

## Compliance Assessment Report CAR\_NRW0049064

**Licence being assessed:** 21/57/31/0034.

For: Spray irrigation & wash down at Creigiau Golf Club, held by Creigiau Golf Club Ltd.

At: .

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

On 05/08/2025, between 14:10 and 15:00.

Parts of licence assessed: Conditions 1-4, 6, 8-9.

**NRW Lead Officer:** Charlotte Rhodes.

**Report sent to:** Richard Brookman, Secretary Manager, on 12/08/2025.

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

Part of licenced activity assessed (criteria)	Assessment result	Licence condition
WR-B3 - Water Abstraction - Abstraction measurement and records - Reporting	C4 No impact	Condition 9
WR-A1 - Water Abstraction - Abstraction specified by licence - Source of supply	Action only (X)	
WR-B2 - Water Abstraction - Abstraction measurement and records - Recording	C4 No impact	Condition 9

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

### 2. What action is required?

Criteria	Action needed	Complete by
WR-B3	1. Please submit the 2024 annual return data as soon as possible.	28/08/2025
WR-A1	2. Please note that a Groundwater Investigation Consent is required for the borehole investigations discussed. Applications and more information can be found on our website.	Already completed
WR-B2	3. Keep records of meter readings every day regardless of whether water is abstracted or not.	Already completed

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

### Visit report

On 5<sup>th</sup> August 2025, Officer C RHODES met with the Secretary Manager of **Creigiau Golf Club** for a routine inspection of the water abstraction system licensed by permit number: **21/57/31/34**. Weather at the time of inspection was warm and dry with rain several days prior but predominantly dry weather.

### Abstraction point

The Secretary Manager accompanied Officer RHODES to the spring-fed pond at Point A on the license map (pictured below) and explained that the club have noticed a decrease in the levels in recent years and are considering installing a borehole to abstract from instead. Additionally, that no abstraction has been taken from this pond for some years (approximately 4-5) due to the pump having broken and not been replaced. In its absence, the club have been using mains water to irrigate. Borehole investigations are expected to take place this September; Officer RHODES made it clear that installation of one and transference to this for abstractions would require a permit variation at the expense of the license holder.



### Compliance context

**Condition 3** – a submersible pump is in place at point A, however no mobile pumps are present in the other ponds at present.

**Condition 4** – abstractions from point A have historically been used solely for the purpose of spray irrigation; it has not been used for washdown of equipment despite being permitted to do so. At present, no abstraction is taking place and hasn't been for some years so this condition is not being used. Points B, C, D and E are

transferring flows as designed.

**Condition 7** – as the site has not been abstracting, the maximum quantities permitted are not currently relevant / utilised.

**Condition 8** – a meter is in place to monitor the quantity of water abstracted for spray irrigation, however it is not currently monitored since the submersible pump is out of action and the abstraction is not in operation. At the time of visit, the meter reading was 6977 as shown below.



**Condition 9** – during the previous inspection in 2019 the site was found to be non-compliant with this condition and was reminded to record the meter readings **at the same time each day**. The site is still **non-compliant** with this condition, since the abstraction is not operational and the meter is therefore not being read daily. It is understood that it's being checked periodically by the Head Greenskeeper but not on a regular basis.

#### **Actions / Further comments**

Overall, the site was found to be **non-compliant** with **Condition 9** by failing to read the meter at the same time each day. It is understood, however, that this is due to the abstraction not currently being in operation nor has it been for several years. As such, for this we issue advice & guidance only at this stage and ask that we are kept updated regarding the borehole investigations.

However, our records also show that your abstraction return for the period 01 April – 31 October 2024 is **now overdue**. Please see actions below.

1. Please submit the annual return data as soon as possible.
2. Please note that a **Groundwater Investigation Consent** is required for the borehole investigations

discussed. Applications and more information can be found on our website: [Natural Resources Wales / Prepare an application for a groundwater investigation consent](#)

3. Keep records of meter readings every day regardless of whether water is abstracted or not.

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.