

Compliance Assessment Report CAR_NRW0049773

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: Check Monitoring/Sampling, Reason: Routine.
On 19/08/2025.

Parts of permit assessed: Conditions 1.6.1 and 1.6.2

NRW Lead Officer: Bethan Lewis, accompanied by: Carol Fielding, Heidi Markham, John McMahon.

Report sent to: Oliver South, Director of Sea Rivers Leisure Sales LTD, on 06/11/2025.

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	1.6.2
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	1.6.1
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C2 Significant	1.6.1
WQ-B2 - Water Quality - Operations - The site	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-C1	Regularly desludge the sewage treatment plant in accordance with condition 1.10.1(c); inspect the final effluent sample point regularly to ensure that the final effluent is free-flowing and clear; and maintain the sewage treatment plant in accordance with manufacturer's instructions. Also provide NRW with a copy of your documented maintenance programme.	06/02/2026
WQ-C1	Regularly desludge the sewage treatment plant in accordance with condition 1.10.1(c); inspect the final effluent sample point regularly to ensure that the final effluent is free-flowing and clear; and maintain the sewage treatment plant in accordance with manufacturer's instructions. Also provide NRW with a copy of your documented maintenance programme.	06/02/2026
WQ-C1	Regularly desludge the sewage treatment plant in accordance with condition 1.10.1(c); inspect the final effluent sample point	06/02/2026

Criteria	Action needed	Complete by
	regularly to ensure that the final effluent is free-flowing and clear; and maintain the sewage treatment plant in accordance with manufacturer's instructions. Also provide NRW with a copy of your documented maintenance programme.	
WQ-B2	Confirm whether water within the ditch discharges into the final effluent sample point and explain why NRW officers observed final effluent travelling in two different directions within the final effluent sample point on the 26 August and 17 September 2025. Finally, confirm how final effluent travels from the final effluent sample point to the permitted discharge point into the Afon Leri at SN 61630 93530.	06/02/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 final effluent sample collected from the sewage treatment plant at Sea Rivers Caravan Park by Natural Resources Wales (NRW) at 11:55 hours on the 19 August 2025 was found to contain 106mg/l Biochemical Oxygen Demand (BOD) and 232mg/l suspended solids. The final effluent sample contained a significant trace of visible oil or grease and was heavily discoloured as shown by photograph 1 below.



Photograph 1: Final effluent sample collected from Sea Rivers Caravan Park on the 19 August 2025.

Condition 1.6.1 of permit CG0046101 states that final effluent from Sea Rivers Caravan Park's sewage treatment plant must not contain more than 60mg/l BOD and 80mg/l suspended solids. The BOD and suspended solids concentrations of the final effluent sample collected on the 19 August 2025 exceeded these limits. As the BOD failure was less than twice the absolute limit but not within 20% of the absolute limit, a category 3 non-compliance has been recorded above for a non-compliance that has the potential to have a minor or minimal impact or effect on the environment, people and/or property. As the suspended solids failure was more than twice the absolute limit, a category 2 non-compliance has been recorded above for a non-compliance that has the potential to have a significant impact or effect on the environment, people and/or property.

Condition 1.6.2 of permit CG0046101 states that "*as far as is reasonably practicable, the sewage treatment plant shall be operated so as to prevent the Discharge from containing any significant trace of visible oil or grease*". As a significant trace of visible oil or grease was noted within the final effluent sample collected on the 19 August 2025, a further category 3 non-compliance has been recorded above.

In response to the poor quality final effluent sample collected at Sea Rivers Caravan Park on the 19 August 2025, an NRW officer called Sea Rivers Caravan Park on the 20 August 2025 to ask them to arrange for a suitably qualified person to inspect the sewage treatment plant. This was reiterated in an email sent to the Caravan Park on the 21 August 2025.

NRW officers attended Sea Rivers Caravan Park on the 26 August 2025 and inspected the sewage treatment plant's final effluent sample point at SN 61254 93692 as shown in photograph 2 below. Final effluent discharging from the sewage treatment plant continued to

appear discoloured on this day.



Photograph 2: Final effluent sample point on 26 August 2025. Final effluent appeared discoloured.

Following the NRW officers' visit on the 26 August 2025, Sea Rivers Caravan Park confirmed that they had arranged for the sewage treatment plant to be desludged on the 03 September 2025.

NRW officers reattended Sea Rivers Caravan Park on the 17 September 2025 and inspected the sewage treatment plant's final effluent sample point as shown in photograph 3 below. Final effluent discharging from the sewage treatment plant appeared significantly clearer on this day. A formal final effluent sample was collected at the sample point as shown in photograph 4 below. Analysis of the sample confirmed that it contained 16.3mg/l BOD and 28mg/l suspended solids. The BOD and suspended solids concentrations were within the permitted limits of permit CG0046101.



Photograph 3: Final effluent sample point on 17 September 2025. Final effluent appeared significantly clearer.



Photograph 4: Formal final effluent sample collected on the 17 September 2025.

As desludging the sewage treatment plant on the 03 September 2025 appears to have rectified the non-compliances recorded above, NRW's enforcement response will amount to a warning only. To avoid repeated sample failures however, the permit holder, Sea Rivers Leisure Sales LTD are asked to regularly desludge the sewage treatment plant in accordance with condition 1.10.1(c) of permit CG0046101 which states that "*the sewage treatment plant shall be operated and maintained in accordance with good operational practice such that tanks shall be desludged at sufficient frequency and in such a manner to prevent excessive carryover of suspended solids*". Sea Rivers Leisure Sales LTD are also asked to inspect the final effluent sample point regularly to ensure that the final effluent is free-flowing and clear, and to maintain the sewage treatment plant in accordance with manufacturer's instructions. Although a deadline of the **06 February 2026** has been recorded for these actions above, it is expected that Sea Rivers Leisure Sales LTD continue to undertake these actions whenever the sewage treatment plant is operational.

