

**Revised Carmarthenshire Local Development Plan**

**Burry Inlet**

**Supplementary Planning Guidance**

**DECEMBER 2019**

**DRAFT**



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## 1.0 INTRODUCTION

### Purpose of Guidance

- 1.1 This Supplementary Planning Guidance (SPG) is an elaboration and consolidation of the policies and provisions of the Revised Carmarthenshire Local Development Plan (rLDP) 2018-2033 - Deposit Draft (December 2019), most notably policy INF4: Llanelli Waste Water Treatment Surface Water Disposal, as well as SP 8: Infrastructure and CCH3: Water Quality and Protection of Water Resources.
- 1.2 Whilst the rLDP does not repeat national policy statements, reference can also be made to policy SP 13: Maintaining and Enhancing the Natural Environment, most notably in terms of the reference to Planning Policy Wales (PPW) Technical Advice Note (TAN) 5. It is also noted that reference is made to PPW TAN 15 within policy SP15: Climate Change.
- 1.3 This SPG provides specific guidance in relation to the consideration of relevant development proposals located within the Llanelli Waste Water Treatment Works (WWTW) catchment area. Whilst Llanelli (Principal Centre) and Burry Port (Service Centre) are identified as a focus for growth in the rLDP, they are also subject to high level environmental considerations, not least the water quality of the Carmarthen Bay and Estuaries European Marine Site (CBEEMS). This SPG seeks to balance these considerations with a view to facilitating the delivery of growth within the rLDP up to 2033.
- 1.4 Whilst Dwr Cymru Welsh Water (DCWW) have confirmed there is capacity to accommodate the rLDP growth that drains to the Llanelli WWTW catchment, they have concerns that the connection of foul flows generated by new development introduces the risk of deterioration in the water quality of the CBEEMS. This is because the majority of the sewer system in this area is combined (surface and foul flows). Introducing additional foul flow can lead to overloading to the WWTW, as well as an increasing the frequency of discharges from storm sewerage overflows out to the CBEEMS during significant rainfall. There can also be potential localised flooding issues resulting from these issues. DCWW are therefore requesting that a scheme of compensatory surface water be taken forward.
- 1.5 This SPG provides a mechanism to address the concerns outlined above by allowing additional foul flows to be connected subject to relevant developments taking out surface water from the combined sewer as part of a compensatory / betterment measure. In this regard, it builds upon the provisions of the established Burry Inlet Memorandum of Understanding (MoU).
- 1.6 Those development proposals of relevance to this SPG will be those located within the Llanelli WWTW area and defined as 'major development' within Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO).
- 1.7 The adoption of this SPG is also a recognition by the Council of a range of legislation and guidance, notably the Well-being of Future Generations Act 2015 and the Environment Act 2016.

- 1.8 This SPG establishes a transparent and consistent approach that supports the delivery of new development across the Llanelli WWTW area without increasing the pollution (including nutrients) within the estuary and thus preventing the deterioration of the environmental quality of the CBEEMS. The wider context is one of partnership and collaboration with the former MoU replaced by a high level statement of common ground between Natural Resources Wales (NRW), DCWW, City and County of Swansea (CCS) and Carmarthenshire County Council.
- 1.9 This SPG will be a material consideration in the determination of planning applications and appeals located within the Llanelli WWTW area.
- 1.10 The preparation of this SPG will be subject to a public consultation exercise alongside the draft deposit rLDP with comments invited on its content. The consultation has been conducted in a manner consistent with that set out within the Delivery Agreement for the rLDP. It is intended to be adopted concurrently with the rLDP. It should be noted that the Plan should be read in its entirety in formulating any proposals.

## 2.0 LEGISLATIVE AND POLICY CONTEXT

2.1 There are a range of legislative and policy drivers that are of relevance to the Burry Inlet area within the context of balancing developmental and environmental interests.

### Legislative Context

2.2 **Water Framework Directive (WFD):** The Burry Inlet and Loughor Estuary form part of the WFD Carmarthen Bay and Gower Management Catchment. The catchment is divided into Burry Inlet Inner, which is a transitional waterbody, Burry Inlet Outer and Carmarthen Bay (sub-divided into 'North' and 'South'), both of which are coastal waterbodies. All three are required to meet Good ecological status under the UK's Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 referred to in this agreement as the WFD.

2.3 In the 2015 Cycle 2 WFD classification, both the Burry Inlet Inner and Burry Inlet Outer water bodies achieved Poor status. Carmarthen Bay's status was classed as moderate. As the waterbodies are not meeting the required WFD ecological status today (and even the existing status could deteriorate) when the additional nutrients resulting from sewage produced from an increased population (even though the WWTWs remain within the permit limits) are treated and discharged to the estuary, additional mitigation measures may be necessary to safeguard water quality.

2.4 **Habitats Directive** - The Burry Inlet and Loughor Estuary also form part of the Carmarthen Bay and Estuaries Special Area of Conservation (SAC) and Burry Inlet Special Protection Area (SPA) and Ramsar that are collectively referred to as the Carmarthen Bay and Estuaries European Marine Sites (CBEEMS). Targeted investment in recent years at Llanelli, Gowerton, Pontyberem and Parc Y Splott WwTWs, as a result of the 2010 Conservation of Habitats and Species Regulations review of consents process (implemented through the DCWW AMP funding) has resulted in all the licensed discharges being compliant with the Habitats Regulations. Any consent modification which might be identified as necessary to provide capacity for increased development will need to be subject to assessment under the Habitat Regulations.

2.5 **Shellfish Waters Protected Area** - The Water Framework Directive requires specification of protected areas for those areas designated for the protection of economically significant species. Areas previously designated under the repealed Shellfish Waters Directive are now specified under the Water Framework Directive. The Burry Inlet and Loughor Estuary contains two designated shellfish waters, Burry Inlet North and Burry Inlet South.

2.6 Water quality in these areas has met minimum statutory standards for shellfish waters since 2000 but not all shellfish collected in the estuary meet Class B under the Hygiene Regulations, the desired quality determined by Welsh Government policy. It is necessary to protect shellfish water quality from deterioration that could result from increased bacteriological loadings being discharged to the estuary as a result of an increase in the local population.

2.7 **Judgment of the Court (Ninth Chamber) of 4 May 2017. European Commission v United Kingdom of Great Britain and Northern Ireland. Case C-502/15** - Further to public complaints to the European Commission relating to inadequacies in the implementation of the Urban Waste Water Treatment Directive, the European Court of Justice ruled in May 2017 that the UK had failed to ensure that the waters collected in a combined urban waste water and rainwater system in the Gowerton and Llanelli agglomerations were retained and conducted for treatment in accordance with the Directive (91/271).

2.8 As a result of the ruling, competent authorities are implementing a comprehensive programme of works to ensure compliance with the judgment by 2020, taking account of the overall objective to protect the environment. The programme of works is undertaken in accordance with the principle of the ‘best technical knowledge not entailing excessive costs’ and will contribute to significantly reduce spill frequencies and volumes of surface water from the collecting system prior to treatment.

