

## DECISION STATEMENT

### ABSTRACTION LICENCE APPLICATION

#### St Ives (Hunts) Golf Club Limited

**Application number:** NPS/WR/032317

**Licence number:** AN/033/0026/065

**EA Area:** Cambridgeshire and Bedfordshire

**Date of Application:** 11/09/2019

#### **Applicant details**

St Ives (Hunts) Golf Club Limited

Needingworth Road

St Ives

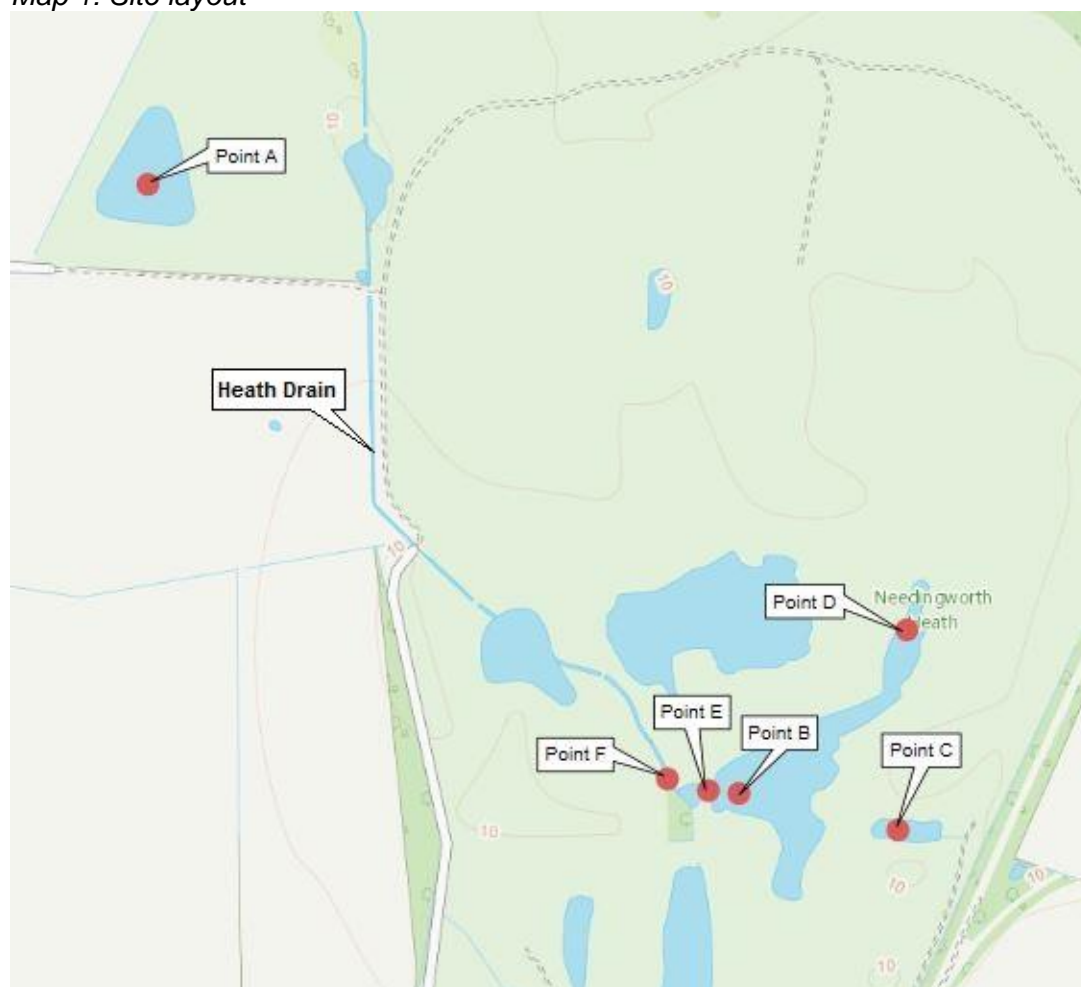
Cambridgeshire

PE27 4AD

#### **Summary of the proposal**

St Ives (Hunts) Golf Club Limited applied for a new licence to abstract water to fill a 28,000 cubic metre (m<sup>3</sup>) capacity reservoir for the subsequent spray irrigation of 16.5 hectares of greens, tees, approaches and fairways. The application form and supporting information state that the abstraction point would be within a pond. The applicant would top up that pond with water from Heath Drain by removing a footpath that currently acts as a barrier between Heath Drain and the pond. We would therefore deem the initial abstraction point to be from Heath Drain and not the pond. Map 1 below shows the layout of the site.

