

# Application for an environmental permit: Part B6.5 Discharging treated domestic sewage effluent of up to 15 cubic metres a day into ground or up to 20 cubic metres a day onto surface water.

## About you

Who will be the permit holder?
A registered company (including limited liability partnerships) or other corporate body

## Registered company or other corporate body

Please provide details below	
Company name:	Castlewood (Pembrokeshire) Limited
Company address:	2 Wyevale Business Park Kings Acre, Hereford
Company postcode:	HR4 7BS
Company registration number:	12275558
Date of registration (DD/MM/YYYY):	22/10/2019

Contact name for the company	
First name:	James
Last name:	Powell
Email:	jamesedwardpowell@gmail.com
Telephone:	+44 7803260243

## Is somebody completing this application on your behalf?

Tell us if you're using an agent or somebody else to complete this application on your behalf
Yes – I'm completing this application on behalf of somebody else

## Agent or others acting on behalf of the applicant

### Complete your details:

**First name:** Matt  
**Last name:** Morga  
**Address:** ExCAL House, Capel Hendre Industrial Estate, Ammanford  
**Postcode:** SA18 3SJ  
**Telephone:** 01269831606  
**Email address:** matt.morga@excaluk.com

## Pre-application discussions

Did you have pre-applications discussions with Natural Resources Wales about this activity?

Yes

## Pre-application discussions

Give us the case reference or details of the pre-application advice you received. We will then be able to refer back to the information you've already given us, which will help us to determine your application.

#### PRE-APPLICATION DISCUSSIONS

ExCAL, on behalf of Brookside & Castlewood, was instructed to apply for an environmental permit Part B6.5 for 'Discharging treated domestic sewage effluent up to 20 cubic metres (20m<sup>3</sup>) a day to surface water.'

Based on the pre-application discussions with Terry Gulliford from the Permitting Department and Ross Grisbrook (Natura 2000 Advisor), ExCAL was given instructions on how to complete the Part B6.5 form.

#### NRW Instructions:

1. To carry out sampling of the local stream Narberth Brook, which the current PTP installation discharges to, including upstream, downstream, and the current PTP effluent. Samples would be collected over a minimum of seven days, including the Easter Holiday period and tested for ammonia, total phosphate, and orthophosphate levels. The laboratory analysis results gained from the above testing can be viewed in a separate document to be submitted with the permit application (Reference: B&C Testing Results).
2. A single Part B6.5 environmental permit application is to be submitted with two-stage consent: the first is for the current PTP installation, and the second is for the proposed reed bed. Both the current PTP effluent and the treated sewage discharged from the planned twelve-holiday lodges development would be secondary treated/polished by the proposed engineered wetland system. It was also stated that both application stages will be processed with improvement conditions at NRW's discretion.
3. NRW requested that the proposed design of an 'engineered wetland' must include information on when the reed bed system becomes fully operational.

#### NRW Correspondence

Further to discussions with NRW, the sampling results will form baseline data estimation and should be submitted along with the Part B6.5 application as supporting evidence.

Also, NRW officers suggested that it would be beneficial for the applicant to show "better than nutrient neutrality" as measures need to be taken to restore the local Afon Cleddau Special Area of Conservation (SAC).

Terry Guilford pointed out that "although the PTP discharge is not directly into the SAC, it still needs to be assessed for impact on the SAC from the phosphorus in the effluent."

Notably, the local stream that collects the treated PTP effluent is a tributary of Cleddau Ddu. The Cleddau Ddu (part of Afon Cleddau) and the Pembrokeshire Marine are designated SACs.

Moreover, the 2022 Pembrokeshire County Council guidance states that "all future development proposals within failing SAC River Catchments that will generate an increase in the volume of wastewater must now prove that the ensuing development will not contribute to increased phosphorus levels," which is in line with the NRW requirements.

## About your discharge

Where is your septic tank / sewage treatment plant located?

**Address** Brookside & Castlewood Holiday Park  
Mill Pond Road, Narberth Bridge, Pembrokeshire  
**Postcode** SA67 8RD

Please provide the 12 character national grid reference of the location of your septic tank / sewage treatment plant. This consists of two letters followed by 10 numbers (for example AB 12345 67890).

To find out the 12 character grid reference, you can search on the UK grid reference finder website

SN 10996 14223

What type of premises does your sewage treatment facility serve?

For example, the number of houses or a description such as a pub, café, restaurant, office and so on.

18 Existing Lodges & 12 Proposed New Lodges

## When did your discharge start?

When did your discharge start? (New or existing)

Before 1 April 2010 (existing discharges)

## What is the maximum volume of effluent you will discharge in a day (in cubic metres)?

Tell us the maximum volume of effluent you will discharge in a day (in cubic metres)?

