

Compliance Assessment Report CAR_NRW0048901

Licence being assessed: 24/66/3/0028.

For: Public Water Supply - Llwyn Isaf Boreholes, held by Dwr Cymru Cyfyngedig.

At: Llwyn Isaf, Llanrhaeadr, Denbigh, Denbighshire, LL16 4NG.

Type of assessment: Site Inspection, Reason: Routine.

On 10/06/2025, between 15:00 and 16:00.

Parts of licence assessed: 6 - maximum quantities. 8 - means of measurements

NRW Lead Officer: Philip Barrett, accompanied by Richard Smith.

Report sent to: DCWW, licence contact, on 30/07/2025.

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

Part of licenced activity assessed (criteria)	Assessment result	Licence condition
WR-A6 - Water Abstraction - Abstraction specified by licence - Quantities	C3 Minor	8.1 - The licence holder shall use a meter to measure quantities of water abstracted.
WR-A3 - Water Abstraction - Abstraction specified by licence - Means of abstraction	Action only (X)	
WR-C1 - Water Abstraction - Surface/groundwater level and protected flow - Minimum hands-off flow/level requirements	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
WR-A6	Investigate the source of the leak and carry out a fix to ensure water is used efficiently and is metered correctly	22/08/2025
WR-A3	Vary the licence so that artesian flow is included in the means of abstraction condition	31/12/2025
WR-C1	Vary the licence so that the groundwater level requirement is amended to take into account the artesian abstraction.	31/12/2025

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.

You are non-compliant with your licence.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

A visit was carried out on the 10th June 2025 to the abstraction that takes place from the boreholes at Llwyn Isaf. This is used as part of the Clwyd augmentation scheme. During the visit, an abstraction was taking place.

A check of the meter found that it was reading 19.81 l/s, with a total reading of 2307751 m³.

Condition 6 of the licence states the maximum quantity of water abstracted per day to be 2600m³.

At a continuous rate of 19.81 l/s, the daily total quantity will be 1711.6 m³ a day, therefore this is within the daily maximum quantity of the licence. However, the ground where the boreholes are situated is very boggy and overgrown. There was mention of a potential leak during the visit that was likely to be the cause of the ground not being maintained at the moment as it is too wet. The flow meter is situated on the outfall pipe that both boreholes feed to. Any leak before this will not be accounted for.

The groundwater level gauge on the side of the building appears to have been replaced since the last visit as this is now visible. There is a water mark in the pipe that lines up with the 0.2 mark on the gauge board.



The water level is at the bottom of the gauge board at 0.

Condition 5.2 (period of abstraction) of the licence states:

No abstraction shall commence to take place when the groundwater level in both boreholes P1 and P2 are at, or below, ground level (for the purpose of this condition ground level shall be taken as 30.4 metres above ordnance datum).

An email was sent to DCWW to determine what checks are carried out to comply with the groundwater level requirement. A response was received stating that the abstraction is artesian and not pumped as these have been capped off and are now redundant, therefore it isn't physically possible to abstract when the level is below ground level.

As the gauge is used by NRW, an email was sent to the hydrology and water resources management team to determine the height of the gauge board. This found that the bottom of the board is set to 31.083m AOD.

Condition 3.1 (means of abstraction) of the licence states:

Borehole P1 115.8 metres deep, 300mm diameter steel tube

Borehole P2 122.5 metres deep, 380mm diameter steel tube

One electrically driven centrifugal pump on each borehole, and one booster pump in the delivery room.

As the licence doesn't cover how the site is currently operating, a variation will need to be submitted to amend the conditions that aren't relevant.

The actions for the non-compliance scored must be carried out by the specified date.

Please do not hesitate to contact me if you wish to discuss this further.

Phil Barrett
0300 065 3670

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 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

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.