

## Compliance Assessment Report CAR\_NRW0049601

**Permit being assessed:** AN0401901

For: RYDER CUP CLUBHOUSE CELTIC MANOR, held by THE CELTIC MANOR RESORT LIMITED

At: RYDER CUP CLUBHOUSE, CELTIC MANOR RESORT, COLDRA WOODS, NEWPORT, NP18 2YA.

**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 29/10/2025.

### 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	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-A1	Provide an example copy of the site's maintenance programme for the benefit of NRW.	12/11/2025
WQ-D1	Provide the waste transfer note for the de-sludge undertaken in August 2025 as evidence of effective management and appropriate disposal of wastes.	12/11/2025

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.

**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

### Site Visit Report

This report details the site visit made by Natural Resources Wales (NRW) on the 07/10/2025 to the sewage treatment plant serving the Ryder Cup Clubhouse, Celtic Manor Resort, permit reference number EPR-AN0401901.

I (NRW Environment Officer Elis Nuttall) attended the Ryder Cup Clubhouse 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 (WB3797TG), which is outlined in a separate report.

### General Observations

This permit regulates the discharge of secondary treated sewage effluent and trade effluent (via a Sewage Treatment Plant) to an unnamed tributary of the River Usk. The emissions from this treatment plant shall not exceed the following limits, as specified in condition 1.6.1 of the permit:

- Maximum daily discharge volume: 10 m<sup>3</sup>/day
- ATU-BOD as O<sub>2</sub>: 20mg/l
- Suspended solids: 30mg/l
- Ammoniacal nitrogen (expressed as N): 10mg/l
- Visible oil or grease: No significant trace present

The discharge shall be made to the un-named watercourse at ST3565591328, with the consented sample point being located at the same coordinates (this is reflected in the variation notice issued in 2011).

The site was operational at the time of the visit.

### Initial Discussion

This site has an extensive compliance history with 23 previous inspections and/or audits being undertaken since the permit was issued in 2006. The most recent inspection was conducted in March 2024, with 2 breaches recorded and requisite actions set for lack of a management system available for inspection and lack of waste transfer notes available for the most recent de-sludge works. I began my inspection by discussing this compliance history and assessing if there were any outstanding actions.

It was noted by SW that all actions set were completed and email evidence showing the information had been shared with NRW was observed during this meeting. Copies were also shared with me. I have no evidence to suggest that there are any outstanding actions from this previous visit.

When requested, SW presented the site's maintenance programme, explaining that they are set up as individual contract jobs. The weekly jobs (e.g. BOD checks) are conducted internally by site maintenance staff, while the quarterly jobs (e.g. full services) are undertaken by external contractors. While I saw a digital copy of this MP during the visit, I requested that a copy be shared with me via email for records purposes. This is actioned below. The system was last de-sludged in August 2025, to which I requested waste transfer notes as evidence of completion and effective management.

SW queried a comment made by the previous compliance officer to visit site regarding Condition 1.5.1 and the need for flow monitoring on site. While the wording of the permit is *"At the request of the agency, the Consent holder shall install, operate and maintain a means of flow measuring..."*, it is unclear whether NRW or its predecessor organisations have ever requested that this infrastructure be installed. I noted that I will query this with NRW's permitting team and attempt to clarify this point.

Regarding other aspects of the site operations, it was noted that a separator intercepts all grease/oil before it is sent for treatment and that all effluent from the site goes through this system. There is also a separate grease trap present. These systems are serviced separately and form no further part of this inspection. No other non-routine actions or maintenance have been required since the last compliance visit.

We then proceeded to inspect the site infrastructure.

### **Site Infrastructure**

General site conditions were good at the time of the visit with good access to all permitted components and no obstructions or restrictions present. An overview of the site can be seen in Figure 1.



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

We first inspected the discharge point which was located at ST356391336; while not in the exact location stipulated in the permit it is within 8m of the listed point and does not pose any risk of being miss-identified. As such I am happy that the location is compliant. The discharge itself was very minimal at the time of the visit. There was minor staining on the outfall pipe but the effluent was clear and there was no fungus present around the pipe or downstream. I am happy that the discharge is not posing any environmental risk. As noted above, there were no access issues and there were steps down to the watercourse to facilitate any sampling required. These observations are evidenced in Figure 2.



Figure 2: The discharge/sample point as observed during the visit.

The treatment system itself appeared to generally be in a good condition. All covers were in place and there were no major defect present. A small gap was present in one of the covers (Figure 3), to which SW explained that the general maintenance operators may have failed to replace the chamber covers correctly during their last visit. SW replaced the cover immediately, but I have added an advisory note below to ensure all covers are returned as designed to ensure no water ingress can occur which may overwhelm the system or even cause flooding.



Figure 3: The treatment system with a small gap in the cover as observed during the visit.

Each system chamber was lifted in sequence and an assessment made on its function and effectiveness. The observations made are as follows:

1. Primary effluent/settlement chamber - As expected, no defects in the chamber walls observed and not overly full, with sufficient volume remaining before next de-sludge is required.
2. Filter and aeration chambers (x2) – Filters were in operation and clear of excessive debris. There was good aeration and no significant solids carry over from the settlement chamber.
3. Final effluent chamber – The effluent was clear with no trace of solids carry over and there was no noxious or prominent odours present.

No concerns noted. Evidence of the above observations can be seen in Figure 4.

It was stated by SW that this treated effluent discharges via a tertiary reed bed, similarly to another system located on site. While not a permit condition, it was noted that this reed bed had not successfully established itself. I will query whether this could impact the final effluent quality with NRW specialists but further considerations to the reed bed are not given in this report and I did not observe it at the time of the visit.



Figure 4: The treatment system chamber as observed during the visit.

From top to bottom, left to right: Primary/settlement chamber, Filter and aeration chambers (x2), Final effluent chamber.

The small control box for the system was observed (Figure 5). There was no damage present and there was an isolator in place. This is appropriate for the size and nature of the system. No concerns raised.



Figure 5: The control box as observed during the visit.

No further infrastructure observations were made during this visit.

### **Final Discussion**

I ran through my observations and actions with SW who raised no further questions.

I left site at 12:30.

### **Breaches of permit conditions**

No breaches were recorded during this inspection. Please see a list of actions below.

### **Actions required by dates specified**

1. Provide an example copy of the site's maintenance programme for the benefit of NRW.

**Deadline: 12/11/2025**

2. Provide the waste transfer note for the de-sludge undertaken in August 2025 as evidence of effective management and appropriate disposal of wastes.

**Deadline: 12/11/2025**

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. Ensure all chamber covers are replaced correctly after routine maintenance to restrict water ingress into the system.

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@cyfoethnaturiolcymru.gov.uk](mailto:elis.nuttall@cyfoethnaturiolcymru.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](mailto: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](mailto: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.