*Map 1: Site layout*



The labels on Map 1 show the following:

- Point A = The 28,000m<sup>3</sup> reservoir that they applied to pump water to from Point B.
- Point B = The existing pond that they want to top up from Heath Drain at Point F so that it can be used to more reliably top up the Point A reservoir via a pumped abstraction.
- Point C = A pond currently used to top up Point A via a pump. The pond also overflows into the Point B pond.
- Point D = A wetland that feeds the Point B pond. They look like one pond on the map but less so on aerial photography.
- Point E = The footpath that they proposed to remove to join up the Heath Drain Point F to the Point B pond.
- Point F = Heath Drain. It runs from north to south through the golf course via existing ponds and eventually joins Parsons Drove Drain which is a tributary of the River Great Ouse.

#### **Sources of supply**

There are two sources of supply.

1. Heath Drain (Point F on Map 1)
2. Pond (Point B on Map 1)

#### **Points of abstraction/impoundment and quantities**

The exact points of abstraction have not been provided. The following are approximate locations of Heath Drain and the pond.

1. Heath Drain: TL 33344 73233
2. Pond: TL 33429 73235

#### **Means of abstraction**

1. Heath Drain: Not provided
2. Pond: Flotation Pump

#### **Purpose of abstraction**

Filling a reservoir/pond for subsequent spray irrigation

#### **Abstraction period**

1. Heath Drain: Not provided
2. Pond: 1 November to 31 March

#### **Case history**

**11/09/2019:** Application received.

**16/09/2019:** Administratively complete.

**06/11/2019:** Application accepted as technically valid.

**21/11/2019:** Consultation concerns raised about uncontrolled abstraction and the amount of water available in Heath Drain.

**12/06/2020:** Flow monitoring data submitted by the applicant.

**28/04/2021:** Additional flow monitoring data submitted by the applicant.

**14/06/2021:** Following analysis of the 2021 flow data, we provided the applicant with the flow restriction, achievable quantities and suggestions for how they could abstract within the restrictions. We still did not have enough information about the proposal to determine a licence so we gave them the option to either submit the further information or withdraw the application.

**21/06/2021:** The applicant provided a partial response to the request for further information.

**28/06/2021:** We discussed the details of the proposal and current set up with the applicant over the phone and confirmed via email on 29/06/2021.

**26/07/2021:** We emailed the applicant a table of changes from the original application and the remaining uncertainties with their proposal to explain why we were unable to make a decision. We explained we would refuse the application unless they chose to withdraw it.

### **Justification of quantities**

The applicant requested the following quantities:

- 28,000m<sup>3</sup> per year
- 250m<sup>3</sup> per day
- 30m<sup>3</sup> hour
- 8.3 litres per second (l/s)

The annual quantity on the application form was 30,000m<sup>3</sup> but the applicant reduced it to 28,000m<sup>3</sup> which is the capacity of the Point A reservoir.

The quantities on the application form are what the applicant planned to abstract via a pump from the Point B pond to fill the Point A reservoir. However, the initial abstraction to fill up the Point B pond will actually be from Heath Drain at Point F and the applicant has not provided the quantities that they plan to take from Heath Drain.

The quantities that can be abstracted are complicated by what quantities are achievable as well as what is justified. See the 'Resource assessment' section below.

