

## Compliance Assessment Report CAR\_NRW0046628

**Permit being assessed:** CM0109901

For: HIGHFIELD PK LLANDYRNOG DENBIGH, held by MENTAL HEALTH CARE LTD

At: HIGHFIELD PK, LLANDYRNOG, DENBIGH, FLINTSHIRE, LL16 4LU.

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

On 14/03/2025, between 09:00 and 17:00.

Parts of permit assessed: All

**NRW Lead Officer:** Amy Chisnell.

**Report sent to:** Darren Hughes, Estate Manager, on 19/03/2025.

### 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	8. As far as is reasonably practicable, the works shall be operated so as to prevent: a) any matter being present in the discharge, other than matter specifically covered by numerical conditions in this consent, to such an extent as to cause the receiving waters, or any waters of which the receiving waters are a tributary, to be poisonous or injurious to fish in those water, or to the spawning grounds, spawn or food of fish in those waters, or otherwise cause damage to the ecology of those waters and b) the discharge from having any other adverse environmental impact.

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 treatment at the sewage treatment works so that the discharge is compliant with numerical limits, and so that the sewage fungus ceases to grow at the outlet.	31/05/2025

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

Following a routine sample failure, a site visit was arranged with the estate manager. NRW officers visited site on the 14th March 2025.

The site benefits from a private sewage treatment works, which is gravity fed.

A large build up of fat, oil and grease (FOGs) was observed at the inlet, as well as on the surface of the primary tank and humus tank and on the filter bed media (stones).

The storm tank was not in use at the time of visit, although there was a build up of solids/mud at the bottom of the tank.

One of the 2 primary tanks was in use at the time of visit - some repair work is needed to the inner tank walls.

One of the 2 filter beds was operating at the time of visit, further investigation showed that the second filter bed is used as a storm overflow filter. There was growth of grass around the filter bed arms, preventing it from turning and therefore not achieving even wetting of the media.

The first filter bed had the correct media for biological treatment but was being impacted by the high amount of FOGs at site. The FOGs had created a greasy film over the media, reducing the biological treatment ability. The area of wetted media was also small, as flows at the time were not high enough to flow from the holes in higher part of the arms.

The humus tank (A settling tank used to clarify effluent by the removal of humus solids that have been washed off filter media) had a thick crust on the surface and sewage fungus growing in the v-notches and outflow channel. There was also sewage fungus growing around the sewage works outfall and on the banks. However, plant growth on the banks was preventing the fungus from reaching the main channel of the stream.

Sewage fungus is an indicator of organic pollution and therefore could indicate that the sewage is not being treated to standard. The sewage fungus is fed by the nutrients in sewage and should quickly clear up when treatment improves.

Please consider carrying out the following actions

1. Investigate measures to reduce fats, oils and greases entering the sewer network and ultimately the sewage treatment works.
2. Increase maintenance on site - increase frequency of emptying and cleaning tanks to reduce FOGs and scum built up, including the storm tank.
3. Include an inspection of the outfall to the weekly checklist

Please complete the following action by 31/05/2025:

Improve treatment at the sewage treatment works so that the discharge is compliant with numerical limits, and so that the sewage fungus ceases to grow at the outlet.

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.