

## **Appendix 6      Draft Supplementary Planning Guidance: Burry Inlet. Consultation Report on Responses to the Representations Received**

### **1.0 Overview**

1.1 The Supplementary Planning Guidance (SPG) seeks to provide an elaboration and consolidation of the policies and provisions of the Revised Carmarthenshire Local Development Plan (rLDP) 2018-2033 - Deposit Draft (January 2020), most notably Policy INF4: Llanelli Waste Water Treatment Surface Water Disposal, as well as Policies SP 8: Infrastructure and CCH3: Water Quality and Protection of Water Resources.

1.2 The SPG was made available for consultation between the 29 of January 2020 and the 27 of March 2020.

### **2.0 Responses Received**

2.1 A summary of the comments received, together with responses and any actions in relation thereto, are provided below for Council's attention / ratification as appropriate.

#### **Respondent: R James**

2.2 **Rep ID CT01:** The respondent does not agree that the purpose of the SPG is clear.

2.3 **Officer Response:** Comment noted / disagree. It is considered that the purpose of the SPG is clear in that it seeks to provide specific guidance in relation to the consideration of relevant development proposals located within the Llanelli Waste Water Treatment Works (WwTW) catchment area.

2.4 **Action:** No change to the SPG.

2.5 **REP ID CT02:** The respondent does not agree that all of the relevant legislative and policy content are covered.

2.6 **Officer Response:** Comment noted / disagree. It is considered that Section 2 of the SPG provides a full review of the legislative and policy content.

2.7 **Action:** No change to the SPG.

2.8 **REP ID CT03:** The respondent does not agree that the SPG is appropriately evidenced.

2.9 **Officer Response:** Comment noted / disagree. It is considered that there is sufficient evidence in place. This evidence includes evidence of need for Policy INF4 / the SPG

(confirmation has been attained from a statutory consultee in the form of Dwr Cymru Welsh Water). Further evidence can be shown in terms of growth/development and infrastructural considerations.

2.10 **Action:** No change to the SPG.

**Respondent: S Thomas**

2.11 **Rep ID CT04:** The respondent agrees that the purpose of the SPG is clear.

2.12 **Officer Response:** Support welcomed.

2.13 **Action:** No change to the SPG.

2.14 **REP ID CT05:** The respondent agrees that all of the relevant legislative and policy content are covered.

2.15 **Officer Response:** Support welcomed.

2.16 **Action:** No change to the SPG.

2.17 **REP ID CT06:** The respondent agrees that the SPG is appropriately evidenced.

2.18 **Officer Response:** Support welcomed.

2.19 **Action:** No change to the SPG.

**Respondent: K Mudge**

2.20 **Rep ID CT07:** The respondent does not agree that the purpose of the SPG is clear.

2.21 **Officer Response:** Comment noted / disagree. It is considered that the purpose of the SPG is clear in that it seeks to provide specific guidance in relation to the consideration of relevant development proposals located within the Llanelli Waste Water Treatment Works (WwTW) catchment area.

2.22 **Action:** No change to the SPG.

2.23 **REP ID CT08:** The respondent does not agree that all of the relevant legislative and policy content are covered.

2.24 **Officer Response:** Comment noted / disagree. It is considered that Section 2 of the SPG provides a full review of the legislative and policy content.

2.25 **Action:** No change to the SPG.

2.26 **REP ID CT09:** The respondent does not agree that the SPG is appropriately evidenced.

2.27 **Officer Response:** Comment noted / disagree. It is considered that there is sufficient evidence in place. This evidence includes evidence of need for Policy INF4 / the SPG (confirmation has been attained from a statutory consultee in the form of Dwr Cymru Welsh Water). Further evidence can be shown in terms of growth/development and infrastructural considerations.

2.28 **Action:** No change to the SPG.

**Respondent: R Norman - Dwr Cymru Welsh Water (DCWW)**

2.29 **Rep ID CT10:** The respondent appreciates and welcomes the opportunity to continue to engage in the Burry Inlet SPG process and offers representations for the LPA's consideration. (general comment)

2.30 **Officer Response:** Comment noted and support welcomed.

2.31 **Action:** No change to the SPG.

2.32 **Rep ID CT11:** The respondent has welcomed the discussions that have taken place between the Local Planning Authority and DCWW in the moving away from the previous Memorandum of Understanding (MoU) arrangement to the current proposal in expressing the sentiment of the MoU as a planning policy requirement in the LDP, with a supporting SPG. (general comment)

2.33 **Officer Response:** Comment noted and support welcomed.

2.34 **Action:** No change to the SPG.

2.35 **Rep ID CT12:** The respondent states “*As has been discussed, owing to the sewerage network within the Llanelli WwTW catchment being of a predominantly combined nature the requirement for compensatory surface water removal to allow new foul flows is required to ensure that the network and WwTW does not become hydraulically overloaded and the frequency of spills from CSOs does not increase*”. (general comment)

2.36 **Officer Response:** Comment noted.

