

Compliance Assessment Report CAR_NRW0049272

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 28/08/2025, between 12:11 and 12:40.

Parts of permit assessed: Site infrastructure and operations

NRW Lead Officer: Elis Nuttall.

Report sent to: DCWW, Water Industry, on 03/10/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B2 - Water Quality - Operations - The site	Action only (X)	
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-B2 - Water Quality - Operations - The site	Action only (X)	
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-B2 - Water Quality - Operations - The site	Action only (X)	
WQ-D1 - Water Quality - Information - Records	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-B2	Confirm the new location of the sampling point that will be reflected in the varied permit.	Already completed
WQ-A1	Provide evidence that the permit variation process has been undertaken.	17/10/2025
WQ-B2	Confirm the storage capacity of the SPS as it is a permit requirement under condition 7. For reference, the permit states an equivalent to a total of 6 hours of the dry weather	17/10/2025

Criteria	Action needed	Complete by
	flow.	
WQ-D1	Provide an example of any records associated with the requirements of condition 2 i.e. instances of discharge and the associated causes.	17/10/2025
WQ-D1	Provide an example of any records associated with the requirements of condition 8 i.e. maintenance programme and non-routine actions and associated reports.	17/10/2025
WQ-B2	Investigate and assess the corrosion present on some of the wet well infrastructure. Any maintenance required should be notified to NRW and evidence of works undertaken provided.	03/11/2025
WQ-D1	Provide details and evidence of the most recent telemetry maintenance, calibration and servicing.	17/10/2025
WQ-D1	Provide details and evidence of the most recent pump maintenance and servicing, both duty and standby.	17/10/2025

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.

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 by Natural Resources Wales (NRW) on the 28/08/2025 to Highfields SPS operated by Dŵr Cymru Welsh Water (DCWW), permit reference number EPR-AN0269801.

I (NRW Environment Officer Elis Nuttall) attended Highfields SPS, Blackwood at 12:11 for a water quality permit compliance inspection where I met with DCWW Catchment Performance Manager (MM). The weather was overcast and raining during the visit.

General Observations

This permit consents a water discharge activity for the discharge of sewage in an emergency from a Sewage Pumping Station (SPS) via an outlet to the Afon Sirhywi at ST1775096820. An emergency, as defined in the permit, is a period when the SPS is inoperative as a result of electrical power failure, mechanical breakdown of duty and standby pumps, rising main failure or a blockage of the downstream sewer which is not due to the act or default of the operator. There are no set composition limits for the EO discharge, only that it passes through a screening device with apertures no greater than 10mm prior to discharging. The sample point of the EO is listed to be located at

ST1705096950.

The site was operational at the time of the visit.

Initial Discussions

This was my second regulatory visit to this site, previously conducting an inspection in January 2025, where I listed 1 breach and 4 actions to be completed. I began this visit with a follow up of these actions and confirmed which had been completed. The actions are outlined below.

1. 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

2. 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

3. 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

4. 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

It was stated by MM that action 2 (submit a permit variation to change the sample point location – scored as a C4 breach) had been undertaken and that the permitting process is currently under action by NRW. I appreciate that this process can take an extended period, so the only follow up action set is to confirm the new sample point location and provide evidence of the variation process being initiated. I agreed to contact NRW's permitting team to enquire about the timescales associated with this permit variation. This will be communicated to MM via email.

It was also stated that condition 3 (confirm storage capacity) was undertaken as part of the variation process and will be outlined in the updated permit. I requested that the storage volume be communicated to me via email for reference. These actions are reflected below.

Actions 1 and 4 had not been completed after the previous visit. As they were not linked to any breaches I am happy to re-issue as actions in this report but please note that further failures to complete actions will result in regulatory enforcement and a warning being issued. This is reflected in the actions list below.

Since my last visit, it was noted that no major issues or periods of operational shutdown had occurred with only general management and maintenance being undertaken e.g. wet well cleaning, odour complaint investigations etc. MM also stated that no periods or instances of spills had occurred. The requested data (as listed above) will be assessed separately and a report issued outlining my observations.

We then proceeded to investigate the site infrastructure.

Site Infrastructure

The site is in a good condition with operational areas clear of obstructions and all points were accessible. The infrastructure is all within a secure compound with the control panel and associated systems within a secondary locked control box. General site conditions can be seen in Figure 1.



Figure 1 – The site conditions as observed during the visit.

The wet well was inspected and found to be of concrete construction and free of any cracks or defects. There was some corrosion present on metallic components so an action has been set to assess their condition and confirm their continued operational appropriateness. Please see the actions list for further details. As observed in the site log book, the wet well was last cleansed on 12/06/2025. It is noted that there was no safety grate over the wet well void; while not a permit requirement I have added an advisory comment to review the site's H&S considerations for the benefit of operators.

Telemetry was in place with flow alarms and EDM functions noted. This systems has not

been updated as part of the “Diffodd” project due to it being a GSM (mobile signal) unit. It was noted that they are on a 4 year maintenance programme, of which I requested information on the most recent maintenance and calibration. This is reflected in the actions list. These observations are evidenced in Figure 2.

MM explained that this asset runs on a two pump alternating system (1 duty and 1 standby). The pumps were running at the time of the visit but there was no excessive or concerning noise, indicating continued appropriate condition. I did however request information on the most recent maintenance undertaken on both pumps, see actions below for further details.



Figure 2 – The wet well as observed during the visit.

The valve chamber was observed to be secure and covers were intact, however similarly to the wet well there was no safety grate in place. There was some minor corrosion present but overall the systems appeared to be in a good condition. The tankering point is also located within this chamber. These observations can be seen in Figure 3.



