



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

Site	Crews Hill Transfer Station			Permit Ref	80716		
Operator/ Permit holder	RYAN O'DONOVAN HAULAGE LTD						
Date	23/02/2026			Time in	10:30	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, Stephen Fellows, Louise Harvey			Date issued	10/03/2026		

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
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	C3	Schedule 1;
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	C3	MSA
	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	2	Total compliance score (see section 5 for scoring scheme)	8
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 Monday 23rd February 2026, Environment Agency officers attended Ryan O'Donovan Haulage Ltd which is located at Crews Hill Transfer station, Kingswood Nursery, Theobalds Park Road, Enfield EN2 9BH (The site) to conduct an unannounced routine compliance inspection against licence reference No EAWML 80716.

The weather was 11 Degrees Celsius, overcast, dry under foot with a west-southwest wind of 15mph and a strong breeze.

Officers arrived on site at 10:30 hrs and met with the sites Technical Competent Manager (TCM). Officers showed their Personal Authorisations and explained the reason for the visit.

The site is operating from an Environment Management System (EMS) dated 28th March 2025, and a Fire Prevention Plan (FPP) dated 28th March 2025.

The site has a Technical Competent Manager (TCM) whose CIWM continuing competence certification expires 10/04/2026.

No waste exemptions are registered to the above address.

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

A Notice of Powers of Rights (NOP&R) was issued under the Home Office Code of Practice (HOCOP) at 10:36 hrs reference number 114552.

A Notice of Powers of Rights (NOP&R) was issued under PACE Code B at 10:48 hrs reference number 114553 for a suspected breach of permit conditions.

Previous Breaches.

B4) Infrastructure – Containment of stored materials

Permit condition – Schedule 1

Score CCS 3

Schedule 1 of your permit states: 'This licence relates to the land at Crews Hill Transfer Station, Kingswood Nursery, Theobalds Park Road, Crews Hill, Enfield, Middlesex EN2 9BH shown edged in red on the drawing number ESL.001, dated 16/125/04 and attached to this licence.'

The site has recently installed a new picking line along the northern and eastern boundary. This picking line exceeds the permitted area by around 10ft. This picking line was installed prior to any permit variation being submitted. The Environment agency considers that enforcement action for this issue would be disproportionate at this time. However, this will be kept under review, and the Environment Agency reserve the right to take enforcement action in accordance with its Enforcement and Sanctions policy.

The site has submitted a permit variation application which was received by the permitting service on 31/03/2025. Application reference: EPR/QP3897NB/VOO6

Until this permit variation is duly made and issued, the site will continue to receive breaches against the permit condition Schedule 1 of the current permit as waste is stored and processed outside of the permit boundary.

A formal warning letter will accompany this CAR form as a response to the above permit breach.

No action or deadline has been given for the above breach as the application for the permit variation has been submitted and is now with the Environment Permitting Service.

C2) Management – Management Systems & Operating Procedures

Permit condition – MSA.

Score CCS 3

You have been scored for a breach of MSA. MSA is a condition which has been inserted into your permit with effect from 7 April 2019 by Schedule 9 Part 3 of the Environmental Permitting (England & Wales) Regulations 2016. This condition requires you to: – MSA manage and operate in accordance with a written management system that identifies and minimises risks of pollution arising from the waste operation.

You are in breach of this condition because the site's Environment Management System is inadequate and/or procedures in the Environment Management System were not being followed.

Section 4.2.1 of the sites Fire prevention plan states: *Table 4.1 details the maximum quantity, location and duration for all wastes stored on site. This ensures all piles are stored in accordance with section 9.1 of the FPP guidance.*

Table 4.1-waste storage table in the sites FPP dated 28th March 2025 states that the maximum pile height of the unprocessed waste in the waste reception (tipping) inspection and sorting area will not exceed 4 metres.

Table 3.1-waste storage table in the sites EMS dated 28th March 2025 also states that the maximum pile height of the unprocessed waste in the waste reception (tipping) inspection and sorting area will not exceed 4 metres.

One main pile of unprocessed waste was located in the waste reception (tipping) inspection and sorting area. The waste pile was below 20 metres in length but was in excess of the 4m limit as stated in the EMS table 3.1- waste storage table and table 4.1-waste storage table in the sites FPP.

The pile was around 4.5 to 5metres in height. The site needs to reduce the height of the pile and store the unprocessed waste pile in accordance with table 3.1- waste storage table as stated in the EMS and Table 4.1-waste storage table as stated in the sites FPP.

Action 1- Reduce the height of the pile of unprocessed waste was located in the waste reception (tipping) inspection and sorting area so that the waste pile is stored in accordance with table 3.1 of the EMS and table 4.1 of the FPP. Send photographic evidence that the waste pile has been reduced.

Deadline- Noon, 22nd May 2025.

Observations from 23/02/2026

Officers entered the site through the main entrance. It was immediately observed that the waste piles were exceeding 4m in height and were observed to be around 6-8m high. See pictures 1,2 and 3.

It was also observed that waste materials consisting of, but not limited to, cardboard, inert materials and metals materials were being stored outside the permitted boundary on the Northern area of the

site. See pictures 4,5,6, and 7.

All waste needs to be stored and processed inside the permitted boundary. This waste needs to be moved to inside the permitted boundary.

The area at the top of the site was observed to be very muddy. Although mud was not observed being tracked on to the public highway, this muddy area needs to be cleaned to prevent mud and debris from being tracked on to the public highway.

Officers entered the waste operations and processing area. This area was full of mixed waste materials. The TCM for the site informed officers that the recent wet weather had delayed the processing of the waste. Officers informed the TCM that if there is not sufficient room to store the waste on site within the FPP guidance, waste should not be accepted to the site, and it should be diverted elsewhere.

