

Compliance Assessment Report CAR_NRW0051607

Permit being assessed: AN0325301

For: TRAVELLERS REST INN, **held by:** MITCHELLS & BUTLERS RETAIL LIMITED

At: THORNHILL, ., ., CAERPHILLY, CF83 1LY.

Type of assessment carried out: Site Inspection,

Reason: Routine.

On 22/04/2026, between 12:00 and 12:30.

Parts of permit assessed: Site operations

NRW Lead Officer: Gavin Dodd.

Report sent to: Tania Jones , Manager, on 23/04/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-A1 - Water Quality - Management - General management	C3 Minor	Condition 1.1.1 (a) General Management- The operator shall 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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
		the operator as a result of complaints
WQ-D1 - Water Quality - Information - Records	C3 Minor	Condition 4.1.2 Records- The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency
WQ-C2 - Water Quality - Emissions and monitoring - Emissions to land	C3 Minor	Condition 3.1.1 & 2 Emissions to 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 & the limits given in schedule 3 shall not be exceeded
WQ-C2 - Water Quality - Emissions and monitoring - Emissions to land	C3 Minor	Condition 3.3 Monitoring- 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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
		otherwise agreed in writing by the Environment Agency.

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	Submit the written management plan for the system	08/05/2026
WQ-D1	Submit maintenance logs for the system and the waste transfer notes from having it emptied (from the most recent to when the previous CAR form was issued)	08/05/2026
WQ-C2	Produce an investigative report highlighting the reason for poor quality final effluent and resolve these issues. Bring the system into compliance with permit conditions.	08/05/2026
WQ-C2	Change the lock on the fence door and keep a key on site to facilitate easier access for future sampling and inspections	08/05/2026

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.

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

I (Environment Officer Gavin Dodd) arrived at the Travellers Rest Inn, Thornhill Road, Caerphilly CF83 1LY at 12:00 on 22nd April 2026 to conduct an inspection regarding a discharge of trade and sewage effluent to a soakaway system. Site manager Tania Jones was also in attendance.

I initially established that the actions from the previous CAR form (from a visit on 3rd September 2025) had not been completed. Before commencing the inspection, I explained that these actions would be added to this CAR form and need to be completed with the new deadline.

This CAR form is issued with a warning and if the actions required are not completed by the date specified, a Notice will be served to achieve compliance.

The chambers of the treatment could not be inspected as they were locked shut. The sampling point was accurate to that stipulated in the permit, though the effluent had not been treated to a high enough standard for discharge as evidenced by the heavy concentration of solid waste present. While it was not actively discharging during the visit, this concentration of solid waste would not be getting any further treatment prior to discharge and so was a breach of the permit.



Figure 1: Treatment system



Figure 2: Final effluent chamber

Breaches

1.) Condition 1.1.1 (a) General Management- The operator shall 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

Justification: No written management plan was available at the time of the visit

2.) Condition 4.1.2 Records- The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

Justification: Waste transfer notes and maintenance logs were not available/stored on site

3.) Condition 3.1.1 & 2 Emissions to 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 & the limits given in schedule 3 shall not be exceeded

Justification: Table 3.1 specifies that the limit for suspended solids in the discharge is 60 mg/l. Final effluent at the sampling point visibly exceeds this due to the amount of solid waste in the chamber

4.) Condition 3.3 Monitoring- 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 the Environment Agency.

Justification: Sampling equipment would not currently be possible to take to the sampling point due to a locked door blocking access

Actions required by date specified

- 1.) Submit the written management plan for the system
- 2.) Submit maintenance logs for the system and the waste transfer notes from having it emptied (from the most recent to when the previous CAR form was issued)
- 3.) Produce an investigative report highlighting the reason for poor quality final effluent and resolve these issues
- 4.) Change the lock on the fence door and keep keys on site to facilitate easier access for future sampling and inspections
- 5.) Bring the system into compliance with permit conditions
- 6.) Have the system (and final effluent point) emptied and serviced

The deadline for the above actions is 8th May 2026

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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

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 Monitoring
- WQ-C5 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

Enforcement response

Any non-compliance with a permit condition 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 twenty working days to let you know if we agree to your request.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.