2.9 Whilst it can be argued that the primary driver of this programme of works is regulatory compliance, as opposed to the delivery of new development, reference can be made to the indirect contribution of the Memorandum of Understanding as outlined below.

#### **Memorandum of Understanding -**

2.10 A “Memorandum of Understanding - Safeguarding the Environment of the Burry Inlet and Loughor Estuary whilst enabling Social and Economic Development for Communities in the Llanelli and Gowerton area” has been in place for some time, with the most recent iteration being dated September 2011.

2.11 Whilst its primary driver is to deliver new development, the MoU has helped support the comprehensive programme of works referred to in 2.8 above. It is intended to ensure a transparent approach to safeguarding the water quality of the Burry Inlet and Loughor Estuary. It sets out a collaborative approach that supports the delivery of new development across the MoU area without increasing the pollution, including nutrients, within the estuary and thus preventing the deterioration of the environmental quality of the Burry Inlet and Loughor Estuary.

#### **National Planning Policy**

##### **Planning Policy Wales (Edition 10, December 2018)**

2.12 PPW sets out the land use planning policies of the Welsh Government and is supplemented by a number of documents, including TANs. Paragraph 6.4.14 of PPW states that “International and national responsibilities and obligations for conservation should be fully met, and, consistent with the objectives of the designation, statutorily designated sites protected from damage and deterioration, with their important features conserved and enhanced by appropriate management”. Reference should also be made to Paragraph 6.4.18 of PPW, notably “...development can normally only be authorised or the plan adopted, if the planning authority ascertains that it will not adversely affect the integrity of the site, if necessary taking into account any additional measures planning conditions or obligations”.

2.13 Paragraph 6.6.9 of PPW provides guidance on capacity of water supply and sewerage/drainage infrastructure – whilst 6.6.14 provides guidance on water quality and surface water flooding. Of note within Paragraph 6.6.15 of PPW is the reference to “.....sustainable places will be those with resilient, well-maintained networks for sewerage and drainage with sufficient capacity to manage the demand placed upon them without causing pollution or surface water flooding”.

##### **Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009):**

2.14 TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It provides an overview of all relevant legislation within the field and “demonstrates how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it” (paragraph 1.6.1). TAN 5 also provides guidance on the use of planning obligations and conditions – (sections 4.6 and 4.7 of TAN 5).

2.15 It is noted that paragraph 3.4.2 of TAN 5 states that “Local planning authorities may adopt SPG to provide more detailed, locally relevant guidance for -achieving more sustainable solutions to development problems and opportunities that respect natural processes and ecological systems.

### **Planning Conditions and Obligations**

2.16 Reference is made to the Development Management Manual (Revision 2 Welsh Government, May 2017 – the DMM 2017). Paragraph 10.1.1 states that conditions and planning obligations can enable development proposals to proceed where it would otherwise be necessary to refuse planning permission.

2.17 Welsh Government Circular 016/2014 provides guidance on the Use of Planning Conditions for Development Management. Paragraph 1.2 states that the power to impose conditions when granting planning permission is very wide. If used properly, conditions can enhance the quality of development and enable many development proposals to proceed where it would otherwise have been necessary to refuse planning permission. The objectives of planning, however, are best served when that power is exercised in such a way that conditions are clearly seen to be fair, understandable, reasonable and practicable. This circular sets out guidance on how this can be achieved.

2.18 The below six tests are set out in paragraph 3.1 of the Circular. In adopting this SPG, the Council is satisfied that this SPG meets these tests in identifying a Plan level policy intervention for implementation within the rLDP period – notably to support the delivery of development in the Llanelli and Burry Port areas. In terms of need, reference is made to the specific request from DCWW for compensatory surface water removal to be undertaken as part of planning approvals. It should also be noted that this SPG represents a policy intervention within a defined spatial area (i.e. Llanelli WWTW catchment).

- (i) necessary;
- (ii) relevant to planning;
- (iii) relevant to the development to be permitted;
- (iv) enforceable;
- (v) precise; and
- (vi) reasonable in all other respects.

2.19 Paragraph 10.3.8 of DMM2017 clarifies that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It is considered unlikely that the Council will enter into a planning obligation with a developer in the implementation of this SPG.

2.20 The legal tests for planning obligations are set out in the Community Infrastructure Levy Regulations 2010 (as amended) (set out below).

- necessary to make the development acceptable in planning terms
- directly related to the development
- fairly and reasonably related in scale and kind to the development

2.21 Procedural guidance on how planning obligations should be properly negotiated and used by Planning Authorities is provided by Planning Obligations Welsh Office Circular 13/97 (8th July 1997).

## Local Planning Policy – Revised Carmarthenshire LDP

- 2.22 This Supplementary Planning Guidance (SPG) is an elaboration and consolidation of the policies and provisions of the Revised Carmarthenshire Local Development Plan (rLDP) 2018-2033 - Deposit Draft (December 2019), most notably policy INF4 which is set out below.

2.23 **‘INF4: Llanelli Waste Water Treatment Surface Water Disposal**

**Proposals that drain to Llanelli Waste Water Treatment Works and are defined as major under Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 will be subject to a requirement to remove a quantifiable amount of surface water from the combined sewer system as set out within the Burry Inlet Supplementary Planning Guidance.’**

- 2.24 Whilst the rLDP does not repeat national policy statements, reference can also be made to policy SP 13: Maintaining and Enhancing the Natural Environment, most notably in terms of the reference to Planning Policy Wales (PPW) Technical Advice Note (TAN) 5. It is also noted that reference is made to PPW TAN 15 within policy SP15: Climate Change.



### **3.0 ROLES AND RESPONSIBILITIES**

3.1 The alignment of potentially competing demands has led to an established partnership approach. In this regard, the roles of identified key stakeholders follows below:

#### **Dwr Cymru Welsh Water (DCWW)**

3.2 DCWW is responsible for the collection, treatment and disposal of sewage in the areas served by Llanelli WWTW. DCWW is responsible for providing sewerage services to its customers, complying with its discharge permits and accommodating appropriate development. Through the MoU (see paragraph 3.11 below) and ongoing dialogue in preparation of revised LDPs, DCWW works with NRW, CCS and Carmarthenshire County Council in order to facilitate development and playing its part in improving the WFD ecological status for the Burry Inlet and Loughor Estuary, in line with all relevant legislation.

3.3 DCWW continue to meet increased demand for sewerage services through legislative and regulatory mechanisms, and supply/demand investment as set out within the Asset Management Programme (AMP). The AMP investment will support future growth and regeneration as identified in Development Plans.

