

## Compliance Assessment Report CAR\_NRW0048529

**Licence being assessed:** 20/56/71/0009.

For: Peterstone GC, held by PW Millar Golf Ltd.

At: Peterstone Lakes Golf Club, Peterstone Wentlooge, Cardiff, Newport, CF3 2TN.

**Type of assessment:** Site Inspection, Reason: Routine.

On 11/06/2025, between 10:00 and 10:40.

Parts of licence assessed: Operations & infrastructure

**NRW Lead Officer:** Elis Nuttall.

**Report sent to:** Peterstone Lakes Golf Club, Operator, on 12/06/2025.

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

Part of licenced activity assessed (criteria)	Assessment result	Licence condition
WR-A8 - Water Abstraction - Abstraction specified by licence - Other specified on licence	C3 Minor	7.1(v) - MEANS OF MEASUREMENT OF WATER ABSTRACTED

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

### 2. What action is required?

Criteria	Action needed	Complete by
WR-A8	Undertake a service and calibration of both meters (Point A & Point B) and provide evidence of certification and maintenance to NRW.	31/10/2025

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 or civil sanctions being imposed depending on the circumstances of the offence.

**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

#### Site Visit Report

This report details the site visit made by Natural Resources Wales (NRW) on the 11/06/2025 at 10:00 to PW Millar Golf Ltd (Peterstone Lakes Golf Club), license reference

number 20/56/71/0009.

I (NRW Environment Officer Elis Nuttall) attended Peterstone Lakes Golf Club, Peterstone, Wentlooge, Cardiff, CF3 2TN for a Water Resources (abstraction license) inspection where I met with the head greenkeeper. The weather was dry and sunny.

### **General Observations**

The site is a commercial golf course which holds an abstraction license for 2 separate points:

**Point A)** ST 27499 80845

**Point B)** ST 27666 80974

for the purpose of:

**Point A)** Topping up of reens and ponds to maintain water levels (1 May to 30 September inclusive).

**Point B)** Spray irrigation (1 April to 31 October inclusive).

The maximum quantities of water to be abstracted during the specified periods are as follows:

**Point A)** For the purpose of topping up of reens and ponds to maintain water levels:

14.2 cubic metres per hour

341 cubic metres per day

127,288 cubic metres per year

At an instantaneous rate not exceeding 12 litres per second.

**Point B)** For the purpose of spray irrigation:

From 06 June 2013 to 31 March 2029:

24 cubic metres per hour

192 cubic metres per day

14,400 cubic metres per year

At an instantaneous rate not exceeding 12 litres per second.

From 1 April 2029

2.48 cubic metres per hour

59.10 cubic metres per day

9,092 cubic metres per year.

At an instantaneous rate not exceeding 0.7 litres per second.

The site and abstractions were operational at the time of the visit.

### **Site Infrastructure**

During initial discussions, concerns were raised regarding Condition 6.2. of the license which stipulates a reduction in abstraction rates for Point B (spray irrigation) from 193m<sup>3</sup>/d

to 59.1m<sup>3</sup>/d from the 1<sup>st</sup> of April 2029 onwards. It was noted that the site is currently abstracting between 100-120m<sup>3</sup> to meet its requirements for irrigation, and that this will be an unsustainable reduction and means they will struggle to maintain irrigation needs. While I could not give the operators an explanation for the reduction on site, I queried this with NRW's Water Resources Permitting Team. Further correspondence on this issue will be carried out but does not form any further part of this report.

Abstraction point A was inspected at 10:10. Access to the pumphouse and infrastructure was good and secure. The location was checked against both map and grid reference and was found to be in the correct location. It was noted that the site have not used this abstraction in several years due to electrical issues, and that nil returns have been submitted reflecting this. However, the abstraction is now operational as of 22/05/2025 with an initial meter reading of 534688m<sup>3</sup>. The meter was in place and appeared to be working as designed. The reading at the time of the visit was 535025m<sup>3</sup>, as seen in Figure 1.



Figure 1 – Abstraction Point A meter at the time of the visit.

