

## Compliance Assessment Report CAR\_NRW0046078

**Permit being assessed:** AN0269801

For: HIGHFIELDS SPS & SEWERAGE SYSTEM HI, held by DWR CYMRU CYFYNGEDIG  
At: HIGHFIELDS SPS & SEWERAGE SYSTEM, & SEWERAGE SYSTEM HIGHFIELDS  
PHA, HIGHFIELDS PHASE 2 DEVELOPMENT B, BLACKWOOD ,, ,.

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

On 27/01/2025, between 13:24 and 14:15.

Parts of permit assessed: Operational practices

**NRW Lead Officer:** Elis Nuttall.

**Report sent to:** Dwr Cymru, Water Industry, on 14/02/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-B1 - Water Quality - Operations - Permitted activities	C4 No impact	4 - Sample Point
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-D1 - Water Quality - Information - Records	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-D1	Condition 2: Records - Provide an example of any records associated with the requirements of condition 2 i.e. instances of discharge and the associated causes.	03/03/2025
WQ-B1	Condition 4: Sampling point change – Submit a permit variation to reflect a more appropriate sample point location for the EO. As discussed this may include some investigatory dye tracing to locate an appropriate point.	31/03/2025
WQ-A1	Condition 7: Storage capacity – Confirm the storage capacity of the asset. For reference, the permit states an equivalent to a total of 6 hours of the dry weather flow (p. 2). Deadline adjusted from original due to the need for a dry weather period to undertake survey works.	30/06/2025
WQ-D1	Condition 8: Records – Please provide an example of any records associated with the requirements of condition 8 i.e. maintenance programme and non-routine actions and	03/03/2025

Criteria	Action needed	Complete by
	associated reports.	

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.

**At this time, we do not intend to take any further action.**

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

#### **Site Visit Report**

This report details the site visit made on the 27/01/2025 to Highfields Sewage Pumping Station, permit reference number EPR-AN0269801.

I, Natural Resources Wales (NRW) Environment Officer Elis Nuttall, attended Highfields SPS at Cwrt Y Coed, Blackwood, NP12 1GL for a routine permit inspection where I met with Dwr Cymru Welsh Water's (DCWW) Catchment Performance Manager. The weather was cold with intermittent rain showers during the visit.

#### **General Observations**

This site is a Sewage Pumping Station (SPS) and Emergency Overflow (EO) servicing the Highfields housing development, Blackwood. The permit was issued on 26/02/1997, and as of the date of this visit (27/01/2025) NRW have no records to suggest a compliance visit has previously been undertaken for this permitted asset.

The consented discharge to the EO is only permitted to consist of sewage in an emergency and should only occur when the pumping station is inoperative (see condition 2 for details). The discharge shall only be made via a 600mm pipe to the River Sirhowy at ST17759682. A sampling point shall be provided at the listed coordinates ST17059695. All discharges must pass through (without prior maceration) a screen with apertures no greater than 10mm in one dimension, the screen shall be maintained to ensure efficient operational condition, and all screenings must be removed and disposed of in a manner that prevents entry into the discharge. The discharger (DCWW) shall remove all solid matter visible in and around the watercourse at the outfall as soon as reasonably practicable.

The site was operational (the EO was not spilling/in operation).

#### **Site Infrastructure**

On arriving at the site, I discussed the history of the SPS and EO with DCWW operators due to this being the first permit inspection NRW hold a record of.

In this discussion it was noted that the last piece of maintenance work was undertaken in August 2024 to conduct a wet well clean. Additionally, two 13.5kw pumps were replaced. These works were recorded in the site maintenance book, of which an example of an entry

can be seen in Figure 1. When asked about any major incidents or failures of the asset it was stated that there were no records (at least in the time of the current Catchment Performance Manager’s tenure) of any at this site. I noted that a request will be made for some data from the site’s telemetry system, a copy of the site’s maintenance record and records of any non-routing actions taken to remedy on site issues. Please see these in the actions list below.