The waste operational area needs a significant improvement to its housekeeping. The mixed waste in this area needs to be processed and removed from site so all waste is stored within the FPP guidance.

Further improvements have been made to the dust suppression system on site. Extra spray locations have been added to the northern end of the site. The dust suppression system was not seen to be operational during the visit due to the wet weather. No dust related issues were observed during the visit.

No other amenity issues observed during then visit.

The EMS and FPP were readily available on request. A site diary was being completed and the TCM recording their attendance on site.

Photographs were taken of waste transfer notes for further review. A Waste Audit Report (WAR Form) will accompany this report. Officers left site at 11:40h.

Breaches.

B4) Infrastructure – Containment of stored materials Permit condition – Schedule 1 Score CCS 3.

Schedule 1 of your permit states: 'This licence relates to the land at Crews Hill Transfer Station, Kingswood Nursery, Theobalds Park Road, Crews Hill, Enfield, Middlesex EN2 9BH shown edged in red on the drawing number ESL.001, dated 16/125/04 and attached to this licence.'

The site has recently installed a new picking line along the northern and eastern boundary. This picking line exceeds the permitted area by around 10ft. This picking line was installed prior to any permit variation being submitted. The Environment agency considers that enforcement action for this issue would be disproportionate at this time. However, this will be kept under review, and the Environment Agency reserve the right to take enforcement action in accordance with its Enforcement and Sanctions policy.

The site has submitted a permit variation application which was received by the permitting service on 31/03/2025. Application reference: EPR/QP3897NB/VOO6

Until this permit variation is duly made and issued, the site will continue to receive breaches against the permit condition Schedule 1 of the current permit as waste is stored and processed outside of the permit boundary.

A formal warning letter addressing this issue has been sent to the site dated 8th May 2025.

No action or deadline has been given for this part of the breach as the application for the permit variation has been submitted and is now with the Environment Permitting Service.

Waste soils, trommel fines and cardboard was observed being stored outside of the permitted boundary. Waste was being processed outside of the permitted boundary. Metal waste was seen being stored in skips outside the permitted boundary. The site needs to remove all waste that is being stored and processed outside the permitted boundary to inside the permitted boundary. The site needs to cease storing waste outside the permitted boundary until the variation of the permit extension has been completed.

The root cause of this breach is that the site is not following their permit and storing waste outside of their permitted boundary.

Action 1- remove all waste that is being stored and processed outside the permitted boundary to inside the permitted boundary.

Deadline- 17:00h, 19th March 2026.

C2) Management – Management Systems & Operating Procedures

Permit condition – MSA.

Score CCS 3

You have been scored for a breach of MSA. MSA is a condition which has been inserted into your permit with effect from 7 April 2019 by Schedule 9 Part 3 of the Environmental Permitting (England & Wales) Regulations 2016. This condition requires you to: – MSA manage and operate in accordance with a written management system that identifies and minimises risks of pollution arising from the waste operation.

You are in breach of this condition because the site's Environment Management System is inadequate and/or procedures in the Environment Management System were not being followed.

Section 4.2.1 of the sites Fire prevention plan states: *Table 4.1 details the maximum quantity, location and duration for all wastes stored on site. This ensures all piles are stored in accordance with section 9.1 of the FPP guidance.*

Table 4.1-waste storage table in the sites FPP dated 28th March 2025 states that the maximum pile height of the unprocessed waste in the waste reception (tipping) inspection and sorting area will not exceed four metres.

Table 3.1-waste storage table in the sites EMS dated 28th March 2025 also states that the maximum pile height of the unprocessed waste in the waste reception (tipping) inspection and sorting area will not exceed four metres.

One main pile of unprocessed waste was in the waste reception (tipping) inspection and sorting area. The waste pile was below 20 metres in length but was more than the 4m limit as stated in the EMS table 3.1- waste storage table and table 4.1-waste storage table in the sites FPP.

The pile was around 6 to 8 metres in height. The site needs to reduce the height of the pile and store the unprocessed waste pile in accordance with table 3.1- waste storage table as stated in the EMS and Table 4.1-waste storage table as stated in the sites FPP.

The root cause of this breach is that the site is not following their own management systems and storing waste incorrectly as stated in their own management systems.

Action 1- Reduce the height of the pile of unprocessed waste that was in the waste reception (tipping) inspection and sorting area so that the waste pile is stored in accordance with table 3.1 of the EMS and table 4.1 of the FPP. A follow up visit will occur to ensure compliance.

Deadline- 17:00h, 19th March 2026.

Total non-compliance score.

The total non-compliance score for this inspection is **eight**. The total CCS score for the year to date (2026) is **eight**, which makes you a Band **B** operator. The site will be expected to pay **100%** of the base line subsistence charge.

Photograph 1 illustrating waste pile heights.



Photograph 2 illustrating waste pile heights.



Photograph 3 illustrating waste pile heights.



Photograph 4 illustrating waste being stored/processed outside permitted boundary.



Photograph 5 illustrating waste being stored/processed outside permitted boundary



Photograph 6 illustrating waste being stored/processed outside permitted boundary



Photograph 7 illustrating waste being stored/processed outside permitted boundary



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.

X

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			
B4	C3	Action 1- remove all waste that is being stored and processed outside the permitted boundary to inside the permitted boundary. Deadline- 17:00h, 19th March 2026.	19/03/2026
C2	C3	Action 1- Reduce the height of the pile of unprocessed waste that was in the waste reception (tipping) inspection and sorting area so that the waste pile is stored in accordance with table 3.1 of the EMS and table 4.1 of the FPP. A follow up visit will occur to ensure compliance. Deadline- 17:00h, 19th March 2026.	19/03/2026

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.