

Compliance Assessment Report CAR_NRW0046375

Permit being assessed: BE0042801

For: Llanrhidian Holiday Park, held by John Fowler Holidays Ltd

At: Llanrhidian Holiday Park, Llanrhidian, Swansea, Swansea, SA3 1EU.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 19/02/2025 - 27/02/2025.

Parts of permit assessed: Permitted Activities

NRW Lead Officer: Gareth Martin.

Report sent to: Gavin Lewis, General Manager , on 27/02/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Water Quality - Operations - Permitted activities	Assessed (A)	
WQ-B3 - Water Quality - Operations - Operating techniques	Assessed (A)	
WQ-B1 - Water Quality - Operations - Permitted activities	C3 Minor	6. Calibrated apparatus, approved in writing by the Authority, shall be provided and maintained in full working order, to permit the instantaneous rate of flow of effluent discharged to be measured accurately at any time

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	Assess the feasibility of installing a flow meter of the correct standards as per permit conditions. Continue to provide annual abstraction returns data,	01/08/2025

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

On 27.02.25 we conducted a data audit and review of sampling conducted throughout 2024 to inform the following...

Permit Condition 3 refers to the location of the discharge point, which had not been inspected during our last full site inspection in 2023, due to tidal conditions. On 22.11.24 we inspected the discharge point and confirm it is correctly located as per the permit. Possibly due to bankside erosion, the discharge point overhangs the river bank by several metres and discharges into the middle of the channel. This may require monitoring in future to ensure that further erosion does not result in the pipe collapsing into the watercourse. We have discussed this on site previously and you are aware that this may require monitoring.

Permit Condition 4 requires that the discharge shall be no greater than 100m³ per day. This cannot currently be assessed accurately as no flow monitor is in place. In its place you were able to provide daily abstraction records for 2024, the most you abstracted at any point was 87m³ a day, although we cannot account for additional volume from surface water run-off etc, this suggests you have not exceeded your permitted discharge limit at any point. We understand that your abstraction limit is 95m³ a day and at no point did you exceed this.

Permit Condition 5 requires a sampling point be made available to Natural Resources Wales, at NRW's convenience, from where a representative sample may be collected. The sites treatment system is a batch reactor, i.e., not a continuous discharge, which is discharged at night to improve performance and this had previously been an issue that prevented NRW sampling. During our inspection dated 06.09.2023 you suggested that a representative sample could be collected at a pre-arranged time as this would allow you to alter your operations so that the batch reactor was discharging at the time of our sampling visit.

This was trialled throughout 2024 as the site was subject to monthly sampling and analysis. A representative sample was collected from the marked sample point at a pre arranged time and date each month, the results of the analysis are as follows.

Sample Folder ID	Month	Sample Date	BOD (Max-50mg/l)	Suspended Solids (Max-60mg/l)		Comments
N/A	January				No Sample collected - Park closed	
2400107	February	06/02/2024	32.2	60	Dry & Overcast. Park reopen for less than	
2400108	March	05/03/2024	16.8	45	Dry	
2400109	April	02/04/2024	87.9	137	Dry day. Strong smell from sample chamb	
2400110	May	07/05/2024	1.45	23		
2400111	June	04/06/2024	3.66	41		
2400112	July	02/07/2024	3	15.5	Very low flow	
2400113	August	13/08/2024	1	20.5		

2400114	September	03/09/2024	33	13.5		
2400115	October	01/10/2024	12.1	15.5		
2400116	November	05/11/2024	337	76	Broken plant	
2400117	December	03/12/2024	64.4	66	Follow on from broken plant - tank not re	

Separate CAR forms were issued for the 3 non-compliant samples collected in April, November and December, resulting in actions to ensure essential maintenance is carried out on schedule to avoid breakdowns and to arrange for a tanker contract to be in place to avoid a discharge to the environment as a result of future breakdowns.

On 11.02.2025 you reported a failure of a component in your Sewage Treatment Works but confirmed that tankering was already in place and therefore there had been no discharge of polluted matter. You also informed us that the broken component had been added to your replacement schedule to limit the risk of the same component breaking in future, demonstrating that the requirements of the previous CAR had been actioned.

Permit condition 6 states that calibrated flow monitors shall be in place. There are no calibrated flow monitors in place which is a breach of permit condition 6. Please investigate the feasibility of installing a flow monitor. As discussed during our last site inspection, it is possible that the discharge falls below the threshold for requiring flow monitoring and we will investigate this further.

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.