

Compliance Assessment Report CAR_NRW0052114

Permit being assessed: DB3391CQ.

For: 1 Acre Farm, **held by:** G W Lewis & Sons Ltd

At: Springfield Hill, Pentre Halkyn, Holywell, CH8 8BA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 16/06/2026 between 10:30 and 11:00.

Parts of permit assessed: 1.1.1, storage of waste, waste transfer notes, waste returns.

NRW Lead Officer: Boguslaw Pierzchala.

Report sent to: Geraint Lewis, Owner, on 13/07/2026.

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	Permit condition 1.1.1. and 2.3 and 2.3.1
W4A - Waste - Information - Records	Action only (X)	
W1A - Waste - Management - General management	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	4

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	Please store contaminated waste and undepolluted ELVs on an impermeable surface with sealed drainage system. Please store waste tyres as described in the site EMS/site plan. Ensure the hardstanding surface is as describe in the ELV directive.	17/07/2026
W4A	Please revise and send upated waste returns by no later than	31/07/2026

Criteria	Action needed	Complete by
	the 31st of July 2026	
W1A	Please submit the most up-to-date Environmental Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP) for our records.	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 the 16th of June 2026 Natural Resources Wales (NRW) officer attended at G W Lewis & Sons Ltd site.

This was a planned, announced visit, due to Mr Lewis' commitments.

Mr Lewis, the site owner, accompanied the officer throughout the inspection.

The site's infrastructure has not changed since the last inspection.

The depollution area was checked and appeared cluttered and a little disorganised as the site employee was working on waste tyres. Please ensure this area is kept tidy to minimise the risk of pollution

W1A General Management

General management - Waste storage

It was noted that mixed metal and plastic parts, some with visible oil residue were stored in piles on permeable ground towards the site boundary. Please see the below photos.



Waste stored in a pile on permeable ground

Permit condition 2.3 Operating techniques states:

2.3.1 The activities shall be operated using the techniques and in the manner described in **Table 2.3** below.

1. Fully depolluted end-of-life vehicles, uncontaminated plastic, glass and ferrous and non-ferrous metal wastes arising from the treatment of end-of-life vehicles shall be stored on hard standing or an impermeable surface with sealed drainage system. **All other wastes shall be stored on an impermeable surface with sealed drainage system.**

This is a breach of the above-mentioned permit condition and subsequently has been assigned a **C3** score.

Directive 2000/53/EC known as the 'ELV Directive' states: "**Hardstanding** means ground surfaced with a durable material. It must have the ability to be kept clear of debris, remain level and rut free. It must be maintained so that it is permeable and does not cause surface water ponding".

The surface didn't seem to meet the definition of hardstanding, as detailed above. This was discussed with the owner who stated this will be improved by the end of August 2026.

Action: Please store contaminated waste on an impermeable surface with sealed drainage system. Please comply by the **17th of July 2026**.

Improve the hardstanding surface to meet the ELV directive by the **31st of August 2026**.

Depolluted end of life vehicles

Depolluted vehicles seen on site were inspected and two were found to have residue fluid left in them. Please see the below photos.



Not fully depolluted ELV stored on hardstanding surface



Not fully depolluted ELV stored on impermeable surface

Storage of undepolluted ELVs on hardstanding surface is a breach of permit condition **2.3 Operating techniques and 2.3.1** as described above.

This is a breach of the above-mentioned permit condition and subsequently has been assigned a **consolidated C3** score.

Action: Please ensure all ELVs are fully depolluted. Any undepolluted ELVs must be stored on impermeable surface with sealed drainage system. Please comply by the **17th of July 2026**.

Tyres stored on site.

Waste tyres were seen stored stacked up but also in piles in several places around the site. Please see the below photos.



Waste tyres stored across the entrance to the depollution building



Tyres stored next to a skip marked on the site plan as the storage of tyres in a 8yard skip



Tyres stored next to a disused skip

Permit condition 1.1.1. states : 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

The storage of tyres as detailed in the site EMS and site map requires the tyres to be stored in a 8yard skip to the left of the access path.

This is a breach of the above-mentioned permit condition and subsequently has been assigned a **consolidated C3** score.

Action: Please ensure all tyres are stored as described in the site EMS. Please comply by the **17th of July 2026**

W4B Reporting – waste returns

A review of the waste returns submissions for permit EPR-DB3391CQ has been completed for 2025

It's noted that in the waste removed from site tab two waste codes referring to construction and demolition waste are marked as removed from site, namely 170405 and 170402.

The owner stated that the code was automatically applied by the site the outgoing waste was taken to.

Please note that it is the waste producer's duty of care to correctly code and describe their waste.

Action: Please revisit the waste returns submission and confirm if it's a true reflection of what has been removed.

Action: Please revise and send updated waste returns by no later than **the 31st of July 2026**

W1A General Management**Environmental Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP).**

Action: Please submit the most up-to-date Environmental Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP) for our records. Please comply by the **31st of July 2026**.

Thank you for your time during the visit please find my contact details below.

Kind regards,

Boguslaw Pierzchala Waste regulation Officer (Waste Regulation Team)

Email: boguslaw.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.