

## Notice of refusal

Environmental Permitting (England and Wales) Regulations 2016

### Refusal of an application for a permit

To: Mr Simon Stone  
Unit 1009  
Caerwent Army Training Estate  
Caerwent  
Monmouthshire  
NP26 5XL

**Application number: PAN-000167**

Natural Resources Wales has considered your environmental permit application to operate a waste operation at Unit 1009, Caerwent Army Training Estate, Caerwent, Monmouthshire, NP26 5XL.

We give notice that the application for a permit is refused.

The reasons for this decision are outlined in the attached Schedule.

Name	Date
<b>Holly Noble</b>	<b>04 April 2017</b>

Authorised on behalf of Natural Resources Wales

# Schedule

## Reasons for Refusal

We are refusing this application as we are not satisfied that the appropriate infrastructure will be in place for the activity.

Our decision has been influenced by the following principals:

- The proposed activity in the proposed location, given the sensitivity of the location on a Principal Aquifer and a Source Protection Zone 1 (SPZ1).
- The inadequate infrastructure of the proposed facility and the unacceptable risk to groundwater within this SPZ1 that this activity may cause, in particular from the discharges of potentially contaminated run-off into a dry ditch and leachate seeping to ground from potentially contaminated soils stored on site.'
- Position G4 (Trade effluent and other discharges inside SPZ1) from our Groundwater Protection: Principles and Practice (GP3) apply to this operation. Position G4 states: *"Inside SPZ1 we will object to any new trade effluent, storm overflow from sewer system or other significantly contaminated discharges to ground where the risk is high and cannot be adequately mitigated. If necessary, we will use a prohibition notice to stop any such existing discharge."*
  - o The site drainage that the applicant proposes to use is not considered to be impermeable and our position statement G4 of GP3 (*as included above*) applies.
- We are therefore unable to grant a permit for this activity in this location, given the inadequate infrastructure and risk to groundwater.
- The applicant intends to make improvements to the infrastructure and drainage of the site *"pending agreement on the lease with the MoD"*. As a lease agreement is not currently in place between the land owner and the applicant, we do not have confidence that the applicant will be able to meet the definition of the 'operator' if they do not have agreement to operate on the site.

Our detailed reasons for the refusal to grant this permit can be found in our decision document accompanying this notice.