

## Compliance Assessment Report CAR\_NRW0050852

**Permit being assessed:** BP0236603

**For:** CSO and EO at Knab Rock Sewage Pumping Station, **held by:** DWR CYMRU CYFYNGEDIG

**At:** Mumbles Road, Opposite Car Park, Knab Rock, Mumbles, Swansea, Swansea, SA3 4EN.

**Type of assessment carried out:** Report/Data Review,

**Reason:** Routine.

**On** 29/09/2025.

**Parts of permit assessed:** 3.1 Emissions to water

**NRW Lead Officer:** Sarah Bennett.

**Report sent to:** CARS@dwrwymru, CARS mailbox, on 25/02/2026.

### 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	C4 No impact	3.1.2 (b)
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	
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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 ensure that Full Investigation Proposals are submitted on time following a spill trigger exceedance.	Already completed

Criteria	Action needed	Complete by
WQ-C1	Mitigation to increase FPF - Carry out mitigation to increase FPF if you are able to minimise potential risks. Expected completion date 04/05/2026. Please update us on progress by 08/05/2026.	08/05/2026
WQ-C1	Gravity network survey work for identified hot spots - conduct a survey of designated network targets in the upstream catchment. Expected completion date 30/06/2026. Please update us on progress by the 10/07/2026.	10/07/2026
WQ-C1	Catchment modelling - rebuild upstream gravity catchment modelling with new information. Expected completion date 31/12/2026. Please update us on progress by 08/01/2027.	08/01/2027
WQ-C1	Catchment modelling - run modelling with remedial optioneering. Expected completion date 30/06/2027.	30/06/2027
WQ-C1	Please provide us with a Stage 3 TERR by the 14 August 2027	14/08/2027

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 Compliance Assessment Report is to:

- Record compliance with Condition 3.1.2 (b)
- Provide a summary of my review of a Full Investigation Proposal (FIP)
- Record my approval of the FIP
- Give actions which align with the FIP
- Give advice on compliance with Condition 3.1.2 (c)

#### Compliance with Condition 3.1.2 (b)

Condition 3.1.2 (b) of your permit requires you to do the following.

3.1.2 Effective from the date of installation of EDM monitoring equipment at the site:

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;

The trigger was exceeded on the 12 June 2025, you notified us of the exceedance within

the required time period and then should have submitted the follow up information required by the 29 September 2025. We did not receive this information until the 26 January.

Failing to submit the information within the specified time period is a breach of permit condition 3.1.2 (b) and under Regulation 38 (2) of the Environmental Permitting Regulations 2016, it is an offence for a person to fail to comply with or to contravene an environmental permit condition.

This type of breach would normally attract a score of 3 due to the potential impact delays in developing a solution can have on the environment. However, my understanding is that you have been working on reducing the number of spills and investigating flows despite the FIP being submitted late. I have therefore given the non-compliance a score of 4.

**Please ensure that Full Investigation Proposals are submitted on time following a spill trigger exceedance. Any Advice and Guidance in this report is given formally as part of our enforcement response.**

#### Summary of my review of a Stage 2 Initial Investigation and FIP

I have read through the Stage 2 Initial Investigation with a view to approving the Full Investigation Proposal (FIP) as per Condition 3.1.2 (b).

Whilst I appreciate that more investigations are still needed to identify all the reasons for the Trigger Exceedances, you appear to have already identified a number of reasons, notably:

- Failure to consistently pass forward 189 l/s
- Saline and intrusion and hydraulic overloading
- A lack of adequate storm storage

My understanding is that

- you consider the impact of saline intrusion and hydraulic overloading to be a significant contribution to spill numbers
- the relatively small, short fall in FPF from the SPS is currently being addressed
- any interventions involving changes to storm storage would be considered post inflow and infiltration removal and not at this stage.

The Full Investigation Proposal you have sent to us includes actions which we would normally expect to see in Stage 3 (Trigger Exceedance Reasons Report TERR), Stage 4 Spill Reduction Plan (SRP) and Stage 5 Implementation of the overall spill reduction process.

I think that Sections 1, 2a and 2b are part of the Stage 2 FIP. At the end of this stage, you should have all the information you need to provide us with a Stage 3 TERR.

I do not think that Sections 3 and 4 are actions you would normally propose in a FIP and I would expect them to be delivered as part of a Stage 3 SRP. The action in Section 5 lacks any description so I cannot tell if it is part of the SRP or a Stage 5 Implementation of the solution.

You have also submitted information in the Stage 4 Spill Reduction Plan (SRP) for our

approval. Whilst the work planned in this section may reduce the number of spills and may provide essential information you need to develop a spill reduction plan, it is not a fully developed plan that I can agree to under Condition 3.1.2 (d) of your permit'

- 3.1.2 Effective from the date of installation of EDM monitoring equipment at the site:  
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:  
(d) submit a plan with timeframes to resolve the reason/s for the Trigger Exceedance identified in 3.1.2(c) for approval by Natural Resources Wales;

Given that the mitigation you have included in the SRP section of the report is a trial to 'aim to meet the permit FPF requirement and determine if higher flow velocity can clear debris from the rising main, thus reducing frictional losses, system head loss, and improving FPF flows' I think this work should be included in the FIP. You are essentially carrying out an investigation to see if increasing the FPF, even temporarily, delivers some longer-term benefits. Proposing to run a SPS without a standby pump installed is not a long-term solution.

#### Approval of the Full Investigation Proposal

**I approve Sections 1, 2a and 2b on page 8 and section 1 on page 9 of the submitted Stage 2 report as a Full Investigation Proposal. The end dates of the actions you have proposed are reflected in the actions listed below.**

#### Actions aligning with the FIP

**Action: Mitigation to increase FPF - Carry out mitigation to increase FPF if you are able to minimise potential risks. Expected completion date 04/05/2026. Please update us on progress by 08/05/2026.**

**Action: Gravity network survey work for identified hot spots - conduct a survey of designated network targets in the upstream catchment. Expected completion date 30/06/2026. Please update us on progress by the 10/07/2026.**

**Action: Catchment modelling - rebuild upstream gravity catchment modelling with new information. Expected completion date 31/12/2026. Please update us on progress by 08/01/2027.**

**Action: Catchment modelling - run modelling with remedial optioneering. Expected completion date 30/06/2027.**

#### Compliance with Condition 3.1.2 (c)

- 3.1.2 Effective from the date of installation of EDM monitoring equipment at the site:  
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:  
(c) 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;

On completion of the actions above you should have all the information you need to provide us with the report required by Condition 3.1.2 (c) otherwise known as a Stage Trigger Exceedance Reason Report 3 TERR.

**Action: Please provide us with a Stage 3 TERR by the 14 August 2027.**

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 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](mailto: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](mailto: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.