Compliance Assessment Report CAR_NRW0052514

Permit being assessed: CB3237AP.

For: Gwynedd Skip And Plant Hire Ltd, **held by:** Gwynedd Skip And Plant Hire Ltd

At: Lon Hen Felin, Cibyn Ind Est, Caernarfon, Gwynedd, LL55 2BD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 27/07/2026 between 14:00 and 14:57.

Parts of permit assessed: As below.

NRW Lead Officer: Kieran Evans, accompanied by Nia Brunning.

Report sent to: Alan Hughes, Company Director, on 08/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3G - Waste - Emissions and monitoring - Fire	Action only (X)	
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	3.5.1
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	3.5.1
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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
W3G	Keep waste within the permitted site boundary, and therefore under the fire prevention measures, as outlined within the FPMP, for as long as possible, prior to transfer from the site.	28/09/2026

Criteria	Action needed	Complete by
W3G	Maintain a minimum of 1m freeboard, at all times, between the top of a waste pile, and the top of a fire wall, for all wastes stored within fire bays/walls. Also Inspect and maintain the integrity fire walls/bays in line with section 4.8.5 of the site FPMP.	28/09/2026
W3G	In the absence of sufficient fire wall/bay containment, establish a minimum of 6 meters separation distance between combustible waste piles.	28/09/2026

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 un-announced site visit conducted on 27 July 2026. Weather conditions at the time of the visit were dry, overcast with a light prevailing wind.

Representing NRW was Waste Regulation and Enforcement Team Leader, Nia Brunning, and Waste Regulation Officer, Kieran Evans. Representing the operator was Company Director, Alan Hughes.

The purpose of the visit was to assess current site operations, against the procedures set out in the Fire Prevention and Mitigation Plan (FPMP). The FPMP document was drafted on behalf of the operator, and submitted to Natural Resources Wales (NRW), by a third party environmental consultant, on 29 January 2026.

This visit was also conducted following a recent review of the site FPMP by NRW, via Compliance Assessment Report (CAR_NRW0051971). The actions required by CAR_NRW0051971 were due by 31 August 2026. As of the 8 September 2026, NRW have received no communication by the operator that these actions have been completed. **Upon receipt of this compliance assessment report, please provide NRW with an update on this matter.**

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W3G - Fire

Permit condition 3.5.1 states: ***"The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance".***

With reference to the section 1.2.1 of the site's FPMP, it is noted that the FPMP document has been prepared in accordance with NRW Fire Prevention and Mitigation Plan Guidance - Waste Management, Guidance Note 16 (Published August 2017) (GN16).

As previously outlined in Compliance Assessment Report: CAR_NRW005197, GN16 has been withdrawn and replaced by updated NRW FPMP guidance (hereby referred to as "the guidance") which can be found here: Natural Resources Wales / Fire prevention and mitigation plans.

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Incident 12 July 2026

Prior to our visit, NRW became aware of a fire incident, which occurred in the early hours of 12 July 2026, within a yard (also owned by the operator) directly adjacent to, but sitting outside of the site's permitted boundary.

Via correspondence with both the Fire and Rescue Service and the operator's third party environmental consultant, it was established that:

Approximately 24.5 tonnes of combustible waste (refuse derived fuel) (LoW 19 12 10) left the permitted boundary via a waste transfer note, and had been pre-loaded into a vehicle trailer. At the time the fire occurred, the trailer had been temporarily parked within the yard, pending onward transfer of this waste.

Prior to our inspection of the permitted site, company director Alan Hughes, took us to the area of the incident, where it was explained to ourselves that the fire had been identified by a member of the public, who upon detection of the fire, notified the operator, via contact details located on signage at the permitted site entrance.

Section 1.2.1 of the site FPMP, outlines that the FPMP document has been designed to meet the following objectives:

"a) To minimise the likelihood of a fire happening.

b) Reduce the impact from emissions during or after a fire on the local community, critical infrastructure and the environment.

c) Ensure suitable resources required by NRW and other emergency responders are available during an incident; and,

d) To identify post incident clean-up and remediation costs."

