

Compliance Assessment Report CAR_NRW0043250

Permit being assessed: WQD006817
 For: GOLFING FACILITIES, held by COTTRELL PARK LIMITED
 At: COTTRELL PARK, ST NICHOLAS, CARDIFF, SOUTH GLAMORGAN, CF5 6SJ.

Type of assessment carried out: Site Inspection, Reason: Routine.
 On 29/08/2023, between 10:15 and 11:00.
 Parts of permit assessed: 2, 3, 4

NRW Lead Officer: Charlotte Rhodes.

Report sent to: Derek Smith, General Manager, on 21/02/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Operations - Permitted activities	Assessed (A)	
WQ-C2 - Emissions and monitoring - Emissions to land	C3 Minor	3.3.1
WQ-D1 - Information - Records	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-C2	Grounds team to tidy the area to identify the discharge point and find the missing lid for the septic tank.	Already completed
WQ-D1	Source and supply via email the relevant service history, Waste Transfer notes and service/maintenance photos.	Already completed

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

Visit report/Comments

On 29th August 2023, Officer C RHODES met with the Site Manager and Site Administrator, for a routine inspection of the sewage treatment system servicing Cottrell Park Golf Club, permit number: WQD006817. Weather at the time of inspection was overcast with brief shower of rain.

The treatment plant is maintained by Kingspan, serviced twice yearly including a recent replacement battery pack on the pumps. Settlement tanks used to be emptied once a year by Kingspan also but now by Cardiff Drains.

Treatment plant

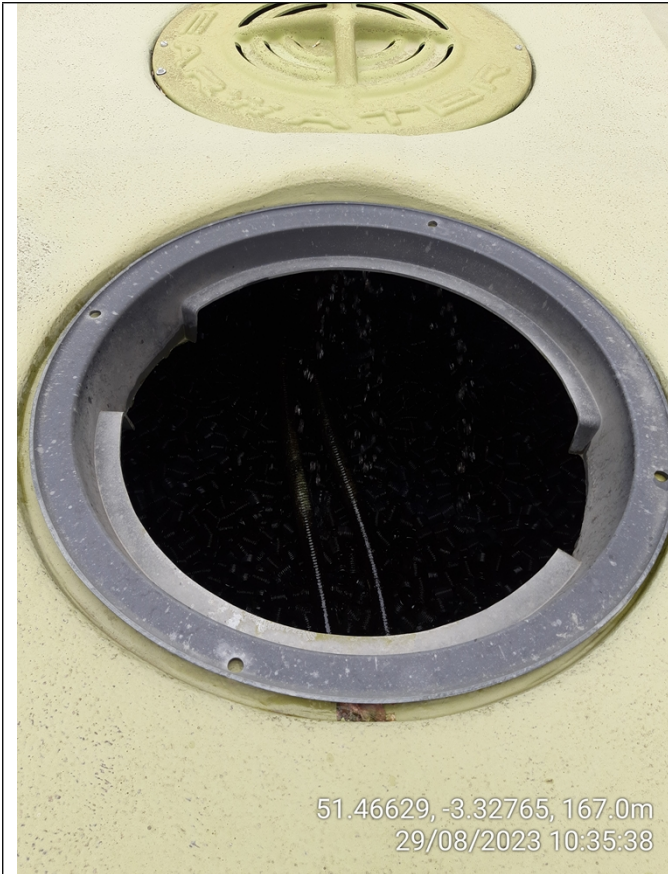
Treatment consists of two underground storage/settlement tanks and an above ground infiltration tank with plastic filter media, before discharge to soakaway.

Condition 2 - No observations were made of permitted activities extending beyond the site or permitted locations.

Condition 3.3.1 - The soakaway location was uncertain; upon checking the grid reference and looking again, the outlet and sample point couldn't be found due to overgrowth however there was no evidence of breakouts – **grounds team to tidy the area and find the missing lid for the septic tank** as introducing rainwater into the system has the potential to impact its effectiveness in treatment.



Looking inside the tank via the missing lid, the input looked quite clear and there was no noticeable odour or build up atop the plastic filter media. Photos below.



Since the site changed to new management, digitisation of all their existing paperwork and records has been underway for ease of access. As this is still in progress, they have not yet found records

containing the full permit and its associated information so requested I send this via email, which I accepted. Waste transfer notes and service history to be provided in due course as the accounts manager was currently delayed returning from annual leave due to the UK air traffic control restrictions the previous day.

The following actions were agreed by both parties.

Actions

Site Manager and/or Administration to source and supply the following info by end of next week (8th Sept):

- Waste transfer notes – Cardiff Drains
- Service history – Kingspan
- Service/maintenance photos – Kingspan
- Clear grounds around discharge area & find outlet/sample point
- Replace the missing tank lid

Officer C RHODES to email a copy of the full permit for the club's digital records.

Subsequent communications - Sep '23 to Jan '24

Service history and Waste Transfer notes were emailed to Officer Rhodes by Site Administrator on 7th September 2023, who responded with the following on 27th September:

- A desludge of the septic tank and/or filter was strongly suggested in Sep 2021 and Oct 22 – I note this was conducted in Nov 22 so I'm satisfied there.
- It was also noted in two previous reports and during my recent visit that one of the tank lids was missing, has this been located now that the area surrounding has been landscaped? Introducing rainwater into the system has the potential to impact its effectiveness in treatment.
- In the first report of Sep 2021 it was stated that the plant was running at 1/6th of its potential, since the pumps have been replaced has this returned to 100%?
- Also, if you've any photos from the Kingspan reports and of the soakaway and sample point now the ground has been cleared please that would be great.

Site Administrator responded on 2nd October that the tank lid had been located (needed to check if replaced securely) and the area had been landscaped. A Kingspan service was scheduled for 20th October which should include photos and confirmation that the plant is running at full capacity. They also offered to send photos of the sample points and soakaway since these had not been clear during the inspection, however these remain outstanding.



13th October - tank lid had been securely replaced as evidenced by photo to the left emailed by Site Administrator.

Resuming communications in January, the service report from October was emailed to Officer Rhodes on 29th January 2024 and confirmed the site had returned to full capacity and was fully operational. Only the

photos of the soakaway and sample point remain outstanding, though a revisit to site may be arranged to cover this.

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.