18

If your discharge comes from a single domestic property, use the table below to work this out. Number of bedrooms in your house Daily volume (m<sup>3</sup> per day) 1 to 3 1.5 4 to 6 2 7 to 8 2

If you are discharging sewage from premises other than a single domestic property (for example, from a group of houses, a guest house or a very large house), the volume should be worked out using the Code of Practice: 'Flows and Loads 4 – Sizing Criteria, Treatment Capacity for Small Wastewater Treatment Systems' which is published by British Water. (opens in new window)

Show how you calculated the figure given in the box below or upload below:

#### Brookside & Castlewood – Calculations

The maximum daily volume of effluent discharged was calculated using the Flows and Loads—4 Sizing Criteria, Treatment Capacity for Sewage Treatment Systems, as per the NRW specification. For the 'Holiday camp chalet resident', the daily activity loading for sewage treatment systems per person is 150 litres.

#### STAGE1 ((Existing Lodges served by PTP (Klargester))

The current PTP system serves 18 holiday lodges. Therefore, the maximum daily volume of effluent can be calculated as follows:

Population (present)

18 x 4 people (max allowed) = 72 (max allowed occupancy)

MAX daily volume

72 people x 150 litres = 10,800 litres or 10.8 m<sup>3</sup>/day

#### STAGE2 (Proposed Lodges)

The proposed number of additional wooden lodges to be erected is 12

Population (proposed, additional)

12 x 4 people = 48 (max allowed occupancy)

MAX daily volume

48 people x 150 litres = 7,200 litres or 7.2 m<sup>3</sup> /day

MAX total daily volume (proposed)

STAGE1 + STAGE2 = 10.8 + 7.2 = 18 m<sup>3</sup>/day

The maximum daily effluent volume treated by the current PTP (18 existing lodges), combined with the proposed development volumes (12 new lodges), is calculated at 18,000 litres/day or 18 m<sup>3</sup>/day.

It should be noted that, although there are typically only ever 2 occupants per lodge, NRW have requested that we model a worst-case scenario of 4 people per lodge in order to achieve a worst-case estimation.

As such, given that it is unlikely that more than 2 people will occupy a lodge at any one time, a discharge volume of 18 m<sup>3</sup>/day is an overestimation of the likely volumes to be discharged on any one day at site.

**What type of sewage treatment system will you be using to treat your effluent?**

All sewage effluent must be treated before it can be discharged into the environment and new systems must conform to the relevant standards For new systems the supplier or manufacturer should be able to provide details For existing systems please provide any information you do have on the system If you tick 'other' please give us more details about the system in the box provided or on a separate sheet and upload it. Tick one box to show what sewage treatment plant you will be using to treat your effluent.

**Other (please specify):**

Stage1 Package treatment plant (PTP) that meets British Standard BS 12566; Stage2 Proposed 'reed bed' system to polish the existing PTP effluent and the proposed new effluent generated from the additional 12 lodges to be constructed

Please upload details of the sewage treatment system you'll be using

- File: Reed Bed Design (2nd Stage).pdf - [Download](#)

## Your sample point

You must provide a sample point where a sample of your discharge can be safely taken before it has mixed with any other discharges.

This sample point is used to assess compliance with any water quality emission limits on your permit.

You must ensure that it allows a representative sample of the discharge to be obtained. You must ensure that your discharge passes through the sampling point at all times.

Please give the 12 character national grid reference for the sample point. This consists of two letters followed by 10 numbers (for example AB 12345 67890)  
To find out the 12 character grid reference, you can search on the UK grid reference finder website.

SN 10995 14224

## Your discharge point

Tell us where effluent is discharged into the environment.

For discharges into surface water (i.e. rivers, streams, lakes, ponds etc) - this is the location where the discharge is made from the outlet pipe to the surface water. On some occasions discharges are made via surface water sewers owned by someone else before they discharge into a receiving water. Where this is the case the outlet will be the point where the surface water sewer meets the river, stream, ditch or canal.

For discharge into or onto land - this is the location where the effluent from the treatment system enters the infiltration system.

Please give the 12 character national grid reference for the discharge point. This consists of two letters followed by 10 numbers (for example AB 12345 67890).

To find out the 12 character grid reference, you can search on the UK grid reference finder website.

SN 10996 14220

## Where will your treated effluent discharge to?

Sewage effluents are usually discharged to one location in one receiving environment.

If you are proposing to discharge multiple effluents, you must complete a separate application form for each effluent and submit the form, along with the correct application fee, for assessment.

Where will your treated effluent discharge to?

