Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: EA2467090125, EA2568006065 and EA2568001169

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Jennian King
Permitting Officer
National Permitting Service
Environment Agency
Sapphire East
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By email: Jennian.King@environment-agency.gov.uk

14 October 2019

Dear Jennian,

Proposal to vary abstraction licence 24/67/090/125 (Tower Brook) at National Grid References SJ 50258 54070, SJ 50513 53955 and SJ 50801 53899, 25/68/006/065 (Tattenhall) at National Grid References SJ 52047 58332, SJ 51877 58072, and SJ 52234 58786 and 25/68/001/169 (Peckforton) at National Grid References SJ 52819 55520, SJ 52975 55306 and SJ 52860 55035

Thank you for your enquiry, which we received on 23rd September 2019.

Our understanding is that Severn Trent Water Limited are applying to formally vary three groundwater abstraction licences. They are proposing to remove the hourly quantity from two of the licences, and aggregate the quantities of all three licences together. The aggregate conditions will restrict annual abstraction to no more than 5,710,000m^3 between all three licences, and will also include a condition where no more than 25,000,000m^3 can be abstracted between all three licences over five years.

Our advice is based on the information you have provided with your enquiry.

We have no major objections but would like a response to the below queries raised during consultation:

1. Will the new licences be time limited so there will be opportunity for further review in the future?
2. How was the aggregated annual total of 5,710 Ml/year arrived at? Looking at previous documents and records as part of the Restoring Sustainable Abstraction Programme (RSAP) they show the production of sustainable yields of 5400 Ml/year and 5100 Ml/year which are lower than the proposed total. Is there a report that explains how the 5710 Ml/year is arrived at and are the Environment Agency happy that this is sustainable and justified?

3. What is the reasoning for the hourly rate being removed from two of the licences? Could this cause an impact if an increased pumping rate is used for a short duration?

Designated Sites
It is stated in the consultation document that the current abstractions are negatively impacting upon tributaries of the Aldford Brook, which is itself a tributary of the River Dee. As a supporting tributary of the River Dee and therefore the River Dee and Bala Lake Special Area of Conservation (SAC) NRW recommend that a Habitats Directive Assessment is completed to fully consider the features of the designated site, the potential impacts and the potential measures that could be put in place to ensure the integrity of the designations are not adversely impacted as a result of this proposed abstraction.

Any queries please let me know.

Yours sincerely

Hannah Pearce
Senior Permitting Officer

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