

Compliance Assessment Report CAR_NRW0049150

Permit being assessed: AB0056501

For: READYMIX BATCHING PLANT TRAM RD, PO, held by Breedon Trading Limited
At: Pinnacle Construction Materials, Tram Road, Pontllanfraith, Blackwood, Caerffili, NP12 2JF.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 13/08/2025, between 10:10 and 11:15.

Parts of permit assessed: Site infrastructure and permitted activities

NRW Lead Officer: Elis Nuttall.

Report sent to: Jason Griffiths, Site Manager, on 20/08/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B4 - Water Quality - Operations - Improvement programme	Action only (X)	
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-D1 - Water Quality - Information - Records	Action only (X)	

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-B4	Organise a meeting with myself (Elis Nuttall, Environment Officer) to discuss the permit variation process and requirements. This action has a non-specified deadline. I will consult with the appropriate teams within NRW to gather all relevant guidance and advice prior to organising this meeting.	20/02/2026
WQ-D1	Provide an example of recent weekly sample results for the site effluent.	03/09/2025
WQ-D1	Provide a copy of waste transfer notes for waste removal off site.	03/09/2025

Action 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

Site Visit Report

This report details the site visit made by Natural Resources Wales (NRW) on the 13/08/2025 to Breedon Blackwood concrete plant, Tram Road permit reference number EPR-AB0056501.

I (NRW Environment Officer Elis Nuttall) attended Breedon Blackwood at 10:10 for a water quality compliance visit where we met with the site manager (JG). The weather was dry and overcast at the time of the visit.

General Observations

This site is a concrete batching plant producing ready-mix concrete. The facility is operated by Breedon Trading Ltd.

The site is consented to discharge trade effluent and site drainage to the River Sirhowy, the volume of which shall be dependent on rainfall. There is a suspended solids concentration limit of 100mg/l, and the effluent shall at no time contain any matter that could cause the receiving waters to be poisonous or injurious to fish or the spawning ground, spawn or food of fish.

The site was operational at the time of the visit.

Office Discussion

Prior to any site investigations, a brief discussion regarding site operations and practices was held with JG. It is noted that previous compliance visits have focused on the incorrect/inaccessible sample and discharge point(s). The permit stipulates that the discharge shall be made via a pipe to the river at ST1806095890, but this point does not reflect the reality of the discharge location. The site drainage discharge enters the river ~260m downstream via a culverted watercourse at ~ST1801195634, with the outfall behind an industrial unit and is completely inaccessible. This is reflected in Figures 1 & 2.

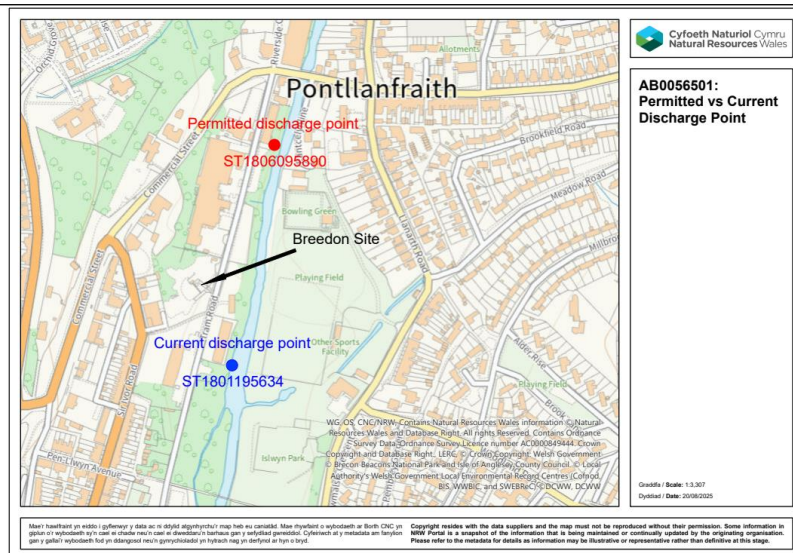


Figure 1 – The locations of the permitted and current discharge points in relation to the site and each other.

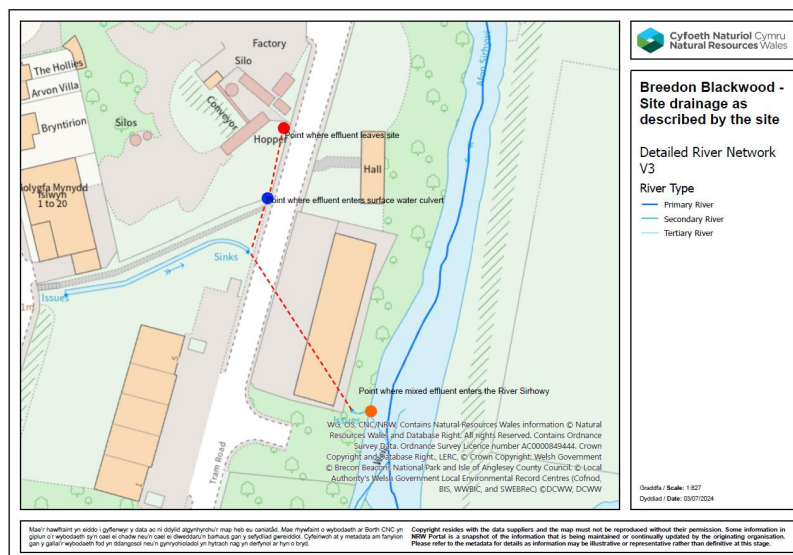


Figure 2 – The site drainage arrangements as described by Bredon operators.

