

Compliance Assessment Report CAR_NRW0050848

Permit being assessed: BB3697ZN.

For: New Horizon Plastics Co Ltd, **held by:** New Horizon Plastics Co Ltd

At: Unit 27 & The Former Scrapyard, Gelicity House, Castle Park Industrial Estate, Flint, Flintshire, CH6 5XA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 24/02/2026 between 11:30 and 13:00.

Parts of permit assessed: 2.3.1, 3.1.1, Table S1.2, 4.2.

NRW Lead Officer: Amy Henderson, accompanied by Steven White.

Report sent to: Phillip Thomas, Company Director, on 12/03/2026.

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
W2C - Waste - Operations - Operating techniques	C2 Significant	2.3.1
W2C - Waste - Operations - Operating techniques	Action only (X)	
W2E - Waste - Operations - Waste acceptance	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
2	35

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	Restore litter fencing along perimeter of unit 27 & carry out a litter pick of plastics blown offsite. Ensure regular checks of	09/03/2026

Criteria	Action needed	Complete by
	the litter fencing are carried out to ensure repairs required are carried out as soon as possible.	
W2C	Submit permit variation for the changes to operations on site. Ensure a permit variation has been agreed prior to any changes taking place.	Already completed
W2C	Ensure permit variation is a true picture of future site layout/operations.	06/04/2026
W2E	Ensure waste returns give an accurate code and description of the waste accepted onsite. Silage Wrap should be coded 02 01 04 Waste plastics (except packaging).	31/03/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This was an unannounced site inspection carried out New Horizon Plastics Ltd, Flint. The inspection was carried out by Waste Regulation Officer Amy Henderson and Senior Waste Regulation Officer Steve White.

The weather at the time was dry.

NRW Officers were accompanied throughout the visit by Company Directors Phillip Thomas and Karyn Thomas

Prior to arriving on site Officers inspected the area surrounding the permitted area for signs of plastic/litter following a report from a member of the public in relation to this. An area was identified where a small quantity of shredded plastic had accumulated. This was situated beneath a section of fence line where the litter netting was missing along the NW perimeter of Unit 27. The sites EMS states a 5.5m high litter fence will be in situ along this boundary. This was raised with the site and an action given to carry out a litter pick in this area and repair the netting to prevent further escapes.



Photograph showing gap in litter fencing



Photographs of shredded plastic on grass by gap in litter fencing.

A walk around of the site was then carried out. Officers were shown the area where the site hopes to expand. Some waste was already being stored in this area. Advice and Guidance was given and the site was reminded that this is currently outside of the permitted area and no operations should commence here until the after a variation has been granted. NRW Officers advised that all waste needed to be stored within the permitted area. Photographs were sent by the site on the 25/02/2025 showing this waste has now been moved back within the permitted area and the unpermitted yard area is now clear. WTNs were received for some waste which had been taken off site to another permitted facility.

The site has implemented considerable changes to the site layout and equipment to what was agreed in the last permit variation and therefore agreed under the current permit. The site has various sections of the EMS/FPMP/NIA that are incorporated into the permit. These changes included the installation of new equipment and the removal of the wastewater treatment plant in unit 27. These changes are deemed to impact the risk of the site and therefore cannot be agreed by the area team. The site has been previously made aware any changes such as these require a permit variation to be in place **prior** to the activity commencing, including in the last CAR form issued on 04/07/2025 which stated the following:

"The site was reminded to ensure they remain in compliance with the activities on their permit. This includes any aspect of the EMS/FPMP which has been incorporated into the permit. Any changes which deviate from this will need to be agreed in writing or be submitted through a permit variation if required. As there is current infrastructure work taking place, please ensure all site plans/EMS/FPMP are accurate. Please note that changes to any aspect of the EMS/FPMP which have been incorporated into the permit, can only be agreed locally if they do not increase the risk of the activity."

The site does have a permit variation current submitted to NRW, however this has not been assessed and agreed. As the activity has commenced prior to a variation being granted, this is a breach of permit conditions. The site is in a particularly sensitive area being in close proximity to the River Dee which is a designated SSSI/SAC. The Dee estuary is also an important cockle fishery.



Baler onsite - this was located in where should be the quarantine area. This equipment is not listed on the current site plan.



Photograph of one of three new wash baths installed in total. These are not listed on the current site plan incorporated into the permit.



Photograph of new wash bath installed in 'unit 27'

It was also discussed that the site now plans to move the glass treatment area to a different location to what has been submitted in the plans for the current variation application. There is no record that this has been communicated to our Permitting Team. Please ensure the application is a true picture of how the site proposes the future operations onsite. Glass is not a waste currently listed on the permit. No acceptance of this waste can take place until a permit variation has been granted.

Following the site inspection a check of waste returns was carried out. These have been submitted up to date, however it has been noted that records do not declare any acceptance of silage wrap, despite this being evident on site. The appropriate EWC code for Silage wrap should be 02 01 04 Waste plastics (except packaging). Please ensure all waste returns have the accurate coding for this waste type.



Silage wrap onsite

As a result of this site inspection, the following breaches have been identified;

Permit condition 2.3.1(a) states The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.

All listed treatments and waste storage can be carried out on the site as shown on the plan in Site layout and Fire Plan Drawing No. CAS/2570/03 incorporated in Table S1.2 of this permit.

The site submitted a permit variation on the 09/12/2025 however this has not yet been determined. The site has been informed several times previously the importance of insuring a permit variation is in place before changing activities onsite. Despite this repeated advice the site has chosen to disregard this and start operating the changes under the variation before this has been granted. The site is in a sensitive area being close to the River Dee SSSI/SAC and cockle beds. The site also has a Noise Impact Assessment, which is incorporated into the permit, any changes to machinery have the potential to impact on this. For the above reasons it is essential that any changes are assessed in full prior to commencing any changes. As a result of the above a category 2 non-compliance score has been issued. A warning has also been issued. **An action has been given to ensure a permit variation is in place before commencing changes to any activities onsite. The site also needs to ensure that the plans submitted under variation are an accurate picture of the activities onsite.**

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.

Litter was identified to have blown off the site, the cause of this was identified to be a break in the litter fencing. The site plan states a 5.5m high litter fence will be in place in this area. This was seen to have been damaged and a large gap was enabling litter to blow from the site. This has been given a category 3 non-compliance score. **Actions have been given to carry out a litter pick of this area and repair the litter fencing. Regular checks should also be carried out of the litter fencing to ensure any damage identified is repaired**

as quickly as possible.

Action only: Ensure waste returns are an accurate picture of waste accepted onto site. Silage wrap should be coded 02 01 04 Waste plastics (except packaging).

Thank you for your time during the site inspection.

Should you have any queries regarding this CAR form please contact
amy.henderson@cyfoethnaturiolcymru.gov.uk

Kind regards
Amy Henderson
Swyddog Rheoleiddio Gwastraff / Waste Regulation Officer
Cyfoeth Naturiol Cymru / Natural Resources Wales
Swyddfa Bwcle / Buckley Office

"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.