3.4 DCWW are also investing in additional improvements to its sewerage infrastructure required to improve service and meet its obligations under the National Environment Programme (NEP) for Wales. This £113m programme commenced in 2010 and will continue to the end of 2020. The objectives of the programme are to reduce the frequency and volume discharged by combined sewer overflows (CSO) in line with their NEP obligations and reduce the risk of sewage flooding for their customers in a sustainable and technically feasible way. This programme is not designed to create headroom for development and runs in parallel to any works required to meet increased demand for sewerage services. An example is the Rainscape investment in the Llanelli area.

3.5 DCWW work with NRW especially where concerns over compliance with quantitative or qualitative limits at the receiving works might restrict planned growth in the area. DCWW (along with NRW) are a statutory consultee in the planning process as well as being a statutory water and sewerage undertaker, and that as such can influence the inclusion of conditions on the matter of SW removal.

#### **Local Planning Authorities (LPAs)**

3.6 The City and County of Swansea and Carmarthenshire County Council are the Local Planning Authorities (LPAs) responsible for setting out the strategic context for future development and land use objectives within Local Development Plans within the area. Swansea and Carmarthenshire LPAs are also responsible for the determination of planning applications against the policies and provisions of their adopted Development Plans unless material considerations indicate otherwise.

3.7 Swansea and Carmarthenshire LPAs consult with DCWW and NRW throughout the Local Development Plan preparation process, in order that future demands on infrastructure provision can be identified in a timely manner.

#### **Natural Resources Wales (NRW)**

3.8 NRW are the competent authority responsible for implementing Welsh Government's environmental and flood protection policies. They do this by determining permit conditions for existing or new discharges, monitoring and enforcing compliance with permits, managing flood protection and consulting on new development to ensure it does not breach flood protection policies.

3.9 NRW will also work with DCWW to ensure their discharges are permitted appropriately and to determine any proposed variations or modifications to permits in a manner that is compliant with all relevant legislation. In particular, NRW will ensure that any new permit applications or variations/modifications to existing permits are subject to assessment under regulation 61 of the Habitats Regulations.

3.10 NRW will consult on developments brought forward for planning to ensure they comply with the appropriate Welsh Government policy on flooding and flood protection.

### **The Memorandum of Understanding for the Burry Inlet**

3.11 A “Memorandum of Understanding - Safeguarding the Environment of the Burry Inlet and Loughor Estuary whilst enabling Social and Economic Development for Communities in the Llanelli and Gowerton area” has been in place for some time, with the most recent iteration being dated September 2011.

3.12 The MoU is intended to ensure a transparent approach to safeguarding the water quality of the Burry Inlet and Loughor Estuary. It sets out a collaborative approach that supports the delivery of new development across the MoU area without increasing the pollution, including nutrients, within the estuary and thus preventing the deterioration of the environmental quality of the Burry Inlet and Loughor Estuary.

3.13 As a headline guide the MoU is underpinned by two key facets. These are (1) partnership and (2) implementation of a scheme of compensatory surface water removal as part of granting planning permission. In terms of partnership, the signatories to the MoU are City and County of Swansea, NRW, Carmarthenshire County Council and DCWW. This partnership approach to addressing water quality issues being taken by the parties through the MoU is not to be interpreted as being a legal document, with parties wishing to terminate their participation in this MoU able to do so with written notice.

3.14 In terms of the compensatory surface water removal requirement, this is a firmly established approach with the area which is supported by well associated processes – eg provision of surface water removal register. The MoU has allowed development to continue across the area over recent years and did feature as a deliverability indicator during the adoption of the Carmarthenshire Local Development Plan 2006-2021 (adopted 2014).

3.15 With the advent of compensatory surface water removal through the planning system, Swansea and Carmarthenshire LPAs are making a contribution to those wider efforts to water quality and localised infrastructural issues in the area (see Section 2 of this SPG). Development that removes surface water from the combined system would therefore be a contributor towards improving the position in an area of challenge as opposed to creating a detrimental position.

### **The Way Ahead**

3.16 As part of the preparation of the rLDP, DCWW have indicated that whilst there is sufficient capacity to accommodate the growth earmarked for Llanelli and Burry Port, there is concern with regards the fact that the foul and surface system is combined. As such, the ongoing requirement to build on the provisions of the MOU within rLDP is noted as part of a partnership approach.

3.17 Furthermore, the September 2011 version of the MoU is in need of review. To this end, it is proposed that in terms of Carmarthenshire, this SPG be utilised in the preparation of the rLDP and provide the mechanism for compensatory surface water removal. In terms of wider governance and partnership, a high level statement of common ground will be signed by all parties.

3.18 The adoption of this SPG is intended to satisfy those other key stakeholders in terms of their regulatory requirements and also confirm the deliverability of the rLDP. Reference should also be made to Section 7 (management and monitoring).

## **4.0 CARMARTHEN BAY AND ESTUARIES EUROPEAN MARINE SITE**

4.1 A recognition of the developmental context is important, particularly in terms of the environmental considerations and designations.

### **Overview**

4.2 The Carmarthen Bay and Estuaries European Marine Site (CBEEMS) is part of a European-wide network of areas – the Natura 2000 series – designated under the European Union's Habitats and Birds Directives to safeguard habitats and species that are important and threatened on a European scale. Three marine Natura 2000 sites together form the European Marine Site – Carmarthen Bay and Estuaries Special Area of Conservation (SAC), Carmarthen Bay Special Protection Area (SPA) and Burry Inlet SPA. The Burry Inlet is also a Ramsar site and it should be noted that sites designated as wetlands of international importance under the Ramsar Convention are subject to the same provisions as Natura 2000 sites.

4.3 In framing this SPG, regard has been made to European Directive 92/43/EEC (as implemented in the UK by the Habitat Regulations 2017) together with guidance issued within Planning Policy Wales Technical Advice Note 5. Reference is made to Section 2 of this SPG (legislative and policy context) in this regard.

4.4 Detailed information on the designations, interest features and conservation objectives, as well as potential pressures on the CBEEMS, are available from NRW. However, within the context of this SPG, it is noted that these waters are some of the most heavily designated and protected in Europe. An awareness of such issues has been an implicit part of the preparation of the rLDP, which has been informed at all stages by the plan level HRA.

4.5 The CBEEMS sits directly adjacent to the Llanelli and Burry Port coastline. Section 5 of this SPG outlines the strategic importance of these settlements to the rLDP from a growth / developmental perspective.

4.6 Reference is also made to Section 2 of this SPG – legislative and policy context – notably Planning Policy Wales Technical Advice Note 5.

### **rLDP - Habitats Regulations Assessment (HRA) (December 2018)**

4.7 This report comprises of a high-level preliminary screening stage of the Preferred Strategy. It undertook a high level, generic screening of issues that could result in likely significant impacts, and identifies any strategic policies which would clearly have no effects upon European sites enabling these to be 'screened out' of any further assessment. Therefore, the focus of further, more detailed assessment would only be applied to allocation sites, or policies, where a likely significant effect could be possible. It should be noted that the potential impact of the rLDP on the CBEEMS could not be ruled out at this early stage.

