

Compliance Assessment Report CAR_NRW0049281

Permit being assessed: AN0287201

For: RES DEVMT PS OFF MORGAN ST, held by DWR CYMRU CYFYNGEDIG

At: RESEDENTIAL DEVELOPMENT, OFF MORGAN STREET, CAERPHILLY, WALES, .

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

On 28/08/2025, between 14:00 and 14:26.

Parts of permit assessed: Site infrastructure and operations

NRW Lead Officer: Elis Nuttall.

Report sent to: DCWW, Water Industry, on 08/10/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Water Quality - Operations - Permitted activities	C3 Minor	4 - Sample Point
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-B3 - Water Quality - Operations - Operating techniques	Action only (X)	
WQ-B3 - Water Quality - Operations - Operating techniques	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-B3 - Water Quality - Operations - Operating techniques	Action only (X)	
WQ-B2 - Water Quality - Operations - The site	Action only (X)	
WQ-B1 - Water Quality - Operations - Permitted activities	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-B1	Identify where the EO discharge point is located and confirm (with evidence) this with NRW.	07/11/2025

Criteria	Action needed	Complete by
WQ-A1	Remove the large potted plant from in front of the SPS compound gate to improve access. Evidence of the works completion shall be provided to NRW.	07/11/2025
WQ-A1	Undertake vegetation clearance within the SPS compound to improve access. Evidence of the works completion shall be provided to NRW.	07/11/2025
WQ-B3	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.	07/11/2025
WQ-B3	Investigate and assess the root ingress present in the wet well. Any maintenance required should be notified to NRW and evidence of works undertaken provided.	07/11/2025
WQ-B2	Inform NRW of the storage capacity of the SPS.	21/10/2025
WQ-D1	Provide details and evidence of the most recent telemetry system service and calibration records.	21/10/2025
WQ-D1	Provide details and evidence of the most recent pump service and maintenance records.	21/10/2025
WQ-B3	Investigate and assess the corrosion present on some of the valve chamber infrastructure. Any maintenance required should be notified to NRW and evidence of works undertaken provided.	07/11/2025
WQ-B2	Confirm and inform NRW (with evidence) the location of the tanker point for this SPS.	21/10/2025
WQ-B1	Once identified (Action 1), undertake the permit variation process to change the sample and discharge points to reflect their current, appropriate and accurate location. It is advised that the sample point should be accessible and maintained to allow access for NRW sampling teams at all times. Further information on the variation process shall be supplied on request.	08/12/2025

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 Morgan Street SPS (Plas y Felin SPS) permit reference number EPR-AN0287201.

I (NRW Environment Officer Elis Nuttall) attended Morgan Street SPS, Caerphilly at 14:00 for a water quality permit compliance inspection where I met with Dŵr Cymru Welsh Water (DCWW) Catchment Performance Manager (MM). The weather was overcast with intermittent rain 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 Nant yr Aber at ST15308770. 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 other than it shall not contain a significant quantity of solid matter having a size greater than 10mm in more than two dimensions. The sample point of the EO is listed to be located at ST15308770.

The site was operational at the time of the visit.

Initial Discussions

This is the first regulatory visit to this asset by NRW. As such, I began my inspection by querying the recent history of the site and checking the site's log book. It was stated by MM that DCWW do not visit this asset regularly given its small scale and only services 5 properties. No major incidents or non-routine maintenance have occurred at the site.

It was observed in the log book that cleaning maintenance was conducted in March and June 2025, with the latter visit also resulting in a communications failure. The failure was due to maintenance operator error in turning off the spur to undertake works and failing to turn it back on before leaving site. This was rectified promptly and the SPS returned to full working order, as evidenced in the log book.

We then proceeded to inspect the site's infrastructure.

Site Infrastructure

Site access and conditions were moderate at the time of the visit. DCWW operators needed to move a large potted plant from in front of the access gate to gain entry (it is unknown who placed this here) and the asset compound itself displayed vegetation overgrowth, although access was not severely hindered. Actions have been set to ensure the access to the site are maintained effectively going forward. The conditions of the compound are seen in Figures 1 and 2.



Figure 1 – Site conditions as observed during the visit.



Figure 2 – Site conditions as observed during the visit.

The wet well as inspected and found to have corrosion present on the metal infrastructure as well as minor root ingress. This is evidenced in Figure 3. Actions have been set to address these observations and are outlined below. Information on the storage volume of the SPS was queried which MM could not confirm during the visit. I therefore requested that this information be provided via email and is actioned below. For reference, Condition 5 of the permit stipulates that the storage capacity should be equivalent to a total of at least 6 hours of the average flow in the sewer immediately upstream of the pumping station.