Furthermore section 1.1.2 of the FPMP document states:

"The FPMP assesses the fire risk associated with the storage and processing of

combustible waste at Lon Hen Felin Waste Treatment and Transfer Facility, Cibyn Industrial Estate, Caernarfon, Gwynedd, LL55 2BD", i.e. the permitted site.

Once waste is transferred outside of the permitted site boundary, it ceases to benefit from the fire prevention measures, as set out in the FPMP document, and therefore it must be considered that the risk of a fire incident increases.

In order to reduce the likelihood of a repeat occurrence of the unfortunate fire event of 12 July 2026, it is recommended that combustible waste remain within the permitted boundary, and therefore under the fire prevention measures set out within the FPMP, for as long as is practically possible prior to transfer from the site.

ACTION: Keep waste within the permitted site boundary, and therefore under the fire prevention measures, as outlined within the FPMP, for as long as practically possible, prior to transfer from the site.

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Storage of Wastes within Fire Bays/Walls

The *enclosing stacks using bays and fire walls* sub-section of section 7 of the guidance states:

"*You can reduce the need for separation distances if you use bays or fire walls between waste storage stacks.*

Bays and fire walls must be of sufficient height, thickness and construction that offer a fire resistance period of at least 120 minutes to allow waste to be isolated to stop fire spreading and minimise radiant heat."

With reference to FPMP Table 4.5 (*Combustible waste storage/monitoring table (bales)*), pictured below , the site's storage and monitoring procedures for baled wastes are outlined.

Table 4.5 - Combustible waste storage/monitoring table (bales)

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
AREA 24 Bales of paper, cardboard and plastic to be baled	• Once processed bales will be stored in a three-sided concrete bay in an open fronted building for <4 weeks. • Bales are accessible from at least on side and from the top in the event of a fire occurring to allow access for firefighting. • Bales will not exceed the height of the surrounding walls. • In the event of a fire bales can be moved to the quarantine area. • Waste can be visually monitored 24/7 throughout the day by site operatives and by CCTV out-of-operational hours. • In terms of moving the waste in a fire incident, site management or the FRS will decide on the best course of action from a practical and safety point of view. • Due to the above it is considered no further storage or monitoring is required.

Within FPMP Table 4.5 it is outlined that: *"Bales will not exceed the height of the surrounding fire walls."*

Furthermore, section 4.8.6 states: *"All waste stored against fire walls will have a suitable freeboard of at least 1M* (Meter)".

One of the actions outlined, following NRW review of the site's FMPM, via CAR_NRW0051971, was to reduce the maximum storage height of baled wastes to 2.7 metres. This was because site FPMP table 4.1 (waste storage table), outlined that the height of the surrounding firewall for baled wastes is 3.7 meters, and the outlined maximum baled waste storage heigh was 3 metres, resulting in a freeboard of 0.7 metres between the top of the waste and the top of the firewall, which fell below the stated minimum freeboard of 1 meter, as outlined by section 4.8.6 of the FPMP document.

With reference to the below image, taken during our visit to the site, it can be seen that the storage height of baled waste was in excess of the surrounding fire walls, and therefore non-compliant with the measures set out in both Table 4.5 and section 4.8.6 of the site's FPMP.



Similarly, it can be seen from the site's wood (for shredding), storage area (pictured below), the height of stored wood can be seen exceeding the top of the firewalls for that area, also contrary to section 4.8.6 of the site's FPMP.



Section 4.8.5 of the site's FPMP states: *"Walls are checked throughout the day by staff and recorded on weekly inspections, if any gaps or damage to the walls are present which could compromise their integrity will be repaired and sealed as soon as practically possible."*

Within CAR_NRW0051971 it is stated that: "*it can be reasonably assumed that both the concrete panels and legato blocks used at the site are in line with the requirements set out in section 7 of the guidance. This assumption stands under the condition that the concrete panels and legato blocks remain in an undamaged, fully maintained state (via monitoring and repair maintenance measures outlined in FPMP section 4.8.5)"*.

With reference to the below image, taken during our site visit, a gap within the firewall panelling for the municipal waste for shredding area of the site was noted. As a result of this gap, the containment's integrity, and therefore it's ability to contain a fire was considered compromised.



