Compliance Assessment Report CAR_NRW0052611

Permit being assessed: CG0151702

For: Hafan Y Mor Holiday Park, **held by:** Bourne Leisure Ltd

At: Hafan Y Mor Holiday Park, Chwilog, Pwllheli, Gwynedd, LL53 6HX.

Type of assessment carried out: Report/Data Review,

Reason: Routine.

On 14/08/2026.

Parts of permit assessed: Event Duration Monitoring (EDM) and reporting

NRW Lead Officer: Sally Sheehan.

Report sent to: Bourne Leisure Limited, Permit holder, on 18/09/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-C4 - Water Quality - Emissions and monitoring - Monitoring	C4 No impact	3.3.5 Effective from the date of installation of EDM monitoring equipment at the Site:The Operator shall take appropriate measures to ensure that the event recorder remains fully operational at all times within the reference period specified in table S3.1. Any failures shall be remedied as soon as reasonably practicable.
WQ-C4 - Water Quality - Emissions and monitoring -	Action only	

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
Monitoring	(X)	
WQ-C4 - Water Quality - Emissions and monitoring - Monitoring	Action only (X)	
WQ-D2 - Water Quality - Information - Reporting	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-C4	Investigate the root cause of the 50 days with missing data and provide the findings to NRW	Already completed
WQ-C4	Once the root cause is identified, create an action plan to improve the EDM operational time.	Already completed
WQ-C4	Confirm that the EDM installed is recording spills in 15 min intervals	Already completed
WQ-D2	Change the format of the data submitted to NRW ready for the submission of 2026 data - more details in the comments section.	28/02/2027

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

This CAR summarises the compliance assessment of event duration monitoring (EDM) permit conditions for the year 2025. In line with the permit, EDM operational time data is submitted retrospectively and reviewed annually. We have assessed the data and have the following comments.

WQ-C4 - Monitoring - Category 4 breach

Breach of permit condition: 3.3.5 Effective from the date of installation of EDM monitoring equipment at the Site: The Operator shall take appropriate measures to ensure that the

event recorder remains fully operational at all times within the reference period specified in table S3.1. Any failures shall be remedied as soon as reasonably practicable.

You have provided the daily spill duration, in hours, for the 12-month period 1/01/2025 - 31/12/25. There are 50 days with data missing, recorded as 'no data' on your spreadsheet. Using this data we have concluded that the operational time for 2025 was 86%. This is a C4 breach of permit as the event recorder should be operational at all times.

Please complete the actions in the above table to become compliant with this permit condition.

WQ-C4- Actions complete

You have confirmed that the data is recorded in 1 minute intervals. Providing a more detailed record than required.

You have investigated the root cause of the missing data. You have identified 4 causes: Processor corruption following a power disruption, a cyber incident, 4G router/signal loss and lack of timely notifications.

Your action plan consists of the following measures:

• One-minute cloud data capture. This has been operational since May 2026.

• Missing data alarms alert the team when expected data does not arrive.

• Twice-weekly review meetings between Hafan y Mor and NSI to review monitoring data and CSO activity are now in place.

• Automated emails are now in place when there is a CSO activation.

• Starlink has been installed on the DAF to improve communications resilience and reduce the risk of future data loss associated with connectivity issues.

WQ-D2 - Reporting - Action only

Table S4.1 in the permit sets out the information to be reported to NRW annually. For your next submission please make the following additions:

- Include the total number of spills using the block counting method (permit, schedule 6)
- Include the operational time for the 12 month period as a percentage
- If the operational time is below 90%, include a reason and an action plan to become compliant

WQ-D2 - Action in progress

You will instigate future reporting conversations with Natural Resources Wales to ensure that our planned submission for 2026 data is suitable prior to the submission.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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

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 Monitoring
- WQ-C5 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

Enforcement response

Any non-compliance with a permit condition 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 twenty working days to let you know if we agree to your request.

Disputing the Content of this Compliance Assessment Report Form
If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales

Concerns Not Related to the Content of this Compliance Assessment Report Form
If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone**: 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email**: enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone**: 0300 790 0203
- **Email**: 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.