### **rLDP - Habitats Regulations Assessment (HRA) (December 2019)**

4.8 This report comprises of a more detailed review of the draft deposit rLDP given that the detailed policies have been prepared and a full list of allocation sites has been set out in the draft deposit Plan. The draft deposit also sets out the overall growth requirement for the Llanelli and Burry Port areas.

4.9 This SPG should be seen as a positive policy intervention, which reflects the importance of the natural environment but also reaffirms the deliverability of development identified within the Plan.

4.10 Furthermore, rather than having a negative impact, development can assist in improving the position 'betterment' by assisting in those wider efforts to remove surface water from the combined system (see Section 3 of this SPG for other partners efforts – eg DCWW Rainscape programme).

### **Wider benefits**

4.11 This SPG also provides opportunities to address other issues which may emerge given the nature of the combined sewer system in the Llanelli area – notably localised flooding. This is in recognition of key legislative drivers – notably the Well-being of Future Generations Act 2015 and the Environment Act 2016.

## **5.0 DEVELOPMENT CONTEXT – LLANELLI AND BURRY PORT**

5.1 A recognition of the developmental context is important, particularly in terms of the role of Llanelli and Burry Port in delivering the development identified in the rLDP.

### **Llanelli**

5.2 Llanelli is identified as a Principal Centre within the rLDP deposit draft (December 2019). There are 1707 residential units allocated within Llanelli (including Pwll). There is around 16 hectares of proposed employment land allocated. This is a notable amount of growth in terms of the overall Plan for the County and as such it is important that deliverability of this growth is facilitated.

5.3 A Wellness and Life Science Village is planned for Llanelli. The £200million complex planned for Delta Lakes on the Llanelli coast is expected to create close to 2,000 jobs and give the local economy a £467million boost. Other notable housing sites identified within the rLDP include the Cwm Y Nant allocation in the Dafen area.

5.4 There is a wider corporate emphasis on Llanelli. Moving Forward in Carmarthenshire - the next 5 years - is the Council's Corporate Strategy 2018 – 2023 (approved 2018 – updated 2019). The Tyisha area, Llanelli Town centre, the Wellness and Life Science Village are amongst those projects cited within this Corporate Strategy. The Council has a commitment to the delivery of affordable homes, and a report “building more homes – increasing our ambition” was received by the Council in February 2019 – with a banding framework in place to guide delivery. It is noted that across Bands A, B and C, a total County wide figure of 917 units and £141m investment is cited. Of these, 439 units and £73.5m of investment is earmarked for the Llanelli and District area. A further report was provided to Council in September 2019.

5.5 Llanelli's spatial and functioning contribution to the Swansea Bay City Region/ Deal and any emerging Swansea Strategic Development Plan is also readily apparent. Reference is made to the explicit reference to Swansea Bay and Llanelli within the emerging National Development Framework (draft – published 7 August 2019) in this regard.

5.6 Reference to the Appendix 3 off this SPG for a more detailed appraisal of the development context.

### **Burry Port**

5.7 Burry Port (including Pembrey) is identified as a Service Centre within the rLDP deposit draft (December 2019). There are 501 residential units allocated in Burry Port (minus the Cwrt Farm and Garreglwyl sites which are in Pembrey and won't drain to Llanelli WWTW). There is around 3 hectares of proposed employment land allocated in Burry Port.

5.8 The transformation of Burry Port is underway and already a number of exciting developments are being delivered, with more in the pipeline. The regeneration of Burry Port Harbour is a major project supported by the Llanelli Waterside Joint Venture Partnership (JV) between Carmarthenshire County Council and Welsh Government.

5.9 Reference to the Appendix 3 off this SPG for a more detailed appraisal of the development context.

## **Waste Water Treatment Works**

5.10 A key aspect in the delivery of sustainable development – notably from an infrastructural, amenity and environmental point of view - is a suitable means of treatment of flows. Development within Llanelli and Burry Port (not including Pembrey) drains to Llanelli WWTW. An illustrative plan is provided in Appendix 4. DCWW have indicated that whilst there is sufficient capacity to accommodate the growth earmarked for Llanelli and Burry Port, there is concern with regards the fact that the network is combined (foul and surface) and are therefore requesting that a scheme of compensatory surface water be taken forward.

5.11 Within the Llanelli WWTW catchment, there are concerns that the connection of foul flows generated by new development introduces the risk of deterioration in the water quality of the CBEEMS. This is because the majority of the sewer system in this area is combined (surface and foul flows). Introducing additional foul flow can lead to overloading to the WWTW, as well as an increasing the frequency of discharges from storm sewerage overflows out to the CBEEMS during significant rainfall. There can also be potential localised flooding issues resulting from these issues.

## **Deliverability of rLDP growth in Llanelli and Burry Port**

5.12 In order to re-affirm the deliverability of the sites identified in Llanelli and Burry Port within the rLDP, Carmarthenshire County Council recognises the need to proposed to build upon established approaches set in place within the Burry Inlet Memorandum of Understanding (Mou).

5.13 This SPG provides a mechanism to address these concerns by allowing additional foul flows to be connected subject to relevant developments taking out surface water from the combined sewer as part of a compensatory / betterment measure. Reference should be made to Section 6 of this SPG in this regard.

5.14 The mechanism outlined within this SPG re-affirms the deliverability of development in both Llanelli and Burry Port. It provides a transparent and consistent approach that provides certainty to developers and investors, whilst also satisfying key stakeholders including DCWW and NRW.

## 6.0 COMPENSATORY SURFACE WATER REMOVAL REQUIREMENT

### Overview

6.1 As part of granting planning permission for relevant developments, Carmarthenshire LPA requires the removal of a quantifiable amount of surface water from the combined system as expressed in l/s. Such credits will then be entered onto the register of surface water removal (see Section 7 of this SPG).

6.2 Removal of surface water is likely to involve bespoke solutions, dependant on the size and location of the development. In terms of the l/s credit, the actual betterment figure achieved may be negligible. Notwithstanding this, there should be no detriment in terms of flows, with the credits achieved quantifiable and measurable. Reference should be made however to paragraph 2.3.5 in Appendix 1 of this SPG.

6.3 There will be a requirement to submit a drainage report to Carmarthenshire LPA that demonstrates that betterment can be achieved and that the required sequential search has been followed. Reference is made to Appendix 6 of this SPG (flow chart). Appendix 1 of this SPG provides information on flow calculations along with an illustrative example for a residential unit factoring in a x2 betterment factor.

6.4 Whilst the submission of the drainage report is not a validation requirement, developers are strongly advised that early and timely consideration should be implicit within development proposals. Timely engagement with key stakeholders – particularly DCWW - is strongly advised in this regard. It should be noted that relevant developments will be those that are subject to Pre-application consultation and as such this provides an early opportunity to consider the requirements of this SPG – see paragraph 6.16 below.

