

Compliance Assessment Report CAR_NRW0049035

Permit being assessed: BP0221702

For: WOODLANDS CARAVAN PARK, held by Woodlands Caravan Park

At: DEVILS BRIDGE, ABERYSTWYTH, ., CEREDIGION, SY23 3JW.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 13/06/2025, between 11:27 and 12:48.

Parts of permit assessed: See criteria listed below

NRW Lead Officer: Bethan Lewis, accompanied by: Carol Fielding, John McMahon.

Report sent to: Woodlands Caravan Park, Woodlands Caravan Park, on 21/08/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Water Quality - Management - General management	C2 Significant	1.1.1(a)
WQ-B1 - Water Quality - Operations - Permitted activities	C2 Significant	2.1.1
WQ-C2 - Water Quality - Emissions and monitoring - Emissions to land	Action only (X)	
WQ-C3 - Water Quality - Emissions and monitoring - Emissions of substances not controlled by emission limits	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-A1	Prepare a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints. Provide NRW with a copy of this written management system.	21/11/2025
WQ-B1	Comply with condition 2.1.1 of permit BP0221702, or apply for a new Environmental Permit to enable you to carry out a different discharge activity to that specified in permit BP0221702.	21/02/2026
WQ-C2	Comply with condition 3.1.2 of permit BP0221702, or apply for a permit variation or new Environmental Permit to enable you to discharge more than 5 cubic metres of sewage effluent per day.	21/02/2026

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

Summary

This was a pre-planned site inspection of Woodlands Caravan Park's discharge permit BP0221702 undertaken by Natural Resources Wales (NRW) staff Bethan Lewis, Carol Fielding and John McMahon. The NRW staff were accompanied during the inspection by Alfie Chism, a member of staff at Woodlands Caravan Park. The NRW staff also met Victoria Chism, one of the directors of Woodlands Caravan Park Limited.

The site inspection commenced at 11:27 hours on the 13 June 2025 and concluded at 12:48 hours. The weather at the time of the inspection was dry and sunny.

For observations concerning water discharge permit BP0221701 at Woodlands Caravan Park, please refer to Compliance Assessment Report (CAR) CAR_NRW0049034.

BP0221702

Under permit BP0221702, Woodlands Caravan Park currently discharge sewage effluent to land via an above ground soakaway from a Package Treatment Plant (PTP) near SN 74329 76974. The PTP is shown in photograph 1 below. The PTP was installed two years ago to replace a septic tank at the same location. The PTP serves 50 caravans at Woodlands Caravan Park but has the capacity to cater for 250 people, over and above the current need. This ensures that the PTP remains suitable if the site expands in future.



Photograph 1: Package Treatment Plant (PTP) near SN 74329 76974

The PTP photographed above consists of two compartments, one for the settlement of solids and the other for treatment. The PTP is aerated by blowers to facilitate treatment. An alarm is raised if the blowers fail.

Following treatment, final effluent passes through a final effluent inspection chamber as shown in photograph 2 below. This inspection chamber enables Woodlands Caravan Park to carry out the sampling/monitoring required by permit BP0221702.



Photograph 2: Final effluent inspection chamber

Final effluent from the PTP discharges to land via an above ground soakaway as shown in photographs 3 and 4 below. At the time of the site inspection, the discharge from the PTP was found to be clear and odourless with no signs of sewage fungus at the outfall. The discharge did not contain any significant trace of visible oil or grease.



Photograph 3: Package Treatment Plant (PTP) outfall



Photograph 4: Package Treatment Plant (PTP) outfall

Non-compliances and associated actions

Permit BP0221702 permits Woodlands Caravan Park to discharge sewage effluent into land from a septic tank via a soakaway system at National Grid Reference (NGR) SN 74700 77200. Woodlands Caravan Park however currently discharge sewage effluent to land via an above ground soakaway from a PTP near SN 74329 76974. This is a different discharge activity and represents a breach under condition 2.1.1 of permit BP0221702. A category 2 non-compliance has been recorded above for a non-compliance which has the potential to have a significant impact or effect on the environment, people and/or property. NRW deem that the change in activity has the potential to have a significant impact due to the proximity of the PTP to the Coedydd a Cheunant Rheidol Site of Special Scientific Interest (SSSI). The Coedydd a Cheunant Rheidol SSSI is an internationally important old sessile oak woodland. It has a particularly rich assemblage of hyper-oceanic mosses and liverworts. These bryophytes require high humidity and as a result many of them are concentrated in and around the watercourses and streams that flow through the site. Many of the rarer and more unusual species are very sensitive to increased nutrient levels, therefore a change in the discharge activity at Woodlands Caravan Park has the potential to directly impact on these species.

