

Compliance Assessment Report CAR_NRW0050213

Permit being assessed: CB3591HG.

For: Lelo Aggregates, **held by:** Lelo Aggregates Ltd

At: Land Situated at Craig Lelo Works, Gwyddelwern, Corwen, LL21 9SD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 19/12/2025 between 12:20 and 12:40.

Parts of permit assessed: 1.1.1, waste storage, WAMITAB.

NRW Lead Officer: Boguslawa Pierzchala, accompanied by Steven White.

Report sent to: Gari Jones, Owner, on 23/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	2.3.2
W1A - Waste - Management - General management	Action only (X)	
W4B - Waste - Information - Reporting	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	4

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
W1A	Please ensure the site surface is upgraded to allow activities being carried out in compliance with the permit	30/06/2026

Criteria	Action needed	Complete by
W1A	Please clarify where the specified in the CAR form waste originated from and what is the site management's intention for this waste	06/02/2026
W1A	Please remove all unpermitted waste and provide photographic evidence by the 6th of February 2026.	06/02/2026
W1A	Please provide your WAMITAB certificate	30/01/2026
W4B	Please clarify why only 70tonnes of waste soil is detailed on waste returns for the site.	06/02/2026

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 Friday the 19th of December 2025 Natural Resources Wales (NRW) waste regulation officers attended at Lelo Aggregates Ltd.

This was a planned, unannounced site inspection.

The weather at the time was wet and windy, with heavy rain prior to the officers visiting the site.

The officer met Alan Jones, site manager ,who accompanied officer throughout the inspection. He explained that Gari Jones, who is in charge of the site, was not available at the time.

The site has been further improved with storage bays installed for products.

The site was extremely wet and muddy with deep standing water in the middle of the site and towards the back boundary.



Mud on site



Standing water between the waste piles

This has been raised with Mr Jones as the site surface needs to be kept free of standing water.

Mr Jones suggested that improvement works will start in early 2026 when the weather conditions improve. A six months timescale appeared to be appropriate for the works to be completed.

Table S1.1 activities, Limits of activities. (...)

If the site is located outside a groundwater Source Protection Zones 1 or 2, then wastes listed in tables S2.1 and S2.2 may be stored and treated **on hard-standing or on an impermeable surface**

with sealed drainage system. (...)

"Hardstanding" should be a compacted solid surface capable of withstanding the operation and the loading / unloading of wastes.

It should be capable of being kept clear of debris, being maintained so that it does not cause surface water ponding, and remaining level and rut free.

Action: Please ensure the site surface is upgraded to allow activities being carried out in compliance with the permit.

Please comply by **the 30th of June 2026**.

Waste storage

Officers noted several piles of shredded metal, wood, plastic and possibly inert waste. Please see photos below

Action: Please clarify where did this waste originate from and what is the site management's intention for this waste. Please comply by the **6th of February 2026**.





a pile of mixed waste

Officers noted some unpermitted waste stored on site. Please see the below photos.



Mr Jones explained that it was being stored there due to the shortage of space on the metal recycling site.

Section 2.3.2 of the site permit states: “Waste shall only be accepted if: (a) it is of a type and

quantity listed in schedule 2 table(s) S2.1 [, S2.2 etc.];”

This has been discussed with the site owner on previous occasions, where metal waste had been stored on the aggregates site, and subsequently been scored against the permit condition as a CCS C3 breach

Action: Please remove all unpermitted waste and provide photographic evidence by the **6th of February 2026**.

W1 General management. Technically Competent Manager – TCM

Permit condition 1.1.1 states: “The operator shall manage and operate the activities:

b)using sufficient competent persons and resources.”

Permit condition 1.1.4 states: “The operator shall comply with the requirements of an approved competence scheme”.

Action: Please send your WAMITAB certificate by Friday **the 30th of January 2026**.

W4B Reporting – Waste returns

A review of waste return submissions for permit number CB3591HG has been completed. The returns show that Only 70tonnes of waste soil and stones 170504 (Q2-2025) has been sent from site since the permit was granted.

This was discussed with the owner who stated that the inert waste is treated to produce 6f2 aggregate or similar product under the site’s Aggregates Protocol. Two sample results have been sent to the regulating officer and will be discussed separately.

Section 3.8.5 of the EMS states: “Mechanically processed soil – As there is no end of waste for mechanically processed soil, every load of processed soil (arising from screening) leaving the site will have an accompanying waste transfer note with all recorded details shown in section 3.9 below. Mechanically processed soil will be sent to suitably permitted disposal or recovery / restoration site.”

Action: Could you clarify why only 70tonnes of waste leaving the site is detailed on waste returns. Please reply by the **6th of February 2026**

Thank you for your time during the visit please find my contact details below.

Kind regards,

Boguslawa

Email: boguslawa.pierzchala@naturalresourceswales.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.