

Compliance Assessment Report CAR_NRW0051673

Permit being assessed: VP3794FN.

For: A S H Bretton Recycling Centre, **held by:** Alan's Skip Hire Limited

At: Broughton Mill Road, Bretton, Flintshire, CH4 0BY.

Type of assessment: Site Inspection,

Reason: Other.

On: 24/04/2026 between 12:00 and 12:45.

Parts of permit assessed: W3B - Emissions of substances not controlled by emission limits.

NRW Lead Officer: Steven White.

Report sent to: Steve Rymill, HSEQ Director, on 11/05/2026.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.1.1

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
W3B	Implement a detailed dust emission management plan and submit this to NRW for approval.	28/05/2026
W3B	Improve dust mitigation measures (fix vent on Blue Mac machine, fix site netting)	28/05/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This was an unannounced inspection following a report to Natural Resources Wales (NRW) from a neighbouring business over concerns of dust and particulates leaving the ASH Bretton site and affecting their employees and operations. Senior Environment Officer Steven White attended with Environment Officer Thomas Lefebure, the weather was dry with wind blowing from a south easterly direction from ASH Bretton towards the business reporting the dust issues.

At the neighbouring business officers observed dust and small pieces of light plastics emitting from the 'Blue Mac' machine on ASH and blowing over the ASH site boundary onto this site. This dust got into officers eyes and throats and was quite uncomfortable, employees from the neighbouring business stated that this was a common occurrence and had video and photographs of previous emissions from ASH in their direction. There was a lot of dust observed on the ground on the land adjacent to the ASH site boundary and small pieces of plastic were visible over a large area, when walking on the grass a lot of dust was disturbed. Employees expressed concern for their health from this and potential impact on the operations at the adjacent business.



Dust and small plastic pieces visible over ASH site boundary



Blue Mac machine with dust and small plastics blowing over site boundary. A video of this showing it much clearer has been sent to ASH separately.

After gathering evidence officers went to ASH Bretton and met with Keith Morris and George Hassall, after explaining the reason for the visit we went onto the main site. Officers inspected the Blue Mac machine that was operating at the time of the visit, dust suppression was observed in the area where the fines are collected, and at the site entrance where the wheel wash was full. At the time there was a collection of metal occurring at the site and officers were unable to go to the rear of the Blue Mac machine, however dust was visibly coming out of the rear of the machine and blowing towards the adjacent business. In conversation with Keith Morris it was found that a vent had been discovered to require maintenance and a section of netting was in need of fixing. Both these required the use of a cherry picker that would not be accessible for a few days. It was discussed that should the operations on site obviously be causing dust issues for neighbours that the dust mitigation measures (up to and including shutting the relevant machines down) should be instigated. I have concerns regarding the positioning of the Blue Mac machine and am looking into the permit and any local agreements that are associated with this machine.





Dust suppression measures observed on site

As a result of the site inspection the following permit breaches have been identified.

3.1.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached 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 emissions.

The amount of dust observed leaving site was excessive and has had a detrimental effect on neighbouring businesses and employees. Subsequently a Category 3 non-compliance score has been issued. Amenity breaches are scored on the actual pollution impact. The impact at the time was deemed to be Category 3 level, however the site needs to be aware being adjacent to an airfield this has the potential to cause a higher risk to people and the environment. The neighbouring business is a designated Foreign Object Debris (FOD) site.

Action: Implement a detailed dust emission management plan and submit this to NRW for approval.

Action: Repairs to be carried out to litter fencing and Blue Mac machine vent. If this does not rectify issue the site should look to increase the height of this fencing to prevent emissions to bordering sites. This fencing should be checked regularly and any repairs prioritised and completed in a timely manner.

A date for the above actions has been set for 28/05/26, following discussions with ASH this date supersedes the date in the previous CAR form (12/05/26). Discussions with ASH soon after the visit indicated that the netting and Blue Mac fixes have been scheduled in and are dependant on a cherry picker, and mist cannon is awaiting parts before commission. Please keep me updated on progress on this.

The amounts of waste in the main sorting shed was discussed, this has been scored in a previous CAR form and an action plan for the reduction of the waste volumes is underway.

Thank you for your time, please find my contact details below.

Regards

Steven White

Senior Officer (NE Waste Regulation Team)

Email: steven.white@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.