

Compliance Assessment Report CAR_NRW0049595

Permit being assessed: WB3797TG

For: STP AT CELTIC MANOR RESORT, held by The Celtic Manor Resort

At: HUNTER LODGES, CELTIC MANOR, COLDRA WOODS, NEWPORT, NP18 1HQ.

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

On 07/10/2025, between 10:40 and 12:30.

Parts of permit assessed: Site operations and infrastructure

NRW Lead Officer: Elis Nuttall.

Report sent to: Simon White, Facilities Manager, on 13/10/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Water Quality - Operations - Permitted activities	C3 Minor	3.3.1 - Sample/monitoring point access
WQ-B1 - Water Quality - Operations - Permitted activities	C3 Minor	2.1.1 - Permitted activities (reed bed)
WQ-A1 - Water Quality - Management - General management	C4 No impact	1.1.1(a) - General management (control box access)
WQ-D1 - Water Quality - Information - Records	Ongoing (O)	2.1.1 – Permitted activities (reed bed)
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-D1 - Water Quality - Information - Records	Action only (X)	

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-B1	Clear the vegetation around the sample/discharge point to enable access for monitoring purposes. Evidence shall be provided to NRW on completion.	03/11/2025
WQ-B1	Clear the reed bed of excess vegetation to promote healthy reed growth. Evidence shall be provided to NRW on completion.	03/11/2025

Criteria	Action needed	Complete by
WQ-A1	Clear the vegetation around the control box to improve access. Evidence shall be provided to NRW on completion.	03/11/2025
WQ-D1	Provide the management history of the reed bed and any maintenance undertaken attempting to establish effective growth and treatment.	13/11/2025
WQ-D1	Provide NRW with an example of the management system documentation as observed during the visit.	27/10/2025
WQ-D1	Provide an example of the quarterly sample results for reference.	27/10/2025
WQ-A1	Undertake clearance of excess vegetation around the treatment system chambers to ensure continued access. Evidence shall be provided to NRW on completion.	27/10/2025
WQ-D1	Provide details and evidence (in the form of waste transfer notes) on the most recent cleaning/de-sludge of the sewage treatment system.	27/10/2025

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

Site Visit Report

This report details the site visit made by Natural Resources Wales (NRW) on the 07/10/2025 to the package treatment plant serving Hunter Lodges, The Celtic Manor Resort, permit reference number EPR-WB3797TG.

I (NRW Environment Officer Elis Nuttall) attended Hunter Lodges at 10:40 for a water quality permit compliance inspection where I met with the site's Facilities Manager (SW). The weather was overcast but dry during the visit.

It is noted that this visit was conducted concurrently with an inspection of a second permit held by the site (AN0401901), which is outlined in a separate report.

General Observations

This permit regulates the discharge of secondary treated domestic sewage effluent (via a Package Treatment Plant and reed bed) into an unnamed tributary of the River Usk,

serving 10 holiday accommodation lodges. The emissions from this treatment plant shall not exceed the following limits, as specified in condition 3.1.2 of the permit:

- Maximum daily discharge volume: 18 m³/day
- ATU-BOD as O₂: 20mg/l
- Suspended solids: 30mg/l
- Ammoniacal nitrogen (expressed as N): 5mg/l
- Visible oil or grease: No significant trace present

The discharge shall be made via a lined reed bed centred on ST3631791513, with the consented discharge/sample point outlet located at ST3630591521.

The site was operational at the time of the visit.

Initial Discussion

This site has an extensive compliance history with 10 previous inspections and/or audits being undertaken since the permit was issued in 2014. The most recent inspection was conducted in March 2024, with 2 breaches recorded and requisite actions set for lack of a management systems available for inspection and emissions limit exceedance for N (7.95mg/l recorded). I began my inspection by discussing this compliance history and assessing if there were any outstanding actions.

