

Compliance Assessment Report CAR_NRW0050683

Permit being assessed: AB0068201

For: Underwood PS Underwood Newport, **held by:** DWR CYMRU CYFYNGEDIG

At: 11 Larch Grove, Llanmartin, Newport, NP18 2EW.

Type of assessment carried out: Other,

Reason: Incident Response (Incident number: 2510608).

On 30/11/2025.

Parts of permit assessed: Site Operations

NRW Lead Officer: Elis Nuttall.

Report sent to: Dwr Cymru Welsh Water, Water Industry, on 20/02/2026.

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	C3 Minor	2.3.2(a) - Operating Techniques
WQ-B3 - Water Quality - Operations - Operating techniques	Action only (X)	
WQ-B3 - Water Quality - Operations - Operating techniques	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	Identify why the wet well was running low which led to the airlock occurring and the subsequent discharge.	20/03/2026
WQ-B3	Inform NRW of actions to address the causes of the incident and what measures will be put in place to minimise the re-occurrence of the issue in future.	20/03/2026
WQ-B3	Provide evidence that Underwood PS is now working as designed.	20/03/2026

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Incident Report

This CAR form details an self-report for and environmental incident made by Dŵr Cymru Welsh Water (DCWW) to Natural Resources Wales (NRW) (WIRS 2510608) on the 30/11/2025 at 15:14 for the permitted asset Underwood Pumping Station (11 Larch Grove, Llanmartin, Underwood, Newport, NP18 2EW), permit reference number EPR-AB0068201.

It is noted that NRW did not visit the site physically due to the operator taking all appropriate actions.

General Observations

This site is a sewage pumping station (PS) serving the DCWW sewer networks in the Underwood area of Newport City Council (NCC).

The PS has a storm overflow which is permitted to discharge storm sewage in an emergency to Monks Ditch via a discharge point at ST3793988809. An emergency shall be defined as the period when the sewage pumping station is inoperative as a result of one or more of the following, which is not due to the act or default of the operator, its agents, representatives, officers, employees or servants;

- electrical power failure;
- mechanical breakdown of duty and standby pumps;
- rising main failure;
- blockage of the downstream sewer.

The overflow setting shall be 60l/s and the maximum size of solid matter permitted for discharge shall be no greater than 6 mm in more than 1 dimension, with a screen aperture size of 6mm x 6mm required to be in place to ensure this. Monitoring frequency should be whenever a discharge occurs, with event duration monitoring in place at the effluent sampling point at ST 37961 88801.

The site was operational at the time of the report.

Incident Summary

NRW received a self-report from DCWW on the 30/11/2025 informing that Underwood PS was discharging to storm at 14:02 due to conflicting telemetry data. It was noted at 15:02 that all pumps were available and the foul and storm sumps were at normal levels. A subsequent update at 16:44 noted that the upstream SPS (Wilcrick) was experiencing an airlock on the foul pumps which was causing a reduction in pass forward flow, resulting in Underwood SPS becoming inhibited and spilling to storm. These pumps at Wilcrick SPS were cleared by standby personnel, returning both PS's to normal operation. No further updates were provided on the 30/11/2025. NRW officers awaited further updates on further investigations.

This incident was initially categorised as a High Level (Category 2) due to discharges to main river (Monks Ditch) and potential impact to a Site of Special Scientific Interest (SSSI; Gwent Levels) downstream.

On the 01/12/2025, DCWW informed NRW that personnel were attending both Underwood PS and Wilcrick PS to carry out checks with further investigations needed to identify the route cause. No further issues were found with site operations at the time of this visit. The site was also attended by a DCWW pollution technician who collected ammonia samples from Monk's ditch (the receiving watercourse).

On the 02/12/2025 DCWW contacted the local NRW officer and confirmed no further actions were required. No further incident response updates were provided.

Investigation Summary

Initial NRW investigations raised several questions regarding the caused the discharge and DCWW's response timings. It was evident from assessing the Event Duration Monitoring (EDM) data that the storm overflow had been discharging from ~20:00 on the 29/11/2025 despite DCWW claiming that the alarm notification was received at 14:02 and NRW being informed at 15:02. This means that the PS had been discharging for approximately 19 hours before NRW were informed.

As such, it was requested that DCWW answer the following questions (answers in *Italics*):

1. What caused the airlock at Wilcrick PS?

An airlock was caused by the well level running to low and causing the pumps to draw air.

2. How are the systems (Underwood PS and Wilcrick PS) connected?

Underwood PS pumps into Wilcrick PS, therefore if a high level is triggered in Wilcrick it will inhibit underwood due to the fact the underwood SPS pumps over 50l/s to Wilcrick and Wilcrick only pumps at approx. 15l/s.

3. Why didn't the alarm go off on the 29/11/2025?

Alarms did activate for High Sump and all foul pumps on stop (this is due to the Wilcrick inhibit). Other alarms were also activated – Storm well high, Storm tank Spill. Again these would have been due to the inhibit at Wilcrick PS well on high level.