Freshwater river, stream, ditch or canal

## Discharges to a river, stream, ditch or canal

Give the name of the watercourse, canal or the main watercourse it is a tributary of if you know it:

The name will usually be shown on an Ordnance Survey map. If the receiving water is unnamed, please indicate the named watercourse into which it flows, for example 'an unnamed tributary of the River Wye'

'Narberth Brook' then Cleddau Ddu

Is the discharge into:

A river, stream or ditch

Does the watercourse dry up for part of the year?

We prefer effluent to discharge to watercourses which flow all year. Discharging to a seasonally dry watercourse may cause the effluent to pond which can cause odour and other local problems

No

Does the discharge reach the watercourse or canal by flowing through a surface water sewer?

No

## Your site plan

Please upload your plan here

- File: 342-01-04.D01 - Location of Sewage Treatment Facility\_ REV A.pdf - [Download](#)

## Your management system

Your permit requires you (as the operator) to ensure that you manage and operate your activities in accordance with a written management system. This management systems identifies and reduces the risk of pollution.

You can find guidance on management systems and what to include in one on our website (opens in new window).

I confirm that I have read the guidance and that my management system will meet NRW requirements

## When will you want to discharge?

What date do you want the permit for this effluent to start?

You cannot discharge your effluent prior to this start date on your permit. This is the date that your annual subsistence charges will start, even if you have not started to discharge.

\* 01/05/2024

Will the discharge take place all year?

For seasonal discharges which only occur for part of the year, tells us when the discharge will take place.

Yes

## How do you want to pay?

Who can we talk to you about your billing or invoice?

Same as application contact

How do you want to pay for your application fee?

Electronic transfer (e.g. BACS)

## Paying by electronic transfer

Please provide your reference for the payment.

**BACS reference:** PRCCASTLEWO456

**Amount paid:** £4,094.00

## How we collect your personal data

We will process the information provided by you in line with the Data Protection legislation. For more information on how we manage, store and use your data, see our Privacy Notice (opens in new tab)

I have read and understood this information

## Freedom of Information

Under the Freedom of Information Act 2000, anybody may request information from a public authority. The Act grants two statutory rights: to be told if the public authority holds that information; and if so, to have that information communicated to you.

Find out how to request information under the Freedom of Information Act.

I have read and understood this information

## Confidentiality and National Security

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential. Confidential information is information that is commercially or industrially confidential in relation to any person and is unlikely to be applicable for small-scale sewage discharges.

You can ask for information in the public register to be made confidential or withheld in the interests of national security by answering the question below and provide information on the next page giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application.

Do you believe that for reasons of confidentiality or national security your details should not be included on the public register?

No

## Declaration

A relevant person should make the declaration. You must be a relevant person or have the authority of a relevant person to sign this application on their behalf. An agent acting on behalf of an applicant is NOT a relevant person.

Each individual (or individual trustee) who is applying for their name to appear on the permit must complete this declaration. You can send a separate document with the relevant information if there are not enough spaces to sign below.

Relevant people means each applicant, and in the case of a company, a director, manager, company secretary or any similar officer or employee listed on current appointments in Companies House. In the case of a Limited Liability Partnership (LLP), it includes any partner. If the permit holder is an organisation of individuals, each individual (or individual trustee) must complete the declaration.

To simplify and speed up the application process, we recommend that the declaration is filled in by an officer of a company or one of the partners in a Limited Liability Partnership (LLP).

If you wish a manager, employee or consultant etc. to sign the declaration on behalf of a relevant person, we will need written confirmation from a relevant person; that is, an officer of the company, a partner in the LLP or the individual, confirming that the person has the authority to fill in the declaration.

If you are joint permit holders, you should each fill in your own declaration. We have provided extra spaces for this below. Please upload a separate sheet with your application if you need more room for signatories.

Where the operator is the subject of any insolvency procedure, the declaration must be filled in by the official receiver/appointed insolvency practitioner.

I have included written confirmation from a relevant person to confirm I can sign on their behalf

Upload written confirmation here

- File: Declaration PDF.pdf - [Download](#)

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

I understand that if I knowingly or recklessly make a false or misleading statement: I may be prosecuted; and if convicted, I may have to pay a fine and/or go to prison.

By signing below, you are confirming that you understand and agree with the declaration above.

<b>Title</b>	Mr
<b>First name</b>	James
<b>Last name</b>	Powell
<b>On behalf of (if applicable)</b>	Castlewood (Pembrokeshire) Limited
<b>Date (DD/MM/YYYY)</b>	19/04/2024

## Submit your application

Enter the email address you'd like a copy of your application sent to:

matt.morga@excaluk.com