When asked if the meter held a current and valid certification it was stated that they were unsure and did not know when the meter was last calibrated. As per license condition 7.1(iv & v):

*iv) The Licence Holder shall maintain, repair or replace any meters to ensure that accurate and efficient measurements of quantities of water are recorded at all times.*

*v) The Licence Holder shall retain evidence of current certification for inspection by the*

**Body.**

As a rule, meters must be calibrated every 5 years, checked regularly for wear and tear, corrosion or other damage and should be sealed when they're in storage.

An action to undertake the above maintenance has been reflected below.

Abstraction point B was inspected at 10:40. Access to the pumphouse was once again good and secure. The location also matched the listed point in the license. Unlike point A, this abstraction was stated to have been in consistent use for irrigation purposes, however it has experienced some breakages and leaks which were last remedied on 05/06/2025. The meter was in place with a reading of 165624 at the time of the visit, as seen in Figure 2. Similarly to point A, maintenance and calibration records were unknown, so this has been included with the action for Point A.



Figure 2 - Abstraction Point B meter at the time of the visit.

I am satisfied with the overall condition and compliance for the site in line with the licence conditions. Please see the list below for the required remedial actions.

A data audit for the abstraction returns will be undertaken and issued in a separate report.

I left site at 10:40.

**Breaches of permit condition**

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

CATEGORY 3 BREACH – PERMIT CONDITION 7.1(v) - Means of measurement of water abstracted:

*v) The Licence Holder shall retain evidence of current certification for inspection by the Body.*

Justification:

Information regarding meter certification, calibration and maintenance was unknown for both Point A and Point B meters. This is a non-compliance which could have a minor environmental effect, and has thus been scored as a C3 breach. Please see below for the required remedial actions.

**Action required by dates specified**

Undertake a service and calibration of both meters (Point A & Point B) and provide evidence of certification and maintenance to NRW.

**Deadline:** Post abstraction period – 31/10/2025.

**Advisory comments**

The license is currently under the name of the previous owner, trading as PW Millar Golf Limited. If the trading name has changed after the transfer of ownership then a variation can be submitted to reflect this. Please enquire with [Adnoddaudwr.trwyddedu@cyfoethnaturiolcymru.gov.uk](mailto:Adnoddaudwr.trwyddedu@cyfoethnaturiolcymru.gov.uk) if you wish to do so.

**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](mailto:elis.nuttall@naturalresourceswales.gov.uk)  
03000 654 651/07813 396 378

Thank you,  
Elis Nuttall.



***In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.***

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 licence is issued to you under the Water Resources Act 1991 as amended by the Water Act 2003. You have a responsibility to comply with the conditions of your licence 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.

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 only relating to the activity assessment
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

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

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

**Full list of Water resource action criteria** (used in section 1 and 2):**WR A: Abstraction specified by Licence**

- WR-A1 Source of supply
- WR-A2 Points of abstraction
- WR-A3 Means of abstraction
- WR-A4 Purposes of abstraction
- WR-A5 Period of abstraction
- WR-A6 Quantities
- WR-A7 Land
- WR-A8 Other specified on licence

**WR B: Abstraction measurement and records**

- WR-B1 Means of measurement
- WR-B2 Recording
- WR-B3 Reporting

**WR C: Surface / Groundwater level and protected flow**

- WR-C1 Minimum hands-off flow/level requirements
- WR-C2 Flow/level measurement devices
- WR-C3 Recording
- WR-C4 Reporting

**WR D: Environmental monitoring and information**

- WR-D1 Recording
- WR-D2 Reporting
- WR-D3 Notifications

**WR E: Fish and eel passage**

- WR-E1 Infrastructure specified by licence
- WR-E2 Maintenance and records

**WR F: Discharge**

- WR-F1 Point of discharge
- WR-F2 Infrastructure
- WR-F3 Measurement
- WR-F4 Recording
- WR-F5 Reporting

**WR G: Impoundment specified by licence**

- WR-G1 Inland water to be impounded
- WR-G2 Manner and extent of impoundment
- WR-G3 Point(s) of impoundment
- WR-G4 Construction and removal requirements
- WR-G5 Other specified on licence

**WR H: Borehole infrastructure**

- WR-H1 Infrastructure and accessibility
- WR-H2 Maintenance and calibration

**Enforcement response**

Any licence condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution or civil sanctions. 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 20 working days to let you know if we agree to your request.

**What do I do if I disagree with the report or have a complaint?**

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Mon to Fri 08:00 – 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [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.