

Compliance Assessment Report CAR_NRW0042394

Permit being assessed: VP3526XB

For: 7 PROPERTIES AT TWYN OAKS, held by TWYN OAKS PROPERTY MANAGEMENT LIMITED

At: CAERLEON, NEWPORT, GWENT, ., NP18 1LY.

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

On 16/08/2023, between 12:20 and 13:10.

Parts of permit assessed: All Permit

NRW Lead Officer: Gavin Summerhill, accompanied by: Megan Jones.

Report sent to: Richard Hastings, Property Owner, on 17/10/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C2 - Emissions and monitoring - Emissions to land	C3 Minor	• 2 Operations • 2.1 Permitted Activities • 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 ("the activities") Groundwater activity; discharge into land of secondary treated sewage effluent via an infiltration system centred on NGR ST 34553 91267.

Result types are explained in more detail in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
WQ-C2	• Carry out a full inspection on the Package Treatment Plant. • Produce an investigative report detailing the discharge activity and the current discharge point.	11/12/2023

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

Site Report

On Wednesday 16th August 2023 Myself and Megan Jones visited Twyn Oaks, Caerleon Newport NP18 1LY to carry out a permit inspection on their Package Treatment Plant. Permit Number VP3526XB . We arrived on site at 12.20pm. The weather conditions were dry, warm and sunny. Our Site inspection commenced at 12.25pm.

Observations

We proceeded to identify the location of the Package Treatment Plant. Please see Photo 1 below.

Package Treatment Plant (Photo 1)



After identifying the location of the Package Treatment Plant we checked the sample point location at NGR ST 3455391267. We confirmed that this was inaccurate as stipulated by the permit and the correct sample point is located at NGR ST 3454891262.

We lifted the lid on the first chamber and identified a lot of solid waste within the chamber. This is expected as it is the primary chamber. A slight odour was present. Please see Photo 2 below.

First Chamber (Photo 2)



We lifted the lid on the second chamber and could see that the amount of solid waste had reduced from the first chamber but there was still a carry over of solid waste. The treatment within this chamber appeared to be working as designed. The A slight odour was still present. Please see Photo 3 below.

Second Chamber (Photo 3)



We lifted the lid on the Sample Point chamber and could see that the waste water was slightly brown in colour but there was no solid waste within this chamber. There was still a slight odour present. Please see Photo 4 below.

Sample Point Chamber (Photo 4)



At this point we had a discussion with the property owner from Twyn Oaks Limited. We questioned the property owner with regards to any maintenance logs and waste transfer notes that were available. The property owner confirmed that he had maintenance logs and waste transfer notes. I gave the property owner my contact details and he advised that he would email all paperwork to myself.

We continued our discussion with the property owner regarding the discharge to ground as we could see that the pipe in the sample point chamber continued underground. The property owner advised the the pipe continued underground approximately 50m where it met with neighbouring properties which also had Package Treatment Plants. Please see Photo 5 below.

Discharge pipe connecting with neighbouring properties. (Photo 5)



The property owner advised that at this point the pipe crossed underneath the road and discharged to ditch/woodland area.

We left site at 13.10

Breaches of permit condition:

- **2 Operations**
- **2.1 Permitted Activities**
- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 ("the activities")

Groundwater activity; discharge into land of secondary treated sewage effluent via an infiltration system centred on NGR ST 34553 91267.

Justification

The discharge point as stipulated in the permit is inaccurate at NGR ST 34553 91267.

Action required by date specified:

- Carry out a full inspection on the Package Treatment Plant.
- Produce an investigative report detailing the discharge activity and the current discharge point.

The above actions are required by the 11th December 2023.

Other advisory comments:

- The National Grid Reference of the sample point on the permit is inaccurate by approximately 50m. We may need to vary this permit at a later date.

Contact details:

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details:

Gavin Summerhill (Environment Officer)

gavin.summerhill@cyfoethnaturiolcymru.gov.uk

If we do not receive the information requested within specified deadline and have not been informed as to why there is a delay then we may serve a Regulation 60 Notice requiring the information under Environmental Permitting (England and Wales) Regulations 2016.

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.