

## Compliance Assessment Report CAR\_NRW0051718

**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:** Incident Response (Incident number 2604522).

**On:** 01/05/2026 between 13:00 and 13:30.

**Parts of permit assessed:** 3.1.1 Litter, dust.

**NRW Lead Officer:** Steven White, accompanied by Joe Weatherley.

**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	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	Fix damaged netting, put in a fix on the potential source of the dust/litter on the Blue Mac machine	Already completed

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 pollution incident report, ref WIR2604522, from a neighbouring business raising concerns with the amount of dust and litter blowing from the ASH Bretton site over the site boundary. The weather was dry with a slight breeze blowing from a south-easterly direction. Prior to visiting the ASH site Senior Officer Steven White and Waste Regulation Officer Joe Weatherley visited the neighbouring business to verify the reports.

At the neighbouring business adjacent to the ASH permitted boundary there was a lot of dust visible on the ground that was disturbed when walking over it. There was also a lot of small light plastics observed in various places around the site, when looking over the small watercourse towards ASH it was observed in this area.



Light plastics over ASH perimeter



Plastics observed on land between ASH and neighbouring business

Following the visit to the neighbouring business Officers arrived at ASH and met with Keith Morris who showed us around the site. We went to the two potential sources of the dust and litter - the Blue Mac machine and the trommel fines originating from the site. There were no signs of dust or litter coming from the trommel fines area, or at the front of the Blue Mac machine where dust suppression measures were in place.



Trommel fines area

At the rear of the Blue Mac machine the netting was in a state of disrepair and would not be able to stop any airborne plastics from leaving the site. The machine was loaded whilst we were there and we were able to observe small amounts of dust and small plastics leaving the machine and blowing over the area of missing netting towards the neighbouring business.



Rear of Blue Mac machine

### Permit condition 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.**

Officers were able to observe airborne litter of varying sizes leaving the Blue Mac machine and going over the site boundary towards the neighbouring business. The lightweight plastics observed over the site boundary are the same that are produced from the Blue Mac machine, as such this is a breach of the above permit condition. The neighbouring business is a designated Foreign Object Debris (FOD) site, discussions with the neighbouring business has raised concerns that this litter emanating from ASH has the potential to cause damage to and contaminate the equipment produced at this site.

The netting in this area is damaged and is not able to stop any litter, namely small plastics, from leaving the site as observed by officers on the day, as such this has been scored as a Cat3 breach of the above permit condition.

Section 4.6 of the site EMS describes Litter Monitoring at the site

**4.6. LITTER MONITORING The perimeter of the Site is checked daily for any instances of, or the potential for, litter escaping from the Site. The Site contains external bays to the height of four metres, with netting providing an additional metre. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur. All wastes liable to give rise to contamination will be removed from the Site if the Site is not secure or if operations cease or are temporarily suspended**

It is understandable that due to the nature of the neighbouring business access to carry out litter picking would be difficult. However, it is advised that measures are looked into to reduce the amount of small plastics coming from this area of the site. In the interim between the site visit and the issuing of this CAR from the netting to the rear of the Blue Mac machine has been fixed and a mist cannon has been allocated to the site to mitigate the dust in this area. This cannon will be operational once certain parts have been sourced. Due to the fixes being already carried out, no date for compliance has been set.

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](mailto: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](mailto: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](mailto: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.