

Compliance Assessment Report CAR_NRW0052167

Permit being assessed: AB3393FL.

For: Lower Park Farm Co-operative AD Plant, **held by:** Mr Richard Tomlinson, Mrs Sadie Tomlinson, Mr George Tomlinson and Mr William Tomlinson

At: Lower Park farm, Parkside, Rossett, Wrexham, LL12 0BN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/06/2026 between 10:30 and 11:25.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Ian Thomas2.

Report sent to: William Tomlinson, owner, 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
W4A - Waste - Information - Records	C4 No impact	4.2.2
W2D - Waste - Operations - The site	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	0.1

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
W4A	submit waste returns up to date	31/07/2026
W2D	manage storage of waste below bunded area wall	31/07/2026

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 12th of June 2026 Ian Thomas, waste regulation officer carried out a routine, unannounced inspection. The weather was dry and clear. The officer was met by Mr Richard Tomlinson, site owner. Richard introduced me to Will Tomlinson, who is taking more supervision of the AD plant in readiness for Richard stepping down. Richard is still TCM for the site.

Ian explained that following previous site inspections, it was recorded as an action that waste returns had not been submitted as required by the permit conditions. Checks carried out prior to the inspection showed that again, waste returns have still not been submitted since 2022.

An email was sent in May 2024 with full guidance and templates to ensure waste returns were submitted. The importance of correctly submitting waste returns is important to track the quantities used in relation to the permit conditions.

The failure to submit waste returns could further impact the ability to ensure the maximum 31,000 tonnes processed per annum.

1.5.4 The AD process is fuelled by up to 31,000 tonnes/annum of farm waste and manure consisting of the following feedstocks:

- 2,000 tonnes of poultry manure;
- 2,000 tonnes of grass silage;
- 2,000 tonnes of farmyard manure; and,
- 25,000 tonnes of cow slurry

Waste returns: Section 4.2.2 of the site permit states that "Within one month of the end of each quarter, the operator shall submit to NRW using the form made available for the purpose, the information specified in the form relating to the site and the waste accepted and removed from it during the previous quarter.

Scored C4 – Waste returns have not been submitted after multiple requests. Ensure all waste returns are submitted up to and including the current quarter by **31st July 2026**.

Please make available evidence that the above quantities relating to section 1.5.4 are adhered to. This can be in writing or via email.

A walk around the site was carried out accompanied by Will. Inside the bunded area it was noted that some of the storage had been too high and had breached the top of the wall.

Action. Please ensure the storage of materials is managed so that the bunded area is

kept clear.



Storage of waste materials over bunded wall.

Waste transfer notes were not available at the time of the visit, chicken manure is brought in from an external source which is used in the AD plant.

Please provide waste transfer notes for materials received showing all relevant information required, e.g – European waste code, quantities. Please supply this paperwork to NRW by 31st July 2026.

The AD plant and tanks looked to be in good working order with no signs of any issues – cracks or structural damage. The bunded area around the digester needs tidying. The mixing facility also appeared to be in good order. The AD diary is in use and records.

The gas plant was checked and was in good working order, producing power which is added to the grid. Maintenance checks are carried out under contract on a weekly basis.

Thank you for assisting with the inspection.

Kind regards,

Ian Thomas, Waste regulation Officer

Please find your regulating officer's contact details below.

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 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.