Compliance Assessment Report CAR_NRW0052697

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 2609000).

On: 12/08/2026 between 13:00 and 13:25.

Parts of permit assessed: 3.1.1 3.5.1.

NRW Lead Officer: Joe Weatherley, accompanied by Enfys Radley.

Report sent to: Steve Rymill, Site Manager, on 24/09/2026.

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)	
W3G - Waste - Emissions and monitoring - Fire	C2 Significant	3.5.1
W1A - Waste - Management - General management	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	31

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	Update the site Dust Management Plan to include preventative measures to be taken in the case of this scenario being repeated (i.e maintenance/ repair of machinery causing emissions). Provide a copy of the updated Dust Management Plan to NRW.	24/10/2026

Criteria	Action needed	Complete by
W3G	Ensure onsite storage is compliant with the FPMP.	24/10/2026
W1A	Please advise as to how long the build of of sub 50mm is expected to be stored along the site perimeter.	24/10/2026

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.

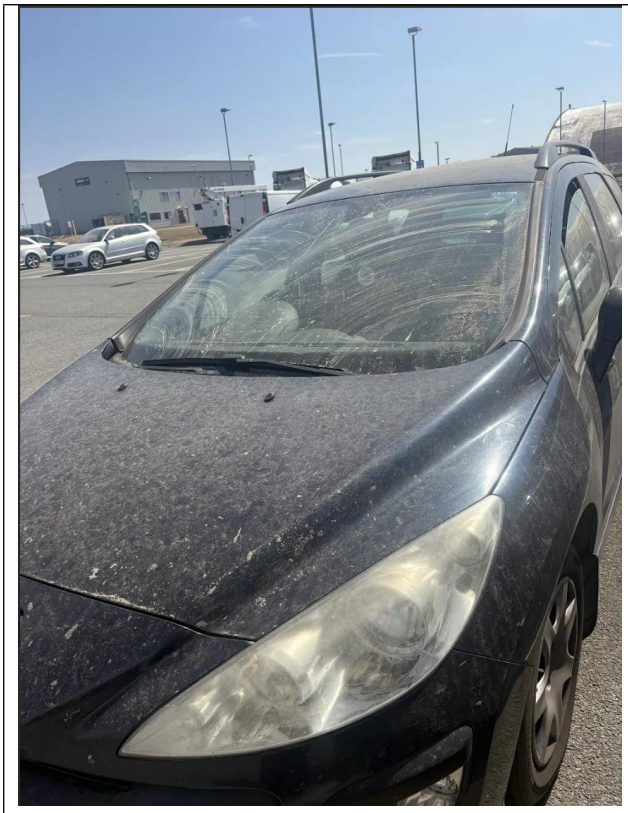
We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

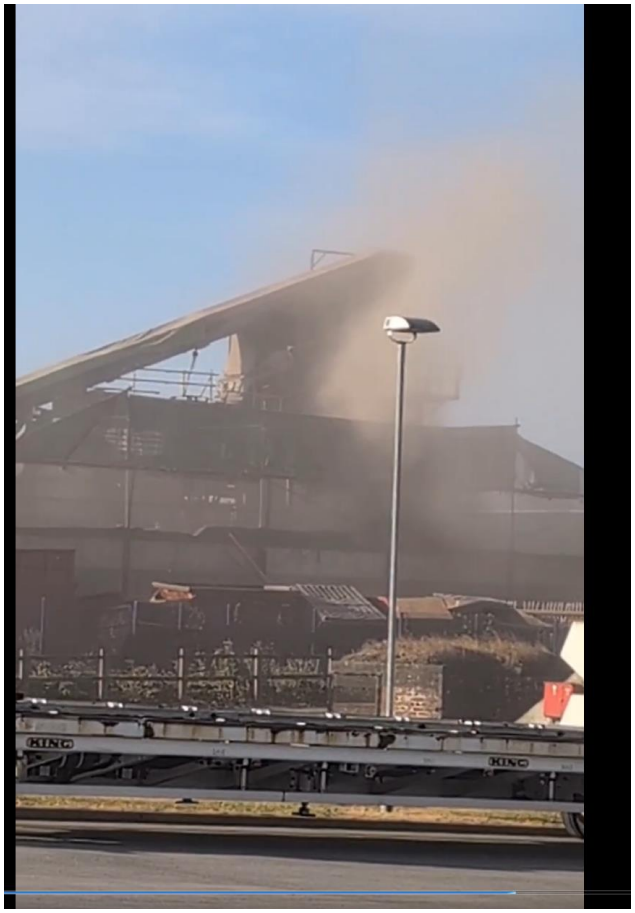
At 10:11 hours on 12/08/2026, Natural Resources Wales received reports of excessive dust emissions from operations at Ash Bretton Recycling Centre, Broughton Mill Road, Broughton.



