



Project:	145522 – Morgan Sindall – King Henry VIII Secondary School	Date:	27-Nov-25
Reference:	145522.271125.JH.NRW		
Subject:	Permit Variation Note		
Distribution:	Susan Lenthall & Asta Smith - Natural Resources Wales		
Copied:	Steve Langford – Morgan Sindall Construction & Infrastructure Limited Ian Collins - Morgan Sindall Construction & Infrastructure Limited		
From:	Ashfield Solutions Limited		

1 Purpose of Document

Ashfield Solutions Limited (“Ashfield”) has been appointed by Morgan Sindall Construction & Infrastructure Limited (“Morgan Sindall” or “the Client”) to prepare this technical note in support of compliance with the existing temporary discharge permit. The purpose of this document is to inform Natural Resources Wales (“NRW”) of minor amendments to the temporary surface water discharge arrangements for Phase 2 construction works at Old Hereford Road, Abergavenny, NP7 6EP (“the site”).

The objectives of this document are to:

1. Summarise the proposed updates to the surface water management strategy for Phase 2 works.
2. Demonstrate that these changes do not significantly change from the original permit.
3. Confirm that all works will remain fully compliant with the scope and conditions of Environmental Permit EPR/CB3997ZY.
4. Seek NRW's agreement that these changes may be accepted and do not require a formal variation to the permit.

2 Background

The existing Environmental Permit (Reference. EPR/CB3997ZY) was originally issued on 6th September 2023 to support Phase 1 construction activities, mainly the temporary discharge of treated surface water. The permit approved by NRW allows for the following:

“This permit regulates the discharge site drainage into an unnamed stream of the Afon Cibi. The site drainage originates from a building site at King Henry VIII school site as it is being re-developed to include the construction of Abergavenny 3 -19, King Henry III school. The site drainage will consist of collected surface water run-off that will be captured through land drains on site. These land drains are terminated within the Swale. Silt water from the swale is then pumped back out to the TT10 treatment tank, where it is dosed with 60mg/l Ferric Chloride, a coagulant and 40mg/l Anionic flocculant. From there it passes to a lamella plate settlement tank before it is discharged to the stream. The maximum flow rate is 15 litres/second, with a maximum daily rate of 432m³/day.”

The permit boundary encompasses the entire site, including the Phase 2 working area. The Phase 2 working area comprises a 2.98Ha area in the northeast of the site (please refer to the enclosed site drawing of the Phase 2 works area). Phase 2 involves further earthworks (cut and fill) and is subject to temporary surface water accumulation as a result of rainfall events. Accordingly, temporary surface water controls remain necessary to ensure that discharges continue to meet the limits and treatment standards set out in the existing permit.

3 Summary of Proposed Changes

The proposals do not change the parameters of the permit. However, given the location of Phase 2 works, Morgan Sindall is seeking to update the location of treatment systems and, ultimately, the discharge point (to the Afon Cibi)

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due to the positioning of on-site drainage. These proposed changes are a direct result of logistical and operational challenges of the Phase 2 works in relation to the school being operational following the completion of Phase 1 construction activities. No changes are proposed to the treatment process, discharge rates, or the environmental risk profile of the activity.

Updated Working Area (Phase 2)

Phase 2 construction works now require temporary surface water management within the eastern portion of the site (please refer to the drainage strategy and water treatment system strategy drawings enclosed). This area lies fully within the boundary covered by the existing permit.

Discharge Point Relocation

The temporary outfall location will be moved approximately 30 metres along the Afon Cibi (New Grid Reference: SO 29822 15155), labelled as 'Outfall 4' on the enclosed drainage strategy drawing.

- The relocation is required for practical on-site logistics and to facilitate connection from the Phase 2 working area to existing storm water drains that discharge into the Afon Cibi.
- The proposed discharge shall outfall to the permitted surface water body, with the same permitted treatment process and quality standards.

Temporary Storage Arrangements

Temporary storage and settlement will be provided via a tank-based system. Surface water from rainfall is intercepted by temporary land drains installed along low points, which convey runoff into a designated sump. From the sump, water is pumped into the temporary storage tank system, which provides both hydraulic attenuation and primary settlement. The tanks have been selected to maintain sufficient residence time for solids to settle prior to treatment.

Although the original permit referenced swales for temporary storage, the enclosed tank system provides a defined and consistently available storage volume, improved initial settlement conditions, and more controlled runoff capture via land drains. Given the smaller contributing catchment (2.98 ha) and the unchanged treatment process downstream, the tank-based arrangement offers storage performance equivalent to, or better than, that assumed under the original permit.

Discharge Rate

Drainage calculations have been made in the original accepted permit application. This was calculated as 15 litres/second. The 15 L/s limit was originally calculated for the full 10.7 ha site and represents the maximum runoff scenario. Phase 2 covers 2.98 ha (around 28% of the total area), meaning the contributing catchment is significantly smaller than the one used in the original assessment.

As peak runoff is proportional to catchment size, Phase 2 will generate lower flows than the whole-site scenario. With storage provision equal to or better than Phase 1, actual discharge rates during Phase 2 are expected to remain well below 15 L/s.

The existing limit therefore remains appropriate and within the parameters of the current permit.



No additional changes to the permitted activity are proposed. The revisions set out in this variation do not alter the approach established in the original application and are not considered significant. The treatment system and receiving water body remain unchanged, and the strategy will operate at a discharge rate lower than that previously permitted, ensuring continued compliance. The Water Treatment System Strategy drawing enclosed, highlights the minimal changes from the Phase 1 pumping system setup to the Phase 2.

