

Compliance Assessment Report CAR_NRW0049749

Permit being assessed: RP3024XG

For: STP @ PLAS TANYBWLCH, held by IAN JONES

At: RHYDYFELIN, ABERYSTWYTH, ., CEREDIGION, SY23 4PZ.

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

On 28/08/2025, between 15:01 and 16:03.

Parts of permit assessed: See criteria listed below

NRW Lead Officer: Bethan Lewis.

Report sent to: Helen Harrison and Nicholas Strong, Directors of Plas Tanybwllch Management Company Limited, on 23/10/2025.

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	C4 No impact	1.1.3
WQ-B2 - Water Quality - Operations - The site	Action only (X)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-D1 - Water Quality - Information - Records	C4 No impact	4.1.2
WQ-D3 - Water Quality - Information - Notifications	C4 No impact	4.3.4

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	Keep a copy of permit RP3024XG at or near the place where duties are carried out.	23/12/2025
WQ-B2	Investigate whether the disused brick chamber and broken pipework on Tanybwllch Beach once formed part of the PTP's final effluent discharge pipe, and confirm where final effluent from the PTP currently discharges. Provide NRW with an update on your findings.	23/02/2026
WQ-C1	Confirm whether an effluent sample point exists at Plas Tanybwllch, and if so, provide NRW with a photograph of the inside of the effluent sample point as evidence.	23/12/2025
WQ-D1	Keep a copy of your written management system on site and provide NRW with a copy of the written management system.	23/12/2025
WQ-D3	Transfer permit RP3024XG from Mr. Ian Jones to Plas	23/12/2025

Criteria	Action needed	Complete by
	Tanybwllch Management Company Limited.	

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.

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

This was a pre-planned site inspection of Plas Tanybwllch's discharge permit RP3024XG undertaken by Natural Resources Wales (NRW) officer Bethan Lewis. The site inspection commenced at 15:01 hours on the 28 August 2025 and concluded at 16:03 hours. The weather at the time of the inspection was dry, however regular showers had occurred on both the 27 and 28 August 2025.

Plas Tanybwllch Management Company Limited (company number: 13404692) are currently responsible for the management of Plas Tanybwllch. The NRW officer was accompanied during the majority of the above site inspection by Helen Harrison, secretary and director of the Company, and Nicholas Strong, chairman and director of the Company.

Sewage at Plas Tanybwllch is treated by a Package Treatment Plant (PTP) located at approximately SN 57963 79380. The PTP is shown in photograph 1 below. Oxygen is fed into the PTP by a blower unit shown in photograph 2. The blower was replaced on the 27 August 2025 due to damage believed to have resulted from a power outage. Whilst the blower can continue to operate without power for a couple of weeks, automatic emails/texts are issued to Plas Tanybwllch Management Company Limited if the PTP/blower loses power. This ensures that issues are rectified as soon as possible.



Photograph 1: Package Treatment Plant (PTP)



Photograph 2: Blower unit

Condition 3.3.1 of Plas Tanybwllch's permit requires final effluent from the PTP to pass an effluent sample point at SN 58015 79367. As the PTP chambers shown in photograph 1 were not opened as part of the site inspection, it was not confirmed whether an effluent sample point exists at Plas Tanybwllch. Plas Tanybwllch Management Company Limited are therefore asked to confirm whether an effluent sample point exists at Plas Tanybwllch, and if so, provide NRW with a photograph of the inside of the effluent sample point as evidence. The Company are asked to complete this by no later than the **23 December 2025**.

A maintenance contractor attends Plas Tanybwllch twice a year to undertake inspections of the PTP. The PTP is also regularly desludged by a registered waste carrier. It was stated that the PTP was last desludged 6-8 months before the date of the site inspection.

