Compliance Assessment Report CAR_NRW0051396

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 2603432).

On: 07/04/2026 between 13:10 and 13:40.

Parts of permit assessed: 3.1.1, 3.5.1.

NRW Lead Officer: Amy Henderson, accompanied by Joe Weatherley.

Report sent to: Steve Rymill, Site Manager, on 22/04/2026.

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
W3G - Waste - Emissions and monitoring - Fire	C2 Significant	3.5.1

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	Implement Dust Management Plan. Repair litter fencing.	12/05/2026
W3G	Update FPMP to ensure this is in compliance with the FPMP guidance. Ensure storage onsite is compliant with FPMP.	12/05/2026

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 site inspection carried out as a result of an incident report relating to dust blowing off the permitted site. The inspection was carried out by Waste Regulation Officers Amy Henderson & Joe Weatherley. The weather at the time was dry and sunny and there was a strong breeze blowing in a Northerly direction.

Prior to arriving onsite, NRW Officers had visited neighbouring properties and witnessed dust and litter blowing off the site causing nuisance. A quantity of of shredded plastics was identified on a grass area at a neighbouring site.





Photographs of litter identified on neighbouring grassed area.

On arrival at site there was no dust suppression in place. The yard itself was very dusty and Officers noticed dust could be felt in the air. A wagon was being loaded with mixed waste, dust and litter could be seen blowing up in the air from this process. Dust

suppression at the entrance to the buildings was then operational as we walked around the site.

Quantities of waste onsite were deemed excessive. The storage area within the building was full to the roof with waste, which was starting to spill out the front of the building. The storage area for trommel fines was above the height of the block walls and spilling out of the front of the bay.



Waste quantities on site stored well in excess of the height of the bays, not in compliance with FPMP.



The Bluemac machine was not operational at the time of the visit but Officers were informed it had been earlier in the day but they had had to stop the operation due to the wind.

The output area for the main trommel is within a netted area. This net was seen to be in poor condition with large holes. The litter fencing to the north of the site was also in poor condition and a large section had fallen down. There was a large quantity of trommel fines stored in this area and this waste was found to be very dusty in nature, as shown in photo below. The waste height was also in excess of the bays.



Trommel fines onsite - also showing netting in poor repair.



Photo showing dusty nature of trommel fines onsite



Litter fencing in disrepair behind Bluemac trommel

Whilst onsite, a skip wagon arrived and deposited a load of waste in the open yard area. This activity produced a cloud of dust, as show in photo below.



Photograph of dust produced from deposited load.

Whilst onsite, it was also mentioned that the trommel fines from the Bluemac machine are sent off the the companies own wash plant plant. As these fines originate from mixed household waste source, they may be hazardous. The site must ensure that these are sent to a suitable site permitted to accept these.

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.
Discussions onsite identified there is no dust management plan in place for the site. There is a small section of the site EMS which relates to dust, however given the issues onsite this is not deemed sufficient. The site does have dust suppression sprinklers at the front of the building, however these were not operational on arrival onsite. Litter fencing was also seen to be in disrepair.

As a result of the above 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 bordering site 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. 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 completely in a timely manner.

3.5.1 The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance.
The sites FPMP states the following in relation to storage '*Combustible waste will be stored within bays or designated areas and the height of stockpiles will not exceed the height of the bay walls or 4 metres for waste stored externally and outside of bays, to create*

significant permanent fire breaks between combustible materials and limit the spread of fire'
Waste was seen to be stored in exceedance of the above height limits and therefore not in compliance with the sites FPMP. The waste within the building was mixed household type and therefore combustible and a fire risk. Due to the quantities, access to the building for NWFRS should a fire occur would prove difficult and increase the difficulty of extinguishing a fire.
Should a fire occur at the site this could have significant implications to neighbouring businesses and the nearby air field. The quantities of waste within the building would hamper efforts to extinguish the fire and therefore increase the severity of any incident. There is potential that should a fire occur the nearby airfield would have to be closed resulting in multiple agencies and businesses being impacted.
There is also a watercourse in close proximity to the site which could be impacted from firewater runoff. This watercourse flows directly into the River Dee which is a designated SSSI/SAC site. The Dee Estuary is also an important cockle fishery. Breaches of this nature are scored on the potential environmental impact. For this reason a category 2 non-compliance score has been issued based on the potential impact of the increased fire risk due to the quantities/storage onsite.
Action: Update the sites FPMP to ensure this is in line with the FPMP Guidance and ensure storage is compliant with the storage heights specified.

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.