

Determination report

Licence number: WA/067/0008/0013

Application reference number: PAN-032613

Site name: Mold Waste Water Treatment Works (WWTW)

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

Application for a transfer abstraction licence to facilitate dewatering works at Mold Waste Water Treatment Works, Gwynedd. The site is undergoing upgrade works including the installation of new below ground settlement tanks and pumping chamber. To install these assets shallow excavations below ground are necessary and require the removal of water to provide dry working areas. Proposed abstraction quantities are based upon two pumps with a combined initial pumping rate of up to 50 l/s, abstracting up to 2,060m³/day. Once cofferdams are installed within the excavations it is expected that the abstraction rate will reduce. Two or three excavations are proposed as part of the works, and to allow the operator flexibility for their operation an area delineated by the following National Grid References: SJ 24578 63221, SJ 24651 63245, SJ 24741 63157, SJ 24741 63140 and SJ 24614 63141 which covers the site has been agreed in which abstraction can take place within.

All abstracted water will be treated by the removal of any silt and discharged to the adjacent watercourse at the site. The applicant has applied for an abstraction licence duration of approximately 14 months to allow for the duration and any contingency necessary to complete the works.

2. Application details

Administrative details	
Applicant name and address	Eric Wright Water Limited
New licence number	WA/067/0008/0013
Hydrometric sub-catchment	0008 Alyn

Departures from application forms	
Aspect of application	New value applied for
Abstraction area National Grid References	An area agreed delineated by the following NGRs: SJ 24578 63221, SJ 24651 63245, SJ 24741 63157, SJ 24741 63140 and SJ 24614 63141. The area covers the site, to allow the operator flexibility within the site.
Volumes/method of abstraction	Pump capacity confirmed as 50 l/s, achieved by two pumps.
Licence duration	14 months from date of issue.
Treatment of water prior to discharge	Siltbuster silt removal.

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 14/05/2026. 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. Further information was required to enable final determination of the application. Copies of these requests and the responses when received were placed on our public register.

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 area.

4. Advertising

In exercise of its discretion under the Water Resources (Abstraction and Impounding) Regulations 2006 (Regulation 7(4)), Natural Resources Wales dispensed with the advertising requirements in relation to this proposal. This decision is documented on a dispensation notice, which can be found on the public register.

Notice of this proposal has not been published; consequently, no external representations from the general public can be made or considered. No statutory bodies have been notified because the proposal is not subject to advertising.

5. Justification of requirements and water efficiency

Estimates of volumes proposed to be abstracted are based upon groundwater inflow rate from an exploratory borehole at the site which was observed to fill at a rate of 0.012 l/s. This value has been multiplied by the area of each proposed excavation to provide volumes. NRW have assessed the applicant's justification of requirements and have deemed them reasonable.

Water efficiency

Natural Resources Wales have reviewed the measures provided by the applicant and consider that they are satisfactory to ensure that water is used efficiently. The applicant will be deploying coffer dams into the excavations to prevent further groundwater ingress and reduce abstraction to only that necessary.

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	12/06/2026

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, there is no surface water available for licensing at this location; the abstraction is from groundwater in an unassessed area. The ALS states that for non-consumptive abstraction where 'all the water is returned, the environmental impact is localised and there is no overall change in water availability. Consequently we may be able to consider licensing

new non-consumptive abstractions where we would not license other water uses'. As this proposal includes the return of all water abstracted to the nearby watercourse it is considered acceptable to NRW as it aligns with ALS.

7.2 Hydrology and/or hydrogeology

The abstraction is from made ground alluvium above the Dee Coal Measures underground strata. The proposed excavations are shallow being less than 2 metres deep. There is a chance that there is connectivity with surface waters. The proposal includes the mitigation measure of returning all water abstracted to the nearby watercourse which runs along the northern boundary of the site. A condition is added to the licence (9.1) requiring the return of all water abstracted to NGR SJ 24671 63234.

7.3 Impact on groundwater

The HIA concludes that the risk to groundwater is negligible. Two deregulated groundwater abstractions have been identified within 1.5km of the proposal, however given their distance from the site they are unlikely to be at any risk of being impacted. The applicant's estimates of volumes abstracted do not take into account the installation of the cofferdams, i.e. are worst case scenario figures. It is anticipated that with the insertion of the cofferdams abstraction volumes will decrease significantly, further reducing any impacts. NRW agree with the conclusions in the HIA.

