

Determination report

Licence number: WA/0067/0010/0022

Application reference number: PAN-030979

Point of Ayr Gas Terminal, Holywell, Liverpool Bay

Report of an application for a new full abstraction licence.

Purpose of this document

This determination report:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies any further conditions in the licence other than those applied as standard.

Unless the determination report specifies otherwise we have accepted the applicant's proposals.

NRW has decided to issue the licence.

We consider that in reaching this decision, we have taken into account all relevant considerations and legal requirements and that the licence will ensure that the appropriate level of environmental protection is provided.

A glossary of acronyms used can be found at the end of this document in [Annex 2](#).

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1. Summary of the proposal

An application to dewater an existing industrial site located adjacent to the Dee Estuary. It is necessary to undertake a series of excavations to provide a dry working area for the demolition of works at the site which is being developed as a key hub for the Hynet North West Carbon Capture and Storage project. The site was previously a gas terminal processing natural gas for the North West area. As part of the remodelling of the site seven separate areas are required to be dewatered; via a series of deepwells, with a single area being dewatered at any one time. Abstracted groundwater will be treated and discharged via a v-notch to a nearby unnamed stream. The treatment and subsequent discharge of the water is a permitted activity regulated under EPR/DP3934EW/V004.

2. Application details

Administrative details	
Applicant name and address	Saipem Limited. Saipem House, 12-42 Wood Street , Kingston Upon Thames Surrey, KT1 1TG.
New licence number	WA/067/0010/0022
Hydrometric sub-catchment	0010 Dee Estuary

Departures from application forms	
Aspect of application	New value applied for
Abstraction area and discharge point National Grid References (NGRs)	<p>Information above provided in 'Stuart Wells NRW response letter', dated 19/12/2025 confirming the four corners of each of the seven areas proposed to be dewatered as follows:</p> <p>Area A Cooling Tower SJ 12434 83967, SJ 12492 83967, SJ 12492 83925 and SJ 12433 83924.</p> <p>Area B Pig Receiver SJ 12433 83914, SJ 12492 83912 , SJ 12492 83893 and SJ 12432 83895.</p> <p>Area C Gas Inlet Facility SJ 12432 83882, SJ 12490 83881, SJ 12491 83852 and SJ 12434 83856.</p> <p>*Area D Compression station SJ 12241 84000, SJ 12238 83935, SJ 12407 83997 and SJ 12406 83933.</p>

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	<p>Area E Oily Water collection tank SJ 12206 84105, SJ 12233 84106, SJ 12233 84088 and SJ 12206 84093.</p> <p>Area F Knock Out drums SJ 12437 84132, SJ 12447 84133, SJ 12446 84120 and SJ 12437 84120.</p> <p>Area G Propane tank SJ 12412 84114, SJ 12422 84114, SJ 12423 84096 and SJ 12414 84098.</p> <p>* Discharge Point Q SJ 11962 84038.</p> <p>*Note Area D and Discharge point NGRs agreed in an email dated 29/04/2026</p>
Licence duration	Updated to 30/04/2028, was previously stated as 21 months.

Any differences between what was applied for within the initial application and what was subsequently agreed as the application details have been communicated to the applicant..

3. Validation of the application and further information received during determination

The application was validated on 22/12/2025. This means we considered it was submitted on the correct form, the correct application fee has been received and that the application contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination. Following validation the applicant further confirmed the NGRs for area D as well as the required licence duration.

Entitlement to apply

The applicant demonstrated that they are entitled to apply for the abstraction licence, as they have, or will have when the licence takes effect, a right of access to the abstraction point(s).

4. Advertising

A copy of the application is available on the public register. In accordance with our legal obligations we also advertised the application in a local newspaper and served notice to relevant bodies.

Advertisement details	
Date of advertisement	26/01/2026
Name of local newspaper	Daily Post
Notice served to	The Statutory Water Undertaker

This notice was also placed on our website directing people to the public register, advising them of how they could view or request copies of the application documents if required and how they can provide comments.

A summary of representations and our response to the representations we received can be found in Section 7.11. We have taken all relevant representations into consideration in reaching our decision.