### Relevant Developments

6.5 Those developments subject to the betterment requirement are those which drain to Llanelli WWTW **and** are defined as major under Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO). Reference is also made to paragraph 6.14 below. In summary, major development is:

- Housing developments of 10 or more dwellings or where the site area is of 0.5 ha or more (if the number of dwellings is not known);
- The provision of a building(s) where the floorspace created exceeds 1,000 sqm;
- The winning and working of minerals or the use of land for mineral-working deposits;
- Waste development; and
- Development carried out on a site of 1 ha or more.

6.6 Where the Council identifies that developers have sub-divided sites in order to avoid contributing towards the provisions of rLDP policy INF4 as elaborated upon by this SPG, the total provision of the scheme will be calculated and the policy requirement will be applied accordingly. This approach will also apply where planning applications are staggered over a period of time.



## **Sequential Search requirement**

6.7 This should be documented within the drainage report. Carmarthenshire LPA will need to be satisfied that there has been a thorough assessment undertaken and will liaise with key stakeholders – notably DCWW- in this regard.

**It should be noted that in all instances, no new surface water shall be allowed to enter the system.**

- 1 Onsite solution for the removal of compensatory Surface Water from the public sewerage system (at or adjoining the site);
- 2a Sub - catchment area solution for the removal of Surface Water from the public sewerage system;
- 2b Wider catchment area solution for the removal of Surface Water from the public sewerage system.

6.8 Should the drainage report demonstrate, to the satisfaction of Carmarthenshire LPA, that the removal of a quantifiable amount of surface water cannot be achieved, then developers can approach DCWW to see whether there is an opportunity fund a DCWW scheme. Carmarthenshire LPA will notify the developer of this option in writing, following feedback from DCWW.

6.9 Reference should be made to 6.11 below for Carmarthenshire County Council proposals.

## **Dwr Cymru Welsh Water**

6.10 Should an applicant pass through the sequential search and be unable to identify a scheme, then they can approach DCWW to see whether there is an opportunity fund one of their schemes. This approach cannot be undertaken until Carmarthenshire LPA inform the applicant in writing. Negotiations will then take place between DCWW and the developer and Carmarthenshire LPA will require written confirmation from DCWW that an acceptable solution has been identified.

6.11 Whilst being unable to make available a list of 'back up' schemes to be included in this SPG, DCWW does recognise the valuable contribution that has been made in terms of surface water removal through the development system in recent years. Such development is only a part of a wider package of interventions to address infrastructural issues in the Llanelli area. They will seek to work constructively with applicants, however in all instances the sequential search should be firstly exhausted.

## **Carmarthenshire County Council planning applications – The Betterment Bank**

6.12 In all instances where Carmarthenshire County Council is the applicant for planning permission for a relevant development as defined within this SPG, Carmarthenshire County Council will be required to submit a drainage report which fully details the feasibility of on site or adjacent to site removal (stage 1 of the sequential search). Should it be demonstrated to the satisfaction of Carmarthenshire LPA and where appropriate DCWW, that this cannot be achieved, then this SPG makes provision for Carmarthenshire LPA to waive the requirement for Carmarthenshire County Council to progress to Stage 2 of the sequential search process. This will be considered on a case by case basis. This is known as the Betterment Bank exception.

6.13 The Betterment Bank exception will be subject to:

- Carmarthenshire County Council demonstrating to the satisfaction of Carmarthenshire LPA that it has surplus betterment capacity already accrued on the register through development and other surface water removal schemes; and
- Carmarthenshire County Council demonstrating to the satisfaction of Carmarthenshire LPA that the proposal is of strategic significance in terms of corporate / rLDP alignment through submission of a justification report; and
- Carmarthenshire County Council demonstrating to the satisfaction of Carmarthenshire LPA that on site (or adjoining) surface water removal cannot be achieved (stage 1 of the sequential search) through submission of a drainage report; and
- Carmarthenshire LPA being satisfied that the amount of credit being taken from the register will not unduly affect the headroom of the overall surface water removal register.

6.14 The planning justification for implementing the 'betterment bank' approach is to support the Council's contribution towards the delivery of the rLDP and its associated corporate objectives. Reference is made to Section 5 of this SPG, together with Appendix 3 of this SPG. The public interest justification for implementing the 'betterment bank' approach is that the Council has already invested significant amounts of public money in implementing betterment schemes. Due to its reliance on the beneficial use of public funds, the 'betterment bank' is only available to the Council and cannot be utilised by private developers.

## **Other Considerations**

### **Pre Application Consultation (PAC)**

6.15 On 16 March 2016, key elements of the Planning (Wales) Act 2015 (the Act) were implemented. This included a need for developers to carry out statutory pre-application consultation on planning applications for major developments in Wales. From 1 August 2016 applicants (developers) proposing major development were required to show how they had adhered to the new consultation requirements as part of their planning application submissions. Reference is made to paragraph 6.5 above.

6.16 There are clear opportunities, as part of a meaningful PAC engagement process, for developers to have their proposed betterment scheme in place at an early stage. Developers are encouraged to make the drainage strategy available as part of their suite of PAC consultation documents.

### **Sustainable Drainage Systems**

6.17 The Flood and Water Management Act 2010 (Schedule 3) establishes Sustainable Drainage Approval Body (SAB) in County Councils and requires new developments to include Sustainable Drainage Systems (SuDS) features that comply with national standards. This legislation came into force from January 7th 2019. Developers are advised to confirm the requirements at an early stage – particularly as part of formulating the drainage report.

## **Placemaking**

6.18 The incorporation of a place making approach into concept development from the outset could allow for wider benefits – including green infrastructure. In developing drainage solutions, there are opportunities to acknowledge placemaking opportunities – including wider wins – eg biodiversity.

## **7.0 MONITORING AND MANAGEMENT**

### **Strategic governance**

7.1 The former MoU was based on a signatory process. This has now been revised to be as a statement of common ground for the Burry Inlet. Signatories are Carmarthenshire County Council, City and County of Swansea, Natural Resources Wales and Dwr Cymru Welsh Water.

### **Register of Surface Water Removal – Carmarthenshire LPA**

7.2 Carmarthenshire LPA will keep an updated register of surface water removal. The register will be available to all signatory organisations and the Welsh Government.

7.3 With regards to the betterment bank for Carmarthenshire County Council proposals (paragraph 6.12 of this SPG refers), Carmarthenshire LPA will separately account for credits attributed to Carmarthenshire County Council.

### **Timeframe**

7.4 It is intended that this SPG will accompany the rLDP for the duration of the Plan period. It should be noted that the rLDP is subject to Annual Monitoring Reports and a four yearly review.

## APPENDIX 1 - TECHNICAL GUIDANCE AND FLOW CALCULATIONS

### 1 Background

1.1 This appendix provides information to inform calculations undertaken on compensatory surface water removal. It is intended to inform drainage reports that will be required to be undertaken and submitted to Carmarthenshire LPA.

