



Dylan Ingman
Barkers Chambers
Barker Street
Shrewsbury
SY1 2RN

Our reference: PAN-030495

Your reference:WA/064/0016/0004

Date: 13/10/2025

Sent via email to Dylan.Ingman@hafrenwater.com

Dear Dylan

Invalid Application

Application number PAN-030495

We have received your application for a new water resources licence, however we are unable to accept it as valid. Please read the letter below which outlines what further information is required.

Rights of access

In the right to apply part of application form, you have provided a site location, but it is not clear as to whether the abstraction points are inside or outside the boundary as you can,t see the entire boundary limit. Could you provide a clearer map detailing the full boundary and abstraction points.

Discharge information

In regards to the discharge details you have stated for spray irrigation but not clearly explained the discharge area, I note you have stated that the golf course is in the process of *“upgrading the irrigation system and it is to be used on more greens and fairways”*. Would you be able to clarify where the irrigation is currently being used on the existing licence and where the expanded areas it is to be used are.

Licence purposes

In regards to the purpose of abstraction, on the existing licence this is *“filling a storage tank for subsequent spray irrigation”*. Will you please clarify what the purpose of abstraction for the second borehole will be and whether this is in combination with the existing borehole or will it be separate from.

Storage tank information

For the storage tank could you please provide details. i.e. location, capacity etc.

NGR points of abstraction

I note that there are some inconsistencies around the NGR of both boreholes across the application forms, existing licence, the GIC (groundwater investigation consent), Pumping test and site map. These are what I am able to ascertain:-



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Borehole 1 (existing licenced BH):-

NGR SH 57767 30902 on Licence.

NGR SH 57757 30902 on WRA application form.

NGR SH 57757 30902 on WRD application form

NGR SH 57764 30890 Implied on SITE MAP

Borehole 2:-

NGR SH 5774 3308 on Pumping test Report

NGR SH 58532 30628 on WRD Application form

NGR SH 57702 30853 Implied on SITE MAP

Could you please clarify the exact points that the boreholes are located?

Quantity rates

With regards to the abstracted quantities I note that the hourly rate for Borehole 2 has been stated at 5.83 cubic meters, however this amount is more than scaled quantities of the maximum rate per second of 1.6. Would you be able to clarify what the requested quantities are.

Data Information

Would you be able to submit the included raw data that are in tables in the back of the Pumping test report as an Excel document.

Application type

A fee of £6,713.00 was paid on 26/09/2025, this is in line with an application for a new water abstraction licence. However on the application form you ticked a "Technical variation of an abstraction licence", which has a fee of £5,104.00, as detailed on the following page of our website: [Charges for abstraction and impoundment licence applications](#).

We are unclear at this point in the process whether you could vary your existing licence or you would require a new licence. Once we have received the information detailed above and your application can progress to the next stage of our process our technical specialist will be able to assess the supporting information to determine which option is correct.

For awareness:

- If you do need to vary your existing licence we can arrange a partial refund if appropriate.
- If you do require a new licence you will have paid the correct fee and as you also wish to reduce the abstraction quantities of borehole 1 (permitted under WA-064-0016-0004) this element would be considered an administrative variation, which is free, as detailed on: [Apply to renew or change an existing abstraction or impoundment licence](#)



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If we have not received the information we have asked for within **10 working days** from the date of this letter, we cannot accept your application and we will return it to you.

For further detail, please see the 'Applications with insufficient detail to progress' section of the ['Charges for abstraction and impoundment licence applications'](#) page of our website (or via the following pathway: [Home](#) > [Permits and permissions](#) > [Water abstraction and impoundment licences](#)).

If you have any questions about your application, please contact me (see below for details).

Yours sincerely

Stuart Whincup
Water Resources Permitting Officer
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Direct email: stuart.whincup@cyfoethnaturiolcymru.gov.uk