2.37 **Action:** No change to the SPG.

2.38 **Rep ID CT13:** The respondent states that “*With particular regard to paragraph 1.4, given that the Water Framework Directive’s principle of preventing deterioration of water quality remains in place, there remains a requirement to remove compensatory surface water to enable new development to connect; as there are four organisations “signed-up” to compensatory surface water removal, we would welcome reference to this as the current wording reads that the matter is one that only concerns DCWW*”.

2.39 **Officer Response:** Agreed. Reference should also be made to the proposed focused changes to the Revised LDP itself.

2.40 **Action:** Amend paragraph 1.4 of the SPG to include reference to the four partner organisations (i.e. Dwr Cymru Welsh Water, Natural Resources Wales, Carmarthenshire County Council and the City and County of Swansea).

2.41 **Rep ID CT14:** The respondent states “*At paragraph 6.8, we would suggest that the wording from “...then developers...” to “...a DCWW scheme...” is amended to read “...the developers can work collaboratively with DCWW to identify and establish a scheme...”*”

2.42 **Officer Response:** Agreed.

2.43 **Action:** Amend paragraph 6.8 in accordance with the comment of the respondent.

2.44 **Rep ID CT15:** The respondent states “*For clarity purposes, we would suggest the removal of the first line of paragraph 6.11 as this is not helpful or positive. (This is re backup schemes).*”

2.45 **Officer Response:** Agreed.

2.46 **Action:** Amend paragraph 6.11 in accordance with the comment of the respondent.

2.47 **Rep ID CT16:** The respondent states “*A point of clarification at paragraph 7.1 – should the wording not be “SPG” rather than “statement of common ground”?*”

2.48 **Officer Response:** Agreed in part.

2.49 **Action:** Include reference to the statement of common ground as a statement of confirmation on behalf of the signatories to the content of the SPG.

2.50 **Rep ID CT17:** The respondent states “*With regard to Table 1 – Guidance for Peak Foul Flows – Other, we can advise that whilst these figures are accurate as per our current Process Specification, we are in the process of updating this document and these figures will likely be amended to be in line with the British Water Flow & Load Code of Practice. As such, we would suggest that the SPG is monitored alongside the policy as this will allow these figures to be updated accordingly.*”

2.51 **Officer Response:** Comment noted. The Council will seek to respond and monitor as appropriate.

2.52 **Action:** No change to the SPG.

2.53 **Rep ID CT18:** The respondent states “*Please also refer to our comment on the specific policy within our LDP representation*”. (general comment)

2.54 **Officer Response:** Comment noted. Reference should be made to the Council’s response to those representations made on the Plan itself and the focused changes proposed. Where relevant, there will be focused changes that will lead to consequential amendments to the SPG also.

2.55 **Action:** No change to the SPG.

**Respondent: S Luke - Natural Resources Wales (NRW)**

2.56 **Rep ID CT19:** With reference to Paragraph 3.10, the respondent states “*This states that NRW will consult on developments brought forward for planning. We assume it should read will be consulted*”

2.57 **Officer Response:** Agreed – this was a typographical error.

2.58 **Action:** Amend paragraph 3.10 to read as follows: “NRW ~~will consult~~ **will be consulted** on developments brought forward for planning to ensure they comply with the appropriate Welsh Government policy on flooding and flood protection”.

2.59 **Rep ID CT20:** A representation in support for Policy INF4 is registered against the Plan itself, however that representation did also state support for the “*supporting Burry Inlet SPG*” in addition and as such this will also be noted as a representation in respect of the consultation on the SPG.

2.60 **Officer Response:** Comment noted and support welcomed.

2.61 **Action:** No change to the SPG.

### **Respondent: Officer / Council**

2.62 Further to feedback received from internal partners in relation to paragraph 6.12, it is recommended to add the words **‘or landowner’** into the paragraph. It is considered that this addition would provide added clarity around matters of Council land interests and the betterment bank exception.

2.63 **Action:** Amend the SPG so that the first sentence of paragraph 6.12 reads as follows: “6.12 *In all instances where Carmarthenshire County Council is the applicant **‘or landowner’** 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)”.*

2.64 This change will lead to consequential amendments to the SPG being made – notably to the Betterment Bank section, as well as the Revised LDP itself (refer to list of proposed focused changes).

### **3.0 General Matters**

3.1 It should be noted that there may be consequential amendments to the SPG not listed above which may be a result of the Council’s responses to representations made on the deposit LDP itself (notably any representations to policy INF4).

3.2 The Council will undertake any minor editorial amendments / corrections as and where required. (note a slight amendment to paragraph 1.10 was made by officers when the deposit Revised LDP itself was subject to a further 3-week consultation).

3.3 Also, reference should always be made to the proposed focused changes of the Plan itself and it should be noted that the SPG is an evolving document in this regard.