

Compliance Assessment Report CAR_NRW0048887

Permit being assessed: BB3494CU.

For: Seiont Mill Brickworks and Quarry, **held by:** Jones Bros Ruthin (Civil Engineering) Co Ltd

At: Seiont Mill Road, Caernarfon, Gwynedd, LL55 2YL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 14/07/2025 between 13:30 and 14:45.

Parts of permit assessed: See below. .

NRW Lead Officer: Sarah Walton, accompanied by Leon Williams.

Report sent to: Sam Higgitt, Environment Manager, on 01/08/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2B - Waste - Operations - Waste recovery plan	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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
W2B	Following approval from the relevant planning authority, submit a revised Waste Recovery Plan and permit variation to Natural Resources.	02/02/2026

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.

At this time, we do not intend to take any further action.

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

On Monday 14th July 2025, a pre-arranged site inspection took place. NRW Officers Sarah Walton and Leon Williams met on site with Sam Higgitt (Environment Manager for Jones Bros) and Arwyn Evans (Director of Cambrian Ltd). As the site has not been accepting waste for some time due to planning constraints, this inspection aimed to review the obligations of the Waste Recovery Plan.

W2b Waste Recovery Plan

Permit Condition 2.1.1 *"The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities")".*

Obligation 1

"Condition (1) of the 2007 planning permission (called 'Review of Mineral's Permission' (ROMP) within the WRP) calls for the site to be restored in lines with conditions (2) and (13-16). Condition (2) sets out what documents the restoration is detailed within, and condition (15) states that the quarry benches are to be prepared, treated and planted and that haul roads/surfaces are to be removed/restored.

The additional 2017 planning permission gives the following information:

- *Condition (3) nothing other than inert excavation materials, that are surplus to the requirements of the Caernarfon to Bontnewydd bypass project, shall be deposited on the site and used for works of restoration.*

Two further documents from 2017 were provided to give further explanation of the 2017 planning permission:

- *Planning committee meeting*
- *Planning committee report"*

A review of waste return documentation shows the site has accepted and deposited a total of 487,598 tonnes of waste to date. The maximum quantity of waste that can be imported for quarry reclamation is 532,950 (as specified in Table 6.2 of the Waste Recovery Plan).

NRW understands that planning permission only allows wastes produced during the construction of the Bontnewydd bypass project, to be deposited on the site for works of restoration. According to the operator, no further wastes have been deposited at the site since the completion of the Bontnewydd bypass project. Waste return documentation, shows the site ceased accepting waste in quarter 1 (January-March) of 2022.

During the the inspection, NRW confirmed that the restoration of the site has not been fully completed. For example the haul roads remained on site, having not been removed or

restored. Quarry benches also remain exposed and unplanted.



Photograph showing haul road on site

The site still has room on the permit to accept 45,352 tonnes of waste. However, planning permission prevents any further waste from being accepted, given the construction of the Caenarfon to Bontnewydd bypass project has ended. Should the site wish to accept more waste, new planning permission would need to be sought. This in turn, would require the environmental permit to be varied because this would alter 'Obligation 1' of the Waste Recovery Plan.

ACTION:

Submit to Natural Resources Wales, a revised Waste Recovery Plan and permit variation (pending approval from the relevant planning authority).

Obligation 2

"The planning committee report:

- ***makes it clear the restoration of the quarry and the stabilisation of the quarry slopes were jointly considered (points 1.5, 5.45, 5.47).***
- ***It states, "the import of material will allow additional landscaping pf the***

quarry so as to ensure that the finished levels and profile of the restored faces are suitable for establishing a mixed woodland and low maintenance grassland restoration concept as well as addressing any land instability issues" (point 5.17)".

During the site inspection, stabilisation matters were discussed. The operator confirmed that stabilisation issues remain and that further waste is required to resolve the issue. If waste volumes above the remaining balance on the permit, would be required to complete the Waste Recovery Plan, the operator would need to apply and obtain a permit variation as well as amendments to planning.

Recent topographic imagery submitted by site, has shown that the site is some way from meeting the proposed final levels and contours. In addition, Section 7 of the Waste Recovery Plan 'Meeting Quality Standards', has a number of matters outstanding.

Observations on site determined that in its present form, obligation 2 has not been satisfied.

Obligation 3

"The initial restoration plan for the quarry as per the 2007 planning permission included a condition for the flooded sump to be re-designed to be less than 0.5 meters deep, however this plan has changed to infilling the sump completely. The exiting flooded sump will be drained prior to further excavation of the quarry (which is permitted by both the 2007 and 2017 planning permissions), and then will be infilled as part of the overall restoration of the quarry.

Further information on the drainage of the sump is provided in the planning committee report points 5.68 to 5.71".



Photograph showing filled sump area

Observations on site indicated that the sump has been infilled. However, the operator stated that additional volumes of clay were excavated from the area. This has resulted in additional wastes being used to fill the sump area, rather than supporting the quarry faces and improve gradients.

Table 6.2: Capacity at the quarry for reclamation

Specific use of material	Nature of material	Quarry reclamation proposals	
		Import to quarry m ³	Approx. weight (tonnes)
Fill engineered to construct new profile in place of the quarry sump	Fill which can be tracked in or allowed to dry out adequately before profile is completed. The sump will be pumped dry before filling commences and silt lagoons will be receiving silt water that arises from imported wastes.	248,000	372,000
Fill to support quarry faces and improve gradients	Fill which can be tracked in to achieve stability.	107,300	160,950
Total import for quarry reclamation		355,000	532,950

Table 6.2 of the Waste Recovery Plan

The table above states that 372,000 tonnes of waste was required to fill the quarry sump. As the sump is the only area of the site that has been filled, 487,598 tonnes of waste accepted has been deposited into this void. Wastes have so far not been used to support the quarry faces and improve gradients.

Permit Condition 2.2.1 *"The activities shall not extend beyond the site, being the land shown edged in green and the discharge shall be made at the point marked on the site plan at schedule 7 to this permit and as listed in table S3.3 (discharge point)".*



Photograph showing lagoon area adjacent to discharge point SW1

Discharge point W1, was checked. The area was very overgrown. The lagoon area was dry and also overgrown. Due to the vegetation cover, the actual discharge point could not be properly inspected. As there was no surface water in the lagoon, it was assumed no discharge was taking place at the time of the inspection. If a discharge were to resume from W1, the operator should resume sampling as per permit condition 3.6.1.

Thank you to all staff who assisted with the site inspection.

Kind Regards,

Sarah Walton

Swyddog Rheoleiddio Gwastraff /Waste Regulation Officer

Gogledd-Orllewin / North West

Cyfoeth Naturiol Cymru / Natural Resources Wales

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

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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 only relating to the activity assessment
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 – Emissions to water, air or 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.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.