1.2 It should be noted that the information is largely illustrative and as such timely engagement with stakeholders is encouraged – notably DCWW. A list of key contacts is provided at appendix 2.

### 2 Calculation Basis

#### 2.1 Foul Flows – residential

2.1.1 The peak flow per residential property arriving in the public sewer system should be based on the following criteria as a guide:

Water Consumption	180 litres/head/day
Residential Infiltration allowance	120 litres/head/day
Miscellaneous consumption	25 litres/head/day
Residential occupancy	2.5 persons/property
Peak flow factor (diurnal)	2.0 x

Given the above criteria the contribution of peak flow from an individual household will be approximately:

$$[(180+25) \times 2.5 \times 2.0] + 120 \text{ litres/day} = 1,145 \text{ litres/day}$$

Quantification of proposed new foul flows = **0.013 litres / second for 1 residential property**

#### 2.2 Foul Flows – Other

2.2.1 The peak flow for non-residential arriving in the public sewer system should be based on the following criteria as a guide, however this should be subject to agreement with DCWW on a case by case basis.

2.2.2 Reference is made to the table 1 overleaf for guidance on flows for non-residential

2.2.3 **Table 1 - Guidance for Peak Foul Flows – Other:**

Commercial Property Type	Water Consumption l/head/day	Peak foul flows (For comparison) l/head/second	Peak foul flow by Area
Offices	55	0.006	

## Revised Carmarthenshire Local Development Plan

Schools	50	0.005	
Rest Homes	300	0.031	
Hospitals	450	0.046	
Public Houses	15	0.002	
Caravans	120	0.012	
Camp Sites	75	0.008	
Hotels	200	0.021	
Restaurants	25	0.003	
Industrial Sites* (Expected Large water use)			55m <sup>3</sup> / Hectare /day = 2.5l/s per Hectare
Industrial Sites* (Light Industry)			10m <sup>3</sup> / Hectare /day = 0.7l/s per Hectare

\* Note: For Industrial sites the figures above are a guide only. In ALL cases DCWW MUST be contacted to confirm appropriate figures to be used

2.2.4 \* Note: For Industrial sites the figures above are a guide only. In ALL cases DCWW **MUST** be contacted to confirm appropriate figures to be used. The Figures are based on average daily flows assume an 8 and 12 hour working day for light /heavy industries respectively. A peaking factor of x 2 has been used, Peak rain intensity = 10.8 mm/hr and a Betterment Factors = x 2.

2.2.5 It is advised that in all instances, DCWW are contacted in a timely manner.

### **2.3 Surface Water Flows**

2.3.1 **No new surface water shall be allowed to enter the system.**

2.3.2 In addition assessment of existing surface water flows for compensatory removal should be as follows:

2.3.3 Peak storm flow is the amount of flow runoff expected per m<sup>2</sup> area at the peak of the storm, and is the flow that would be expected to impact the drainage system. This is dependent on the storm duration (hours) and return period for a rainfall event. The Flood Estimations Handbook (FEH) provides statistical information relevant to different geographical areas. Table 2 below summarises FEH data for a 1:30 year rainfall event in the Burry Inlet area.

Storm Duration (hrs)	1	2	3	4	5	6
Total Rain in Storm (mm)	30.6	39.0	45.0	49.8	53.8	57.3
Peak Rain Rate (Linear distribution) mm/hr	30.6	19.5	15.0	12.5	<b>10.8</b>	9.6
Peak Rain Rate (FEH (peak) mm/hr		28.6	26.3	34.0	22.2	20.6

**Table 2 FEH peaks and linear distribution of rainfall intensities for a 1:30 year return period storm in the Burry Inlet area.**

2.3.4 The hourly figure for a 5-hour duration, 1 in 30-year return period event, using linear rainfall distribution is to be used to calculate rainfall run-off, ie. 10.8mm/hr. This equates to 10.8 litres/hr/m<sup>2</sup>, or **0.003 litres/second/m<sup>2</sup>**.

2.3.5 The industry standard 1:30 year storm return period has been employed as a basis for calculation of surface water flow rates to be used in identifying suitably sized impermeable areas for drainage re-direction. Due to the fact that new connections introduce - for all intents and purposes - new continuous flow, it is clearly not possible to simply match a comparable surface water flow rate in mitigation against risk of increased down-sewer CSO spills, as most surface water entering combined sewers is rainfall-related, and thereby transient. Consequently, to provide added reassurance of adequate mitigation with a reduced risk of down-sewer storm sewage spills, in appropriate circumstances an additional betterment margin may be sought pending advice of DCWW.

### **2.4 Removal of surface water – illustrative example for a residential unit**

2.4.1 Including a 2x betterment margin, the impermeable area required to have drainage redirected may then be calculated as follows:

$$\begin{aligned} \text{Area redirected} &= (\text{Per property foul flow} / \text{per metre}^2 \text{ run-off}) \times 2 \\ \text{Area} &= (0.013 / 0.003) \times 2 \end{aligned}$$

$$\text{Impermeable area to have drainage diverted} = 9\text{m}^2 \text{ per property}$$

## **APPENDIX 2 – USEFUL CONTACTS**

### **Dwr Cymru Welsh Water**

developer.services@dwrcymru.com 0800 917 265

### **Carmarthenshire County Council Development Management**

planning@carmarthenshire.gov.uk 01558 825285

### **Carmarthenshire Sustainability Drainage Body**

SAB@carmarthenshire.gov.uk 01267 228342



## **APPENDIX 3 STRATEGIC DEVELOPMENTAL CONTEXT AND THE BETTERMENT BANK FOR CARMARTHENSHIRE COUNTY COUNCIL'S PROPOSED DEVELOPMENTS**

### **1. Introduction**

1.1 The Draft Deposit Revised LDP (rLDP) December 2019, as supported by this Draft Supplementary Planning Guidance (SPG), provides a clear approach in the consideration of development proposals within the Llanelli WWTW area.

1.2 Section 2 of this appendix reviews matters in relation to the Council's key corporate / regeneration initiatives. This is with a view to framing the corporate / regeneration context for public investment in the Llanelli / Burry Port areas. Reference is also made to Section 5 of the SPG itself.

1.3 Section 3 of this appendix elaborates upon the exception that can apply where Carmarthenshire County Council is the applicant for planning permission. Reference is also made to paragraph 6.12 of this SPG itself. The SPG provides a mechanism for the Council to utilise "surplus betterment" it has already secured as part of 'public investment' and developments across the Llanelli and Burry Port areas (including surface water removal schemes). This is designed to support the Council in its delivery of its regeneration objectives across Llanelli and Burry Port through the rLDP.

### **2. Development and Corporate Context**

2.1 In recognising and complying with the relevant environmental and infrastructural considerations and legislative provisions / directives, this SPG also sets out to facilitate and support the delivery of development as shaped by the rLDP.