To rectify the above non-compliance, Woodlands Caravan Park are asked to comply with condition 2.1.1 of permit BP0221702, or apply for a new Environmental Permit to enable them to carry out a different discharge activity to that specified in permit BP0221702. Woodlands Caravan Park are asked to complete this by no later than the **21 February 2026**. Woodlands Caravan Park are advised that NRW do not issue Environmental Permits for discharges of sewage effluent to land via above ground soakaways. If discharging to land, an Environmental Permit will only be granted if the discharge is made via a sub-surface soakaway.

Condition 1.1.1(a) of permit BP0221702 requires Woodlands Caravan Park to "*manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints*". Woodlands Caravan Park do not currently have a written management system.

An additional category 2 non-compliance has therefore been recorded above for a non-compliance which has the potential to have a significant impact or effect on the environment, people and/or property. A category 2 non-compliance has once again been assigned to the breach due to the proximity of the Coedydd a Cheunant Rheidol SSSI, but also due to the fact that the PTP currently receives no regular maintenance or desludging as described in greater detail below. To rectify the non-compliance, Woodlands Caravan Park are asked to prepare a written management system and provide NRW with a copy of the written management system by no later than the **21 November 2025**. To assist with this, Woodlands Caravan Park may wish to review the guidance provided under the following webpage for developing an Environment Management System:

<https://naturalresources.wales/permits-and-permissions/water-discharges-and-septic-tanks/discharges-to-surface-water-and-groundwater/develop-an-environment-management-system-for-the-discharge-of-up-to-20-cubic-metres-per-day-of-sewage-effluent/?lang=en>

Woodlands Caravan Park may wish to produce one written management system to cover both their discharge permits (BP0221701 and BP0221702) or keep the written management systems separate.

Recommendations and associated actions

It was stated at the time of the site inspection that the PTP receives no regular maintenance or desludging. NRW wish to remind Woodlands Caravan Park that all PTP's require regular maintenance and desludging, and that this should be carried out by suitably trained and qualified personnel in line with manufacturer's instructions. Failure to do so may result in pollution of the environment and/or permit breaches. Woodlands Caravan Park should detail how they intend to maintain and desludge the PTP in their written management system.

Woodlands Caravan Park is seasonal and closes between the 01 November and 01 March each year. The volume of sewage entering the PTP is therefore significantly reduced during this period. Reducing or stopping sewage from entering a PTP may lead to microbial death and an ineffective sewage treatment system. Woodlands Caravan Park are therefore advised to consider what measures may need to be taken to prevent microbes within the PTP from dying during the winter months, and/or to increase the microbial population prior to the reopening of the caravan park in March. Such measures should be outlined in Woodland Caravan Park's written management system.

Condition 3.1.2 of permit BP0221702 states that the maximum daily flow from the septic tank cannot exceed 5 cubic metres per day. Woodlands Caravan Park's PTP currently serves 50 caravans. Assuming that each caravan is occupied by 2.5 people, approximately 18,750 litres of sewage would be expected to enter the PTP each day (50 caravans x 2.5 people x 150 litres of sewage per person/per day). This equates to 18.75 cubic metres/day - 3.75 times the maximum daily flow limit. If the caravan park were to expand further, with the PTP treating sewage from 250 people (its design capacity), 37,500 litres of sewage would be expected to enter the PTP each day (250 people x 150 litres of sewage per person/per day). This equates to 37.5 cubic metres - 7.5 times the maximum daily flow limit. As no definitive evidence was observed at the time of the site inspection to suggest that the maximum daily flow limit was being exceeded, no permit breach has been recorded against condition 3.1.2 above. Woodlands Caravan Park must however ensure that they comply with condition 3.1.2, or apply for a permit variation or new Environmental Permit to enable them to discharge more

than 5 cubic metres of sewage effluent per day if necessary. NRW ask that Woodlands Caravan Park do this by no later than the **21 February 2026**.

Conclusion

NRW wish to thank Woodlands Caravan Park for their time during the above site inspection. If Woodlands Caravan Park have any queries regarding the contents of this CAR, or are unable to meet any of the above deadlines, we recommend that they contact the NRW officer noted above at the earliest opportunity.

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 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.