

Compliance Assessment Report CAR_NRW0042718

Permit being assessed: BN0064401

For: MORFA BYCHAN HOLIDAY PARK, held by Lickhill Manor Ltd

At: LLANFARIAN, ., ABERYSTWYTH, CEREDIGION, SY23 4QQ.

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

On 06/09/2023, between 10:27 and 11:00.

Parts of permit assessed: 1.1; 2.1; 2.2; 3.1; 3.2; 3.3

NRW Lead Officer: Bethan Lewis, accompanied by: Jade Whitlock.

Report sent to: Gary Brunt, Park Manager, on 30/10/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Management - General management	C4 No impact	1.1.3
WQ-B1 - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Operations - The site	Assessed (A)	
WQ-C2 - Emissions and monitoring - Emissions to land	Assessed (A)	

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	Ensure that a copy of the permit is kept at or near the place where duties are carried out.	27/11/2023

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 inspection undertaken at Morfa Bychan Holiday Park's Package Treatment Plant (PTP) (BN0064401) by Natural Resources Wales (NRW) Officers Bethan Lewis and Jade Whitlock. The NRW Officers were accompanied by Mr. Gary Brunt, one of the Park Managers.

The site inspection commenced at 10:27 hours on the 06 September 2023 and concluded at 11:00 hours. The weather at the time of the inspection was warm and dry.

The PTP serves all 324 caravans and facilities at Morfa Bychan Holiday Park and can cope with flows of up to 100m³/day. The maximum amount of water used across the site in 2023 is however believed to have been 65m³/day, which is beneath the maximum daily flow (80m³/day) permitted to be discharged under the permit.

From ground level, the PTP is viewed as several chambers as shown in photograph 1 below. The NRW Officers found the site to be kept clean and tidy.



Photograph 1: PTP at Morfa Bychan Holiday Park

The final effluent sampling point was opened during the inspection as shown in photograph 2 below. The final effluent appeared clear with no odour, sewage fungus, or oil or grease visible.



Photograph 2: Final effluent sampling point

Sludge is said to be periodically removed from the PTP 3 to 4 times a year, with the PTP serviced at the same time. At the end of September, the PTP is reduced to half its total capacity in preparation for the quieter winter period. The PTP is then returned to full capacity ahead of the busier Spring/Summer season.

Following treatment, final effluent from the PTP is discharged to land via a drainage field with 12 outlets across two neighbouring fields. The drainage field was found to be dry at the time of the inspection and the NRW Officers did not observe any signs of pollution.

Finally, at the site office, the NRW Officers were shown documentation relating to the PTP including plans and health and safety information. It became apparent that no copy of the discharge permit BN0064401 was kept on site. Condition 1.1.3 of the permit states that *"any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out"*. As no permit was found to be kept on site, a category 4 non-compliance has been recorded above for a breach which has no potential environmental effect. To rectify this breach, NRW ask the site operators to ensure that a copy of the permit is kept at or near the place where duties are carried out by no later than the **27 November 2023**.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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.