what waste is being stored in a pile on site as described in the CAR form. Please provide EWC for this waste.	03/06/2026
W2E	Please clarify what waste is being stored in the skip and provide the EWC for this waste.	03/06/2026
W2E	Please clarify what waste is being stored in the skip and provide the EWC for this waste.	03/06/2026

Criteria	Action needed	Complete by
W2E	Please provide an update regarding the roofing felt seen on site during the previous site inspection as described in the CAR form	03/06/2026
W2E	Please provide an update regarding the roofing felt seen on site during the previous site inspection as described in the CAR form	03/06/2026
W4B	Please review and resubmit Q1-Q4 2024 and Q1-Q4 2025. Also, submit the Q1 2026 waste returns	17/06/2026
W4B	Please review and resubmit Q1-Q4 2024 and Q1-Q4 2025. Also, submit the Q1 2026 waste returns	17/06/2026
W1A	Please provide your up-to-date TCM certificate	03/06/2026
W1A	Please provide your up-to-date TCM certificate	03/06/2026
W1A	Please revise and submit an updated version of your working plan for assessment	14/08/2026
W1A	Please revise and submit an updated version of your working plan for assessment	14/08/2026

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

On Friday the 8th of May 2026 Natural Resources Wales waste regulation officer attended at S and K Mathews skip hire.

The site is accessible through a large gate which was locked. The officer phoned the site owner, Neil Matthews, but the calls were not answered.

The weather was dry and windy.

The site appeared in reasonable order with most waste clearly separated. Similar waste quantities were stored on site compared to the previous inspection.

W2E- Waste acceptance and W2A Records

End of life vehicle (ELV) on site

During the last inspection an end-of-life vehicle was seen on site. An action was requested to remove the ELV and provide duty of care documents by **the 17th January 2025**.

As the site was locked during this site inspection the officer could not clearly see the whole site. It is unknown whether the ELV had been removed.

To date, the duty of care documents have not been received by NRW.

Section 6.1.2 of the site permit states:

All records which are required to be made under the other conditions of this licence shall be made available for inspection at the place where there area kept immediately when required by an authorised officer of the Agency.

As the duty of care documents have not been received this breach has been assigned a **CCS 4** score against the above-mentioned permit condition.

Action: Please confirm if the ELV has been removed from site.

If it hasn't been removed , please remove by the **3rd of June 2026**. Provide duty of care documents by the **3rd of June 2026**.

A pile of soil-like black waste was seen on site. Please see the photo below.

Action: Please confirm what is this waste and under what EWC code it has been accepted on site. Please comply by the **3rd of June 2026**.



Waste seen on site

A skip full of waste was also seen on site. Please see the below photo.



Action: Please clarify what waste is being stored in the skip and provide the EWC for this waste. Please comply by the **3rd of June 2026**.

During the last inspection a skip containing roofing felt was seen on site. As discussed at the time, this type of waste is likely to be classed as 17 03 or 17 06 waste depending of its components. It could also be classed as hazardous waste, particularly if it contains asbestos or bitumen.

Permit condition **1.2.1** which states: **No waste other than those, which are categorised in Table 1.2A and specified in details in Appendix A to these conditions shall be accepted at the site.**

EWC codes 17 03 and 1706 are not listed as permitted waste that can be accepted on site and therefore it is a breach of permit condition **1.2.1**.

An action was requested to assess the roofing felt and correctly code and describe this waste before

appropriate disposal. Duty of care documents were also requested with the comply-by date the **4th of July 2025**.

This action has not been completed.

Action: Please provide an update regarding the above-described request by no later than the **3rd of June 2026**.

(W4B) Reporting

Waste Returns

Permit condition **6.2.2**. states: A summary of the waste types and quantities accepted and removed from the site shall be made for each quarter of the financial year and shall be submitted to the Agency within 1 month following the end of that quarter. The summary record shall be in the format detailed in Appendix B or otherwise subsequently agreed with the Agency in writing.

The last CAR form issued to the operator requested resubmission of **Q1-Q4 2024 waste returns**. This was due to the incorrect waste codes for the waste accepted on site.

The resubmission deadline was 17th of January 2025. This actions has not been completed.

This breach has been assigned a **CCS4 score**.

Action: Please review and resubmit Q1-Q4 2024 by the **17th of June 2026**.

A review of the waste returns submissions **Q1-Q4 2025 and Q1 2026** for permit EPR-JP364FP has been completed.

The review has identified the following:

Q1 2026- has not been received.

Q1 2025- shows 191212 and 170904 wastes accepted on site.

Q2-Q4 2025 show 170904 waste accepted on site.

Permit condition **1.2.1** which states: **No waste other than those, which are categorised in Table 1.2A and specified in details in Appendix A to these conditions shall be accepted at the site.**

Both, 191212 and 170904, are not listed and should not be accepted on site.

Action: Please review the waste returns for Q1-Q4 2025 and clarify if the submitted codes are a true reflection of what has been accepted on site. Please comply **17th of June 2026**.

The failure to submit **Q1 2026** has been assigned a consolidated **CCS4 score**.

Q4 2025 waste return shows the TCM certificate expiry date as the 4th of March 2026. Please

provide you current certificate for our records by the **3rd of June 2026**

(W1A) General management

It is noted that the Working Plan has not been updated since 2011. This has been discussed with the owner during the previous site inspection.

An action was requested to revise, update and submit an updated Working Plan for assessment by the **23rd of November 2025. This action has not been completed.**

EMS procedures continue to be inadequate for managing risks from the site's activities.

This is a breach of Condition B Part 3 (1) of The Environmental Protection Miscellaneous Amendments) (England and Wales) Regulations 2018.

This breach has been assigned a **CCS3 score.**

Action: Please revise and submit an updated version of your working plan for assessment. Please comply by the **14th of August 2026.**

Guidance can be found here [How to comply with your environmental permit.](#)

Please find my contact details below.

Kind regards,

Boguslawa Pierzchala

Waste regulation Officer (Waste Regulation Team)

Email: boguslawa.pierzchala@naturalresourceswales.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 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.