

## Compliance Assessment Report CAR\_NRW0050167

<p><b>Permit being assessed:</b> CP3621XJ  For: PEN Y FAN CARAVAN AND LEISURE PARK, held by Pen-Y-Fan Caravan and Leisure Park Limited  At: MANMOEL ROAD, MANMOEL, BLACKWOOD, GWENT, NP12 0HY.</p> <p><b>Type of assessment carried out:</b> Site Inspection, Reason: Routine.  On 26/11/2025, between 10:00 and 11:00.  Parts of permit assessed: Site Operations</p> <p><b>NRW Lead Officer:</b> Gavin Dodd.  <b>Report sent to:</b> Graham Davies , Site Manager, on 16/12/2025.</p>
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### 1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C2 - Water Quality - Emissions and monitoring - Emissions to land	C3 Minor	3.1 Emissions to water, air or 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.

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

### 2. What action is required?

Criteria	Action needed	Complete by
WQ-C2	Vary the permit to reflect the change in discharge location using the following link: Natural Resources Wales / Change (vary) an existing permit for a discharge of trade or mixed effluent	31/01/2026

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

I (Environment Officer Gavin Dodd) arrived at Pen-Y-Fan Caravan and Leisure Park, Gwent on Wednesday November 26th 2025 at 10:05 to conduct an inspection regarding two discharges of secondary treated sewage effluent from two package sewage treatment plants to two separate soakaways on site (Permit Number CP3621XJ). Sub contractor Carl Davies was also in attendance.

The first system (associated with Outfall 1) was located at SO 18913 01152- this location was accurate to the discharge point specified in the permit and the alarm panel was still in place. The system consisted of three chambers with improvement in the quality of effluent from the first to final chamber. There appeared to be no carry over of solids to the final chamber. On lifting the inspection chamber, there was no odour and the discharge appeared clear. The discharge was being made to ground via an infiltration system.

The second system (associated with Outfall 2) has changed since the previous inspection; the system was upgraded to a GRAF package treatment plant. This system includes additional cycling of effluent back to the initial chamber for further treatment before discharging to the second and final chambers, with aeration as part of the treatment process. A vent had also been installed to mitigate any odours but none were present during the inspection. The inspection chamber was lifted and did not have any odour and the discharge appeared clear.

While this new system is more advanced than the previous one and the discharge is still being made to ground via an infiltration system, the site is in breach of the permit as the discharge point has changed.



Fig1: External view of system one



Fig2: Inspection chamber of system one



Fig 3&4: External view and interior of the new system associated with Outfall 2

**Breaches of Permit Condition**

**3.1 Emissions to water, air or 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.

**Justification-** While the system has been updated, the discharge point for the system associated with Outfall 2 is now inaccurate.

**Actions required by date specified**

1.) Vary the permit to reflect the change in discharge location using the following link: [Natural Resources Wales / Change \(vary\) an existing permit for a discharge of trade or mixed effluent](#)

**The deadline for the above action is 31st January 2026**

**Advisories**

Provide the most recent waste transfer notes for both systems.

**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](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.