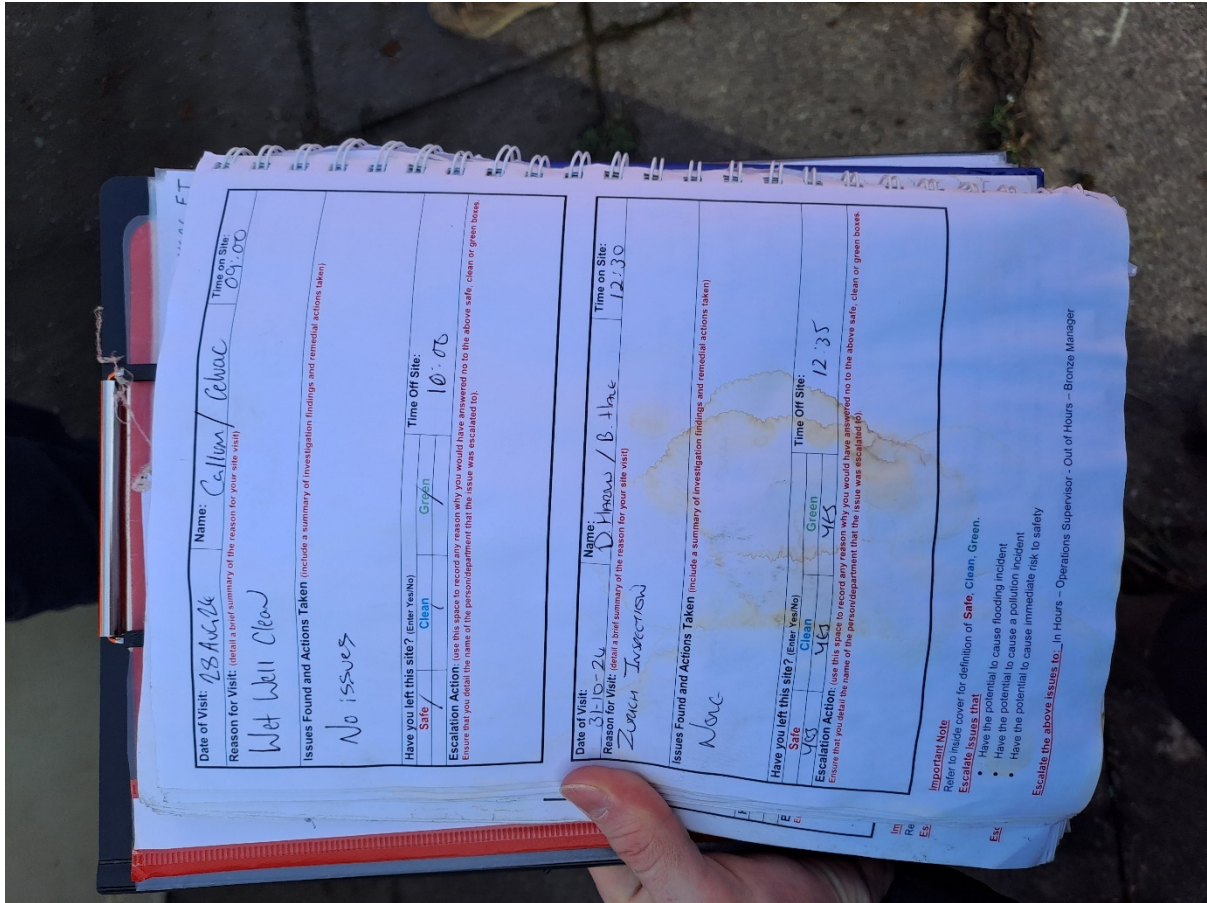


Figure 1 – Site maintenance book

Being a small site there is not a large amount of infrastructure to assess.

The debris screen was observed to be compliant with the permitted size requirements (10mm) and free of excess buildup of debris, as seen in Figure 2. It was stated by DCWW operators that the screen is cleaned based on a visual inspection and a “as and when needed” basis. Please ensure this good practice is upheld.