7.4 Impact on surface water flows

There is potential for surface water connectivity with the groundwater. As mitigation the applicant will discharge all abstracted water to the nearby watercourse which runs along the northern boundary of the site. This is considered sufficient to mitigate any potential localised drawdown. A condition is included within the licence to ensure that all water is returned to discharge point the unnamed tributary of the River Alyn at National Grid Reference SJ 24671 63234.

7.5 Impact on ecology

There are no anticipated impacts to ecology as a result of this proposal. By returning all abstracted water to the nearby watercourse any drawdown impacts will be mitigated.

7.5.1 Impacts on fisheries

There are no anticipated impacts to fisheries as a result of this proposal. Although no fish are expected in the discharge watercourse, the applicant intends on screening the outfall with a 30mm screen.

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. This is a groundwater abstraction with no identified impact pathway to any water dependent features. Reed beds and acid dry grassland habitats have been identified within the set screening distance however are not located within the locality of the abstraction and therefore not be considered at risk given that all abstracted water shall be returned immediately adjacent to the site.

7.6 Impact on water quality

There are no anticipated impacts to water quality as a result of this proposal. The applicant intends of removing any silt in the abstracted water prior to discharge.

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:

No National Site Network Sites or Ramsars have been identified as at risk as a result of this proposal. Therefore, a Habitats Regulations Assessment (HRA) is not required because there is no conceivable impact pathway by virtue of location of the project.

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

Natural Resources Wales is of the opinion that the proposal is not likely to have an impact on any SSSIs, NNRs nor any AONBs as none of these sites was identified in NRW's risk screening exercise.

7.8.3 Other Designations

No other designated sites have been identified in the screening of this application, therefore no pathways of impact possible.

7.9 Water Framework Directive Regulations 2017

The abstraction is within made ground above the Dee Carboniferous Coal Measures GB41102G204800 groundwater body which is hydrologically linked with GB111067052172 Alyn - Leadmill to Hope .

According to NRW policy, the proposal has screened out of requiring any further assessment under the WFD Regulations 2017 because the activity is considered low risk with no WFD concerns raised. The groundwater body below where the abstraction takes place is at 'Poor' overall status. The proposal includes best practice measures of returning all water abstracted to the local watercourse which runs along the north boundary of the site.

7.10. Other considerations

Consideration	
Flooding	No concerns have been raised regarding flood risk as a result of this proposal. It is noted that the proposal site

	lies within a flood risk zone, which will be relayed to the applicant in the issue letter.
Archaeology	NRW sent a screening request to Heneb: The Trust for Welsh Archaeology to seek advice on potential impacts to the historic environment. No 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

Below is a table which summarise responses received together with how they have been addressed in the determination process. For specific statutory bodies and voluntary organisations, we have summarised their specific responses. As the application was not advertised there are no public responses.

Representations from statutory & non-statutory bodies	
Name of organisation and summary of representation	NRW response
Heneb: The Trust for Welsh Archaeology No core records situated within the proposal site; it is located next to historic railway line; there is low potential for archaeological remains to be encountered or existing features to be disturbed. Works in this area should be undertaken with due caution and should avoid disturbance to any surviving historic features.	The applicant will be advised of this historic record in the issue letter.

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	There is low risk of environmental damage occurring as a result of this proposal. The proposal accords with local water resources policy and is sustainable.
The applicant	The applicant will incur the costs of installing and maintaining the method of abstraction and of measuring the volumes of water they abstract. The applicant will have to pay the application fee.
Natural Resources Wales	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. In determining the licence in accordance with local and national policy, Natural Resources Wales is fulfilling its duties as a regulator.
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.

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 CED has been applied to the licence. This has been requested by the applicant who have stipulated they wish the licence to end 14 months from the date of issue. This will provide adequate time with contingency to carry out the proposed works.

11. Special agreements

There are no special agreements relevant to this proposal.

12. Measurement of water abstracted

As the licence is for a transfer abstraction no means of measurement has been included within the licence which is in accordance with NRW policy.

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/067/0008/0013 with the conditions applied.

Annex 1 – Administration

Purpose code and loss factor

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

Finance

The licence is exempt from the payment of annual charges being one of the categories under Paragraph 6.2 of [Natural Resources Wales's water abstraction charges scheme](#).

A scale of 1:5,000 has been used for the licence map to allow for clarity of licensed dewatering area and discharge point.

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