



This form will report compliance with your permit as determined by an Environment Agency officer

Site	Thames Materials			Permit Ref	401566		
Operator/ Permit holder	THAMES MATERIALS LIMITED						
Date	21/10/2025			Time in	11:00	Out	11:40
What parts of the permit were assessed	A,B,C,D,F,G						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Director, Company Secretary						
Officer's name	John Sullivan, Scott Garrod, Josh Mullen			Date issued	04/11/2025		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations (EPR). A detailed explanation and any action you may need to take are given in the Detailed Assessment of Compliance (section 2) and the Actions (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our [Compliance Classification Scheme](#) (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your [local office](#).

Permit Conditions and Compliance Summary

Condition(s) breached

Permit Conditions and Compliance Summary	Condition(s) breached
a) Permitted activities	1. Specified by permit A
b) Infrastructure	1. Engineering for prevention & control of pollution A
	2. Closure & decommissioning NA
	3. Site drainage engineering (clean & foul) N
	4. Containment of stored materials A
	5. Plant and equipment A
c) General management	1. Staff competency/ training A
	2. Management system & operating procedures A
	3. Materials acceptance A
	4. Storage handling, labelling, segregation A
d) Incident management	1. Site security A
	2. Accident, emergency & incident planning N
e) Emissions	1. Air N
	2. Land & Groundwater N
	3. Surface water N
	4. Sewer N
	5. Waste N
f) Amenity	1. Odour A
	2. Noise A
	3. Dust/fibres/particulates & litter A
	4. Pests, birds & scavengers A
	5. Deposits on road A
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment N
	2. Records of activity, site diary, journal & events A
	3. Maintenance records N
	4. Reporting & notification N
h) Resource efficiency	1. Efficient use of raw materials N
	2. Energy N

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

MSA, MSB, TCM = Management System condition A, Management System Condition B and Technically Competent Manager condition which are environmental permit conditions from Part 3 of schedule9 EPR (see notes in Section 5/6).

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

On Tuesday 21st October 2025, Environment Agency officers attended Thames Materials Ltd which is located at Skip Lane, Harvil Road, Hareford, Uxbridge, Middlesex, UB9 6RP (the site) to conduct an unannounced routine compliance inspection against permit EAWML 401566.

Weather was 13 Degrees Celsius, cloudy, wet underfoot, with a southwest wind of 11 mph with a light breeze.

Officer JS arrived on site at 11:00 hrs and met with the Technical Competent Manager (TCM) for the site.

Personal authorisations were shown by all visiting officers and the reason for the visit explained.

The site is working from an Environment Management System (EMS) dated 18/04/2024 version 4.

The site has a CIWM certified person for the site whose certification expires 20/11/2026.

Photographs were taken using an Environment Agency issued phone whilst on site.

No exemptions are registered to this site address.

A Notice of Powers of Rights (NOP&R) was issued under the Home Office Code of Practice (HOCOP) at 11:19 hrs reference number 70589.

Previous breaches.

F3) Dust/Fibres/Particulates & litter.

Permit condition 3.1.1

CCS Score 3

Permit condition 3.1.1 states: - *Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breaches this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emission.*

The site has been breached against the above condition because dust was seen being resuspended from vehicle movement and wind. This dust was seen escaping the site over the boundary walls. The site had not dampened down the site surface which allowed for the dust to be resuspended causing airborne pollution. Officers also observed dust being generated from vehicle movement on the access road to the site. Lorries were observed to be unsheathing whilst moving towards the weight bridge at the entrance of the site prior to being inspected and unloading. Vehicles appeared to be travelling at speed on the access road which was resuspending dust.

Action 1- Ensure that the sites Environment Management System is followed at all times and that dust created from the sites activities does not cause an airborne pollution.

Deadline- 08/05/2024 and ongoing.

Observations.

The site has recently had a permit variation application determined to increase throughput from 500,000 to 750,000 tonnes per annum.

The site now holds a permit which allows for the importation, storage, and treatment of up to 750,000 tonnes of waste per year with a storage capacity of 125,000 tonnes in order to produce soil, soil substitutes and aggregates. Treatment is limited to, separation, screening, crushing, and blending of waste.

The site is in the Colne Vally which has a wide range of high-quality wetland habitats. The site is also within the Air Quality Management Area (AQMA).

Inert waste is brought to site mainly by the companies own fleet of vehicles, and some third parties. The product produced on site is then sold on for further use.

The site is surrounded by concrete slab walls apart from the entrance and exits. The site surface is concreted throughout the site and is in a good condition.

A wheel wash was in use at the site entrance/exit for all departing vehicles.

The site was well organised with clear separation between products and waste materials.

The wash plant was operational during the visit. The screeners and crushers were also running during the visit.

Dust suppression systems were seen to be placed on the concrete walls around the site. No dust suppression measures on site were in use during the visit due to the wet weather.

Substantial amounts of aggregate product material were seen on site. The waste aggregate materials were at a low quantity.

No amenity issues were seen during the visit. No dust was seen being produced on the site during the visit.

A site diary was being used by the site with the CIWM holder signing in on a regular basis.

The EMS and site permit was readily available on request.

Officers requested a choice of waste transfer notes to be sent electronically for further review.

The site appeared well organised and managed.

Officers left site at 11:40 hrs.

Advice and guidance.

The available Environment Management System (EMS) was dated 18/04/2024 version 4. Although operations on site may have not changed, it is good practice to review and update, if necessary, the sites Environment Management System on an annual basis. Once this document has been reviewed and updated, please send a copy to the Environment Agency so the site files can be updated.

Request for further information

Action 1- Please send a choice of waste transfer notes so they can be reviewed so a Waste Audit Report can be completed.

Deadline- Completed

Total non-compliance score.

The total non-compliance score for this inspection is **0**. The total CCS score for the year to date (2025) is **0**, which makes you a Band **A** operator. The site will be expected to pay 95% of the base line subsistence charge.

Section 3- Enforcement Response

Only one of the boxes below should be ticked

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence* and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

**Non-compliance with MSA, MSB & TCM do not constitute an offence but can result in the service of a compliance, suspension and/or revocation notice.*

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required / Advised	Due Date
See Section 1 above			

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence* and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

**A breach of permit condition MSA, MSB & TCM is not an offence but may result in the service of a notice requiring compliance and/or suspension or revocation of the permit.*

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

MSA, MSB & TCM are conditions inserted into certain permits by Schedule 9 Part 3 EPR

MSA requires operators to manage and operate in accordance with a written management system that identifies and minimises risks of pollution.

MSB requires that the management system must be reviewed, kept up-to-date and a written record kept of this.

TCM requires the submission of technical competence information.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within 28 days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If a permit holder disagrees with the CAR form, they should raise their concerns to the officer or team which issued the form. This must be done within 14 calendar days of receipt. If the response does not resolve the issue, a permit holder can request an appeal of the regulatory decision. This request must be made within 28 calendar days of receipt of the response. More details on our regulatory appeals process can be found at

<https://www.gov.uk/guidance/appeal-a-regulatory-decision-from-the-environment-agency>.

If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the Parliamentary and Health Service Ombudsman phone their helpline on 0345 015 4033.