

Compliance Assessment Report CAR_NRW0049905

Permit being assessed: BN0156301

For: TROEDYRHIW CARAVAN SITE, held by IDA MARY WILLIAMS

At: TROEDYRHIW, ., VERWIG, CARDIGAN, SA43 IRX.

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

On 11/11/2025, between 13:00 and 13:20.

Parts of permit assessed: See criteria listed below

NRW Lead Officer: Ffion Quan.

Report sent to: Mrs Williams, Caravan park owner, on 05/12/2025.

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	1.1.1(a)
WQ-B1 - Water Quality - Operations - Permitted activities	C3 Minor	2.1.1 table S1.1

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.	05/03/2026
WQ-B1	Comply with condition 2.1.1 of permit BN0156301, or apply for a new Environmental Permit to enable you to carry out a different discharge activity to that specified in permit BN0156301.	05/06/2026

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.

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 visit carried out by Natural Resources Wales (NRW) officer Ffion Quan, accompanied by Troedyrhiw Caravan Site owner.

NRW officer Ffion Quan arrived on site at 13:00.

The process

The current system at Troedyrhiw Caravan Site is a package treatment plant (PTP) discharging into the Afon Mwldan. The outfall into the Afon Mwldan is accessible and the discharge appeared to be clear at the time of the visit. See photograph below.



Photograph 1: Outfall into the Afon Mwldan

The PTP system is regularly checked by yourselves during the season and is maintained by the local waste management company.

Non-compliances

On your current permit, as per permit condition 2.1.1 Table S1.1, the description of activity is as follows, 'Groundwater activity: discharge into land of sewage effluent from a septic tank via a soakaway system at National Grid Reference SN 20400 49200'. It was discussed during the visit that this system was upgraded a couple of years ago and the system is now a package treatment plant (PTP) discharging to the Afon Mwldan. This is a different discharge activity and is therefore a breach under condition 2.1.1 of your permit BN0156301. A category 3 non-compliance has been recorded for the non-compliance which has the potential to have a minor environmental effect. NRW deem that the change in activity has the potential to have a minor impact due to the proximity of the PTP discharge to the Banc Y Mwldan Site of Special Scientific Interest (SSSI). Banc Y Mwldan SSSI has a number of special features which rely on the calcium-rich groundwater which springs from the ground in a number of seepages and flushes across the site. Nutrient enrichment and changes in the composition of this water has the potential to directly harm

these features. There is a potential for minor impact to these features as the unpermitted discharge inputs the Afon Mwldan which is hydrologically linked to the SSSI.

In order to rectify this non-compliance, Troedyrhiw Caravan Site are asked to comply with condition 2.1.1. of permit BN0156301, or apply for a new Environmental Permit to enable them to carry out a different discharge activity to that specified in permit BN0156301. Troedyrhiw Caravan Site are asked to complete this by no later than 05 June 2026.

As discussed during the visit, as per permit condition 1.1.1(a), you are required to operate under a written management system. Condition 1.1.1(a) stated that Troedyrhiw Caravan Site are required 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'*. Troedyrhiw Caravan Site do not currently have and operate under a written management system. Please prepare a written management system and provide NRW with a copy by no later than the 05 March 2026. Please find a link to the NRW guidance document *'How to Comply with Your Environmental Permit'*. On page 12, there is a section outlining requirements for a written management system- [How to comply with your environmental permit.](#)

Other recommendations

As Troedyrhiw Caravan Site is a seasonal site, it was mentioned during the visit that the PTP gets switched off during the winter months. Reducing or stopping the flow of sewage into the PTP for a period of time can result in microbial die-off, leading to an ineffective treatment process. As most package treatment plants rely on biological processes to break down organic matter, when the plant is shut down for an extended period and then restarted, the system may need time to re-establish a healthy biomass, which can lead to poor treatment performance initially. Troedyrhiw Caravan Site should therefore consider measures to maintain microbial activity within the PTP during the winter months and/or strategies to increase the microbial population before Troedyrhiw Caravan Site reopens.

If you have any queries regarding the contents of this report, please don't hesitate to contact.

Thank you for your time during the visit.

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.