It is noted that no safety grate was present on the wet well chamber. While not a permit requirement, I have issued an advisory comment for the assessment of site H&S procedures regarding the requirements for one for the benefit of all operators visiting site.

Telemetry is in place and described to be a level sensor only at this asset, with no EDM taking place. While not known at the time of the visit, I requested that MM provide details of the last service and calibration maintenance undertaken on the telemetry system, details of which can be seen below.

Two pumps are operated at this SPS, 1 duty and 1 standby. They were running at the time of the visit and displayed no excessive or concerning noise indicating effective operation. I requested that details of the last pump service and maintenance be provided via email. See below for details.



Figure 3 – The wet well conditions as observed during the visit.

The valve chamber was inspected and some corrosion was observed on the metal infrastructure (Figure 4). As with the wet well, I request that this be assessed for continued operational effectiveness. This is outlined in the actions list below. It is unclear if the valve chamber contained a tanker point at the time of the visit. I therefore request that DCWW confirm the location of the tanker point and provide evidence (photographic) to support this. This is included in the actions list. An advisory comment regarding a safety grate has been included along with the aforementioned comments for the wet well.



Figure 4 – The valve chamber as observed during the visit.

The control box and panel were inspected. There was no damage or condensation present and all readouts were clear and appeared to be working as designed. This is evidenced in Figure 5.



Figure 5 – The control panel as observed during the visit.

A mobile generator plug in point was present and the emergency stop function was in place. These observations can be seen in Figures 6 & 7.



Figure 6 – The mobile generator plug in point as observed during the visit.



Figure 7 – The emergency stop function in place as observed during the visit.

Whilst reviewing the permitted sample and discharge points prior to the visit, I noted that they appear to be inaccurate to the reality of the conditions at the site. The listed point is within the adjacent school grounds, not accessible and not close to the watercourse, as seen in Figure 8. This leads me to believe that the permit requires a variation to alter the listing to the correct/actual sample and discharge point. This was confirmed on site with no access to the listed coordinates. As a result, an action has been added to undertake the variation process to change the sample and discharge point coordinates.

