

Compliance Assessment Report CAR_NRW0049335

Permit being assessed: AN0325301

For: TRAVELLERS REST INN, held by MITCHELLS & BUTLERS RETAIL LIMITED

At: THORNHILL, ., ., CAERPHILLY, CF83 1LY.

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

On 03/09/2025, between 11:00 and 12:00.

Parts of permit assessed: Site Operations

NRW Lead Officer: Gavin Dodd.

Report sent to: Tania Jones , Manager , on 10/09/2025.

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	C3 Minor	Condition 1.1.1 (a) General Management- The operator shall 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
WQ-D1 - Water Quality - Information - Records	C3 Minor	Condition 4.1.2 Records- The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency
WQ-C2 - Water Quality - Emissions and	C3 Minor	Condition 3.1.1 & 2

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
monitoring - Emissions to land		Emissions to land- There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3 & the limits given in schedule 3 shall not be exceeded
WQ-C2 - Water Quality - Emissions and monitoring - Emissions to land	C3 Minor	Condition 3.3 Monitoring- Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

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	Submit the written management plan for the system	08/10/2025
WQ-D1	Submit maintenance logs for the system and the waste transfer notes from having it emptied (from the most recent to when the previous CAR form was issued)	08/10/2025
WQ-C2	Produce an investigative report highlighting the reason for poor quality final effluent and resolve these issues. Bring the system into compliance with permit conditions	08/10/2025
WQ-C2	Change the lock on the fence door and keep a key on site to facilitate easier access for future sampling and inspections	08/10/2025

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

I (Environment Officer Gavin Dodd) arrived at the Travellers Rest Inn, Thornhill Road, Caerphilly CF83 1LY at 11:00 on 3rd September 2025 to conduct an inspection regarding a discharge of trade and sewage effluent to a soakaway system. Site manager Tania Jones was also in attendance.

I initially established that the actions from the previous CAR form (from a visit on 24th September 2024) had not been completed. Before commencing the inspection, I explained that these actions would be added to this CAR form and need to be completed with the new deadline, otherwise a notice for the information would be served.

There had been an electrical issue on the site on the morning of the visit, with the alarm panel for the package sewage treatment works (PSTW) indicating a fault. Mrs Jones mentioned that the level of the effluent in the chambers was near max capacity and so had arranged for them to be emptied later on in the morning.

The permit concerned the discharge of secondary treated trade and sewage effluent from the PSTW to an existing soakaway system. The PSTW was accessed via a gap in the fencing (which was padlocked and had no key available) at the end of the site's overflow carpark. Before inspecting the chambers, I noted that the alarm light on top of the control panel for the system was flashing. On closer inspection, the control panel indicated that while there was power to the system, the blower had tripped; it was unclear how long this had been an issue.

The chambers of the system were next inspected. The level of the effluent in the initial chamber was high and there was a large amount of solid waste visible. In the second chamber, the blowers were inactive; there would normally be foam expected in this chamber but as the blower had tripped this was not present. Solid waste had built up on the machinery and there was some of this visible in the effluent being passed forward. The effluent in the third chamber appeared turbid and there was a large amount of solids still present. This is likely because the blowers had tripped and the effluent was not being treated to the required standard before discharge, though there may have been other issues. The final chamber prior to the sampling point showed a similarly high concentration of solids waste. The sampling point was accurate to that stipulated in the permit, though the effluent had not been treated to a high enough standard for discharge as evidenced by the heavy concentration of solid waste present. While it was not actively discharging during the visit, this concentration of solid waste would not be getting any further treatment prior to discharge and so was a breach of the permit. Inspection of the soakaway was not possible due to access restrictions.

I next returned to the main building and discussed the required actions with the site manager. I also mentioned that this CAR form would be issued with a warning based on my findings and the previous actions not being completed.



Figure 1: Lower alarm indicating system fault



Figure 2: Access point to the system w/ padlocked door



Figure 3: Flashing alarm indicating an issue with the system



Figure 4: Control panel indicating that the blower had tripped



Figure 5: External view of the treatment system



Figure 6: Initial chamber of the system showing high amount of solid waste



Figure 7: Second chamber of the system with blowers inactive



Figure 8: Third chamber with turbid water and high solid waste carry over



Figure 9: Final chamber showing high solid waste content



Figure 10: High level of solid waste at sampling point

Breaches

1.) Condition 1.1.1 (a) General Management- The operator shall 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

Justification: No written management plan was available at the time of the visit

2.) Condition 4.1.2 Records- The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in

writing by the Environment Agency.

Justification: Waste transfer notes and maintenance logs were not available/stored on site

3.) Condition 3.1.1 & 2 Emissions to land- There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3 & the limits given in schedule 3 shall not be exceeded

Justification: Table 3.1 specifies that the limit for suspended solids in the discharge is 60 mg/l. Final effluent at the sampling point visibly exceeds this due to the amount of solid waste in the chamber

4.) Condition 3.3 Monitoring- Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

Justification: Sampling equipment would not currently be possible to take to the sampling point due to a locked door blocking access

Actions required by date specified

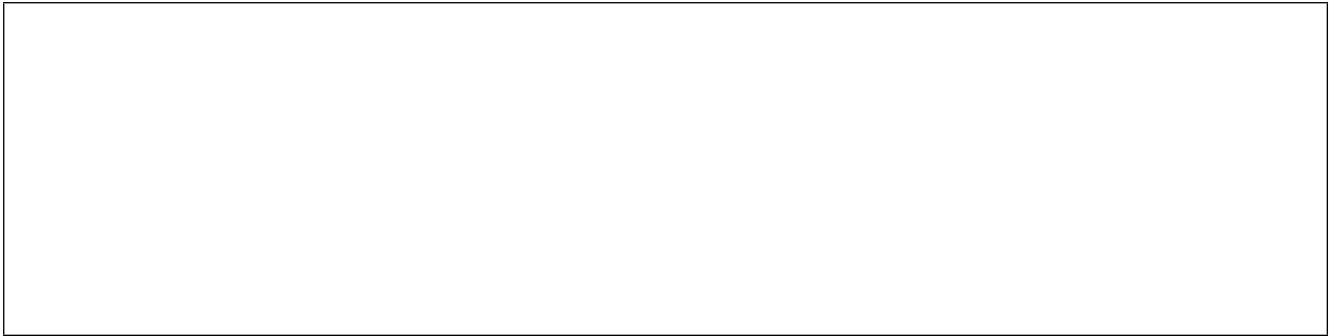
- 1.) Submit the written management plan for the system
- 2.) Submit maintenance logs for the system and the waste transfer notes from having it emptied (from the most recent to when the previous CAR form was issued)
- 3.) Produce an investigative report highlighting the reason for poor quality final effluent and resolve these issues
- 4.) Change the lock on the fence door and keep a key on site to facilitate easier access for future sampling and inspections
- 5.) Bring the system into compliance with permit conditions

The deadline for the above actions is 8th October 2025

Contact details:

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Gavin Dodd, Environment Officer, gavin.dodd@naturalresourceswales.gov.uk, 03000 65 3193.

If we do not receive the information requested within specified deadline and have not been informed as to why there is a delay then we may serve a Regulation 60 Notice requiring the information under Environmental Permitting (England and Wales) Regulations 2016.



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.