

Natalie Wrangham,  
Natural Resource Wales  
By email: [Natalie.wrangham@naturalresourceswales.gov.uk](mailto:Natalie.wrangham@naturalresourceswales.gov.uk)

1 October 2019

Dear Natalie,

Our ref: 66664NRWL001

**Re: Gaens Quarry abstraction licence application (PAN-006949 & PAN-006950):  
Technically Invalid response**

We received a Technically Invalid letter from Natural Resource Wales (NRW) dated 30 September 2019 requesting additional information in order to validate transitional abstraction licence application references PAN-006949 and PAN-006950. A copy of the letter is provided as Annex 1 for completeness.

We have dealt with each request in-line, below.

**Incorrect application type**

We acknowledge that NRW consider that the quarry is abstracting from a 'single source of supply' and thus a single Full licence should apply.

We wish to note that we do not entirely agree with NRW's interpretation of the regulations and also that it is not consistent with its counterpart in England's (the Environment Agency) position on the same matter.

Notwithstanding this, we recognise that NRW wish to limit the number of individual abstraction licences issued to an individual site. We also acknowledge that NRW will be seeking to remove abstraction licence end dates as part of the abstraction licence reform, which it is due to be consulted on in 2020.

As such, we accept the treatment of the Transfer and Full licence application originally applied for as a single Full application at Gaens Quarry, bearing in mind that we would not normally expect limits to be set for transfer (dewatering) licences.

For processing of the application fee refund of £1,500, please contact Mr Sam Rees on 01656748808 or [tsreesltd@btconnect.com](mailto:tsreesltd@btconnect.com).

**Abstraction grid references**

We confirm that National Grid References provided in your request represent the Eastings and Nothings provided in the application.

Additionally, the current point of abstraction is from within the quarry sump area given in the application is currently located at approximately National Grid Reference SS 82588 80374, taken from satellite imagery.

**Report references**

The references in application form to document reference 66647TN1 represents a typographical error and it should read 66664R1 which accompanied the application submission.

Should you have any queries or if you require any further information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kate Brady'.

Kate Brady

SENIOR CONSULTANT

Enc

Annex 1 Technically Invalid letter (dated 30 Sep 2019)

## Annex 1

Technically Invalid Letter dated 30 Sep 2019

New Zealand House  
160-162 Abbey Foregate  
Shrewsbury, Shropshire  
SY2 6FD

Telephone: +44 (0)1743 276 100

Registered Office:  
Stantec UK Ltd  
Buckingham Court  
Kingsmead Business Park  
Frederick Place, London Road  
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Registered in England No. 1188070

T S Rees Limited  
Cornelly Quarries  
Pyle  
CF33 4RD  
Company number: 00797640

C/O Kate Brady  
Stantec UK Limited  
By email: [kate.brady@stantec.com](mailto:kate.brady@stantec.com)

Ein cyf/Our ref: PAN-006949 & PAN-006950

Eich cyf/Your ref:

Ty Cambria House,  
29 Newport Road,  
Cardiff,  
CF24 0TP

Ebost/Email:  
[Natalie.wrangham@naturalresourceswales.gov.uk](mailto:Natalie.wrangham@naturalresourceswales.gov.uk)  
Ffôn/Phone: 0300 065 4518

30<sup>th</sup> September 2019

Dear Kate

**Invalid transitional abstraction licence applications**  
**Application number PAN-006949 & PAN-006950**

We have received your application for a licence, however it is not acceptable.

**Incorrect application type**

You have applied for the wrong type of licence. Having reviewed your application, your activity requires a single full abstraction licence. The activities you have detailed show that the consumptive abstractions (for dust suppression, mineral processing and wheel washing) are intervening uses of the water abstracted to dewater the quarry and therefore a transfer licence would not be appropriate. Please confirm that you agree with this decision within 28 days (by 28/10/2019); we will arrange any necessary refund/payment of the application fee. If you do not agree with us, or we do not hear back from you, we have the option of serving notice under section 36A of the Water Resources Act 1991. We will provide you with details of any notice and your entitlement to appeal this notice.

**Further information required**

Please can you confirm that the grid references (Northings and Eastings) given in Form WRF are correct as given in the table below as National Grid References. Can you also provide the point at which abstraction takes place from the sump.

Point	Easting and Northing	National Grid Reference
1	282155, 180448	SS 82155 80448
2	282675, 180526	SS 82675 80526
3	282739, 180187	SS 82739 80187
4	282213, 180360	SS 82213 80360

In your application form you also refer to a document reference 66647TN1. This document has not been submitted with your application, however a document reference number 66664R1 has. Please can you confirm which is the correct document to accompany your application and if required, submit the correct one.

We cannot guarantee to check any further supporting information received within three months of the 31 December 2019 application period deadline. It is your responsibility to ensure you apply for the required licence(s). It is an offence to abstract without a licence and we may take enforcement action.

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

Yours sincerely

**Natalie Wrangham**

Water Resources Permitting Team  
Natural Resources Wales

Direct phone line: 0300 065 4518

Direct email: [Natalie.wrangham@naturalresourceswales.gov.uk](mailto:Natalie.wrangham@naturalresourceswales.gov.uk)