Figure 3 – The valve chamber as observed during the visit.

It was confirmed that prior to the EO discharging to the local surface water network, it passes through a 10mm screen, as seen in Figure 4. This screen was free of debris at the time of the visit and was noted to be cleaned on a visual inspection basis.



Figure 4 – The 10mm screen as observed during the visit.

The control panel and electrical systems were observed within the secure control box. There was no damage or condensation present and all systems appeared to be in good working order (Figure 5). There is a mobile emergency generator point in place (Figure 6). The system does not have a separate emergency stop function, but it does possess a separate isolator and power off function which combined effectively acts as an emergency stop (Figure 7).



Figure 5 – The control box and panels as observed during the visit.



Figure 6 – The mobile backup generator plug in point in place.



Figure 7 – The control panel with the power off and isolator functions present.

As outlined in the previous compliance assessment report, the listed sampling point was not appropriate and did not reflect the reality of where a sample of the discharge could be taken. As noted above, DCWW have undertaken the variation process and MM confirmed during this visit that the new sampling point will be listed as one of the storm overflow chambers located at ST1705696904. The current and new sample point locations are outlined in Figure 8 for reference. As noted above, I will enquire with NRW's permitting team about the timescales of issuing the variation.

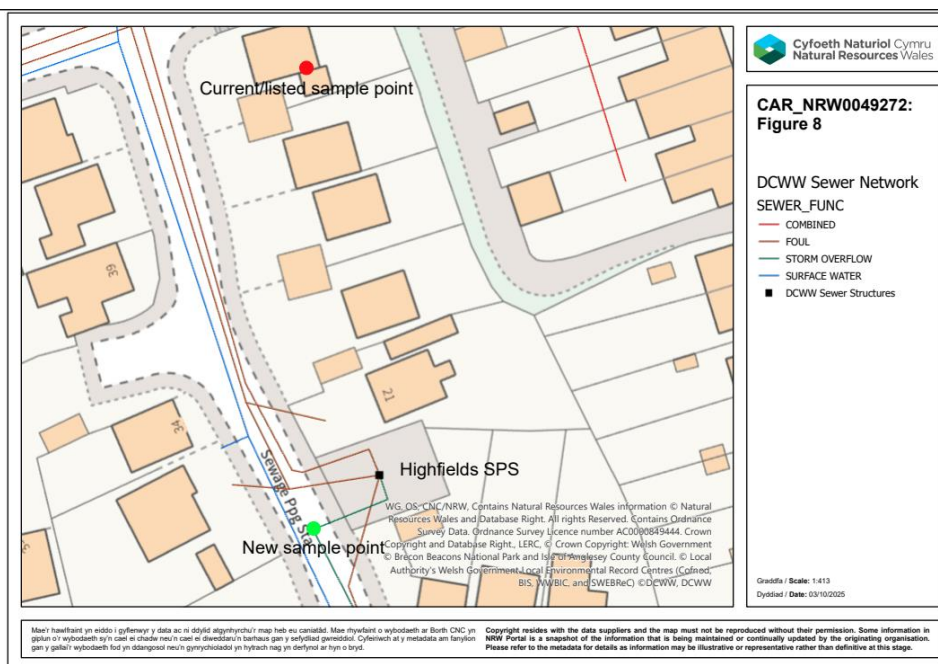


Figure 8 – A map outlining the change between the listed sample point location and the forthcoming new sample point location.

This new sample point was checked (Figure 9) during the visit and found to be accessible and appropriate for use.



Figure 9 – The storm overflow inspection chamber to be used as the new sample point.

Due to the discharge point being located ~700m from the SPS, my familiarity with its location and the limited time available it was decided that we would not check the outfall during this visit.

No further observations were made during this inspection.

Final Discussions

I outlined my observations and actions to MM who did not raise any further questions or queries.

I left site at 12:40.

Breaches of permit conditions

No breaches were recorded during this visit.

Please note that actions 4 & 5 below have been rolled over from the previous compliance assessment report due to no evidence available to suggest that they were completed. While not linked to any breaches it is a requirement to undertake all actions set in a compliance assessment report. Failure to complete the actions again will result in regulatory enforcement action.

Actions required by dates specified

1. Confirm the new location of the sampling point that will be reflected in the varied permit.

Deadline: Already complete – Confirmed during the visit.

2. Provide evidence that the permit variation process has been undertaken.

Deadline: 17/10/2025

3. Confirm the storage capacity of the SPS as it is a permit requirement under condition 7. For reference, the permit states an equivalent to a total of 6 hours of the dry weather flow.

Deadline: 17/10/2025

4. Provide an example of any records associated with the requirements of condition 2 i.e. instances of discharge and the associated causes.

Deadline: 17/10/2025

5. 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: 17/10/2025

6. Investigate and assess the corrosion present on some of the wet well infrastructure. Any maintenance required should be notified to NRW and evidence of works undertaken provided.

Deadline: 03/11/2025

7. Provide details and evidence of the most recent telemetry maintenance, calibration and servicing.

Deadline: 17/10/2025

8. Provide details and evidence of the most recent pump maintenance and servicing, both duty and standby.

Deadline: 17/10/2025

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

1. Assess the H&S policies and procedures regarding the need for a safety grate over the wet well and valve chambers. Note this is not an action and no updates will be requested.

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: Elis Nuttall, Environment Officer, elis.nuttall@cyfoethnaturiolcymru.gov.uk, 03000 65 4651.

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 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.