Figure 2 – Screening device

Telemetry is in place at the asset and was observed to be in operation at the time of the visit. The control box where this system is stored was in good order with no issues observed as seen in Figure 3.



Figure 3 – System control box and telemetry

The wet well was inspected and found to be clear and clean (Figure 4) with the last piece of maintenance (cleaning) conducted is August 2024. When asked about the storage capacity of the wet well I was informed that the information was not known by DCWW operators on site, but the information could be obtained from their records. I informed the operators that I would be requesting this as one of the main actions in response to the visit. Please see the full list of actions below.



Figure 4 – Wet well

Whilst checking various permit conditions against the site infrastructure present, I queried the location of the sampling point. From my prior research and preparation for the visit it appeared that the sample point listed in the permit (ST17059695) was located on/within a private residential dwelling (17, Cwrt Y Coed, Blackwood, NP12 1GL). From the mapping system (as seen in Figure 5) there are no DCWW sewage line on or connected to this location. As a result, I have to conclude that there is no access point for sampling as the listed coordinates. When questioned on this, DCWW operators were unsure where the sample point location was on site and stated they would have assumed it was after any storm sewage had passed the screening device at ST1706896901. A discussion was held around submitting a variation to move the sampling point to a more appropriate location which can be accessed 24/7, even without DCWW presence. It was proposed that this could be changed to one of the EO chambers located on Cwrt Y Coed at either ST17960801 or ST17960834 prior to it discharging to the wider surface water network. DCWW operators agreed to this but stated some investigatory works that included dye tracing would be needed before undertaking the variation process. I have agreed to this and reflected it in the actions list below. As this is a breach of permit condition 4 (sample point) I have no choice but to score it as such, however this will be categorised as a C4 breach, a non-compliance which has no potential environmental effect itself but could hamper any investigatory processes if the asset were to cause an environmental incident.

