

Compliance Assessment Report CAR_NRW0050875

Permit being assessed: LP3135SB.

For: Docksway Generation Plant EPR/LP3135SB/V003, **held by:** Novera Energy Generation No 2 Limited

At: Generation Plant Docks Way , Newport, South Wales, NP20 2NS.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: See Comments.

NRW Lead Officer: Luke Burton.

Report sent to: [REDACTED] , Compliance Manager, on 26/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4B - Installations - Information - Reporting	Action only (X)	
IR4B - Installations - Information - Reporting	Action only (X)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR4B	Annual Performance Indicators: Operator to provide, via email, explanation of gas engine downtime hours vs. flare operation hours.	31/03/2026
IR4B	Annual Performance Indicators: Operator to confirm, via email, dates and times of engine down time and flare	31/03/2026

Criteria	Action needed	Complete by
	operation throughout 2025.	
IR3A(2)	Emission limits - Operator to confirm, via email, the limits they are monitoring for, from Table 2.2.2 IP1 and IP2	31/03/2026

Compliance 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

Regulatory context

This Compliance Assessment Report (CAR) has been produced in response to the submission of the annual performance report(s) and monitoring data.

This assessment was undertaken on 26 February 2026. However, to ensure that the assessment score is attributed to the correct financial year (for billing) the date on the CAR has been altered to 31 December 2025.

Reporting for the following period(s) have been assessed in this CAR form: 01/01/2025 to 31/12/2025.

Permit conditions

Condition 4.1.3 of the environmental permit states:

The Operator shall submit to the Agency a report on the performance of the Permitted Installation over the previous year, by 31 January each year, providing the information listed in Tables S4.1 and S4.2 of Schedule 4, assessed at any frequency specified therein, and using the form specified in Table S3 to Schedule 3.

Table S4.1 of Schedule 4 to the environmental permit is partially reproduced below.

Energy Imported (MWh)	Energy Exported (MWh)	Energy Used on Site (MWh)	Site Efficiency (%)

Table S4.2 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.2: Performance parameters

Parameter	Frequency assessment	of	Performance indicator
Potable water use	Annually		m ³ /t
Non potable water use	Annually		m ³ /t

Table S3 of Schedule 3 to the environmental permit is partially reproduced below.

Table S3: Reporting Forms

Media / parameter	Form Number	Date of Form
Air	A1	
Energy	E1	
Water usage	WU1	
Performance indicators	PI1	

The operator has reviewed and amended their reporting forms to provide a more accurate reflection of on-site operations. Natural Resources Wales accepts these amendments.

Condition 4.1.2 of the environmental permit states:

The Operator shall, unless otherwise agreed in writing, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:-

4.1.2.1 in respect of the parameters and emission points specified in Table S2 to Schedule 2;

4.1.2.2 for the reporting periods specified in Table S2 to Schedule 2 and using the forms specified in Table S3 to Schedule 3;

4.1.2.3 giving the information from such results and assessments as may be required by the forms specified in those Tables; and

4.1.2.4 to the Agency within 28 days of the end of the reporting period.

Table S2 of Schedule 2 to the environmental permit is partially reproduced below.

Table S2: Reporting of monitoring data

Parameter	Emission point	Reporting period	Period begins
Total Volatile Organic Compounds (VOCs) mg m ⁻³	A1, A2	Annually	On the anniversary of the date of issue of this permit
Non methane VOCs mg m ⁻³	A1, A2	Annually	On the anniversary of the date of issue of this permit
Sulphur Dioxide mg m ⁻³	A1, A2	Annually	On the anniversary of the date of issue of this permit
Oxides of Nitrogen mg m ⁻³	A1, A2	Annually	On the anniversary of the date of issue of this permit
Carbon Monoxide mg m ⁻³	A1, A2	Annually	On the anniversary of the date of issue of this permit

Condition 2.10.1 of the environmental permit states:

The Operator shall maintain and implement an emissions monitoring programme which ensures that emissions are monitored from the specified points, for the parameters listed in and to the frequencies and methods described in Table 2.2.2, unless otherwise agreed in writing, and that the results of such monitoring are assessed. The programme shall ensure that monitoring is carried out under an appropriate range of operating conditions.

Table 2.2.2 of the environmental permit is partially reproduced below.

