

Compliance Assessment Report CAR_NRW0049105

Permit being assessed: WQD002107

For: BLUESTONE LEISURE LTD NARBERTH PEMB, held by BLUESTONE RESORTS LTD

At: BLUESTONE LEISURE LTD, THE GRANGE, CANASTON WOOD NARBERTH, PEMBROKESHIRE, SA67 8DE.

Type of assessment carried out: Check Monitoring/Sampling, Reason: Other.
On 05/06/2025.

Parts of permit assessed: S3.1

NRW Lead Officer: Caryl Brace.

Report sent to: Andrew Charlton, Head of Facilities and Maintenance, on 04/09/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	S3.1

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	Improve Operations	31/08/2025

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

A routine sample taken on 5 June 2025 returned a Suspended Solids result of 23 mg/l against a permit limit of 18 mg/l.

Please can you advise as to the reasoning for this failure by 31 August 2025.

Email received from Operator on 25 August.

I acknowledge the suspended solids results (of 23 mg/l) from your UKAS lab, following the

sample taken Thursday 5th June 2025.

Coincidentally, we also took our own monthly samples on that same afternoon – for UKAS lab analysis. Our results were: 14 mg/l spot sample & 15.2 mg/l composite sample. I have attached the UKAS certificate.

Moreover, I'd like to highlight that on that very day, we began the drain-down of our sand filter in readiness for planned repair works on Monday 9th June, by specialist external contractor Jacopa.

Ahead of this planned project, I had asked NRW for express permission to by-pass our sand filter for the duration of the project, which was agreed.

Jacopa advised minimum 2-3 days to fully drain and dry the sand filter before their Monday 9th arrival, so on Thursday 5th we would have been in day 1 of by-pass mode (drain-down start) at the time of the NRW sample being taken.

During this time we would not have been operating with sand filter tertiary treatment.

I would be most grateful if the CAR could be reviewed and reconsidered under mitigating circumstances, without being published as a C3 Minor result.

NRW response of 27 August 2025

On 15 May 2025 Bluestone Leisure Ltd sent an email to inform NRW that maintenance was to be carried out on the sand filter, this email also stated that the effluent discharge would remain within permit limits, on that basis we were happy for you to proceed.

The sample we took on 5 June 2025 was processed at our accredited lab and as such the result remains valid.

The C3 score attributed to the result reflects only a minor permit breach.

No further action. 4 September 2025

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.