5. Justification of requirements and water efficiency

Previous groundwater monitoring and testing (permitted under Groundwater Investigation Consent WA/067/0010/0021) at the site indicates that groundwater within the Tidal Flat Deposits is approximately 1.3 to 3.5 below ground level and it will therefore be necessary to control groundwater levels and ingress into the demolition areas to provide a safe working area. The dewatering scheme has been designed so that each of the seven areas is dewatered via deepwells all with diameters of 300mm and drilled to a depth of 8 metres. The number of wells is dependent upon the size of the area being dewatered. All water abstracted will be returned to the nearby un-named watercourse (referred to as the Talacre Brook in the licence and in this report hereafter). NRW have assessed the applicant's justification of requirements and have deemed them reasonable.

Water efficiency

The dewatering scheme has been carefully designed so that no more than necessary water is removed and it is subsequently returned to the local environment. Natural Resources Wales have reviewed the measures provided by the applicant and consider that they are satisfactory to ensure that water is used efficiently.

6. Consultation

Natural Resources Wales carried out consultation on the application in accordance with its legal obligations, our statutory Public Participation Statement (PPS) and Principles of Working Together agreements.

Consultation with other bodies	
Heneb (The Trust for Welsh Archaeology)	14/01/2026

A summary of consultation comments and our response can be found in 7.11. We have taken all relevant representations into consideration in reaching our decision.

7. Technical assessment of the proposal

This proposal has been screened for potential impacts to the water environment, which includes designated sites, protected species, protected rights and lawful users.

7.1 Resource assessment and Abstraction Licensing Strategy (ALS)

The abstraction is within NRW's Dee Abstraction Licensing Strategy (ALS) area. According to the ALS, water availability is unassessed at this location, however it is quite likely that some water is available. Applications will be assessed on their individual merit. For this particular proposal, all of the groundwater abstracted shall be returned to the nearby un-named watercourse and therefore not lost from the local environment.

7.2 Hydrology and/or hydrogeology

The abstraction is from the Tidal Flat Deposits underground strata. This site is in close proximity (less than 250 metres) of the River Dee tributary, Dee estuary, and a surface water lake system. It is within 1km of a bird wetland reserve. The dewatering will occur from excavations a few metres below ground level and there will be connectivity with the identified surface water features. The abstracted groundwater will be discharged, after appropriate treatment to the local Talacre Brook at the site, which is subsequently connected to the surface water lakes, the River Dee tributary and the Dee Estuary.

7.3 Impact on groundwater

The pumping test (consent no. WA/067/0010/0021) consisted of abstracting using a submersible borehole pump. The constant rate test was undertaken at an average flow rate of 5.3 l/s, between the 13th and 19th August 2025. Based upon the pumping test data estimated maximum dewatering flow rates have been calculated for each of the seven areas to be dewatered. The pumping test indicates that impacts will be localised. No desiccation is anticipated as a result of the proposal and any settlement would be contained within the site boundary. Drawdown impacts are predicted to extend to just over a 600 metre radius from the site (discussed below). Groundwater sampling has been undertaken; it is known that the site historically has been subject to colliery and railway use and therefore potential for contamination. PFAS ('forever chemicals') have been identified at the site; known to be contained in fire-fighting foam, which has been used at the site. From site testing it has been confirmed that overall concentrations of PFAS are below UK drinking water standards. There is a risk that contaminated groundwater will be abstracted; therefore all abstracted water will undergo treatment prior to discharge via Granular Activated Carbon system. The discharge is a permitted operation and the permit has been recently varied to allow for the discharge of abstracted water. The quality and volume of discharged water shall be controlled under EPR/DP3934EW/V004.

Condition 9.2 will be included on the licence to ensure that abstraction will only occur from one area at a time, as proposed by the applicant and reflected by the pumping test undertaken prior to submission of this application.

NRW are satisfied that the risks to groundwater from the application is minimal.

7.4 Impact on surface water flows

Drawdown impacts have been assessed to reach a radial distance of 660 metres, which coincides with the furthest identified possible receptor of the bird wetland reserve.

It is accepted that even if there is direct hydraulic connection with the River Dee (which is unlikely) and subsequently the Dee Estuary, the abstracted volumes represent a very small proportion of overall flow in the River Dee and therefore impact upon flows is negligible. It should be noted that all abstracted water is returned to the Talacre Brook which provides mitigation as the water balance is maintained. The surface water lake system will also be mitigated via the return of abstracted water to the un-named stream as it is also hydrologically connected.

The bird wetland reserve is not hydrologically connected; drawdown impacts calculate that there will be no impact beyond 660 metres, which is the distance to the reserve.