4 Compliance with Existing Permit Conditions

The proposed changes remain compliant with the existing permit for the following reasons:

- The permit boundary covers the entire site, including phase 2.
- The receiving watercourse remains the same.
- The nature of the discharge (treated surface water from construction works) is unchanged.
- The volume and flow rates associated with Phase 2 are lower than those assessed within the original application.
- All pollution prevention and monitoring measures remain in place.

5 Request for NRW Confirmation

Given the minor nature of the updates and the reduction in environmental risk, Ashfield request NRW's confirmation that the existing permit remains valid and that these amendments may be accepted as an update to the site management arrangements without the need for a formal variation.

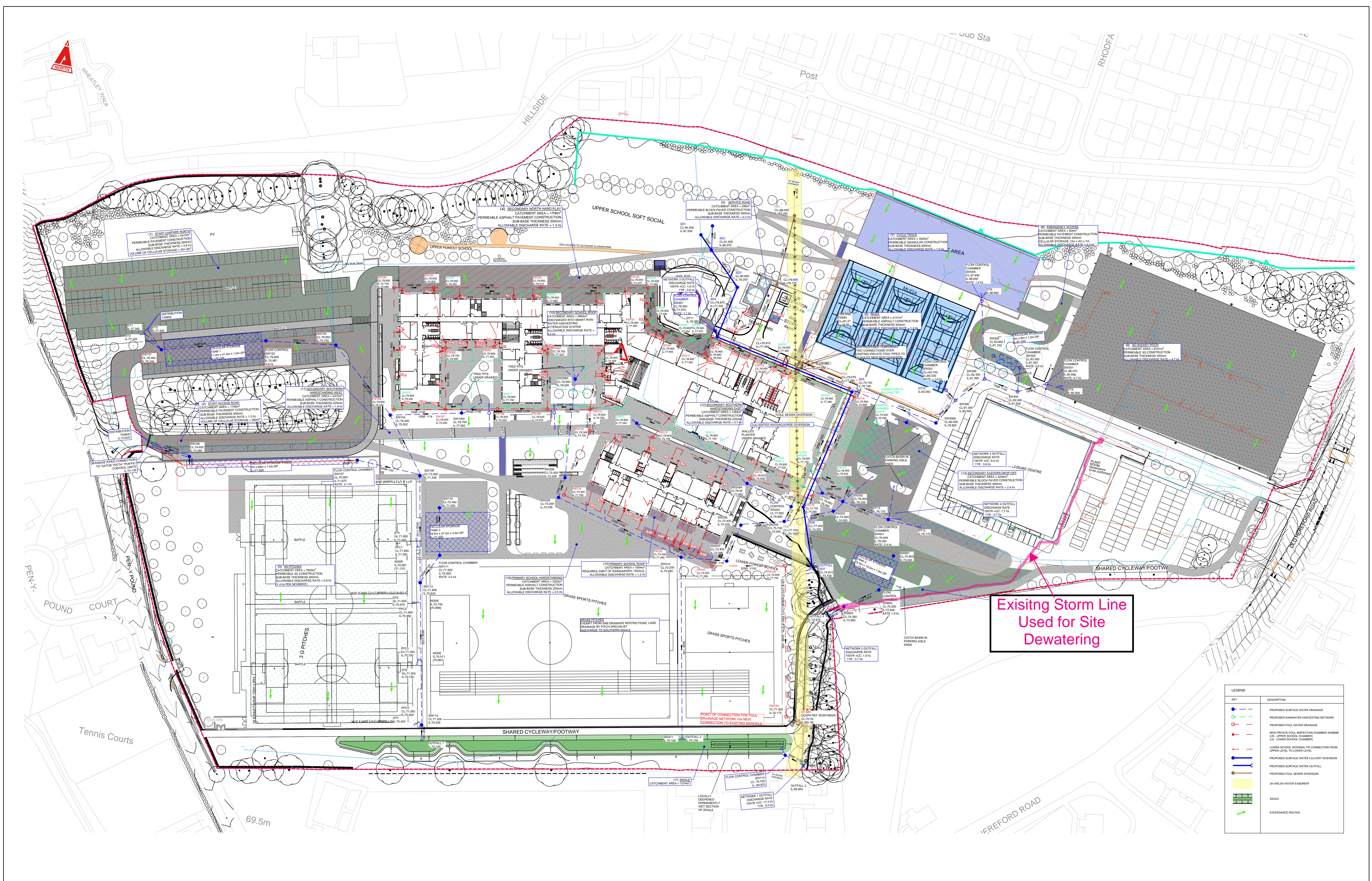
Enclosed.

Phase 2 Site Location
Drainage Strategy overview Drawings
Updated Water Treatment System Strategy



- Legend
- Phase 1 Boundary
 - Phase 2 Boundary

Client	Morgan Sindall	
Project	Abergavenny School	
Title	Site Layout	
Report No.	Drawing No.	Revision
145522-S01	01	-
Scale	Date	Frame Size
1:2,000	25/11/2025	A3
Produced by	Drawn by	Approved by
LC	LC	JH



Existing Storm Line
Used for Site
Dewatering

KEY	DESCRIPTION
	PROPOSED SURFACE WATER DRAINAGE
	PROPOSED RAINWATER HARVESTING NETWORK
	PROPOSED FOUL WATER DRAINAGE
	NEW PRIVATE FOUL INSPECTION CHAMBER 400MM Ø (S1 - UPPER SCHOOL CHAMBER, S2 - LOWER SCHOOL CHAMBER)
	LOWER SCHOOL INTERNAL FOU CONNECTION FROM UPPER LEVEL TO LOWER LEVEL
	PROPOSED SURFACE WATER CLUSTER DIVERSION
	PROPOSED FOUL WATER OUTFALL
	PROPOSED FOUL SEWER DIVERSION
	3M WELSH WATER EASEMENT
	SCALE
	EXCESSANCE ROUTES

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