#### **Llanelli and the Waterfront: A Developmental Context**

2.2 Carmarthenshire County Council (the Council) is the Local Planning Authority for the Llanelli WWTW area. The rLDP sets out a framework for the development and use of land as well as for the protection of the environment. It guides and facilitates investment decisions as well as the delivery of services and infrastructure. The Plan determines the level of provision and location of new housing, employment opportunities and other uses, and sets the framework for considering all land use proposals during the plan period.

2.3 Carmarthenshire is part of the Swansea Bay City Region which also encompasses the Local Authority areas of Pembrokeshire, City and County of Swansea and Neath Port Talbot. The City Region, in bringing together business, local government, and a range of other partners, published the Swansea Bay City Region Economic Regeneration Strategy 2013 – 2030. The role of the rLDP in guiding and supporting the City Region's aspirations will be central to its success. The £1.3 billion Swansea Bay City Deal was signed in March 2017. The City Deal is expected to give the Swansea Bay City Region a permanent uplift in its GVA of £1.8 billion and will generate almost 10,000 new jobs over the next 15 years. There is reference to 11 major projects overall. Within Carmarthenshire, two specific projects are proposed – including the Wellness and Life Science Village along the Llanelli coastline – see paragraph 2.13 below. There is therefore a recognition of Llanelli at this strategic regional level and its geographic position in relation to Swansea is also noted in this regard.

2.4 The Planning (Wales) Act 2015 (The Act) introduces a legislative basis for the introduction of a National Development Framework (NDF). The NDF, in effectively superseding the Wales Spatial Plan, will set out national policies in relation to the development and use of land in Wales. Reference is made to the explicit reference to

Swansea Bay and Llanelli within the emerging National Development Framework (draft – published 7 August 2019) in this regard.

2.5 The Act also introduces the potential for Strategic Development Plans (SDP's) to allow 'larger than local' issues to be considered and planned for within a strategic context. In relation to the reference to Swansea Bay and Llanelli in the draft NDF, it is highly likely that the cross border context in spatial terms would include the Llanelli area, with those issues under potential consideration including housing, employment and infrastructure. The potential for links with the objectives of the City Region are recognised, whilst in preparing their respective LDP's, there is already an emphasis on cross border collaboration and discussion between the City and County of Swansea and Carmarthenshire.

2.6 Moving Forward in Carmarthenshire - the next 5 years - is the Council's Corporate Strategy 2018 – 2023 (approved 2018 – updated 2019). It sets out the direction for Carmarthenshire County Council over the next five years, incorporating its improvement and well-being objectives. It also references the Executive Board's key projects and programmes for the next five years, a set of almost 100 priority projects. The Tyisha area, Llanelli Town centre, the Wellness and Life Science Village, along with Burry Port Harbour are cited.

2.7 There is also a corporate drive to deliver 1,000 new affordable homes across the County. The Affordable Housing Delivery Plan 2016-2020 is supported by the Council Housing Company. A report "building more homes – increasing our ambition" was received by the Council in February 2019 – with a banding framework in place to guide delivery. It is noted that across Bands A, B and C, a total County wide figure of 917 units and £141m investment is cited. Of these, 439 units and £73.5m of investment is earmarked for the Llanelli and District area.

2.8 "Transformations: A Strategic Regeneration Plan for Carmarthenshire 2015-2030" identifies the Council's regeneration plans with a view to facilitating the delivery of employment development, improvement and investment. Within the current position / regeneration to date chapter, Delta Lakes and The Beacon are identified as strategic regeneration sites, whilst Llanelli Town Centre is part of the 'primary towns' classification. Burry Port is listed in the 'vibrant market towns and valley growth zones'. Moving forward, it should be noted that (a) Carmarthenshire Coastal Belt and (b) Llanelli are listed as two of the six transformational projects.

### **The Carmarthenshire rLDP 2018-2033 (draft deposit – December 2019)**

2.9 The rLDP provides a spatial expression and key delivery mechanism for the Council and wider region's developmental ambitions.

2.10 The rLDP provides the framework for all future development within the County until 2033. The vision includes reference to Carmarthenshire having a strong economy that reflects its position as a confident and ambitious driver for the Swansea Bay City Region.

2.11 Listed below are some of the strategic objectives (SO) of the rLDP that are deemed particularly relevant to the Llanelli / coastal belt area, however it could be argued that there is a strong alignment with all of the Strategic Objectives.

- SO1 To ensure that the natural environment, including habitats and species, are safeguarded and enhanced.
- SO6 To ensure that the principles of spatial sustainability are upheld by directing development to sustainable locations with access to services and facilities and wherever possible encouraging the reuse of previously developed land.

- SO10 To make provision for an appropriate number and mix of quality homes across the County based around the principles of sustainable socio-economic development and equality of opportunities.
- SO12 To encourage investment & innovation in rural and urban areas by making adequate provision to meet employment need and to contribute at a regional level to the delivery of the Swansea Bay City Deal.
- SO13 To make provision for sustainable & high quality all year round tourism related initiatives.
- SO14 To reflect the requirements associated with the delivery of new development, both in terms of hard and soft infrastructure (including broadband).

2.12 Reference is also given to the Plan's strategic policies that have been formulated with due regard to the Plan's vision and strategic objectives. Whilst they are an essential contributor in implementing the strategy, they do not comprise the full suite of policies. The Strategic Policies comprise those of a strategic nature and are supplemented by the detailed policies and proposals which are set out in subsequent sections of this Plan. Listed below are those Strategic Policies that are deemed particularly relevant to the Llanelli / coastal belt area, however it could be argued that there is a strong alignment with all of the Strategic Objectives.

- Strategic Policy – SP 1: Strategic Growth
- Strategic Policy – SP 2: Retail and Town Centres
- Strategic Policy – SP 3: A Sustainable Approach to Providing New Homes
- Strategic Policy – SP 4: Affordable Homes Strategy
- Strategic Policy – SP 5: Strategic Sites (one of which is Llanelli Life Science and Well-being Village)
- Strategic Policy – SP 6: Employment and the Economy
- Strategic Policy – SP 8: Infrastructure
- Strategic Policy – SP 10: The Visitor Economy
- Strategic Policy – SP 13: Maintaining and Enhancing the Natural Environment
- Strategic Policy – SP 16: Sustainable Distribution – Settlement Framework

2.13 With reference to SP16, Llanelli is identified as a Principal Centre within the rLDP. The adoption of a Local Development Order (LDO) for Llanelli Town Centre in 2019 is a reflection of the corporate emphasis on the town centre. The ongoing investments into the area (both through the Council and its partnerships with the Welsh Government (WG)) have been successful in regenerating areas left derelict through industrial decline.