Condition 1.11.1(a) of permit CG0046101 states that "*the Consent Holder shall establish and operate a documented maintenance programme and record all non-routine actions undertaken that may have adversely affected effluent quality. Copies of the programme shall be made available for inspection by the Agency's officers at all reasonable times*". In light of the sample failures described in this Compliance Assessment Report (CAR), NRW ask Sea Rivers Leisure Sales LTD to provide NRW with a copy of their documented maintenance programme by the **06 February 2026**. Sea Rivers Leisure Sales LTD may find further information on developing an Environment Management System under the below webpage:

<https://naturalresources.wales/permits-and-permissions/water-discharges-and-septic-tanks/discharges-to-surface-water-and-groundwater/develop-an-environment-management-system-for-the-discharge-of-up-to-20-cubic-metres-per-day-of-sewage-effluent/?lang=en>

Although the webpage provides guidance for permit holders who discharge up to 20m³ of

sewage effluent per day, much of the guidance remains applicable to Sea Rivers Caravan Park.

Figure 1 below provides a schematic of Sea Rivers Caravan Park's final effluent sample point. As shown by figure 1, the final effluent sample point consists of a final effluent discharge pipe discharging into a lower open pipe. On the 26 August 2025, flows discharging from the final effluent discharge pipe travelled in a leftward direction within the lower pipe. This is in the opposite direction to the permitted discharge point into the Afon Leri at SN 61630 93530. The lower pipe did not appear to contain any water other than final effluent from the sewage treatment plant. On the 17 September 2025 however, flows discharging from the final effluent discharge pipe travelled in a rightward direction within the lower pipe, towards the permitted discharge point. A flow of water was also present in the lower pipe flowing from left to right which the NRW officers suspected had flowed from the nearby ditch shown in photograph 5 below.

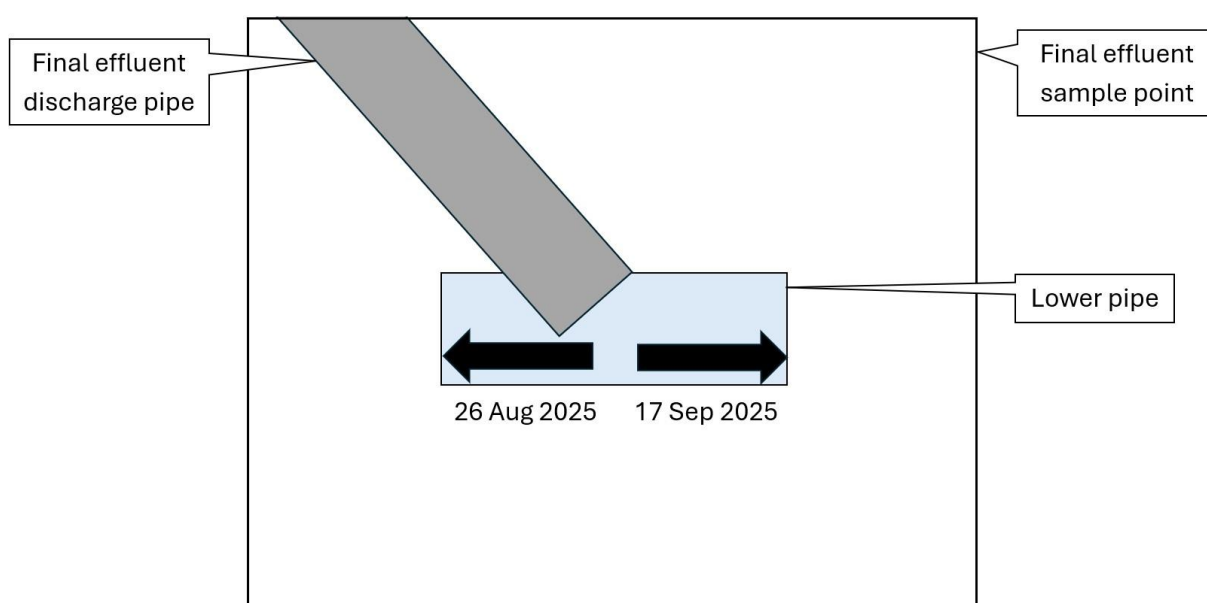


Figure 1: Schematic of Sea Rivers Caravan Park's final effluent sample point.



Photograph 5: Ditch near Sea Rivers Caravan Park's final effluent sample point

Within the most recent Compliance Assessment Report (CAR) issued to Sea Rivers Caravan Park on the 20 December 2023 (Report ID: CAR_NRW0042783), Sea Rivers Leisure Sales LTD were asked to "confirm whether water within the newly dug ditch" (as shown in photograph 5 above) "discharges into the final effluent sample point, and if not, confirm where the water discharges". A deadline of the 12 February 2024 had been set for this, however no response was received from Sea Rivers Leisure Sales LTD. NRW therefore again ask Sea Rivers Leisure Sales LTD to confirm whether water within the ditch discharges into the final effluent sample point and to explain why the NRW officers observed final effluent travelling in two different directions within the final effluent sample point on the 26 August and 17 September 2025 respectively. Given that final effluent appeared to travel in two different directions within the final effluent sample point, Sea Rivers Leisure Sales LTD are also asked to confirm how final effluent travels from the final effluent sample point to the permitted discharge point into the Afon Leri at SN 61630 93530. Sea Rivers Leisure Sales LTD are asked to provide a response to the above by no later than the **06 February 2026**.

If Sea Rivers Leisure Sales LTD wish to discuss the content of this CAR, or require an extension to any of the above deadlines, we ask that they get in touch with the NRW officer highlighted above.

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.