Condition 1.1.1(a) of Plas Tanybwllch's permit requires the operator 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*". It was stated that Plas Tanybwllch's maintenance contractor likely holds the site's written management system. As the written management system was not available to view at Plas Tanybwllch, this represents a breach of condition 4.1.2 which states that "*the operator shall keep on site all records, plans and the management system required to be maintained by this permit*". A category 4 non-compliance has therefore been recorded above for a non-compliance that cannot foreseeably have any impact on the environment, people and/or property. To rectify this non-compliance, Plas Tanybwllch Management Company Limited are asked to keep a copy of the written management system on site and provide NRW with a copy of the written management system by no later than the **23 December 2025**.

Plas Tanybwllch Management Company Limited may find further information on developing an Environmental Management System under the below webpage:

<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](#)

Condition 1.1.3 of Plas Tanybwllch's permit states that *"any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out"*. A copy of permit RP3024XG is not currently held at Plas Tanybwllch. This therefore represents a breach under condition 1.1.3. In response, a further category 4 non-compliance has been recorded above. To rectify this non-compliance, Plas Tanybwllch Management Company Limited are asked to keep a copy of permit RP3024XG at or near the place where duties are carried out by the **23 December 2025**.

Condition 2.2.1 of Plas Tanybwllch's permit requires final effluent from the PTP to discharge to Cardigan Bay at SN 57660 79704. During the site inspection, the NRW officer inspected the permitted discharge point and did not observe any signs of pollution. The permitted discharge point is shown in photograph 3 below. Whilst inspecting the discharge point, the NRW officer identified broken pipework and a disused brick chamber on Tanybwllch Beach as shown in photographs 4-6 below. The disused brick chamber closely resembled another brick chamber observed between Plas Tanybwllch's PTP and Tanybwllch Beach as shown in photograph 7 below. As shown by figure 1, the brick chambers and broken pipework perfectly align with Plas Tanybwllch's PTP and the permitted discharge point. It is possible therefore that the disused brick chamber and broken pipework observed on Tanybwllch Beach once formed part of Plas Tanybwllch's final effluent discharge pipe. As effluent no longer flows through the disused brick chamber and broken pipework, it raises the question as to where final effluent from Plas Tanybwllch's PTP currently discharges.

To resolve the above matter, Plas Tanybwllch Management Company Limited are asked to investigate whether the disused brick chamber and broken pipework on Tanybwllch Beach once formed part of the PTP's final effluent discharge pipe, and confirm where final effluent from the PTP currently discharges. Plas Tanybwllch Management Company are asked to provide NRW with an update on their findings by the **23 February 2026**.



Photograph 3: Permitted discharge point



Photograph 4: Broken pipework on Tanybwllch Beach at SN 57703 79658



Photograph 5: Disused brick chamber on Tanybwllch Beach at SN 57724 79629



Photograph 6: Pipework leading into disused brick chamber on Tanybwllch Beach at SN 57724 79629



Photograph 7: Brick chamber situated between Plas Tanybwllch's PTP and Tanybwllch Beach at SN 57929 79408