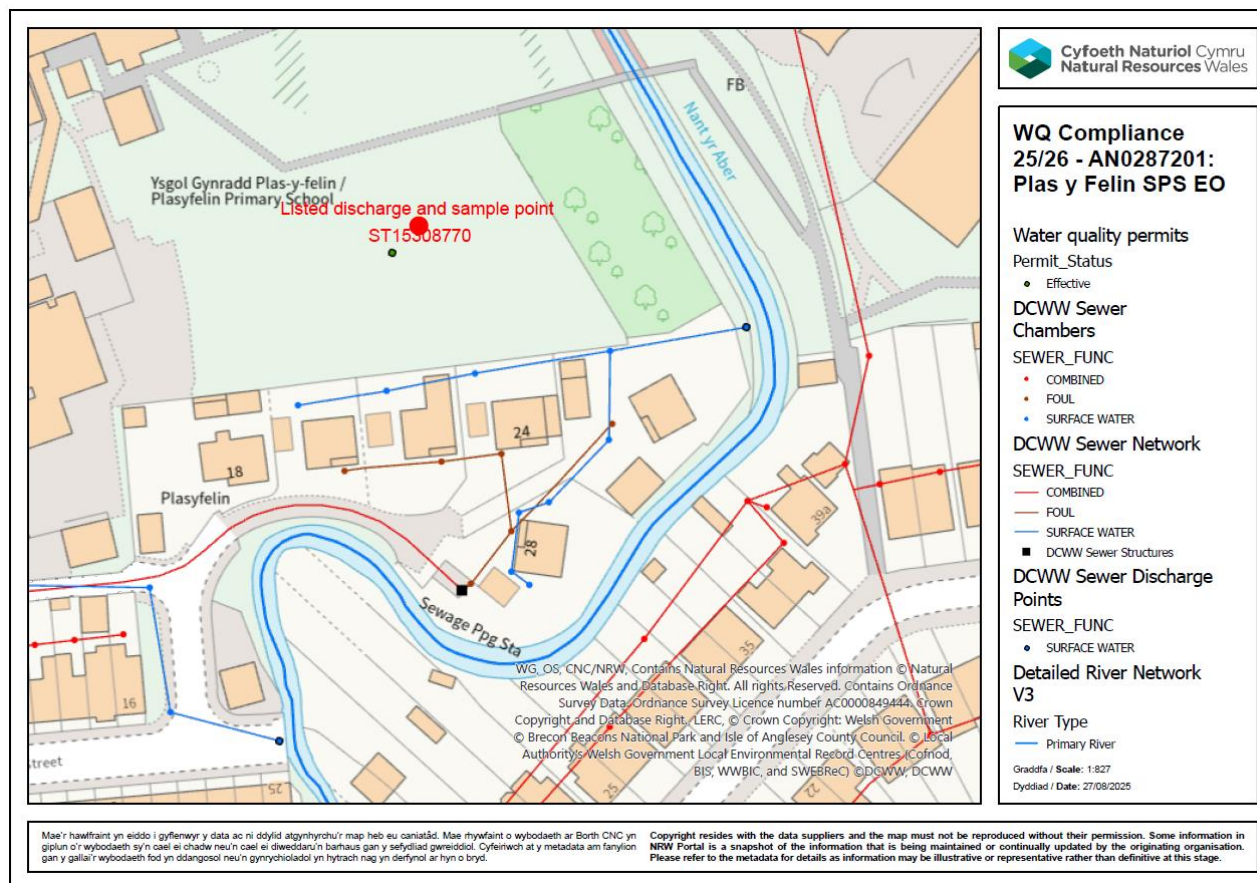


Figure 8 – The listed coordinates for the sample & discharge point in comparison to the location of the SPS.

On attempting to identify a suitable sample and discharge point for the variation, it is noted that no outlets or chambers could be located that could serve new sample and discharge points. This is a requirement and a breach of condition 4 of the permit, however I have scored it as a C3 breach (A non-compliance which could have a minor environmental effect) due to the inaccuracy in the permit itself and does not pose a major environmental risk. An action has been set to identify both an appropriate sample point for the SPS and to identify the EO discharge point to Nant yr Aber, providing evidence of both. These locations should be used to undertake the aforementioned permit variation process. Details of this breach and actions are outlined below.

No further observations were made during this inspection.

Final Discussions

I outlined my observations and actions to MM who raised no further questions.

I left site at 14:26.

Breaches of permit conditions

CATEGORY 3 BREACH – PERMIT CONDITION 4 – Sample Point

The outlet to the watercourse shall be constructed, maintained and appropriately labelled so that a representative sample of the Discharge may be obtained at National Grid Reference ST15308770, as shown marked 'Consent Point' on Plan AN0287201.

Access to the sample and discharge point was not possible at the time of the visit, with DCWW operators not knowing the precise location of the outlet of the EO.

Note that while condition 4 was breached, the listed sample point in the permit is assumed to be inaccurate to the reality of the infrastructure currently in place. Further details on this are outlined in the report content above with requisite actions set.

Actions required by dates specified

1. Identify where the EO discharge point is located and confirm (with evidence) this with NRW.

Deadline: 07/11/2025

2. Remove the large potted plant from in front of the SPS compound gate to improve access. Evidence of the works completion shall be provided to NRW.

Deadline: 07/11/2025

3. Undertake vegetation clearance within the SPS compound to improve access. Evidence of the works completion shall be provided to NRW.

Deadline: 07/11/2025

4. 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: 07/11/2025

5. Investigate and assess the root ingress present in the wet well. Any maintenance required should be notified to NRW and evidence of works undertaken provided.

Deadline: 07/11/2025

6. Inform NRW of the storage capacity of the SPS.

Deadline: 21/10/2025

7. Provide details and evidence of the most recent telemetry system service and calibration records.

Deadline: 21/10/2025

8. Provide details and evidence of the most recent pump service and maintenance records.

Deadline: 21/10/2025

9. Investigate and assess the corrosion present on some of the valve chamber infrastructure. Any maintenance required should be notified to NRW and evidence of works undertaken provided.

Deadline: 07/11/2025

10. Confirm and inform NRW (with evidence) the location of the tanker point for this SPS.

Deadline: 21/10/2025

11. Once identified (Action 1 above), undertake the permit variation process to change the sample and discharge points to reflect their current, appropriate and accurate location. It is advised that the sample point should be accessible and maintained to allow access for NRW sampling teams at all times. Further information on the variation process shall be supplied on request.

Deadline: 08/12/2025

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.

Please note, this comment is not an action. 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.

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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.