

Compliance Assessment Report CAR_NRW0049191

Permit being assessed: CG0123301

For: GORSE HILL CARAVAN PARK TREFRIW ROA, held by GORSE HILL CARAVANS LTD

At: GORSE HILL CARAVAN PARK TREFRIW, TREFRIW ROAD CONWY, CONWY, CONWY, CONWY.

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

On 12/08/2025, between 10:30 and 12:15.

Parts of permit assessed: 4

NRW Lead Officer: Nathan Owen.

Report sent to: Chris Buckley , Operations Manager , on 08/09/2025.

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	C2 Significant	4 suspended solids
WQ-B1 - Water Quality - Operations - Permitted activities	C1 Major	4 Biochemical Oxygen Demand

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	To comply with permit condition 4, Bring Suspended Solids below 30mg/l	02/03/2026
WQ-B1	To comply with permit condition 4, Bring BOD down to permitted level of 20mg/l	02/03/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

RE issued on the 08/09/2025 to account for an additional breach which should have

been issued during the original CAR dated 12/08/2025

On 12 August 2025, NRW Officer Nathan Owen conducted a site visit to Gorse Hill Caravan and Lodge Park. Weather conditions on the day were warm and dry, with minimal rainfall having occurred across the catchment area for several weeks.

Upon arrival, officers were met at reception by Mr Rob Thomas and the site groundsman. During discussions, Mr Thomas outlined the actions taken to bring the permitted treatment plant into compliance with NRW requirements. These actions included:

- Regular maintenance and emptying of the treatment plant
- Engagement of specialist contractors to oversee maintenance and refurbishment
- Investigations into surface water management within the park

Mr Thomas also advised that a grease trap/separator is scheduled to be installed at the park's restaurant, with the installation planned for December 2025.

Image 1 – inlet screen.



Image 1 depicts the inlet screen of the treatment plant. It is noted that the grill spacing is relatively wide, which may permit the passage of solid materials such as rags into the distribution chamber. Additionally, there is a visible accumulation of fats, oils, and grease (FOG) on and around the screen, indicating potential issues with upstream waste management and the need for further mitigation measures.

Image 2 - Ammonia field readings



Please note the Ammonia reader above has maximum limit of 9.99mg/l as such an accurate field reading was not possible on site due to the range of the meter, however from the field tests it is clear there are significant concentrations of ammonia within the final effluent being discharged to the environment.

On the day due to the field readings causing concern officers took a formal sample for laboratory analysis the results of these are –

Permit No	Permit Holder	Sampling No	Sampling Date	Sampling Time	Reason	Det	Det Name	Limit 1		
								Type	Limit 1	Sign Result
CG0123301	GORSE HILL CARAVANS LTD	250196801	12 August 2025	11:50:00	UF	0085	BOD : 5 Day ATU	Max	20	114
	GORSE HILL CARAVANS LTD		12 August 2025							
CG0123301	LTD	250196801	2025	11:50:00	UF	0135	Solids, Suspended at 105 C	Max	30	114

Based on the laboratory results referenced above, it is evident that the treatment plant at Gorse Hill Caravan and Lodge Park is not operating in accordance with the standards required under the conditions of its environmental permit. Specifically, the site is in breach of **Condition 4** of the issued permit, which sets limits for effluent quality prior to discharge.

Required Actions:

Natural Resources Wales (NRW) has instructed Gorse Hill to stop all discharges to the environment with immediate effect. All effluent generated on site must be removed by tanker until such time as the treatment plant is fully operational and consistently meeting the discharge limits specified in Condition 4 of the permit.

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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.