

Compliance Assessment Report CAR_NRW0052637

Permit being assessed: BL1096IB.

For: Padeswood Cement Works , **held by:** Castle Cement Limited

At: PADESWOOD WORKS , PADESWOOD, MOLD, MOLD, CLWYD, CH7 4HB.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 30/07/2026.

Parts of permit assessed: monitoring returns.

NRW Lead Officer: Rebecca Harwood.

Report sent to: Plant Manager, Plant Manager, on 13/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR2E - Installations - Operations - Improvement programme	Assessed (A)	

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?

No action required.

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

This Compliance Assessment Report covers monitoring returns for Q1 (January - March) and Q2 (April - June) 2026 relating to Padeswood Cement Works.

The site had its annual shutdown during January. The kiln remained on an extended shutdown until mid May and operations at site were reduced during this period.

Review of emissions monitoring Q1 2026

Emissions monitoring data, covering the period 1 January to 31 March 2026, was received on 23/04/2026 in accordance with permit condition 4.2.3.

1. Emissions to Water

No exceedances have been identified within the monitoring return for emission point W1.

2. Emissions to Air

Continuous Monitoring (A5, A8, A9, A12, A15, A17)

Continuous emissions monitoring was provided as required by the permit and shown to be within the permitted limits during this period.

No schedule notifications were received for Q1 2026.

3. ARM and WDF Reporting

There were no updates to the alternative raw material / waste derived fuel usage for Q1 2026.

Review of emissions monitoring Q2 2026

Emissions monitoring data, covering the period 1 April to 30 June 2026, was received on 30/07/2026 in accordance with permit condition 4.2.3.

1. Emissions to Water

No exceedances have been identified within the monitoring return for emission point W1.

NRW agreed to bring forward the use of discharge point W4, subject to monitoring being undertaken in accordance with Table S3.3 of the permit. In addition, the Operator's principal contractor has applied for a water discharge permit for use during the construction phase of the carbon capture plant. The application is currently with the Permitting Team for determination.

The Operator confirmed that there was no discharge from W4 during Q2.

2. Emissions to Air

Continuous Monitoring (A5, A8, A9, A12, A15, A17)

Continuous emissions monitoring was provided as required by the permit and shown to be within the permitted limits during this period.

Periodic monitoring (A15, A11, A12, A8)

Particulate monitoring was undertaken at Cement Mill 5 (emission point A15) on 04/03/2026. The results were compliant with the ELV specified in the permit.

Particulate monitoring was undertaken at Arodo Packer Filter (emission point A12) on 02/03/2026 and 01/06/2026. The results were compliant with the ELV specified in the permit.

Particulate monitoring was undertaken at Clinker Transport Filter (emission point A11) on 05/06/2026. The results were compliant with the ELV specified in the permit.

Six monthly monitoring at the Kiln 4 main stack (emission point A8) was undertaken on 02/06/2026 and 03/06/2026. There were no exceedances of the ELVs specified in the permit.

The Kiln by-pass dust six monthly analysis was also submitted.

3. ARM and WDF Reporting

There were no updates to the alternative raw material / waste derived fuel usage for Q2 2026.

Improvement Conditions (ICs)

IC9a: Following successful commissioning and establishment of routine steady operation, the Operator shall undertake a noise impact assessment following BS4142:2014 and guidance set out in [Noise and vibration management: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/noise-and-vibration-management-environmental-permits). The assessment should include an objective assessment of narrow band (FFT) measurements to identify any tonal elements from on-site sources and off-site at sensitive receptors. The assessment should include consideration of the Welsh Government's Noise and soundscape action plan 2018-2023. Upon completion of the work,

a written report shall be submitted to Natural Resources Wales for approval.

IC9b: Following completion of IC9a, should the written report indicate it is required, a Noise Management Plan shall be submitted to Natural Resources Wales detailing any required noise control. This should be completed in line with guidance set out in [Noise and vibration management: environmental permits - GOV.UK \(www.gov.uk\)](#).

A response to IC9a was received on 24/03/2026 following the environmental noise impact assessment of the new Solid Recovered Fuel system (SRF141) undertaken during December 2025. The report indicates that the SRF141 system *"does not significantly contribute to the offsite measured noise levels or acoustic character, it is therefore considered reasonable to conclude that the impact of the new unit is negligible."*

In response to IC9b the Operator stated that they *"have reviewed the impact assessment and no additional control measures are required at this time. The site noise management plan has been reviewed and updated."*

Having reviewed the information provided, NRW is satisfied that the requirements of IC9a and IC9b have been met. Both improvement conditions are therefore considered complete.

Complaints

NRW received 17 complaints during the period January - June 2026. Two of these were related to the carbon capture construction works; the others were related to noise. The noise complaint received in January was linked to disab cleaning work. The remaining complaints could not be attributed to the installation or site activity. The kiln was on an extended shutdown and site operations were significantly reduced during the February to April period when the complaints were received.

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 Industry compliance criteria (used in section 1 and 2):**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.