4. Is the alarm being lowered so crews can attend as soon as possible?

Alarms levels have all been increased to a level 4 alarm to ensure it passed out regardless of time of day/night and will aid for a quicker response time going forward.

Additionally, DCWW submitted a No Impact Claim to NRW with further information and evidence. On assessment, it was assessed that further information was required as evidence of no impact and the following was requested:

1. A detailed timeline of actions after the alarm notification was received.

13:00 Planned maintenance crew attended site to carry out maintenance on the storm tank screens.

13:20 Planned maintenance crew notified Network Technician that the SPS was spilling to storm

14.00 Received a call from network technician ringing to report that a jet vac crew were on site at Underwood SPS carrying out a storm screen clean and the site spilling to storm.

14.05 Checked telemetry, Underwood & Wilcrick SPS

14.10 Rang area standby to attend site, both Wilcrick & underwood SPS to carry out eyes on check to see if everything was ok.

15.10 self-report submitted.

15.15 Update from standby, Wilcrick SPS pumps airlocked. Pumps bled and returned to service.

16.10 Update from Standby at Underwood SPS, no longer spilling and site operating as normal.

16.45 updated Self report everything back to normal both sites operating as designed.

2. Telemetry data and details on why the alarms did not activate when the spill was detected on the 29th.

Alarms did activate for High Sump and all foul pumps on stop (this is due to the Wilcrick inhibit). Other alarms were also activated – Storm well high, Storm tank Spill. Again, these would have been due to the inhibit at Wilcrick well on high level.

Alarms levels have all been increased to a level 4 alarm to ensure it passed out regardless of time of day/night and will aid for a quicker response time going forward. This will aid a quicker response time.

3. Identify what factors lead to the airlock occurring. What is the maintenance history? When was the system last assessed and classified as operationally sound?

An airlock was caused by the well level running to low and causing the pumps to draw air Every time maintenance is carried out at the site the pumps are checked and this where they will be deemed operationally sound. The last maintenance visit to the SPS was 25.10.2025.

Mechanical and Electrical maintenance on the Pumps February 2024.

Telemetry and Air Valves maintenance was carried out December 2024.

4. When were the sample taken and what evidence is available to support that they show the conditions in Monks Ditch at the time of the discharge and as such support the no impact claim?

Samples were collected the following day on the 1st of December, the levels are low and Monks Ditch is pictured in the background of the photo. No visual impact to Monks Ditch and no debris to be seen.

Images also collected by Planned Maintenance show the waste pumping to storm. With short intermittent spills to Monks Ditch.

Upstream 0.77ppm

POE 0.00ppm

Downstream 0.88ppm

Despite DCWW answering all of these queries, it overall has not supplied sufficient evidence to support that the discharge had no impact on the watercourse or that the asset was working as designed.

Investigation Conclusions

It is clear that the asset is not working as designed and there is no evidence that there was no impact to the receiving watercourse (Monks Ditch). As such, the no impact claim was rejected. However, the initial categorisation of High Level (Category 2) was downgraded to a Low Level (Category 3) due to the extent of the impact not being captured, and as such could not be assessed. The response to this incident will be a warning letter (via CAR Form) due to a breach of permit conditions and no evidence to support that the discharge had no environmental impact. Please see further details and justification in the section below.

Breaches of permit conditions

Below are the permit breaches that were identified during the site inspection.

1. CATEGORY 3 BREACH – PERMIT CONDITION 2.3.2(a) – Operating Techniques

The discharge shall only occur when and only for as long as either:

(i) the flow passed forward is equal to or greater than the overflow setting indicated due to rainfall and/or snow melt or

(ii) the hydraulic capacity of the sewer network downstream of the combined sewer overflow is reached due to rainfall and/or snow melt and the level of storm sewage in the sewer at the combined sewer overflow is greater than the weir level of the overflow structure which is specified as an overflow setting in table S3.3.

The capacity of the sewer network downstream of the combined sewer overflow shall not be altered in any way which would lead to a significant increase in the frequency or volume of the discharge.

Justification: The discharge occurred due to an airlock at Wilcrick PS as a result of the wet well level running low and the pumps drawing air and inhibiting Underwood SPS. This mechanical failure and subsequent inhibit and spill was not due to rainfall or snow melt and as such is a contravention of Condition 2.3.2(a). Due to this, discharge of storm sewage entered a main river.

Actions required by dates specified

1. Identify why the wet well was running low which led to the airlock occurring and the subsequent discharge.

Deadline: 20/03/2026

2. Inform NRW of actions to address the causes of the incident and what measures will be put in place to minimise the re-occurrence of the issue in future.

Deadline: 20/03/2026

3. Provide evidence that Underwood PS is now working as designed.

Deadline: 20/03/2026

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

No advisory comments.

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@naturalresourceswales.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 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.