Photograph from Incident Report received by Natural Resources Wales



Photograph received by Natural Resources Wales.





2 x Screen snips of videos provided to Natural Resources Wales showing dust emissions

from the BlueMac machine

At 13:00 hours on 12th August 2026, NRW (Natural Resources Wales) Waste Regulation Officer, Joe Weatherley (JW) attended Ash Bretton Recycling Centre to investigate these reports.The officer was accompanied by NRW Water Quality Officer, Enfys Radley. Upon arrival the officers signed in the visitors register and were joined by the Duty Manager who accompanied them during the inspection.

At the time of the visit the site was operational, the weather conditions dry, hot and sunny. A moderate breeze was blowing in a North Westerly direction. JW informed the site manager of the reason for the visit. The manager agreed that there had been an incident earlier that morning that had produced a large amount of dust.

They went on to explain that the BlueMac trommel machine situated at the Northern end of the site had been out of service for several weeks. An engineer had visited site this morning to effect a repair. During the repair work the engineer had turned the machine on to clear a blockage. This had caused the machine to produce the dust plume seen that morning. If the manager had known the machine would be turned on, they would have taken measures to reduce the amount of dust produced. The recently acquired water cannon was being utilized elsewhere on the site at the time.

The ASH Bretton site is adjacent to an active airfield and several other businesses. While it is appreciated that unintentional emissions sometimes happen, the potential encroachment of airborne foreign objects/substances into such a sight poses a high risk to people, the business operating there and aircraft using the airfield.

Action: Update the site Dust Management Plan (DMP) to include preventative measures to be taken in the case of this scenario being repeated (i.e maintenance/repair of machinery causing emissions). Provide a copy of the updated DMP to NRW. Due date 24/10/2026

The BlueMac machine further treats materials that have already been through a trommel. Due to the BlueMac being inoperative recently, these materials have built up.





Photographs of build up of pre treated sub 50mm waste awaiting further treatment via the BlueMac machine. This could contribute to excess airborne dust during dry and windy conditions.

Action : Please advise as to how long the build of of sub 50mm is expected to be stored along the site perimeter as shown above.

Point 3.3 of the site Fire Prevention and Mitigation Plan (FPMP) addresses the containment of fire on site and states:

*"**FIRE BREAKS***
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. By restricting the height of the stockpiles to the height of the containment bays in which they are stored, fire will not be blown over the walls of one bay and onto the material located in an adjoining bay. Furthermore, the containment bays will provide a wind break surrounding stockpiles of material, which will impede the acceleration of a fire that may occur through the increased oxygen supply provided by wind gusts. "



Photograph taken during inspection, of waste stockpile in excess of the bay walls.

Waste stored internally appeared to be in excess of the capacity of the site. The storage building containing the picking line had a waste materials stockpile that was greater in height than the block walls. In the event of fire, this could result in burning material being blown over the walls of the bay and causing the fire to spread to materials elsewhere on site.This material was spilling out of the bay and onto the concrete surface outside. This is non complaint with point 3.3 of the site FPMP.

This stockpile was stacked up against the trommel inside the building. This is non compliant with point 2.5 of the FPMP which addresses potential ignition sources and states:

"PLANT OR EQUIPMENT FAILURE
Separation distances of 6m will be observed between plant and material when the site is not staffed. Plant and equipment will be subjected to separate manufacturer-specific and operator-specific preventative maintenance programmes."



Photograph taken during inspection of stockpiled waste materials touching the trommel machine.

In the event of fire within the above shown waste stockpile, firefighters would face difficulties in accessing the fire and extinguishing it. This would allow a fire to develop and grow larger, resulting in a greater impact to the environment. Close upon the site boundary is a watercourse that flows directly in to the River Dee which has several designations as being of importance to nature and the environment. The River Dee also flows across extensive cockle beds that supply edible shellfish for human consumption. The site is located nearby an active airfield. A fire at site has the potential to force the closure of the airfield resulting in disruption to other businesses and organisations.

A breach of the following permit condition has been identified:
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.

This is the second incident of this type at the site. As a result of this breach and considering the points made above,a Category 2 score has been issued. Further breaches of the permit condition may result in the issue of a Regulation 36 Notice under the Environmental Permitting Regulations 2016. Failure to take the steps laid out in a Regulation 36 notice may result in legal action.

Action : Ensure onsite storage is compliant with the FPMP. Due date 24/10/2026

Thank you for facilitating this inspection.
Should you have any queries or if you would like to discuss the report then please contact me using the email below.

Kind Regards

Joe Weatherley

Waste Regulation Officer (NE Waste Regulation Team)
Email: joe.weatherley@cyfoethnaturiolcymru.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.