

Compliance Assessment Report CAR_NRW0042783

Permit being assessed: CG0046101

For: SEA RIVERS CARAVAN PARK, held by SEARIVERS LEISURE SALES LTD`
At: YNYSLAS BEACH BORTH, BORTH, GWYNEDD, NORTH WALES, SY24 5JZ.

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

On 06/09/2023, between 14:00 and 15:05.

Parts of permit assessed: 1.1; 1.2; 1.3; 1.9; 1.10

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

Report sent to: Oliver South, Director of Sea Rivers Leisure Sales LTD, on 20/12/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Emissions and monitoring - Emissions to water	C4 No impact	1.3.1
WQ-C1 - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-B1 - Operations - Permitted activities	Action only (X)	
WQ-A1 - Management - General management	Assessed (A)	
WQ-B2 - Operations - The site	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-C1	Locate a key to lift the sample point manhole cover and provide NRW with a photograph of the open manhole as evidence of this.	12/02/2024
WQ-C1	Confirm whether water within the newly dug ditch discharges into the final effluent sample point, and if not, confirm where the water discharges.	12/02/2024
WQ-B1	Confirm whether a flow meter has been installed, and if so, when; and confirm whether you still intend to apply for a permit variation to increase the volume of effluent permitted to be discharged between the 01 November and 01 March.	12/02/2024

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 Sea Rivers Caravan Park's Sewage Treatment Plant (STP) (CG0046101) by Natural Resources Wales (NRW) Officers Bethan Lewis and Jade Whitlock. The NRW Officers were accompanied during the visit by a member of staff, and spoke briefly with Mr. Oliver South, one of the two directors at Sea Rivers Leisure Sales LTD, the operators.

The site inspection commenced at 14:00 hours on the 06 September 2023 and concluded at 15:05 hours. The weather at the time of the inspection was warm and dry.

On arrival, the NRW Officers were accompanied to the STP as shown in photographs 1 and 2 below. It was stated that the STP serves all caravans on site and is emptied, cleaned and serviced twice a year.



Photograph 1: Sewage Treatment Plant (STP) as viewed from ground level



Photograph 2: Sewage Treatment Plant (STP) as viewed from above

As shown in photographs 1 and 2, the STP was found to be surrounded by vegetation. This in itself is not problematic so long as access to the STP is maintained and the treatment process is not impeded. Sea Rivers Leisure Sales LTD are reminded that they must monitor and manage the vegetation as necessary to prevent this from happening.

The NRW Officers noticed a strong sewage odour in the vicinity of the STP, however it was not immediately clear whether this odour stemmed from the normal day-to-day operation of the STP and/or the final effluent. Beside the STP is a final effluent sample point in the form of a manhole as shown in photograph 3 below. At the time of the inspection, the staff member could not locate a key to lift the manhole cover. The NRW Officers were therefore unable to visually inspect the final effluent. Without being able to open the manhole, the quality of the final effluent cannot be monitored and/or sampled. Given the sewage odour noted in the vicinity of the STP, this was a concern to the NRW Officers.

Condition 1.3.1 of permit CG0046101 states that *"The outlet to controlled waters shall be constructed and maintained so that a representative sample of the Discharge may be obtained"*. The site plan attached to the consent shows this outlet at the location of the manhole described above. As a representative sample of the discharge cannot be obtained without a key to lift the manhole cover, NRW believes this represents a breach of permit. A category 4 non-compliance has therefore been recorded above for a non-compliance which has no potential environmental effect. To rectify this breach, NRW ask Sea Rivers Leisure Sales LTD to locate a key to lift the sample point manhole cover and provide NRW with a photograph of the open manhole as evidence of this by no later than the 12 February 2024.



Photograph 3: Final effluent sample point

During the inspection, Mr. Oliver South commented that a ditch (as shown in photograph 4 below) had recently been dug along the northern boundary of the field where the final effluent sample point is situated. It was not entirely clear during the inspection whether water within this ditch fed into the final effluent sample point photographed above. If water within the ditch discharges into the final effluent sample point, final effluent samples collected would not be considered representative of the discharge under condition 1.3.1. NRW therefore ask Sea Rivers Leisure Sales LTD to confirm whether water within the newly dug ditch discharges into the final effluent sample point, and if not, confirm where the water discharges, by no later than the 12 February 2024.



Photograph 4: Recently dug ditch potentially discharging into final effluent sample point

Although the NRW Officers were unable to view final effluent at the sample point described above and shown in photograph 3, the officers were accompanied to view a downstream chamber where the final effluent meets a surface water line discharging from adjoining land.

The inside of this chamber is shown in photograph 5 below, where the pipe carrying surface water is highlighted in red and the pipe carrying final effluent in green. As high tide had occurred approximately 1 hour beforehand, the chamber was found to be flooded with water from the Afon Leri. It was therefore not possible for the NRW Officers to assess the quality of the final effluent discharging into the chamber. The NRW Officers did not however notice any obvious sewage odour when inspecting the chamber.



Photograph 5: Surface water (red) and final effluent (green) chamber

Prior to discharging into the Afon Leri, the final effluent mixed with surface water passes through a final raised brick chamber as shown in photograph 6 below. Due to the recent high tide, the outfall into the Afon Leri was submerged at the time of the NRW Officers' attendance and could not be viewed. The Afon Leri however appeared clear in the general vicinity of the outfall (see photograph 7 below), and the NRW Officers did not notice a sewage odour.



Photograph 6: Raised brick chamber



Photograph 7: Afon Leri at point of discharge

Condition 1.4 of permit CG0046101 states that the volume of effluent discharged into the Afon Leri shall not exceed 87 cubic metres per day between the 01 March and 31 October, and 5 cubic metres per day between the 01 November and 01 March. As Sea Rivers Caravan Park remains open between the 01 March and 09 January, it is possible that condition 1.4 is breached between the 01 November and 09 January when the lower discharge limit is in force but the site remains open. During August 2017, Michelle South, then Director of Sea Rivers Leisure Sales LTD wrote to NRW stating the intention to install a flow meter at Sea Rivers Caravan Park in readiness for applying for a permit variation to increase the volume of effluent permitted to be discharged between the 01 November and 01 March. NRW ask Sea Rivers Leisure Sales LTD to confirm whether the flow meter has been installed, and if so, when; and to confirm whether they still intend to apply for a permit variation to increase the volume of effluent permitted to be discharged between the 01 November and 01 March. As with all other actions, NRW ask Sea Rivers Leisure Sales LTD to do this by no later than the 12 February 2024.

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.