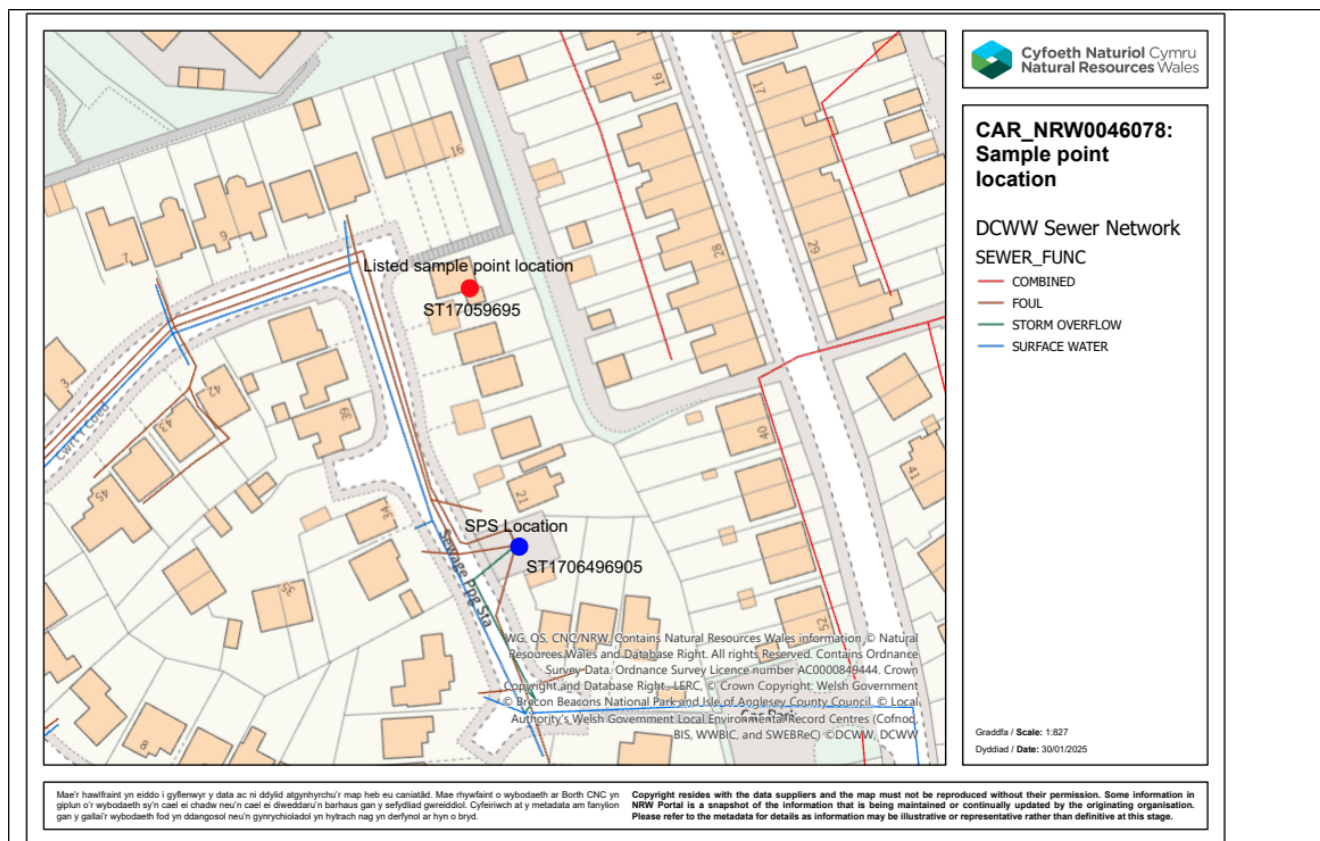


Figure 5 – Sample point map.

After all on site infrastructure at the SPS was assessed, I and the DCWW operators travelled to the discharge point (on the Sirhowy River) ~656m to the East of the SPS, as seen in Figures 6 & 7 below. On arrival at the discharge point it was confirmed that the coordinates listed in the permit are accurate and a 600mm pipe was observed discharging clean water to the river. The discharge contained no visible solid matter, and the outfall steps and surrounding area were clear of any fungus or discolouration. This is evidenced in Figure 8.

A brief discussion was held regarding the results of the visit and the list of actions likely to be issued. DCWW operators agreed with the conclusions as well as the actions that will be set.

I left site at 14:15.

