Compliance Assessment Report CAR_NRW0052723

Licence being assessed: 24/67/5/0051.

For: Abstraction from Caregan Brook at Vale of Llangollen Golf Course, **held by:** Vale Of Llangollen Golf Club.

At: .

Type of assessment: Site Inspection,

Reason: Routine.

On: 08/07/2026, between 11:00 and 12:30.

Parts of licence assessed: 2. Point of Abstraction / 8. Means of Measurement of Water Abstracted

NRW Lead Officer: Caitlin McHugh, accompanied by Philip Barrett.

Report sent to: Hayley Henson / Robert Lydon, Manager / Course Manager, on 04/09/2026.

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

Part of licenced activity assessed (criteria)	Assessment result	Non-compliant licence condition
WR-B1 - Water Abstraction - Abstraction measurement and records - Means of measurement	C3 Minor	8. Means of Measurement of Water Abstracted.
WR-A1 - Water Abstraction - Abstraction specified by licence - Source of supply	Assessed (A)	
WR-A2 - Water Abstraction - Abstraction specified by licence - Points of abstraction	C3 Minor	2. Point of Abstraction

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

2. What action is required?

Criteria	Action needed	Complete by
WR-B1	Locate meter to measure only abstracted flow from the Caregan Brook.	01/04/2027
WR-A2	Stop abstraction for the pond or vary / apply for a licence.	30/09/2026

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

NRW attended Llangollen Golf Club on the 8/07/26 to carry out a routine inspection of the abstraction point from Caregan Brook for irrigation purposes.

We were met on site by the head greenkeeper and his colleague. Weather was very warm and dry.

The source and means of abstraction were as per the license.

The abstraction takes place by an electrically operated pump from is a gravity fed tank wet well on the bank of the brook. There is a weir constructed across the brook with multiple sand bags supporting the structure.

The greenskeeper explained there is a small gap under the weir whereby fish can pass. The construction of the weir is considered an impoundment.

During the previous inspection (17.09.2020) the officers recommended the operator submit a pre-application enquiry so that the impounding weir can be licensed. This doesn't appear to have been done. To reiterate the previous CAR form 'we recommended that you submit a pre-application enquiry so that the impounding weir can be licensed'.

Link: Natural Resources Wales / Pre-application advice service for water abstraction and impoundment licences

The structure appears to have been developed / built up since the previous visit, with the implementation of the steel work to hold the abstraction boards in place.

If the operator continues to obstruct / impede the Caregan Brook without a licence, when one is needed, it is an committing an offence and we may take enforcement action against you.

As the impoundment doesn’t form part of this licence, this will be dealt with separately.

Boreholes

During the visit on 8/07/26, the operator explained two boreholes have been installed, along with two holding tanks for the purpose of groundwater abstraction and storage.

NRW were not notified of any groundwater abstractions ahead of the visit to site. It was explained that the installations have been in place for approximately 5 years. Dragon Drilling Ltd installed the boreholes and advised the operator they did not require any permissions based on the 20,000 cubic meters exemption.

There are no meters visible on the boreholes to check the volume abstracted.

NRW consulted with the Geoscience team who explained the two boreholes are 80m and 70m deep therefore they have been cased out of the overlying superficial till and alluvium deposits. The groundwater is a separate source from the surface water abstraction.

The boreholes do not form part of this licence, but the operator will need to ensure the borehole abstractions do not exceed 20m^3/day to continue abstracting under the exemption.

Volumes / Points of Abstraction

The operator explained that there is one meter on the tank which the abstractions from both the groundwater and the surface water feeds into.

The amount of water used and the amount taken from groundwater boreholes is subtracted to get the volume of water abstracted from the Caregan Brook.

There is however a third point of abstraction further downstream of the licensed abstraction point which appeared to be pumping water into the water feature, and subsequently topping up the level within the pond on the golf course.

This pond was inspected on the 31.07.26 by NRW, returning to site to carry out a visual inspection of the pond which had been missed in the previous visit.

As the abstraction for the pond is taking place from the same source as the license, this would either need to be included in the license through a variation, or an application would need to be submitted for a separate license for this. If there are multiple points of abstraction the operator / licence holder should use a separate meter (or an agreed alternative measurement method) and submit a separate return for each abstraction point and purpose. Combining multiple points or purposes under one measurement or return makes it difficult to assess compliance and the impact of abstraction.

Means of measurement

Condition 8 of the license stipulates:

- The license holder shall use an approved integrating water meter to measure the quantities of water abstracted.

The method currently being used doesn't measure the quantities of water being abstracted as it includes the flow from the boreholes. This wouldn't take into account the following:

- any leakage from the tanks and pipework between the abstraction and the meter, and
- any error on the metering of the boreholes.

Records

As we're referring to the meter recordings in the next steps, it's worth referring to the licence conditions, and the current NRW guidance on the requirement for this. Something along the lines of -

Condition 9 of the license stipulates:

- The licence holder shall take and record readings of the meter specified in condition 8 at the same time each day, during the whole of the period during which abstraction is authorised or as otherwise approved in writing by the agency.
- A copy of the record or summary of data from it shall be sent to the agency within 14 days of the end of each Calander month.

We'll wait for clarification on what category this falls into, but we can refer to the table once this has been confirmed by WR permitting/returns teams.

Table 2: Recording and reporting requirements based on licence category

Category of licence	**Recording:** **How often readings should be taken and recorded**	**Reporting:** **What data should be provided to us**
All licences held by statutory water companies	Daily	Daily totals or meter readings
Electricity generation with a consumptive element	Daily	Daily totals or meter readings
Other licences with daily quantities exceeding 2,500 cubic metres, including spray irrigators with two-part tariff agreements.	Weekly	Weekly totals or meter readings
Spray irrigators with two-part tariff agreements with daily quantities equal to or less than 2,500 cubic metres per day.	Monthly	Monthly totals or meter readings
Other licences with daily quantities greater than or equal to 100 cubic metres and less than or equal to 2,500 cubic metres	Monthly	Monthly totals or meter readings
Other licences with daily quantities below 100 cubic metres. Totals or readings don't have to be provided to us. However, meter readings should still be recorded monthly so that we can assess compliance during site visits, identify licences which are not used and justify quantities at licence renewal.	Monthly	None

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Next steps:

- Progress the impoundment license requirements by submitting a pre-application enquiry. There is further information provided on the NRW website. Links have been provided above. Until an impoundment licence has been issued, the current structure must be removed.

- Develop a methodology to ensure no more than 50% of the flow from the Caregan Brook is

abstracted. As per the permit requirement detailed in Condition 10a.

- This will need to be amended once the returns issue has been clarified As your licence indicates that you abstract less than 100m3 per day then you are not required to submit regular updates to us of your readings, but you are required to take monthly meter readings at the same on the last day of each month.
- Position the meter at the point of abstraction.

Please contact us if you need any further information / guidance.

Diolch.

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 required for the licence condition assessed to avoid non-compliance. No non-compliance scored at this time
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

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 non-compliance with a licence condition 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 twenty working days to let you know if we agree to your request.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone**: 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email**: enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone**: 0300 790 0203
- **Email**: 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.