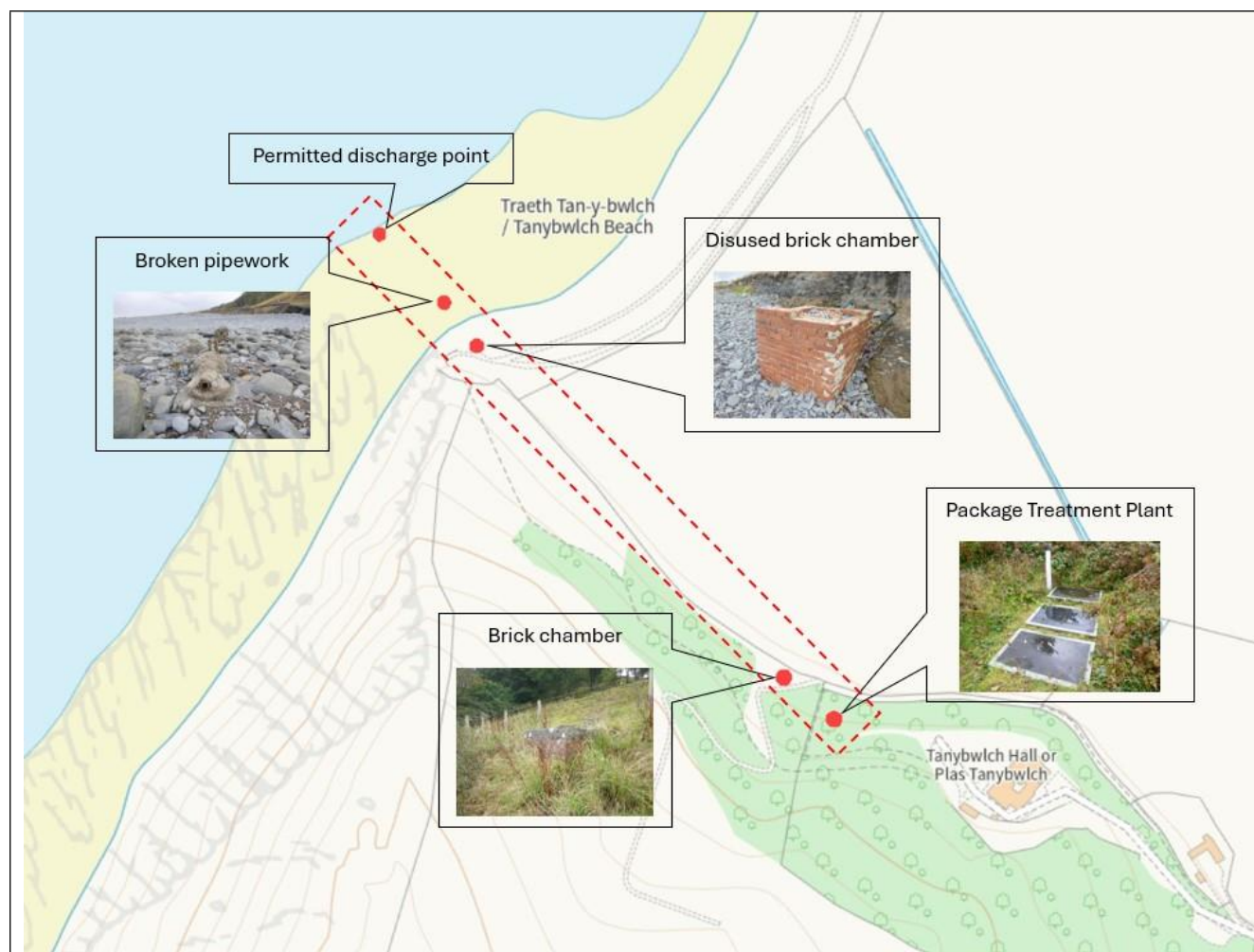


Figure 1: Map showing location of brick chambers and broken pipework in relation to Plas Tanybwllch's PTP and the permitted discharge point

As previously mentioned, Plas Tanybwllch Management Company Limited (company number: 13404692) are currently responsible for the management of Plas Tanybwllch. The current permit holder, Mr. Ian Jones, has not had responsibility for Plas Tanybwllch for over a year. Condition 4.3.4 of Plas Tanybwllch's permit states that where the operator is a corporate body other than a registered company, the Environment Agency shall be notified within 14 days of "any change in the operator's name or address; and any steps taken with a view to the dissolution of the operator". As the permit remains in Mr. Ian Jones' name, this represents a breach under condition 4.3.4. A further category 4 non-compliance has therefore been recorded above. To rectify the non-compliance, permit RP3024XG must be transferred from Mr. Ian Jones to Plas Tanybwllch Management Company Limited. This can be done under the following webpage:

<https://naturalresources.wales/permits-and-permissions/water-discharges-and-septic-tanks/discharges-to-surface-water-and-groundwater/transfer-your-permit-for-water-discharges/?lang=en>

NRW ask for this to be completed by the **23 December 2025**.

NRW would like to thank Helen Harrison and Nicholas Strong for their time during the above site inspection. If Plas Tanybwllch Management Company Limited wish to discuss the

contents of this Compliance Assessment Report (CAR), or require an extension to any of the above deadlines, we encourage them to contact the NRW officer noted above.

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.