

Compliance Assessment Report CAR_NRW0051619

Permit being assessed: BC0003001

For: GOWERTON WwTW, **held by:** DWR CYMRU CYFYNGEDIG

At: GOWERTON WwTW, VICTORIA ROAD, GOWERTON, SWANSEA, SA4 3AB.

Type of assessment carried out: Report/Data Review,

Reason: Routine.

On 25/03/2026.

Parts of permit assessed: 3.1.6 Emissions to Water

NRW Lead Officer: Sarah Bennett.

Report sent to: CARS@dwrwymru.com, CARS Mailbox, on 24/04/2026.

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	3.1.6(b)
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	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	Advice: Please try to submit any future reports within the required 3-month period.	Already completed
WQ-C1	Please provide us with an update on how you are progressing with sourcing the technology and equipment needed to complete the actions you have listed in your Full Investigation Proposal.	29/05/2026

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.

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 report is to:

- **assess and record compliance with Conditions 3.1.6(b-d) relating to a Spill Frequency Trigger (SFT) exceeded on 10/11/2025**
- **record our comments and approval of a Stage 2 Full Investigation Proposal (FIP) and Stage 3 Trigger Exceedance Reason Report (TERR) submitted on 25/03/2026**
- **give advice on complying with Condition 3.1.6(c) going forward.**

Compliance with Condition 3.1.6(b) relating to a SFT exceeded on 01/12/2025

The SFT set for the Storm Overflow (SO) at Gowerton WwTW was exceeded in 2021, 2022, 2023 and 2024. The permit was varied on the 20/01/2025 to include more stringent conditions relating to Spill Trigger Exceedances. The Trigger Exceedance which occurred in 2025 will be subject to the new conditions going forward.

Condition 3.1.6(b) requires you to provide a reason for a 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 you 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.

We received a Stage 2 Full Investigation Proposal (FIP) on the 25 March 2026 when it should have been sent to us by the 27 February 2026. This means you are not compliant with the requirement in Condition 3.1.6(b) to submit the proposal within 3 months. A Category 4 breach has been recorded for this non-compliance.

This breach is in contravention of Regulation 38 (2) of the Environmental Permitting (England and Wales) Regulations 2016 which states that it is an offence for a person to fail to comply with or to contravene an environmental permit condition.

Advice: Please try to submit any future reports within the required 3-month period. This Advice and Guidance is given formally as part of our enforcement response.

Comments and approval of FIP submitted on 25/03/2026

The Full Investigation Proposal provides a detailed explanation of investigations already carried out and those you intend to carry out. It also goes some way to giving a reason for the Trigger Exceedance in Stage 3 (TERR) of the report and also outlines a Spill Reduction Plan (SRP) in Stage 4. My understanding is that until the actions described in the report are completed, all the reasons for the Trigger Exceedance cannot be fully established.

So far it has been established that a reason for the trigger exceedance is poor performance of the Peak Flow Equivalent Treatment (PFET) plant especially on first flush from periods of dry weather. Solids overload puts PFET into repeated backwashing which is preventing the required Flows Passed Forward from being achieved during storm events. You have also identified other maintenance issues with leaks in the internal lanes resulting in poor

media washing.

The Stage 2 Full Investigation Proposal (FIP) in section 2 includes 4 actions.

- 1 - PFET cell major maintenance programme.
- 2 - Capital delivery.
- 3 - Fully commission optimisation modifications.
- 4 - Monitor performance.

The actions do not have any defined timescales as they are all dependant on when you are able to complete Action 1 which has been delayed due to the original manufacturer of this technology no longer supporting the process or specific equipment.

It is not standard procedure to approve a FIP with no timescales, however, on this occasion I have decided to do so given that the core part of the investigation has already been completed and some of the actions in the FIP are more in line with a Spill Reduction Plan, which is yet to be submitted fully and approved.

The Stage 3 Trigger Exceedance Reason Report (TERR) in section 3 of the report does not appear to give the reason for the exceedance. The likely overriding reason has, however, been provided elsewhere. It is possible that there may be other contributing factors to the exceedances which may have to be investigated after the PFET is performing optimally and FPF has been returned to compliance.

Compliance with condition 3.1.6(c) which requires that if a full investigation is required by condition 3.1.6 (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 will be assessed once you have completed the actions in the Stage 2 FIP and have all the information you require to submit a full TERR.

The Stage 4 Spill Reduction Plan (SRP) in section 4 includes 4 actions.

- 1 - Solids removal project.
- 2 - Modification of the backwash and blower control sequence.
- 3 - Improved backwash water using FE directly from blending chamber.
- 4 - Modification to low flow control function and implement proportional flow control off cell availability table.

Actions 1 - 3 do not have any timelines for the reasons already described. Action 4 has already been completed. At this point in time, I have not assessed compliance with condition 3.1.6(d) which requires you to submit a plan with timeframes to resolve the reason/s for the Trigger Exceedance identified in 3.1.6(c) for approval by Natural Resources Wales, because the actions you have described in Stage 2 will need to be fully completed before timelines for the SRP can be included in any plan submitted for approval.

Advice on complying with Condition 3.1.6(c) going forward.

You now need to fully implement the investigation proposal in order to comply with Condition 3.1.6(c).

Action: Please provide us with an update on how you are progressing with sourcing the technology and equipment needed to complete the actions you have listed in your Full Investigation Proposal.

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

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.