On my previous inspection of this site I listed an action to conduct a permit variation to change the consented sampling point to ensure that it is accessible at all times. During that visit there was no access to the discharge or sampling points. However, JG was unsure if any work was undertaken to fulfil this action, and it was stated the situation had not changed. As a result the sample/discharge point could not be inspected for a second consecutive visit. I will arrange a meeting with the Bredon Production Manager (MD) and JG to discuss this variation process and assist in undertaking the necessary work to get an accessible sample point listed.

Regarding current site operations, it was stated that the water used for production is re-used on site wherever possible, with very infrequent discharges being made. This has been the case on site for many years, only discharging when capacity in the lagoons is

exceeded during heavy rainfall. It was stated no untreated process water is ever discharged intentionally. There was no discharge at the time of the visit. The site undertakes its own weekly effluent sampling with records being kept digitally. I observed a record from 10/06/2025 showing suspended solids at less than 1%. I have requested further examples of these results to evidence this routine monitoring.

We proceeded to inspect the on site infrastructure.

Site Infrastructure

The site was operational during the visit, with processing taking place and heavy machinery in use. This included the use of water for processing which was seen entering site drainage channels and collecting in the settlement lagoons before recirculation for further use. This is evidenced in Figure 3.



Figure 3 – The site in operation at the time of the visit.

The lagoons were inspected. These consist of several individual concrete tanks.

The wash out pit was observed to be holding a large amount of sediment and waste material, as seen in Figure 4. I would estimate that this pit is/was at capacity at the time of the visit. It was noted that this material was recycled on site and removed for re-use/disposal off site. I have requested a copy of the waste transfer notes for this waste removal as evidence of this stated operational practice. Due to the large quantity and the apparent lack of capacity for further storage, I advise that the site undertake their recycling and removal activities as a priority due to the risk of overtopping and contaminated runoff increasing the sediment concentration in the settlement lagoons. This is reflected below.



Figure 4 – The wash out pit as observed during the visit.

The primary and secondary settlement lagoons were observed to be quite silty and discoloured at the time of the visit. There was active input and abstraction (for processing) which may have led to a mixing of the effluent which is hampering the settlement process. This is evidenced in Figures 5 & 6. However, due to the statement that all water is re-used on site and that there was no active discharge I do not see this as being an immediate risk. I advise that the site review their settlement lagoon operations to ensure they are capable of settling out solids effectively so that in the event a discharge is required no adverse environmental impact is experienced. This is reflected below.



Figure 5 – The primary settlement lagoon as observed during the visit. An active input can be seen in the top left corner from on-site processing.



Figure 6 – The secondary settlement lagoon as observed during the visit.

As JG was not present during my previous inspection of the site, I escorted him to the inspection chamber which I identified as a potential appropriate sample point and also where the site drainage discharges to a culverted watercourse. This is located at ST1798195695 (as outlined in Figure 2). The chamber cover was still accessible (Figure 7), and it was stated that investigations around feasibility would be undertaken, although JG raised concerns regarding responsibility as the chamber and land fall outside of Breedon's site and as such ownership. This can be queried at the consultation phase of the variation process.



Figure 7 – The proposed sample point as observed during the visit.

We then returned to the site office for final discussions.

Final Discussion

On returning to the office I ran through my observations and actions (see list below) to which JG agreed and raised no objections or further queries. A brief discussion was held regarding the appropriateness of the proposed sample point and the accessibility/ownership responsibilities. I agreed to raise this with NRW's permitting and sampling teams to see what they would deem appropriate and proportionate. I will feed back to JG and MD during the aforementioned (forthcoming) meeting.

No further comments were made or questions asked.

I left site at 11:15.

Breaches of permit condition

No breaches of permit conditions were recorded during this visit. Please see the actions list and advisory comments below.

Action required by dates specified

1. Organise a meeting with myself (Elis Nuttall, Environment Officer) to discuss the permit variation process and requirements. This action has a non-specified deadline. I will consult with the appropriate teams within NRW to gather all relevant guidance and advice prior to organising this meeting.

Deadline: Unspecified (see justification above).

2. Provide an example of recent weekly sample results for the site effluent.

Deadline: 03/09/2025

3. Provide a copy of waste transfer notes for waste removal off site.

Deadline: 03/09/2025

If we do not receive the information requested within specified deadline and have not been informed as to why there is a delay then we may serve a Regulation 60 Notice requiring the information under Environmental Permitting (England and Wales) Regulations 2016.

Other advisory comments

1. Empty the wash out pit of collected waste/material to ensure appropriate capacity and to mitigate against contaminated runoff increasing sediment concentrations in the settlement lagoons.
2. Review the settlement lagoon operations to ensure that they continue to be effective at allowing sediment separation from any site discharges. __

Contact details

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Elis Nuttall, Environment Officer, elis.nuttall@naturalresourceswales.gov.uk, 03000 65 4651.

Thank you,

Elis Nuttall.

--

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 to 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
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend non-compliance for up to six months to allow time for remedial action to be taken. These will be re-instated if the action is not completed.

Full list of water quality action criteria (used in section 1 and 2):**WQ A: Management**

- WQ-A1 General management

WQ B: Operations

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

WQ C: Emissions and monitoring

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.