

Compliance Assessment Report CAR_NRW0046675

Permit being assessed: AF4020401

For: CASTLETON FARM CARAVAN PARK, held by MATTHEW FORREST
At: CASTLETON ROAD, ST. ATHAN, BARRY, SOUTH GLAMORGAN, CF62 4LD.

Type of assessment carried out: Check Monitoring/Sampling, Reason: Routine.

On 03/03/2025, between 10:40 and 11:15.

Parts of permit assessed: Relevant conditions

NRW Lead Officer: Charlotte Rhodes.

Report sent to: Billy Forrest, Site Manager, on 28/03/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
WQ-C4 - Water Quality - Emissions and monitoring - Installation of monitoring boreholes	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
WQ-C1	Ensure continued maintenance and servicing of the package plant. If found at the next visit to be a continuing failure further actions will be given.	Already completed

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Introduction

On 3rd March 2025, Officer C RHODES met with D FORREST, Site Manager and relative of Permit Holder, for a

routine inspection of the sewage treatment system servicing Castleton Park Caravan Park (a residential park), permit number: **AF4020401**. Weather at the time of inspection was cold and dry with no recent rainfall.

This inspection follows CAR_NRW0045612 issued in October 2024, which despite non-compliances with Condition 3.1.2 having been observed previously (CAR_NRW0045036), demonstrated that the discharge at the time of inspection was **within** permitted discharge limits, despite returning high readings for other standard parameters included in other more recent permits such as Suspended Solids and Ammonia. It was concluded that a further revisit and resample was necessary to ensure continued compliance, after which point a return to the regular inspection frequency could be considered.

Visit report

Officer RHODES returned to site on 21st January 2025, however, on this day a maintenance technician was at site attending to a failed screen within the treatment tank, which was allowing bio-balls to escape into the final settlement chamber. A representative sample was therefore unable to be taken, but later the same day the Site Manager emailed to say that the tank was to be emptied by Redwood Environmental the following Tuesday and the technician to return to inspect the inside of the system.

On 5th February the visit report from We Build It Ltd was received via email which stated the *“once tank was drained down it was found that a grid had dislodged in one section of the zone. We have removed all the grids and re fitted them with extra bolts. It was necessary to install new media so this has been seeded so will take a few weeks to get to full working capacity.”*

This revisit was then planned for several weeks later [3rd March] to allow the reseeded to settle in. Upon inspection, the final settlement chamber appeared clear with only a few small floating solids which looked like paper, as shown below.



The Site Manager then accompanied Officer RHODES to the outfall, where the discharge did not appear to be having a visual impact on the receiving watercourse which was running clear. A sample was then taken and sealed in situ, as in the photo below, but Site Manager agreed a bipartite was not necessary and signed the sample receipt as such.



Sample results against permitted limits were later confirmed as follows:

Parameter	Permit limit	Sample result	Interpretation
BOD (biological oxygen demand)	40 mg/l	47.5 mg/l	FAIL
Visible oil or grease	None	None	PASS
COD (chemical oxygen demand)	-	258 mg/l	
Ammonia (N)	-	46.9 mg/l	Extremely high
Suspended solids	-	84 mg/l	High

It is noted that only BOD has a permitted limit and not suspended solids or Ammonia, which is unusual hence their inclusion within the testing parameters regardless. As in the table above, their results are **above the limits** that likely would be permitted and therefore should be considered within the remedial action to be taken.

Conclusions

As seen in the table above, BOD was found to be **non-compliant** with its permitted limits. Inspections were previously undertaken in response to CAR_NRW0045036 and the site has been reseeded several times since a non-compliance was first identified. The last sample in October 2024 was found to be within compliance; hence, it is not clear why this was not the case on this occasion.

Consequently, a further sample will be arranged for April 2025 to allow for possible weather-related fluctuations affecting BOD. There are no further actions in the meantime other than continuing appropriate maintenance and servicing to the plant, implementing mitigation for any issues identified therein.

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.