Compliance Assessment Report CAR_NRW0053176

Permit being assessed: WB3797TG

For: STP AT CELTIC MANOR RESORT, **held by:** The Celtic Manor Resort

At: HUNTER LODGES, CELTIC MANOR, COLDRA WOODS, NEWPORT, NP18 1HQ.

Type of assessment carried out: Site Inspection,

Reason: Routine.

On 01/10/2026, between 10:02 and 11:25.

Parts of permit assessed: Permit compliance

NRW Lead Officer: Elis Nuttall.

Report sent to: Simon White, Facilities Manager, on 09/10/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-B1 - Water Quality - Operations - Permitted activities	Ongoing (O)	2.1.1 Permitted Activities
WQ-B3 - Water Quality - Operations - Operating techniques	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-B1	Work towards re-establishing the reed bed to provide tertiary treatment for the effluent. This is dependant on the requested guidance from NRW being provided.	09/04/2027
WQ-B3	Provide evidence of the most recent de-sludge completed for the system in the form of waste transfer notes.	09/11/2026

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

Site Inspection Report

This report details the site inspection made by Natural Resources Wales (NRW) on the 01/10/2026 to the package treatment plant serving Hunter Lodges, The Celtic Manor Resort, permit reference number EPR-WB3797TG.

I (NRW Environment Officer Elis Nuttall) attended Hunter Lodges at 10:02 for a water quality permit compliance inspection where I met with the site's Facilities Manager (SW). The weather was mixed with intermittent rain.

It is noted that this inspection was conducted concurrently with an inspection of a second permit held by the site (AN0401901), which is outlined in a separate report.

General Observations

This permit regulates the discharge of secondary treated domestic sewage effluent (via a Package Treatment Plant and reed bed) into an unnamed tributary of the River Usk, serving 10 holiday accommodation lodges. The emissions from this treatment plant shall not exceed the following limits, as specified in condition 3.1.2 of the permit:

- Maximum daily discharge volume: 18 m^3/day
- ATU-BOD as O_2: 20mg/l
- Suspended solids: 30mg/l
- Ammoniacal nitrogen (expressed as N): 5mg/l
- Visible oil or grease: No significant trace present

The discharge shall be made via a lined reed bed centred on ST3631791513, with the consented discharge/sample point outlet located at ST3630591521.

The site was operational at the time of the inspection.

Initial Discussion

This was my second compliance inspection of this system, so I was familiar with the arrangement and operating process. On reviewing the previous inspection, several breaches were highlighted which I discussed with SW to begin this inspection. Access issues were stated to have now been resolved with permeant pathways established to both the control box and sample point. SW noted that ensuring access via vegetation clearance has now been added to the site's management regime. The other breach recorded was related to the function of the reedbed which is a condition as part of the tertiary treatment for the system. SW noted that no actions have been taken since the previous inspection to re-establish the reed bed after it previously failed. The reason given for the lack of progress was that SW was waiting on NRW to provide the required guidance and suggestions on how to undertake the work. I agreed to prioritise this so that the site

can commence the remediation of the reedbed as soon as possible.

Regarding general management SW noted that the system was working effectively with no need for any major maintenance or the need to take the system offline for any reason. No operational changes have occurred on site, so capacity remains sufficient.

We then proceeded to inspect the site infrastructure.

Infrastructure Inspection

We began the infrastructure inspection by observing the reed bed and sample point. As can be seen in Figure 1, while there are some reeds present, the uptake is not sufficient to function as effective tertiary treatment. While a non-compliance (condition 2.1.1), as this was previously scored and SW has expressed a desire to re-instate the reed bed it will be classified as an ongoing non-compliance with assistance from NRW forthcoming. This is reflected in the breach and actions lists below.



Figure 1 – The reed bed as observed during the inspection. Lack of sufficient growth and establishment is evident.

The sample point is now completely accessible as the site has addressed the vegetation overgrowth which is now a part of the site's management regime. The sample point itself was clear of any visible staining or pollution and the downstream pond displayed a good standard of water quality. There was no discharge at the time of the inspection, but the

outlet pipe is now easily available for sampling to take place. No concerns were raised. These observations can be seen in Figure 2 below.



Figure 2 – The sample point and access path as observed during the inspection.

On arrival, the treatment system itself was accessible with general site conditions being good (Figure 3). No obstructions or visible defects to the chambers were observed, however due to the commercial needs of the site the chambers are covered by a section of artificial turf to function as a visual barrier.



Figure 3 – The treatment system location as observed during the inspection.

Each chamber of the treatment system was opened in sequence (direction of flow) and their condition assessed. The observations made can be seen in Figure 4 and are outlined below.

1. Primary settlement chamber – The chamber contained settled solids as expected but the contents appeared very dry with no indication of recent input. SW noted that

residency within Hunter Lodges was low at the time of the inspection, hence the apparent low inputs. I advised that the system should be de-sludged prior to the busier winter months to ensure sufficient capacity. I also requested evidence of the most recent de-sludge via waste transfer notes as an indication of effective management. The chamber itself was in a good condition with no cracks or defects present in the walls and all material being contained effectively. No other concerns were raised.

2. Secondary settlement chamber – Similarly to the primary settlement chamber, this secondary chamber was holding solids with no liquid effluent present. The previous advisory note is applicable here also regarding de-sludge requirements. No cracks or defects were present, so I raised no concerns.

3. Aeration chambers (2) – Both aeration chambers were working well at the time of the inspection. There was good dispersal of air through the effluent, and no concerning vibrations or noises present that would indicate a fault. The chambers were in a good condition with no cracks or defects present.

4. Final effluent chamber – The effluent with the final chamber appeared clear with no perceivable presence of solids carried over. There were no noxious odours present which indicates effective treatment. The volume of effluent was not sufficient to overflow into the outlet pipe at the time of the inspection, which explains the lack of discharge observed at the sample point. It is assumed that the lack of occupancy and associated lower inputs of untreated effluent is the primary cause of this. The chamber itself was in a good condition with no cracks or defects present. I raised no concerns.







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.