Compliance Assessment Report CAR_NRW0053120

Permit being assessed: CG0428801

For: PLASSEY LEISURE PARK, **held by:** THE PLASSEY LEISURE PARK

At: EYTON, WREXHAM, .

Type of assessment carried out: Check Monitoring/Sampling,

Reason: Routine.

On 29/09/2026, between 15:30 and 17:30.

Parts of permit assessed: COMPOSITION: 11(a), 11(b) and 12

NRW Lead Officer: Ewan Byers, accompanied by: Amy Chisnell.

Report sent to: John Brookshaw, Managing Director, on 08/10/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C1 Major	11(a)
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C1 Major	11(b)
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	12
WQ-B3 - Water Quality - Operations - Operating techniques	Action only (X)	
WQ-D2 - Water Quality - Information - Reporting	Action only (X)	
WQ-B4 - Water Quality - Operations - Improvement programme	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	Improve operational performance of activated sludge plant to ensure any effluent being discharged complies with the permit	Already completed
WQ-C1	Improve operational performance of activated sludge plant to ensure any effluent being discharged complies with the permit	Already completed

Criteria	Action needed	Complete by
WQ-C1	Improve fat, oil and grease management systems	Already completed
WQ-B3	Before the spring of 2027, create a written maintenance and monitoring schedule for the wastewater treatment works. This should include details of how the site will carry out any cleaning, final effluent monitoring, outfall checks, settlement testing and the monitoring of FOGs. Records should be kept to detail when these checks/processes were carried out, and any relevant results/comments should be recorded	01/03/2027
WQ-D2	Write an escalation procedure so that all members of staff are aware of how to report any issues in relation to the wastewater treatment works. This should include details of how to report to NRW	01/03/2027
WQ-B4	Consider the installation of a below ground grease separator, as recommended in the external contractor's report	01/03/2027

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.

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

On 8th September 2026, Natural Resources Wales (NRW) conducted routine sampling at the designated sample point for Plassey Leisure Park's wastewater treatment works. The sample was described as "almost black" and smelling of sewage. A sample was bottled and brought back for further testing.

The sample taken was found to contain excessive quantities of Fats, Oils and Greases (FOGs). It had a Bio-chemical Oxygen Demand (BOD) of 178 mg/l against a permitted limit of 30 mg/l. The sample contained a concentration of suspended solids at 1,240 mg/l against a permitted limit of 45 mg/l.

Due to the particularly poor sample results, environment officers from NRW arranged to meet with the site's Managing Director (MD) to further investigate.

Officers met with the park's MD on 29th September 2026, he was very forthcoming in assisting

officers with their enquiries. He acknowledged that they had been having issues with their wastewater treatment process during the summer months but had not been aware of the poor-quality effluent being discharged on 08/09/2026.

Officers were provided with records of an internal investigation into wastewater treatment issues that had occurred during the month of July. The treatment works relies on living bacteria to breakdown sewage and the internal investigation found that the bacterial population had been insufficient during the summer months. This was attributed to a combination of prolonged hot and dry weather and the build-up of FOGs in the sewerage network.

The leisure park's MD had gone through great lengths to obtain activated sludge so that he could "re-seed" the treatment plant. This involves adding sludge into the treatment works that has a healthy bacterial population. According to records, this appeared to revive the bacterial population of the wastewater treatment works to healthy levels.

On 30th July 2026, an external company attended the site to investigate the build-up of FOGs in the leisure park's sewerage system. They noted that a sample from the treatment works indicated a high volume of organic material entering the system and carried out inspections of all FOG trap systems on the site. They detailed all of this in a report which provided several recommendations – evidence has been seen by NRW officers that a number of these have been taken into consideration and addressed.

It is not clear what caused the final effluent on 08/09/2026 to be of such poor quality. Therefore, NRW recommends continued monitoring of the site's final effluent to ensure it remains compliant with the site's permit. In addition, several actions are outlined below.

Officers from NRW acknowledge that the leisure park's Managing Director had been very proactive in trying to bring the treatment works into compliance once an issue had been identified. We would kindly ask that we are notified immediately in future, if any issues arise, but are most grateful for the MD's cooperation in investigating this matter.

ACTIONS:

- Before the spring of 2027, create a written maintenance and monitoring schedule for the wastewater treatment works. This should include details of how the site will carry out any cleaning, final effluent monitoring, outfall checks, settlement testing and the monitoring of FOGs. Records should be kept to detail when these checks/processes were carried out, and any relevant results/comments should be recorded

- Write an escalation procedure so that all members of staff are aware of how to report any issues in relation to the wastewater treatment works. This should include details of how to report to NRW
- Consider the installation of a below ground grease separator, as recommended in the external contractor's report

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.