Table 2.2.2 : Emission limits to air and monitoring

Emission point reference	Parameter	Limit (including Reference Period)¹	Monitoring frequency	Monitoring method
A1 & A2	Nitrogen Dioxide	To be set upon collection of initial data set as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1.	Annually (once initial data set has been collected as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1)	As documented in Agency's Guidance for Monitoring Landfill Gas Engine Emissions.
A1 & A2	Carbon Monoxide	To be set upon collection of initial data set as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1.	Annually (once initial data set has been collected as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1)	As documented in Agency's Guidance for Monitoring Landfill Gas Engine Emissions.
A1 & A2	Sulphur Dioxide	To be set upon collection of initial data set as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1.	Annually (once initial data set has been collected as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1)	As documented in Agency's Guidance for Monitoring Landfill Gas Engine Emissions.
A1 & A2	Total Volatile Organic Compounds (VOCs)	To be set upon collection of initial data set as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1.	Annually (once initial data set has been collected as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1)	As documented in Agency's Guidance for Monitoring Landfill Gas Engine Emissions.
A1 & A2	Non-Methane Volatile Organic Compounds (NM VOCs)	To be set upon collection of initial data set as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1.	Annually (once initial data set has been collected as required by Improvement Condition IP 1 and IP 2 in Table 1.4.1)	As documented in Agency's Guidance for Monitoring Landfill Gas Engine Emissions.

Condition 2.2.1.3 of the environmental permit states:

The limits for emissions to air for the parameter(s) and emission point(s) set out in Table 2.2.2 shall not be exceeded. Emission limits for the point references identified in Table 2.2.1 are to be set following collection of adequate data by the Operator as a result of Improvement Conditions in Section 1.4 and Table 1.4.1 of this permit.

Table 2.2.1 of the environmental permit is partially reproduced below.

Table 2.2.1 : Emission points to air

Emission point reference or description	Source	Location of emission point
A1 Engine stack 1	Exhaust of landfill gas spark ignition engine	Shown on Figure 2.1 Schematic diagram of the Docksway generating plant and Figure 2.2 'Photograph of the Docksway generating plant emission stacks and flare'. On page 10 of Supplementary Technical Information Report A1/058 - report 14150
A2 Engine stack 2	Exhaust of landfill gas spark ignition engine	Shown on Figure 2.1 Schematic diagram of the Docksway generating plant and Figure 2.2 'Photograph of the Docksway generating plant emission stacks and flare'. On page 10 of Supplementary Technical Information Report A1/058 - report 14150

Improvement conditions and tables from Section 1 of the environmental permit have not been reproduced in this CAR but are available on pages 2 - 4 of the environmental permit.

Assessment and conclusion – Condition 4.1.3

Report(s) for condition 4.1.3 were submitted via email on 19/01/2026

The report(s) submission was made inside which represents compliance with the environmental permit.

The report(s) submitted include the parameters specified in schedule 4 table S4.1 and S4.2 which represents compliance with the environmental permit.

The report(s) submitted are for the reporting periods specified in schedule 4 table S4.1 and S4.2 which represents compliance with the environmental permit.

The report(s) have not been submitted using the forms specified in Table S3 which represents compliance with the environmental permit.

The operator has reviewed and amended their reporting forms to provide a more accurate reflection of on-site operations. Natural Resources Wales accepts these amendments.

Action - Annual Performance Indicators: Operator to provide, via email, explanation of gas engine downtime hours vs. flare operation hours.

Action - Annual Performance Indicators: Operator to confirm, via email, dates and times of engine down time and flare operation throughout 2025.

Assessment and conclusion – Condition 4.1.2

Report(s) for condition 4.1.2 were submitted via email on 19/01/2026.

The report(s) submission was made inside the reporting window, which represents compliance with the environmental permit.

The report(s) submission was made inside the reporting window, which represents compliance with the environmental permit.

The report(s) submitted include the parameters specified in schedule 2 table S2 which represents compliance with the environmental permit.

The report(s) submitted are for the emission or monitoring points [where relevant] specified in schedule 2 table S2 which represents compliance with the environmental permit.

The report(s) submitted are for the reporting periods specified in schedule 2 table S2 which represents compliance with the environmental permit.

The report(s) have not been submitted using the forms specified in Table S3 but do give the information from such results and assessments as required by the forms specified in those tables which represents compliance with the environmental permit.

The operator has reviewed and amended their reporting forms to provide a more accurate reflection of on-site operations. Natural Resources Wales accepts these amendments.

Assessment and conclusion – Condition 2.10.1

A review of the operator's monitoring, its quality and reliability does not form part of this assessment.

Assessment and conclusion – Condition 3.1.2

A review of the operator's monitoring results do not form part of this assessment.

Action: Emission limits - Operator to confirm, via email, the limits they are monitoring for, from Table 2.2.2 IP1 and IP2

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 of 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	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

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.