

Compliance Assessment Report CAR_NRW0052625

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: 09/07/2026 between 12:00 and 12:30.

Parts of permit assessed: 1.1.1., waste returns, TCM , WRAP Quality Protocol.

NRW Lead Officer: Boguslaw Pierzchala, accompanied by Molly Callow.

Report sent to: Gari Jones, owner, on 19/08/2026.

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	C3 Minor	2.3.2
W1A - Waste - Management - General management	Action only (X)	
W4B - Waste - Information - Reporting	Action only (X)	
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	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 clarify where did this waste originate from and what is the site management's intention in relation to this waste.	31/08/2026

Criteria	Action needed	Complete by
W1A	Please remove all unpermitted waste and provide photographic evidence.	31/08/2026
W1A	Please provide your TCM's site attendance record from the 1st of January to the 19th of August 2026	31/08/2026
W4B	Clarify why only 70 tonnes of waste leaving the site is detailed on waste returns	31/08/2026
W1A	Revise site management system for the production of WRAP Quality Protocol aggregate, taking into account the points detailed in the CAR form. Please provide evidence of testing performed on all WRAP Quality Protocol aggregate, over the last 8 months - 1st January 2026 – 19th August 2026	02/10/2026

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.

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 Wednesday the 9th of July 2026 Natural Resources Wales (NRW) waste regulation officers attended at Lelo Aggregates Ltd.

This was an unannounced site inspection.

The site was last visited on Friday the 19th of December 2025.

The weather at the time was warm and dry, with a prolonged spell of hot weather prior to the officers visiting the site.

The officers met Gari Jones, site manager, who accompanied officer throughout the inspection.

W1A - General management - **Waste storage**

During last site inspection officers noted several piles of shredded metal, wood, plastic and possibly inert waste. Please see the photos.

An action was requested as detailed below:

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

This action has not been completed.

During this site inspection a pile which appeared to consist of the same or similar components was seen.



A pile of mixed waste. Photos taken on the 19th of December 2025



Photo taken on the 9th of July 2026

Action: Please clarify where did this waste originate from and what is the site management's intention for this waste. Please comply by the **31st of August 2026**.

There also appeared to be contaminants within the waste soil, as seen in the below photos. However; no waste is noted as leaving site on the waste returns submitted to NRW. This is being addressed in a separate section below.



plastic seen mixed with waste soil





Metal and plastic contaminants mixed with waste soil



Plastic and glass contaminants seen on site



Various contaminants seen mixed with waste soil

W1A - General management - Unauthorised waste storage

Officers noted large waste metal items and skips containing waste metal stored on site. Please see the below photos.



Large waste metal items stored next to the dividing wall



Skip full of metal waste stored next to waste soil

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 appear to be a reoccurring issue. It has been discussed with the site owner on previous occasions, and subsequently been scored against the permit condition as a **CCS C3** breach.

Accepting waste types not authorised by the permit was scored under the W1- General management criterion, as it appears that the acceptance procedure are not the root cause of this breach. The management made a conscious decision to store the waste on site.

Action: Please remove all unpermitted waste and provide photographic evidence by the **31st of August 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 provide your TCM’s site attendance record from the 1st of January to the 19th of August 2026. Please comply by the **31st of August 2026**.

W4B Reporting – Waste returns

As part of the previous site inspection a review of waste return submissions for permit number CB3591HG had been completed.

The returns showed that only 70 tonnes of waste soil and stones 170504 (Q2-2025) had 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.

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."

An action was requested as detailed below

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**.

This action has not been completed.

Further waste returns review of waste return submissions for permit number CB3591HG had been completed to include Q1 and Q2 2026. The review showed that no waste had been removed from site in 2026.

Action: Clarify why only 70tonnes of waste leaving the site is detailed on waste returns. Please comply by the **31st of August 2026**.

W1 General management – WRAP Quality Protocol

Section 3.8 of the EMS - Aggregates protocol - describes some procedures in relation to the aggregates produced on site.

Producers of WRAP QP aggregate, must set up and produce the aggregate under a system for Factory Production Control, as set out in the relevant BS EN aggregates standard listed in Appendix B of WRAP's 'Aggregate from inert waste' document.

Waste is leaving site as a 'product' when it might have not met WRAP Quality Protocol due to a lack of procedures. In that case this material would remain a waste. When transferring waste as a product, there are no controls deeming where this ends up. There could be duty of care offences through not informing customers that this material is a waste.

Testing should be completed in line with the relevant standard and specification (see Table B2 of WRAP's QP document). Lack of testing, could mean contaminated waste is leaving site and it could also mean WRAP Quality Protocol is not being complied with meaning the material remains a waste.

Action:

- Provide NRW with reviewed EMS procedures for site. They must include procedures detailing how site is meeting WRAP Quality Protocol, please include Factory Production Control. Please comply by the **2nd of October 2026**.
- Please provide evidence of how the site is meeting WRAP QP. This should include evidence of Factory Production Control, testing and delivery documentation. Please provide delivery

documentation and evidence of testing for the last 8 months (1st January 2026 – 19th August 2026). Please comply by the **2nd of October 2026**.

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

Kind regards,

Boguslaw

Email: boguslaw.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.