### **Resource assessment**

At the proposed abstraction point, the contributing catchment size is very small approximately 3.5km<sup>2</sup> and there is no gauging station in this small catchment. The abstraction point is within Assessment Point 1 (AP1<sup>1</sup>) at Earith in the Upper Ouse and Bedford Ouse Abstraction Licensing Strategy<sup>2</sup> (ALS). There is no gauging station at AP1, but the flow that we need to protect at Earith is 732.5 megalitres (Ml) per day which is Q34 (the flow equalled or exceeded 34% of the time). This is the equivalent to a gauged flow of Q45 at Offord which is the nearest gauging station, although Offord is too far away to accurately represent the flow situation in Heath Drain. For that reason, we would use a local Heath Drain Q45 'hands-off flow (HOF)' restriction (the flow at which they must stop abstracting) to protect flows lower than that for the downstream environment and the interests of existing downstream lawful users of water. Based on the applicant's flow gauging data from 2021, the Q45 of Heath Drain would be 15l/s.

We only allow abstraction of up to 10% of the flow in the catchment which would

<sup>1</sup> A significant point on a river, often where two major rivers join or at a gauging station. This is a point where surface water flows are assessed.

<sup>2</sup> This strategy sets out our approach to managing new and existing abstraction and impoundment within the Upper Ouse and Bedford Ouse catchment in the Anglian river basin district.

provide the applicant with only 1.5l/s, which is much less than what they have applied for. The quantities requested on the application form will not be achievable from Heath Drain unless the applicant is willing to accept a much more stringent hands-off flow restriction. The quantities may also not be achievable from the Point B pond as it is currently unclear how much a pumped abstraction from the pond would impact flows in Heath Drain. If it remains unknown in a future application then we are likely to impose the more restrictive Q45 hands-off flow on the pond abstraction which would in turn restrict the abstraction quantities that could be achieved.

### **Impact assessment of proposal**

The following uncertainties mean that we cannot effectively determine the impact of the proposal.

- The applicant expressed an interest in accepting a HOF that is more restrictive than Q45 so that they could abstract more water than 1.5l/s. They did not confirm what HOF they would accept within the timescale given to them.
- We do not know the quantities that would be achievable without a confirmed HOF.
- We do not know how the applicant will abstract to ensure only the permitted quantities are taken.
- We do not know how the applicant will measure the HOF and ensure that abstraction ceases when then HOF is reached.
- We do not know how the secondary abstraction from the pond could impact on Heath Drain because we do not know how they are currently connected nor how they will be connected following any installation of structures related to the initial abstraction from Heath Drain.

### **Statutory consultation**

We have not received sufficient information about the proposal to consult externally. Of the statutory consultees, the only one that may have needed to be consulted is Natural England. We may also have needed to consult the local Wildlife Trust about the River Great Ouse Local Wildlife Site. However, we do not have confirmed quantities so we cannot assess how far downstream could be impacted or to what extent.

### **External representations**

We did not received any external representations to the original application details. We did not receive sufficient information to make a decision on whether or not the changes to the application would require it to be re-advertised.

### **Protected rights**

We do not have confirmed quantities so we cannot assess how far downstream could be impacted or to what extent.

### **Conservation issues**

We do not have confirmed quantities so we cannot assess how far downstream could be impacted or to what extent.

### **Biodiversity and sustainable development**

We do not have confirmed quantities or the type of structure that may be installed so we cannot effectively assess potential impacts.

### **Social and economic welfare of rural communities**

There will be no change to the current situation as we will not be granting a licence for the proposal and the applicant can continue to fill their reservoir using existing sources.

**Costs/ Benefits**

By refusing the licence, there will be no impact on the environment nor water resources and any future application for an amended proposal will be determined on its own merits. The applicant will not be able to top up their Point B pond as requested and will not be able to top the Point A reservoir up from the pond. This may impact their ability to spray irrigate the golf course from the Point A reservoir. However, they do already have other sources that fill the reservoir. They stated that they could use mains water if they could not fill the reservoir via an abstraction. This would likely result in an additional cost for them. The applicant has also paid the application and advertising fees.

**Conclusion and recommendation**

It is recommended that the application is refused because of the number of uncertainties with the application. We cannot effectively determine the impact of the proposal on flows and therefore the impact on water quality, geomorphology, ecology, protected sites, protected species and protected rights or lawful users.

**Contact the Environment Agency**

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