As at the time of the visit, this had not been repaired, this gap in the fire wall panelling was considered to be contrary to measures outlined in section 4.8.5 of the site's FPMP.

ACTION: Maintain a minimum of 1m freeboard, at all times, between the top of a waste pile, and the top of a fire wall, for all wastes stored within fire bays/walls. Also, inspect and maintain the integrity fire walls/bays in line with section 4.8.5 of the site FPMP.

The two above identified cases of waste being stored in a manner contrary to that outlined in FPMP section 4.8.6 (minimum of 1 meter freeboard between the top of a waste pile and the top of a firewall), along with, the lack of firewall integrity at the municipal waste for shredding area of the site, will be consolidated as a **C3 minor non-compliance against permit condition 3.5.1**.

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<u>The use of separation distances between wastes</u>

The *Stack size and separation distances* sub-section of section 7 of the guidance states: *"You must include your proposed stack sizes and separation distances in your plan"*

With reference to Section 4.2.1 of the site FPMP, it is stated that: *"Table 4.1* (Waste Storage Table) *details the maximum quantity, location, and duration for all wastes stored on site. This ensures all piles are stored in accordance with the FPMP guidance".*

Waste storage areas of particular interest during this visit were:

- Area 23: Separated paper, cardboard and plastic to be baled.
- Area 24: Bales of paper, cardboard and plastic.

With reference to FPMP table 4.1, it is stated that both of these waste types are to be contained within a "three-sided concrete bay".

It is furthermore outlined within FPMP section 4.8.2 and 4.8.3 that the use of firewalls and bays at the site, reduce the need for/to provide:

- 6 meter separation distances between different waste piles; and
- 6 meter separation between wastes and the permit or site boundary.

Upon inspection of area 24, pictured below, it was noted that both waste streams were stored within immediate proximity of one another, without the sufficient provision of fire bays/walls present, to sufficiently reduce the need to implement a 6 meter separation distance between the different waste piles. And therefore non-compliant with the measures outlined within sections 4.8.2 and 4.8.3 of the site's FPMP.



It is noted that following the identification of this non-compliance, it was demonstrated, that the site had taken immediate action to rectify this issue, via communication from the operator's third party environmental consultant.

Through this correspondence, it was demonstrated that the operator had moved loose cardboard to a designated fire bay. As a result of this, amendments have been made to the site layout within the site FPMP.

Whilst the speed in which the operator has taken actions in an effort to rectify the above

noted non-compliance should be commended, this non-compliance was still identified during our visit, and will subsequently be scored as a **C3 minor non-compliance against permit condition 3.5.1.**

Action: In the absence of sufficient fire wall/bay containment, establish a minimum of 6 meters separation distance between combustible waste piles.

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Access for Emergency Services

With reference to sections 8.2.1 and 8.2.2 of the site FPMP, the following measures are outlined:

- Access points outlined for emergency services, outlined within FPMP Drawing no. 0377-LHF-03.
- A minimum of 3.7 meters clearance (width) is maintained by the site along these access routes, at all times, as this is the minimum width required by the Fire and Rescue service.

During our visit, measurements of the emergency service access routes into the main waste reception were taken, and found to be in excess of the minimum requirement of 3.7 meters.

subsequently, during the duration of our visit, the site was compliant with sections 8.2.1 and 8.2.2 of the FPMP.

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Please note the actions outlined in this Compliance Assessment Report, are due by the 28 September 2026.

NRW wishes to thank Company Director Alan Hughes, for his time during the visit, and would like to formally recognise the swift nature in which the operator remedied certain issues identified during our visit. If the operator requires any further guidance or information, please do not hesitate to contact us.

"In this document "Natural Resources Wales" means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (establishment) order".

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Please find below relevant links:

- NRW guidance on Fire Prevention and mitigation plans.
  - Natural Resources Wales / Fire prevention and mitigation plans
- WISH document: Reducing fire risk at waste management sites guidance.
  - WASTE-28.pdf
- This document explains how we assess the compliance of permit holders.
  - regulatory-guidance-note-5-operator-competence.pdf

- NRW guidance on charging schemes and annual subsistence fees.
  - Natural Resources Wales / Our charging scheme

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ENDS

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.