7.5 Impact on ecology

There are no anticipated impacts to ecology as a result of this proposal, note that impacts to ecological features within designated sites can be found in section 7.8.

7.5.1 Impacts on fisheries

There are no anticipated impacts to fisheries as a result of this proposal. As discussed in section 7.4 above as all water abstracted is returned to the environment there will be minimal impact to nearby water features including the River Dee and Dee Estuary.

7.5.2 Impacts on other water dependent species and habitats

There are no anticipated impacts to water dependent species or habitats as a result of this proposal, note that impacts to ecological features within designated sites can be found in section 7.8.

7.6 Impact on water quality

A condition is included on the licence to ensure that all water abstracted is returned to the Talacre Brook. The release of this water is controlled via recently varied permit EPR/DP3934EW/V004. This permit requires the testing of the quality of the discharged water. NRW are satisfied that with the appropriate controls that there are no anticipated impacts to water quality as a result of this proposal as licensed.

7.7. Protected rights and lawful users

Lawful uses of water have been considered and appropriate measures to safeguard them have been taken. No protected rights have been identified as being at risk of derogation as a result of this proposal.

7.8 Conservation impacts – Designated sites

7.8.1 The National Site Network and Ramsars:

The following National Site Network sites and Ramsars have been identified as at risk as a result of this proposal:

- River Dee SAC , SPA and Ramsar

A Habitat Regulations Assessment (HRA) was completed to assess the potential to affect any of the sites identified. The project was screened for likelihood of significant effects and,

taking account of the advice received from NRW's protected sites advisors, is considered not likely to have a significant effect on any National Site Network site (as documented in section 3.2 of OGN 200 Form 1, or section 5 if applicable). The Habitats Regulations Assessment is available to view on the public register.

7.8.2 Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) and Areas of Outstanding Natural Beauty (AONB)

The following sites were identified within the potential impact pathway of the proposal:

- Dee Estuary SSSI
- Gronant Dunes and Talacre Warren SSSI

Natural Resources Wales is of the opinion that the proposal is not likely to have any impact on these sites. A SSSI assessment is available on the public register to view.

7.8.3 Other Designations

There are no anticipated impacts to other designations; none have been identified in the screening of this application.

7.9 Water Framework Directive Regulations 2017

A Water Framework Directive Regulations Compliance Assessment has been completed and NRW consider that the proposal has no or low risk of causing deterioration in overall waterbody status or quality elements. NRW consider that the proposal will not prevent any water body or WFD Protected Area from reaching its objectives. The assessment is available on the public register to view.

7.10. Other considerations

Consideration	
Flooding	No concerns have been raised regarding flood risk as a result of this proposal.
Archaeology	NRW sent a screening request to Heneb the Trust for Welsh Archaeology to seek advice on potential impacts to the historic environment. A response to NRW can be found in section 7.11. No significant concerns have

	been raised regarding impacts to the historic environment and archaeology as a result of this proposal.
Recreation and amenity	NRW consider that this proposal will have minimal impact to recreation and amenity.
Subsidence and desiccation	NRW do not have concerns regarding the risk of subsidence and desiccation as a result of this proposal.

7.11 Representations and external consultation/notification responses

No representations from members of the public were received after advertising this application.

The table below summarise responses received from statutory and non-statutory bodies. we have summarised their specific responses.

Representations from statutory & non-statutory bodies			
Name of organisation and summary of representation		NRW response	
<p>Heneb The Trust for Welsh Archaeology advised that there are minor risks as the proposal is located near 4 historic environment records – post medieval. Significant impacts unlikely, minor potential that archaeological remains could be encountered. Advise that all works undertaken are outside a 10 metre buffer zone of historic records and that should any other remains be encountered they the applicant contacts the Trust.</p>		<p>The locations of the historic records lie outside of the suggested 10 metre buffer zones metres of the dewatering areas. The applicant will be advised of the locations of these sites and provided with details on how to contact the trust should remains be encountered in the issue letter.</p>	
PRN	Site Name		NGR
89808	Talacre, Barn Field		SJ1210984024
87235	Talacre, Glider		SJ120840
177724	Llawndy Farm		SJ1181183916
87819	Talacre Limekiln	SJ1228983843	

Dŵr Cymru confirmed they have no concerns as the location of the proposal is not hydrologically connected to any of their raw water abstractions.	Not applicable.
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7.12 Other consents

The applicant may be required to apply for other consents in addition to this application. It is the applicant's responsibility to ensure that all necessary consents are obtained before commencing this proposal.

