

Compliance Assessment Report CAR_NRW0049463

Permit being assessed: BP0237413

For: CSO and EO at East Burrows Road Car Park, Swansea, held by DWR CYMRU CYFYNGEDIG

At: East Burrows Road Car Park, Somerset Place, Swansea, SA1 1RR.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 24/09/2025.

Parts of permit assessed: Emissions & monitoring

NRW Lead Officer: Catherine Tucker, accompanied by: Sarah Bennett.

Report sent to: CARS@dwrwymru.com, CARS Mailbox, on 30/09/2025.

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	3.1.2 - If the measured number of significant block counted spills exceeds the limit specified in Table S3.1 this constitutes a Trigger Exceedance and the operator shall: (b) provide a reason for the Trigger Exceedance and a description of any remedial action undertaken or proposed. Where the reason/s for the Trigger Exceedance cannot be identified within the 3 months of the Trigger Exceedance the operator must provide a proposal with timeframes for a full investigation to be carried out to identify the reason/s for the Trigger Exceedance for approval by Natural Resources Wales.
WQ-C1 - Water Quality - Emissions and	Action only (X)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
monitoring - Emissions to water		
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	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	Please try to submit any future reports within the required 3-month period.	Already completed
WQ-C1	Securing future compliance: Please ensure that you now comply with Condition 3.1.2 (c) by implementing the investigation proposal as approved by Natural Resources Wales. Your investigation proposal included the following: • Re-calibrate spill monitor • Check Langdon Road flow monitor on site. • Check pumps are switching on at the correct levels. Langdon road • Check for pump inhibit at Langdon Road • Add flow monitor data from SCARDA to Prism • Check operation of pumps at Langdon Road • Operational review with Pumping and WwTW colleague's • Modelling exercise to check root cause	01/08/2026
WQ-C1	Securing future compliance: Once you have completed the investigation, please provide NRW with a report which identifies the reason/s for the Trigger Exceedance, as is required by Condition 3.1.2 (c). See comments below for more information. Due 1st September 2026.	01/09/2026

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

The purpose of this report is to:

- assess compliance with conditions relating to Event Duration Monitoring
- record our comments and approval of full investigation proposal
- give advice on compliance going forward
- record any completed actions from previous Compliance Assessment Reports

As this will be the second year the spill trigger has been exceeded, I have also reviewed CAR_NRW0045720 to check if all the actions listed have been completed.

Compliance with Condition 3.1.2 (a)

Condition 3.1.2 (a) requires that ‘if the measured number of significant block counted spills exceeds the limit specified in Table S3.1 this constitutes a Trigger Exceedance and the operator shall notify Natural Resources Wales of the Trigger Exceedance as soon as reasonably practicable (and no later than 4 weeks from the date of the Trigger Exceedance) in a format agreed by Natural Resources Wales’.

On the 15th September 2025 you sent to us a Trigger Exceedance Notification (TEN) for CSO and EO at East Burrows Road Car Park. The TEN informed us that, on the 30th August 2025 the number of spills had exceeded the limit of 5 block counted spills within the Bathing Water Season.

As we received the notification within the required 4-week period in the format agreed by NRW you are compliant with this condition.

Compliance with Condition 3.1.2 (b) and review of previous CAR actions

Condition 3.1.2 (b) requires you to do the following:

Provide a reason for the Trigger Exceedance and a description of any remedial action undertaken or proposed.

Where the reason/s for the Trigger Exceedance cannot be identified within the 3 months of the Trigger Exceedance the operator must provide a proposal with timeframes for a full investigation to be carried out to identify the reason/s for the Trigger Exceedance for approval by Natural Resources Wales.

The trigger was also exceeded in 2024 and, as you do not know the reason for the Trigger Exceedance, you have provided a proposal for a full investigation.

In CAR_NRW0045720 relating to the 2024 EDM TEN we asked you to submit the information required by Condition 3.1.2(b) by the 6 December 2024 which is 3 months from the date of the Trigger Exceedance.

We received your Investigation Proposal on the 21st August 2025. This means you are not compliant with the requirement in Condition 3.1.2 (b) to submit the proposal within 3 months. A C4 breach has been recorded for this non-compliance.

This breach is in contravention of Regulation 38 (2) of the Environmental Permitting (England and Wales) Regulations 2016 which states that it is an offence for a person to fail to comply with or to contravene an environmental permit condition.

Please try to submit any future reports within the required 3-month period. This advice and guidance is given formally.

At this point in time, you have been unable to establish the reason for the Trigger Exceedance and have submitted a full investigation proposal (Stage 2 FIP) for our approval. Whilst the FIP submitted on 21st August 2025 was the overdue one from the 2024 Trigger Exceedance, we acknowledge that you have already started your investigation and that this investigation will continue into 2026. The submitted FIP can therefore be accepted as the 2025 Stage 2 FIP.

The initial desktop studies and operational investigations have identified the root cause to be Hydraulic

capacity of the downstream catchment. Further information is needed for detailed root cause to be completed.

Work carried out so far includes:

- Re-calibrate spill monitor
- Check Langdon Road flow monitor on site.
- Check pumps are switching on at the correct levels. Langdon road

Your full investigation plan to identify the reason(s) for the Trigger Exceedance consists of:

- Check for pump inhibit at Langdon Road
- Add flow monitor data from SCARDA to Prism
- Check operation of pumps at Langdon Road
- Operational review with Pumping and WwTW colleague's
- Modelling exercise to check root cause

I approve the submitted investigation proposal.

Condition 3.1.2 (c) states that if a full investigation is required by condition 3.1.2(b), implement the proposal as approved by Natural Resources Wales and provide to Natural Resources Wales a report which identifies the reason/s for the Trigger Exceedance.

You now need to implement the investigation proposal in order to comply with Condition 3.1.2 (c) of the permit.

Condition 3.1.2 (c) also requires you to provide NRW with a report which identifies the reason/s for the Trigger Exceedance.

Action: Please complete the investigation by the 1st August 2026 and provide this report by the 1st September 2026.

Review of previous CAR action(s) already completed:

CAR_NRW0045720 issued on 27/11/2024 asked you to submit a TERR or FIP. You have submitted a FIP so all actions from this CAR have been completed.

CAR_NRW0046708 issued on 25/03/2025 asked you to take steps to ensure that the Event Duration Monitor was fully operational. You informed us that issues with the EDM had been resolved and the equipment had so far been recording more than 90% of the time in 2025. We also asked you again to submit the overdue FIP from CAR_NRW0045720. As detailed above we have received the FIP so all actions from this CAR have been completed.

Thank you.

End

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.