SW began by showing me the new management system and recording documents held by the site. It was observed that this system is managed with quarterly inspections and routine maintenance which is undertaken by external contactors. I was satisfied with the quality of works recorded and the frequency of maintenance. I can therefore accept that the action for management system compliance from the previous visit have been completed. I requested an example of the management system documentation to be shared with NRW for reference. This is outlined in the actions list below. I will assess the most recent sampling result by NRW to assess compliance with the emissions limits breach, although checks are conducted quarterly by the operator as a precaution. I observed an example of these during our discussions but also requested an example to be shared, as actioned below. I am satisfied that emissions limits are currently compliant.

As the discharge should be served by tertiary treatment via a reed bed, I enquired into the management of the system and if it undergoes a structured regime of maintenance. SW stated that the reed bed has never effectively grown, with minimal to no reed growth present. It was claimed that while efforts were made to encourage growth through different management strategies the reed bed continually failed to establish itself, potentially due to low flow in the area where it is located. In response, I requested that the management history of the reed bed be supplied so that I can assess it (with NRW experts) to ascertain whether we have any guidance to offer so that an improvement programme can be implemented and ensure tertiary treatment is present on site. Please see the actions list below for further details.

Regarding general management and operations it was stated the most recent non-routine action undertaken was servicing works on the PTP fan, which was highlighted in the

management system I observed. There have been no instances where the system had to be taken offline for an extended period of time and there have been no changes to the operations associated with the treatment system e.g. population size increases/decreases etc.

We then proceeded to inspect the site infrastructure.

Site Infrastructure

General access to the treatment system and chambers was acceptable, with some overhanging vegetation present and a section of false grass placed over the inspection chambers to provide a visual barrier for the site's customers. While we were able to access the chambers without hinderance, I request that the vegetation is managed to ensure future access is maintained. This is actioned below. Regarding the false grass placement, I understand the desire to implement this visual improvement, however I advise that the condition of these visual barriers be assessed continually to ensure access is not compromised. Please see the advisory comments section where this is recorded. These observations are evidenced in Figure 1.



Figure 1 – General site conditions as observed during the visit.

While the above access was acceptable, the system's control box was not. As seen in Figure 2, vegetation growth hindered easy access by operators and could become worse if not properly maintained. As a result, I have issued a C4 breach to reflect the conditions

observed and the requisite actions listed below to improve the access.



Figure 2 – The condition of the system control box access as observed during the visit.

It is noted that the treatment system chambers require drain keys to open, tools which neither SW nor I had at the time of the visit. Therefore, while we awaited one of the grounds maintenance operators to arrive with the appropriate tools, we commenced with the inspection of the reed bed and discharge/sample point.

On inspection, it was clear that the location where the discharge/sample point are permitted to be located was heavily overgrown, making access to either impossible, as seen in Figures 3 and 4. The closest I could get to the outlet was ~5m away, which made a visual inspection unfeasible. I explained to SW that I would be issuing a C3 breach for access to the sample point due to condition 3.3.1 stating that “*permanent means of access shall be provided to enable sampling/monitoring to be carried out*”. Details of this breach and the requisite actions to improve access are outlined below.



Figure 3 – The location of the sample/discharge point hindered by overgrown vegetation as observed during the visit.



Figure 4 - The location of the sample/discharge point hindered by overgrown vegetation as observed during

the visit.

The reed bed (listed to be located in the vicinity of the sample/discharge point) was also observed to be overgrown and inaccessible, with minimal reed growth present (Figure 5).

While I have requested a history of the management of this reed bed, I can advise that maintaining access and ensuring no other vegetation takes hold within the reed bed itself will be vital in maintaining the long term viability of the system. I have issued a C4 breach for the condition of the reed bed to reflect the observations made. An action has been set to clear the reedbed of vegetation, as outlined below.



Figure 5 – The reed bed as observed during the visit.

The treatment system itself was accessed once the correct keys were provided. The chambers were lifted in sequence and the following observations were made:

1. Primary chamber – The condition was as expected, not overly full and the inlet pipe was clear of obstructions. The chamber walls were in a good condition. I requested information on when the last de-sludge was undertaken and the requisite transfer notes as evidence. This is actioned below.
2. Settlement chamber – As above, condition was acceptable with good chamber wall integrity and solid matter was not passing forward to the last two chambers. Evidence of de-sludge is requested in conjunction with the primary chamber.