8. Cost benefits and environmental mitigation or gain

In accordance with the Environment Act 1995, Section 39, NRW have had regard to costs and benefits in exercising its powers in the assessment below.

Assessment of probable benefits and costs of proposed option to the :	
Water Resources/ The Environment	<p>There is low risk of environmental damage occurring as a result of this proposal.</p> <p>The requirement to return all water abstracted will ensure there is enough water for the environment.</p> <p>The proposal accords with local water resources policy and is sustainable.</p>
The applicant	<p>The applicant will incur the costs of installing and maintaining the method of abstraction and of measuring the volumes of water they abstract.</p> <p>The applicant will have to pay the application fee, any advertising costs that apply and an annual subsistence charge based on their licensed quantity.</p>
Natural Resources Wales	<p>Natural Resources Wales will incur the cost of determining the application and enforcing the licence. These costs will be partly recovered through the application charge and annual charges, where applicable.</p> <p>In determining the licence in accordance with local and national policy, Natural Resources Wales is fulfilling its duties as a regulator.</p>

The economic and social well being of the rural community.	No adverse effects upon the social and economic well being of local communities in the rural area are perceived as a result of this proposal.
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9. Biodiversity and Sustainable development

The principles of sustainable development and biodiversity are embodied in the conditions attached to the licence.

10. Time limit

A shorter time limit than the CAMS common end date has been applied to the licence at the request of the applicant. This is to schedule the end date in line with the Applicants EPR permit temporary variation end date which authorises the discharge of the abstracted water.

11. Special agreements

There are no special agreements relevant to this proposal.

12. Measurement of water abstracted

The applicant will be advised of the measuring requirements which will comply with the Abstraction Metering Good Practice Manual (R & D Technical Report W84). They will be required to measure their abstraction via a meter and to record the abstracted volumes on a monthly basis, and submit returns on an annual basis to NRW.

13. Considerations of SMNR – compliance with our General Purpose

We are satisfied that this decision is compatible with our general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

14. Conclusion and decision

Full and due consideration has been given to any representations made, and due regard has been taken of protected rights and other lawful interests. The principles of sustainable development are embodied in the conditions attached to the licence.

The conditions incorporated on the licence are considered to be necessary and reasonable in light of the available and presented evidence. The conditions are also considered to be consistent with appropriate standards for enforcement by Natural Resources Wales.

NRW has therefore approved the application (as modified) and issue of Licence number WA/067/0012/0022 with the conditions applied.

Annex 1 – Administration

Purpose code and loss factor

Primary Code	Secondary Code	Use	Loss factor
I: Industrial, Commercial, Public Services	DRG: Drainage Operations	660: Dewatering	Very Low

Finance

The licence will be subject to annual charges under paragraph 6.1 of [Natural Resources Wales's water abstraction charges scheme](#)

Annex 2 - Glossary of acronyms used in this document

ALS	Abstraction Licensing Strategy
CAMS	Catchment Abstraction Management Strategy
CRoW	Countryside Rights of Way
EFI	Environmental Flow Indicator
FRAP	Flood Risk Activity Permit
GES	Good Ecological Status

GW	Groundwater
HAF	Hydro abstraction factor
HEP	Hydro-electric power
HES	High Ecological Status
HIA	Hydrological Impact Assessment
HoF	Hands-off flow
HoL	Hands-off level
HRA	Habitat Regulations Assessment
LNR	Local Nature Reserve
LSE	Likely Significant Effect
NNR	National Nature Reserve
NRW	Natural Resources Wales
PALS	Permitting and Licensing System
PPS	Public Participation Statement
PWS	Public Water Supply
Q ₃₀	Flow exceeded 50% of the time period considered
Q ₅₀	Flow exceeded 50% of the time period considered
Q ₇₀	Flow exceeded 70% of the time period considered
Q ₉₅	Flow exceeded 95% of the time period considered
RBMP	River Basin Management Plans
ROA	Rights of Access (e
RSA	Restoring Sustainable Abstraction
SAC	Special Area of Conservation
SINCs	Site of Importance for Nature Conservation (Local Wildlife Sites)
SMNR	Sustainable Management of Natural Resources
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
WAT	Welsh Archaeological Trust
WFD	Water Framework Directive (2008/98/EC)
WFS	Water Feature Survey
WIA	Water Industry Act
WR	Water Resources