2.14 A Wellness and Life Science Village is planned for Llanelli. The £200million complex planned for Delta Lakes on the Llanelli coast is expected to create close to 2,000 jobs and give the local economy a £467million boost. As well as an Institute of Life Science, a Community Health Hub facility at the Village is set to include a Wellness Education Centre and a Clinical Delivery Centre. A state-of-the-art leisure centre, assisted living accommodation are also planned for the Village, along with landscaped outdoor spaces for recreation.

2.15 Burry Port (including Pembrey) is identified as a Service Centre within the rLDP. The settlement has a history of industrial activity (focused on the harbour) which has now evolved to reflect the tourism potential offered by a waterfront location and high amenity value. Burry Port Harbour offers regeneration potential. It should be noted that Pembrey does not drain to Llanelli WWTW, but Burry Port does.

2.16 The transformation of Burry Port is underway and already a number of exciting developments are being delivered, with more in the pipeline. The regeneration of Burry Port Harbour is a major project supported by the Llanelli Waterside Joint Venture Partnership (JV) between Carmarthenshire County Council and Welsh Government.

2.17 The Llanelli / Burry Port area represents a key economic and regeneration driver for the Joint Venture Partnership (JV) which consists of Carmarthenshire County Council and the Welsh Government (WG). Development of the area seeks to provide an opportunity to deliver sustainable growth in a manner which also reflects the rLDP objectives in respect of previously developed land. The strategic interests of the JV are demonstrated via its significant land holdings and as such the intent to dispose as part of a holistic approach to redevelopment is readily apparent.

### **3 The Betterment Bank**

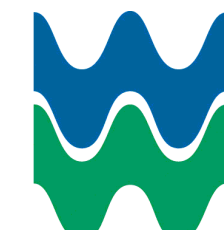
3.1 The SPG provides a mechanism for the Council to utilise “surplus betterment” it has already secured as part of ‘public investment’ and developments across the Llanelli and Burry Port areas (including surface water removal schemes). This is designed to support the Council in its delivery of its regeneration / corporate objectives across the Llanelli and Burry Port areas through the rLDP.

3.2 The planning justification for implementing the ‘betterment bank’ approach is to support the Council’s contribution towards the delivery of the rLDP and its associated corporate objectives – including those set out in Section 2 of this Appendix. Further information is set out in paragraph 6.13 of the SPG in terms of the implementation of the betterment bank.

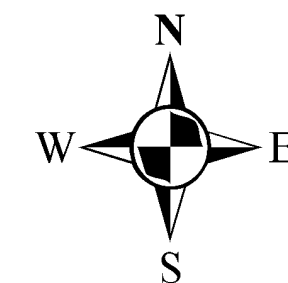
3.3 The public interest justification for implementing the ‘betterment bank’ approach is that the Council has already invested significant amounts of public money in implementing betterment schemes. It is deemed reasonable that the surplus betterment created by the Council is made available for utilisation by the Council.



APPENDIX 4



Dŵr Cymru  
Welsh Water



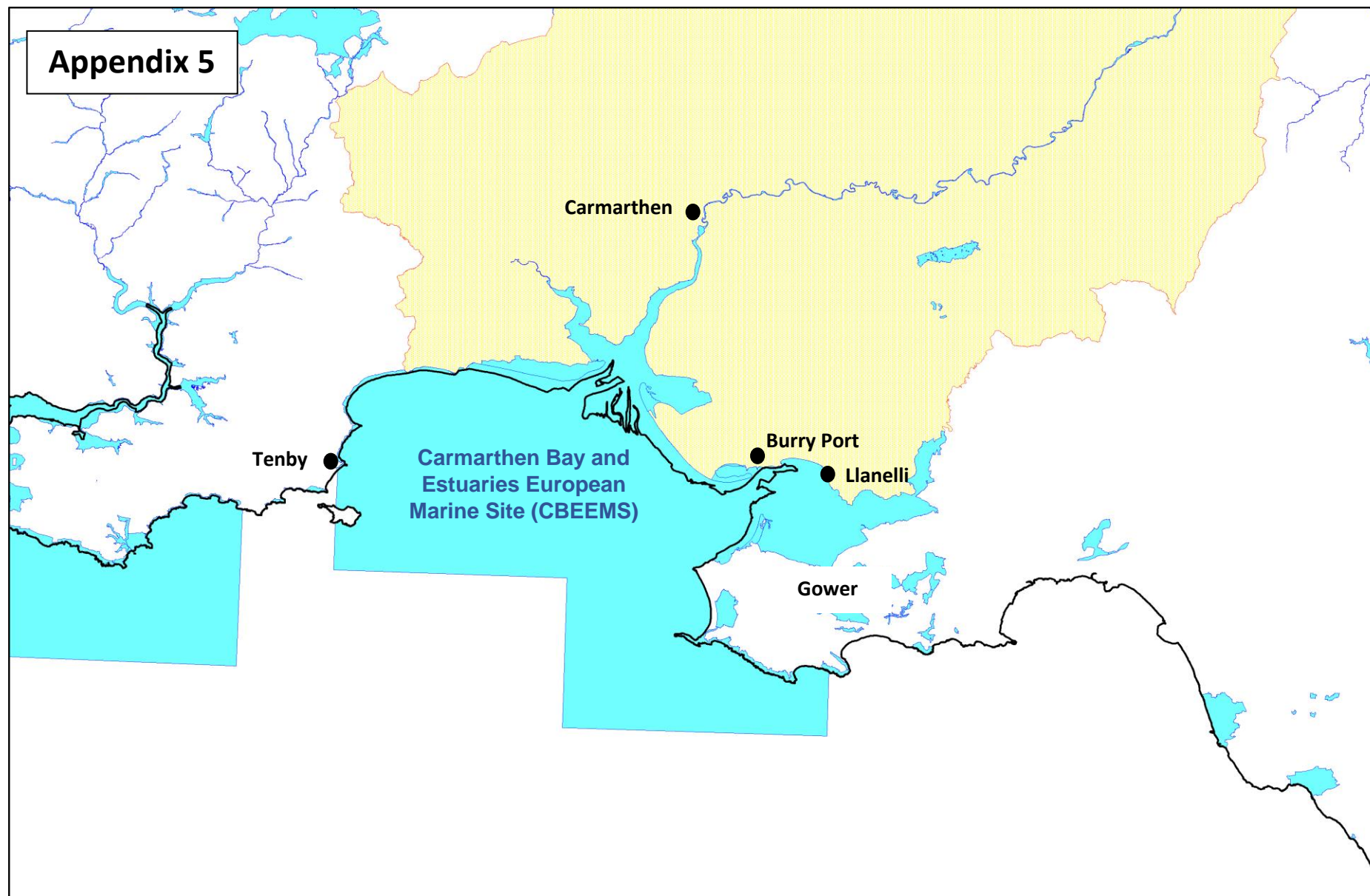
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Map scale: 1:20,000





## Appendix 5



## Appendix 6