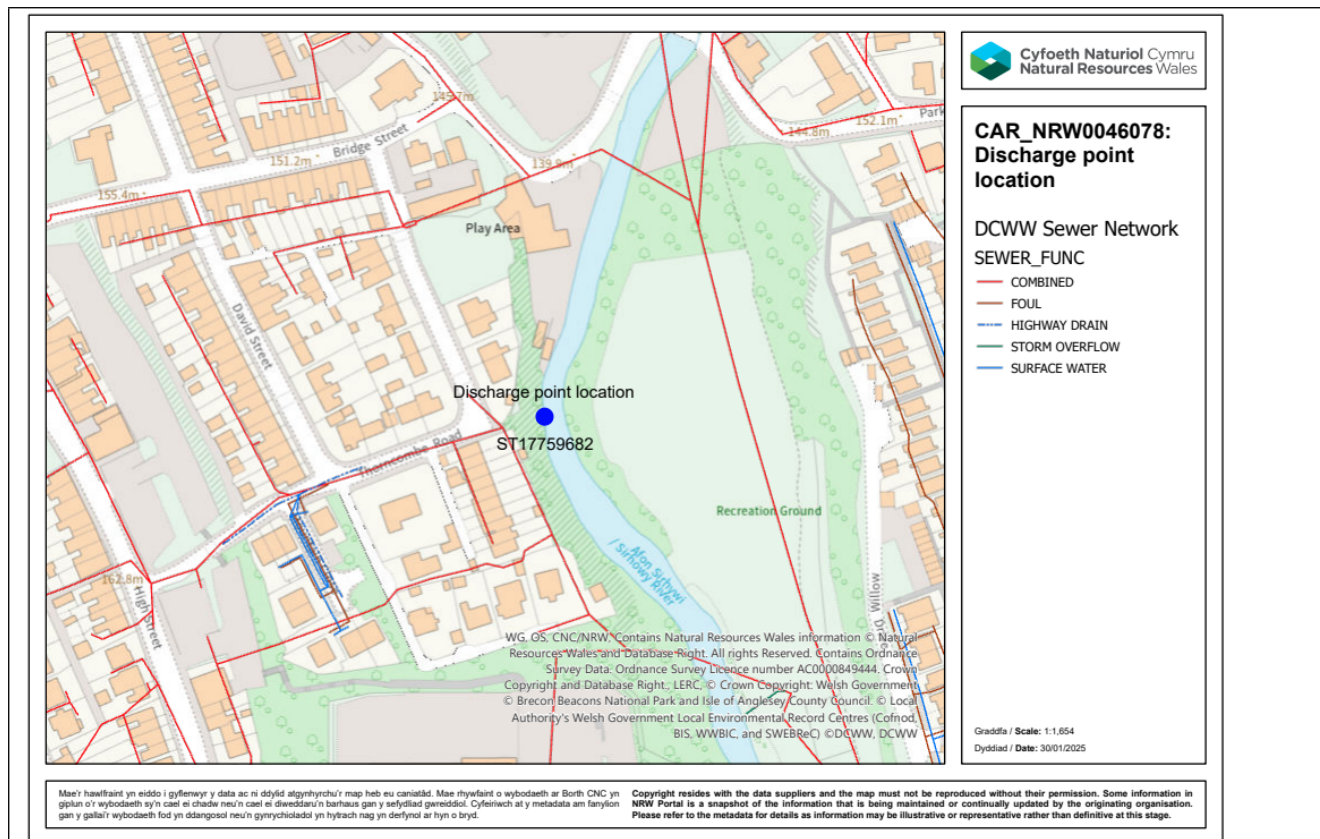


Figure 6 – Discharge point location map

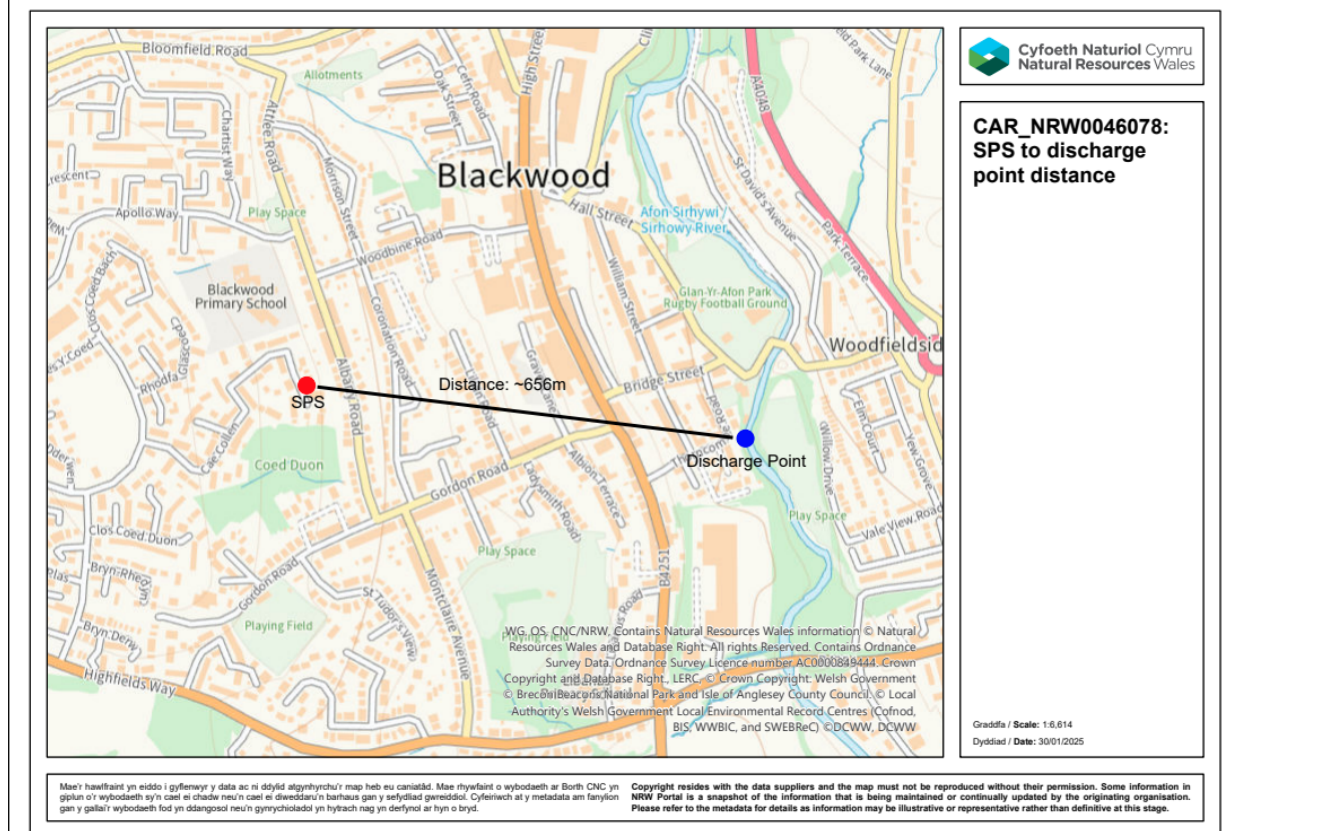


Figure 7 – SPS to discharge point distance map.



Figure 8 – Discharge point

**Breaches of permit condition:**

Below are the permit breaches that were identified during the site inspection.

**CATEGORY C4 BREACH – PERMIT CONDITION 4 – Sample point location**

*The sampling point shall be constructed, maintained and appropriately labelled as that a representative sample of the Discharge may be obtained at National Grid Reference ST17059695, as shown marked 'Sampling Point' on Plan No. ATW/96111 attached as Annex 1.*

Due to the sampling point being listed within a residential property and DCWW's uncertainty around where this point is/should be located I have scored this as a breach of the permit conditions as a C4, a non-compliance which has no potential environmental effect. This will be dealt with via advice and guidance only and no further enforcement/sanctions will be pursued. See actions list below for further details.

**Action required by dates specified:**

Condition 2: Records – Provide an example of any records associated with the requirements of condition 2 i.e. instances of discharge and the associated causes.

**Deadline: 03/03/2025**

Condition 4: Sampling point change – Submit a permit variation to reflect a more appropriate sample point location for the EO. As discussed this may include some investigatory dye tracing to locate an appropriate point.

**Deadline: 31/03/2025**

Condition 7: Storage capacity – Confirm the storage capacity of the asset. For reference, the permit states an equivalent to a total of 6 hours of the dry weather flow (p. 2).

**Deadline: 03/03/2025**

Condition 8: Records – Please provide an example of any records associated with the requirements of condition 8 i.e. maintenance programme and non-routine actions and associated reports.

**Deadline: 03/03/2025**

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.

**Other advisory comments:**

Please ensure all good practices observed during the visit are continued. As this was a first visit to the site from NRW in a compliance capacity we now have a baseline to regulate from in future. We are happy to provide any assistance necessary to achieve the requested actions listed above.

**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: Name, Environment Officer, [elis.nuttall@naturalresourceswales.gov.uk](mailto:elis.nuttall@naturalresourceswales.gov.uk), 03000 65465/07813 396378.

Thank you,

Elis Nuttall.

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](mailto: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](mailto: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.