



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	20/03/2026			Time in	11:30	Out	12:34
What parts of the permit were assessed	A,B,C,D,F						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Director, Company Secretary.						
Officer's name	John Sullivan, Stephen Blackburn			Date issued	31/03/2026		

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	N	
	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	N	
	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 Friday 20th March 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 announced follow up compliance inspection against licence reference No EAWML 80716 to ensure that actions stated in CAR form 80716/0595210 had been completed.

The weather was 9 Degrees Celsius, mostly cloudy, dry under foot with a northeast wind of 5mph and a light breeze.

Officers arrived on site at 11:30 hrs and met with a company director, the sites Technical Competent Manager (TCM) and the sites environmental consultant. 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 Manger (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 not issued due to previous visit occurring 23rd February 2026.

A Notice of Powers of Rights (NOP&R) was issued under PACE Code B at 11:28 hrs reference number 114555 for a suspected breach of permit conditions.

Previous Breaches (from CAR ID 80716/0595210)

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, 12th March 2026.

On 20/03/26, waste soils, metals, and inert materials had all been moved back inside the permitted boundary. No waste materials were seen outside the permitted boundary.

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 FPP 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.

On 20/03/26, the waste piles had been reduced, however still exceeded the limitations set out in table 4.1 of the FPP.

Observations from 20/03/2026

Officers were on site to conduct a follow up inspection to ensure that all actions in CAR form 80716/0595210 had been completed. A full site inspection was not conducted.

Prior to inspecting the permitted area, officers held a brief meeting with a company director, the TCM and the site's consultant. A discussion was held about an application for a Standard Rules permit, the potential for a building to be constructed at the site to contain all waste activities and the site's compliance history. Officers advised the consultant to liaise with the EA permitting team in relation to the application and the options for pursuing this.

Officers again discussed the warning letter which had been issued to the site to address the on-going non-compliance relating to machinery which has been constructed outside of the permit boundary. Separate to this however, officers advised that the EA would not be able to continue recording the same non-compliances against other permit conditions during inspections, without escalating the matter in line with the EA's enforcement and sanctions policy.

Officers explained that the use of a suspension notice may be considered if the EA found that during inspections, it was repeatedly recording non-compliances with the same permit conditions.

Following the meeting in the site office, officers inspected the permitted area.

All waste material on site had now been removed from outside the permitted boundary and placed inside the permitted boundary or removed from site. No waste processing was occurring outside the permitted boundary.

The area at the top of the site near the entrance had been swept and was now, mostly clear of mud and debris. This area needs to remain clear of mud and debris to prevent mud and debris from being tracked on to the public highway.

The dust suppression system was seen to be operational. No dust related issues were observed during the visit.

No other amenity issues observed during then visit.

The site had made improvements to the sites housekeeping and the site was tidier. Waste piles had been reduced however officers noted concerns with the volumes of unprocessed waste which was still exceeding the limits set out within the FPP.

The incoming, unprocessed waste that was stored in area 1 was exceeding the limits set out in

table 4.1 of the site's FPP dated 28th March 2025.

In the layout and fire plan drawing No THEO-3483-03, it is stated that the max width will be 7.5m, max length will be 7m, and the max height will be 4m. The waste stored in these areas were exceeding the 7.5m length and 7m width and was not stored within the Area 1 as defined by the site layout & fire plan' included as Appendix 1 of the FPP.

The site now needs to remove further waste from the site to ensure the site is compliant with their own FPP and the waste stored on site does not exceed the limits set out in the layout and fire plan drawing No THEO-3483-03 in the Fire Prevention Plan (FPP) dated 28th March 2025.

Officers left site at 12:34h.

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 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.

Unprocessed waste that was stored in area 1 as detailed on the site layout and fire plan drawing No THEO-3483-03 was exceeding the limits set out in the Fire Prevention Plan (FPP) dated 28th March 2025.

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 waste stored in area 1 as detailed on the site layout and fire plan drawing No THEO-3483-03 so all waste is stored within the limits set out in In Table 4.1 and in the layout and fire plan drawing No THEO-3483-03. Send photographic evidence that the waste is within the limits set to you Environment Agency officer via email.

Deadline- Noon, 14th April 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 **sixteen**, which makes you a Band **C** operator. The site will be expected to pay **110%** of the base line subsistence charge.

Since the transfer of the Permit to the operator on 27/09/2024, non-compliances with permit condition MSA have been recorded during every routine inspection. These non-compliances have been recorded on four separate CARs (including this one), highlighting inadequacies of and non-compliance with the Operator's own management systems.

As such, the Environment Agency now consider it is necessary to consider our enforcement response including, but not limited to, service of a suspension notice. Nothing in this CAR form can prejudice any enforcement action that the Environment Agency may choose to take in accordance with its enforcement and sanctions policy.

Photograph 1 illustrating pile lengths and widths which are exceeding Table 4.1 and, in the layout and fire plan drawing No THEO-3483-03.



Photograph 2 illustrating pile lengths and widths which are exceeding Table 4.1 and, in the layout and fire plan drawing No THEO-3483-03.



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	<p>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.</p> <p>The site has submitted a permit variation application which was received by the permitting service on 31/03/2025. Application reference: EPR/QP3897NB/VO06</p> <p>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.</p> <p>A formal warning letter addressing this issue has been sent to the site dated 8th May 2025.</p> <p>No action or deadline has been given for this breach as the application for the permit variation has been submitted and is now with the Environment Permitting Service.</p>	ongoing
C2	C3	<p>Action 1- Reduce the waste stored in area 1 as detailed on the site layout and fire plan drawing No THEO-3483-03 so all waste is stored within the limits set out in In Table 4.1 and in the layout and fire plan drawing No THEO-3483-03. Send photographic evidence that the waste is within the limits set to you Environment Agency officer via email.</p>	14/04/2026

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.