

Compliance Assessment Report CAR_NRW0044548

Permit being assessed: BP0282301

For: Settled Storm and Emergency Overflow at Picton Place SPS, **held by:** DWR CYMRU CYFYNGEDIG

At: County Hall Car Park, Freemans Way, Pembrokeshire, SA61 1UG.

Type of assessment carried out: Site Inspection,

Reason: Incident Response (Incident number: 2401932).

On 05/02/2024, between 16:00 and 17:00.

Parts of permit assessed: Monitoring & Reporting Conditions

NRW Lead Officer: Shane Thomas.

Report sent to: CARS@dwrwymru.com, CARS Mailbox, on 23/01/2026.

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

Part of permitted activity assessed (criteria)	Assessment result	Non-compliant permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C2 Significant	2.3.2a i & ii

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	Implementation of procedures to avoid a repeat occurrence in future.	25/06/2024

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

Polfax sent to DCWW on the 05/02/2024 13:57 – “Sewage seen in the main river close to the skatepark. This is grey and turning the river white. Solids also seen. Outfall close to the skatepark is thought to be the discharge point.”

Initial Update from DCWW (05/02) - Operational staff and network crews are on route to investigate

Further Update from DCWW (05/02) - Operator attended site due to duty pump air locking. This was resolved whilst on site. SPIN alarm ‘High level pumps running low or no flow’ generated at 23:00 due to repeat air lock but not passed on by Smarthub to Standby Officer

Final Update from DCWW (05/02) - operator identified alarm however attendance was delayed due to other reactive pressures when POLFAX was received. 16:00PM operator attended Picton Place SPS site, asset found to be discharging intermittently from storm overflow over the weekend. It was identified that the duty pump had air locked and was not passing forward any flow. Pumps were reset and flow was restored, discharge ceased. No visual impact to watercourse. Photos and samples have been taken. Investigations to be carried out to determine reasoning for pumps air locking.

Report completed by consultancy firm Ricardo on 29/02/2024 on the cause of the incident

NRW received an email from DCWW on the 28/05/2024 -

"We do not hold this information but in the interest of trying to assist, in considering other data held, we estimate that the population equivalent for the effluent entering Picton SPS is 16,625. We arrive at this estimate having considered the total number of properties in the vicinity and by deducting those which are known not to enter a treatment works via Picton SPS. The available data and this method of calculation means that we are not certain."

Picton SPS transfers the majority of sewage from Haverfordwest (approx. 16,000 people) to the Merlin's Bridge STW. It seems as though the pumping station and storm tank were fully charged and spilling and no effluent or very little effluent was being passed forward and was instead over the weekend discharging into the Western Cleddau untreated.

NRW received an email from the DCWW CARS mailbox on the 21/11/2024 -

"Could we extend the due date of action 3 for Picton PS & Picton Fields CSO, CAR_NRW0044548 to 30th June 2025 please. Due to its design Picton Storm tank clean is complex with a significant health and safety risk associated with it. A limited dry weather window is available and we have been unable to go ahead with the work within the timeframe previously mentioned. We are still looking to go ahead with the clean as soon as reasonably practicable but are awaiting some further costs from our contractors and will need a sufficient weather window to complete the works. We are working as quickly as possible to get this clean completed."

NRW response to above email dated 21/11/2024 -

We note your response to the CAR form, and whilst understanding the difficulties at this

site, we cannot formally agree to the extension. Please can you answer the following -

1. Why was the tank designed in such a way as to make cleaning extremely difficult
2. When was the tank last cleaned
3. What is the scheduled cleaning frequency for this tank
4. Why hasn't the tank been fitted with a measurement system to measure any build-up of silt?

6 Jan 2025

Questions 1,2,3 and 4 above do not directly link to the initial premise of this CAR form. Therefore, they will be captured in a separate and new CAR form.

Closed and Verified

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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

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 Monitoring
- WQ-C5 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

Enforcement response

Any non-compliance with a permit condition 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 twenty working days to let you know if we agree to your request.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.