3. Aeration chamber – The aeration system was working as designed with good circulation in progress. Chamber walls were fine with no apparent cracks or defects present. No excessive solid material or odours was observed.
4. Final effluent chamber – Chamber wall integrity was fine with no solid material or odour present and the effluent appeared clear in quality. The outlet pipe was clear of obstructions.

The observations on the treatment system are evidenced in Figure 6 below.



Figure 6 – The effluent chambers as observed during the visit.

From top to bottom, left to right: Primary chamber, Settlement chamber, Aeration chamber, Final effluent chamber.

No further observations were made during this visit.

Final Discussion

I outlined my observations, breaches and actions to SW based on the evidence collected during the inspection.

While disappointed, SW initiated proactive steps to improve access to the site infrastructure by arranging a vegetation clearance as soon as possible with their maintenance team whilst I was on site. Additionally, they actioned increased access checks for themselves in

their management system going forward to ensure this breach of conditions does not re-occur in future.

I reiterated my actions regarding the reed bed maintenance history and ensured SW that I would raise this with NRW specialists as soon as possible.

No further questions were raised during this discussion.

I left site at 12:30.

Breaches of permit conditions

Below are the permit breaches that were identified during the site inspection.

1. CATEGORY 3 BREACH – PERMIT CONDITION 3.3.1 – Sample/monitoring point access.

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 Natural Resources Wales.

Access to the sample/monitoring point was not possible during the visit due to excessive vegetation growth. This is a clear breach of the permit requirements and as such has been breached accordingly.

Please see report content for further justification

2. CATEGORY 3 BREACH – PERMIT CONDITION 2.1.1 – Permitted activities (reed bed).

The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

- *The discharge should be made via a lined reed bed centred on ST3631791513.*

It is clear that the reed bed is not fit for purpose, with minimal growth present and access hindered by excessive vegetation overgrowth. This has been scored accordingly. An improvement programme will be needed to rectify the issues observed.

Please see report content for further justification

3. CATEGORY 4 BREACH – PERMIT CONDITION 1.1.1(a) – General management (control box access).

The operator shall manage and operate the activities:

- a. *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

Access to the system's control box was hindered by vegetation growth. While not completely inaccessible, it shows a lack of management in line with the permit conditions and as such has been scored accordingly.

Please see report content for further justification

Due to these breaches and evidence of continued non-compliance regarding the permit conditions in question I have issued the site with a warning. Please see the actions below to rectify the breaches recorded.

Actions required by dates specified

1. Provide NRW with an example of the management system documentation as observed during the visit.

Deadline: 27/10/2025

2. Provide an example of the quarterly sample results for reference.

Deadline: 27/10/2025

3. Provide the management history of the reed bed and any maintenance undertaken attempting to establish effective growth and treatment.

Deadline: 13/11/2025

4. Undertake clearance of excess vegetation around the treatment system chambers to ensure continued access. Evidence shall be provided to NRW on completion.

Deadline: 27/10/2025

5. Clear the vegetation around the control box to improve access. Evidence shall be provided to NRW on completion.

Deadline: 03/11/2025

6. Clear the vegetation around the sample/discharge point to enable access for monitoring purposes. Evidence shall be provided to NRW on completion.

Deadline: 03/11/2025

7. Clear the reed bed of excess vegetation to promote healthy reed growth. Evidence shall be provided to NRW on completion.

Deadline: 03/11/2025

8. Provide details and evidence (in the form of waste transfer notes) on the most recent cleaning/de-sludge of the sewage treatment system.

Deadline: 27/10/2025

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.

Other advisory comments

1. Continually assess the condition of the false grass used as a visual barrier for the treatment system chambers to ensure access is not compromised.

*Please note, this is not an action. No updates will be requested.

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: Elis Nuttall, Environment Officer, elis.nuttall@naturalresourceswales.gov.uk, 03000 65 4651.

Thank you,

Elis Nuttall.

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.