

Compliance Assessment Report CAR_NRW0044123

Licence being assessed: WA/057/0021/0015.

For: Forest Holidays Garwnant, held by Forest Holidays Ltd.

At: Garwnant, Cwmtaf, Merthyr Tydfil, CF48 2HU.

Type of assessment: Site Inspection, Reason: Routine.

On 06/12/2023, between 11:00 and 13:00.

Parts of licence assessed: All

NRW Lead Officer: Ceri Malone, accompanied by Paul Latham, Emily Roe01, Callum Murray.

Report sent to: ryan.birchnall@forestholidays.co.uk, Product Quality Manager, on 26/04/2024.

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

Part of licenced activity assessed (criteria)	Assessment result	Licence condition
WR-A1 - Water Abstraction - Abstraction specified by licence - Source of supply	Assessed (A)	
WR-A2 - Water Abstraction - Abstraction specified by licence - Points of abstraction	C3 Minor	2.1
WR-B1 - Water Abstraction - Abstraction measurement and records - Means of measurement	C3 Minor	7.1 (i)
WR-B2 - Water Abstraction - Abstraction measurement and records - Recording	C3 Minor	8.1
WR-A4 - Water Abstraction - Abstraction specified by licence - Purposes of abstraction	Assessed (A)	
WR-F1 - Water Abstraction - Discharge - Point of discharge	Assessed (A)	

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

2. What action is required?

Criteria	Action needed	Complete by
WR-A2	An application to vary the licence to include the visitor centre borehole should be completed and submitted.	31/03/2024
WR-B1	A meter should be fitted to the borehole.	29/02/2024
WR-B2	Monthly record keeping of abstraction quantities should begin for both abstractions.	29/02/2024

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 or civil sanctions being imposed depending on the circumstances of the offence.

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 Report

Site Inspection of Forest Holidays Borehole abstractions was carried out by Environment Officers Ceri Malone, Paul Latham, Emily Roe and Callum Murray on 06/12/2023. Upon arrival at 11:00 we met with Operations Manager Rob Moses. Weather was ~5°C, dry with significant cloud cover. We were escorted to NGR SO 00317 13101 where an abstraction was located. We were informed by Mr Moses that this abstraction only supplies Garwnant Visitor Centre. A meter with a reading of 10188m³ was installed on the system – see photograph 1. The dial of the meter was turning and appeared to be functioning properly. Mr Moses informed us that no records of abstraction quantities are kept. This abstraction was not listed on the permit.

Photograph 1 – Meter at Visitor Centre



We were escorted to NGR SO 00006 13958 where another borehole was located. This location is the point of abstraction per point 2.1 of the permit. A water storage tank and

pump room were also at this location. We were informed by Mr Moses that this borehole supplies all of the holiday accommodations water for hot tubs, drinking water and domestic water as per point 4.1 of the permit.

Mr Moses presented “Garwnant Cabins Private Water Supply (PWS) Maintenance Schedule” for daily, weekly, monthly, 6-monthly and yearly checks. These checks are recorded on paper and Forest Holidays Product Quality Manager Ryan Birchnall has confirmed that a Computer Aided Facility Management (CAFM) system is being put in place in April 2024 to record and manage these electronically. No meter was installed at this borehole and therefore no record keeping of abstraction amounts/monthly meter readings are kept as detailed in points 7.1 and 8.1 of the permit. Mr Birchnall has confirmed that a meter is due to be fitted in January 2024.

We were escorted to NGR SO 01210 11075, the discharge point as per point 9.1 of the permit. The location was accurate and flow from the outlet was running clear into the Taf Fawr.

Breaches of Permit Condition

2. POINT OF ABSTRACTION – 2.1 At National Grid Reference SO 00006 13958 marked ‘Point A’ on the map.

- The additional abstraction for the visitor centre at NGR SO 00317 13101 is not included on the licence. This abstraction was previously considered exempt due to abstracting <20m³/day however as the source of supply for the abstraction is considered the same as the abstraction for the borehole listed on the permit it should be included in the permit.

7. MEANS OF MEASUREMENT OF WATER ABSTRACTED – 7.1 (i) No abstraction shall take place unless the Licence Holder has installed a meter to measure quantities of water abstracted.

- No meter was installed

8. RECORDS - 8.1 The Licence Holder shall take and record readings of the meter specified in condition 7.1 at the same time each monthly during the whole of the period during which abstraction is authorised or as otherwise approved in writing by NRW.

- No records of abstraction meter readings were being kept

Action Required by Dates Specified

1. An application to vary the licence to include the visitor centre borehole should be completed and submitted by 31/03/2024.

2. A meter should be fitted to the borehole by 29/02/2024.

3. Monthly record keeping of abstraction quantities should begin by 29/02/2024 for both abstractions.

Other advisory comments

To vary the licence forms WRA and WRD will need to be completed and the appropriate fee paid (details available here - [Natural Resources Wales / Apply to renew or change an existing abstraction or impoundment licence](#))

A Pre-application advice service is available here if required – [Natural Resources Wales / Pre-application advice service for water abstraction and impoundment licences](#)

Contact Details:

If you have any queries regarding this CAR form please contact me using the following details: Ceri Malone, Environment Officer, Ceri.Malone@naturalresourceswales.gov.uk

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 licence is issued to you under the Water Resources Act 1991 as amended by the Water Act 2003. You have a responsibility to comply with the conditions of your licence 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.

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 resource action criteria (used in section 1 and 2):**WR A: Abstraction specified by Licence**

- WR-A1 Source of supply
- WR-A2 Points of abstraction
- WR-A3 Means of abstraction
- WR-A4 Purposes of abstraction
- WR-A5 Period of abstraction
- WR-A6 Quantities
- WR-A7 Land
- WR-A8 Other specified on licence

WR B: Abstraction measurement and records

- WR-B1 Means of measurement
- WR-B2 Recording
- WR-B3 Reporting

WR C: Surface / Groundwater level and protected flow

- WR-C1 Minimum hands-off flow/level requirements
- WR-C2 Flow/level measurement devices
- WR-C3 Recording
- WR-C4 Reporting

WR D: Environmental monitoring and information

- WR-D1 Recording
- WR-D2 Reporting
- WR-D3 Notifications

WR E: Fish and eel passage

- WR-E1 Infrastructure specified by licence
- WR-E2 Maintenance and records

WR F: Discharge

- WR-F1 Point of discharge
- WR-F2 Infrastructure
- WR-F3 Measurement
- WR-F4 Recording
- WR-F5 Reporting

WR G: Impoundment specified by licence

- WR-G1 Inland water to be impounded
- WR-G2 Manner and extent of impoundment
- WR-G3 Point(s) of impoundment
- WR-G4 Construction and removal requirements
- WR-G5 Other specified on licence

WR H: Borehole infrastructure

- WR-H1 Infrastructure and accessibility
- WR-H2 Maintenance and calibration

Enforcement response

Any licence condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution or civil sanctions. 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 (Mon to Fri 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.