

Ffurflen Sylwadau Newidiadau a gynigir yn sgil Materion a Godwyd Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018–2033
Carmarthenshire Revised Local Development Plan 2018 – 2033
Matters Arising Changes Representation Form

Hoffem gael eich barn ar Newidiadau a gynygir yn sgil Materion a Godwyd Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018–2033, ac ar y dogfennau sy'n cefnogi'r Cynllun (Atodiad yr ARC a'r ACI).

Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. cefnogiad neu wrthwynebiadau). Mae fersiynau electronig a nodiadau canllaw ar gael yn www.carmarthenshire.gov.wales. Os ydych yn cyflwyno copi papur, atodwch daflenni ychwanegol yn ôl yr angen.

Dylid cyflwyno unrhyw sylwadau fel rhan o'r ymgynghoriad ar Newidiadau Materion a Godwyd Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018–2033. Dim ond sylwadau a gyflwynir yn briodol fydd yn cael eu cyflwyno i'w harchwilio a'u hystyried fel rhan o'r broses Archwilio.

Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Pendyrfyniadau Cynllunio ac Amgylchedd Cymru (PCAC).

Mae'n rhaid derbyn eich sylwadau erbyn 11:59yh ar y 26 o Fehefin 2026.

Dychwelwch ffurflenni at: Rheolwr Polisi Strategol a Chreu Lleoedd, Lle a Chynaliadwyedd, Adran Lle, Seilwaith a

We would like your views on the **Matters Arising Changes Carmarthenshire Revised Local Development Plan 2018–2033**, and also on documents which support the Plan (HRA & ISA Addendum).

This form should be used for all representations (i.e. support or objections). Electronic versions and guidance notes are available at www.carmarthenshire.gov.wales. If you are submitting a paper copy, attach additional sheets as necessary.

Any representations should be made as part of the consultation on the **Matters Arising Changes Carmarthenshire Revised Local Development Plan 2018–2033**. Only duly made representations will be submitted for examination and considered as part of the Examination process.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to Planning and Environment Decisions Wales (PEDW).

Your representations must be received by 11.59pm on the 26th of June 2026.

Please return forms to: Strategic Policy and Placemaking Manager, Place and Sustainability, Department of Place

Datblygu Economaidd, Neuadd Y Sir,
Caerfyrddin, SA31 1JP.

Infrastructure and Economic Development,
County Hall, Carmarthen, SA31 1JP.

RHAN A: Manylion cysylltu

PART A: Contact details

Eich manylion/manylion eich cleient
Your details / your client's details

Manylion yr asiant
(os ydynt yn
berthnasol)
Agent's details (if
relevant)

Enw Name	Dewi Griffiths	
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)	Development Growth Officer	
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	Dwr Cymru Welsh Water	
Cyfeiriad Address	Linea Fortran Road St Mellons Cardiff CF3 0LT	
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd Signed		
Dyddiad Date		

RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad
Your name / organisation

Dwr Cymru Welsh Water

1. Ar ba Newidiadau a gynygir yn sgil Materion a Godwyd (neu ddogfennau ategol) rydych yn rhoi sylwadau?

1. Which Matters Arising Changes (or supporting documents) are you commenting on?

Rhif(au) MAC
MAC number(s)

MAC 036
MAC 046
MAC 080
MAC 125
MAC 126

Cyfeiriad(au) Map MAC
Map MAC reference(s)

Os yw eich sylw yn perthyn i ddogfen ategol (yr ARC neu ACI), rhowch enw'r ddogfen a chyfeirnod(au) yr adran a/neu rif y paragraff yma.
If your representation relates to a supporting document (HRA or ISA) insert the name of the document and section reference(s) and/or paragraph number here.

2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol.

I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

For more information on soundness and procedural requirements, see the guidance notes.

Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.
I think the LDP is sound and meets procedural requirements.

Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.
I think the LDP is unsound and should be changed.

Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.
I think that the procedural requirements have not been met.

3. Rhestrwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/profion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi.

3. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise.

MAC 036 Policy INF4: Llanelli Wastewater Treatment Works Catchment Surface Water Removal

As highlighted in our original comments, we welcome the inclusion of Policy INF4 and are supportive of its principles to satisfy the requirements of the Burry Inlet Memorandum of Understanding (MoU) through compensatory surface water removal. We note that these amendments (MAC036) propose to define the threshold for major development sites and the possible requirement for surface water removal for minor developments. However, whilst we acknowledge this provision is to identify a mitigation measure for nutrient neutrality, the NRW/Welsh Government 'Mitigation Measures Menu' recognises that surface water removal (or SuDS) can only provide a modest removal rate. Therefore, whilst the principle may be acceptable, the Policy should recognise that surface water removal may not necessarily outright "secure nutrient neutrality", in accordance with Policy CCH4, but could be utilised as part of its strategy.

Turning to Paragraph 11.205, we commend the Council's inclusion of a 'Burry Inlet' SPG and welcome the reference to flow calculations in its supporting appendices. We are supportive of this text and would add that the quantifiable amount of surface water to be removed can be expressed as l/s or in terms of its area (sqm), for residential development, which aligns to the SPG appendices.

MAC 046 Policy PSD1: Effective Design Solutions: Principles of Placemaking

We acknowledge amendments (MAC 046) proposed to the criteria for Policy PSD1 and welcome reference to maximised opportunities for water resilience in criteria (g). We agree that water efficiency in new developments can offer multiple benefits and we recognise it can positively contribute to nutrient neutrality provided it forms part of a wider package of mitigation, as referenced in Paragraph 11.284. Similar to the above (MAC 036), we would highlight that water efficiency measures may not secure nutrient neutrality, in accordance with Policy CCH4, but could be utilised as part of its strategy.

MAC 080 CCH4: Water Quality and Protection of Water Resources

As highlighted in our original comments, we welcome the inclusion of Policy CCH4 and acknowledge that these amendments (MAC 080) propose to amalgamate the impact of development on nutrient sensitive protected sites, to substitute phosphorous sensitive riverine SACs. We defer to NRW's '*Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation*' to determine which development will be required to achieve nutrient neutrality and remind that DCWW is a statutory consultee for most planning applications.

With reference to the amendments to Paragraphs 11.513 to 11.515 ('Riverine'), we acknowledge the variety of strategic and developer-led mitigatory actions and welcome the continued collaborative partnership work with NMBs. DCWW remain committed to the 'fair share' approach, as defined by Welsh Government's practical guidance for public authorities (DTA Ecology), through our phosphorus investment plan to remove 90% of the phosphorous load from WwTWs discharging to failing SAC rivers. In accordance with NRW's planning advice, we will continue to comment on the capacity of WwTWs to treat foul water flows alongside confirmation of its compliance with permit conditions, including effective dates as identified by the review of permits. Aside of the permit headroom capacity, we defer to the Council's Action Plan to identify any further measures to mitigate against any increasing nutrient loads in the river.

We acknowledge a separate sub-heading for 'Marine', including requirements to achieve nutrient neutrality within the Burry Inlet Inner and Milford Haven Inner freshwater catchments. We would advise the Council that most site locations within are likely to discharge into these catchments; however, it should also be noted that some sites may be located outside but ultimately drain via a

sewerage network into the affected freshwater catchment. For example, Burry Port is located outside but comprises of a sewerage network which drains to Llanelli Coastal WwTW and therefore discharges into the Burry Inlet Inner. Similarly, albeit rarely, there are site locations located within but discharge to a sewerage network outside of the freshwater catchment and examples of sites that are on the periphery of networks within and outside. For completeness, we refer to NRW's latest planning advice and recognise DCWW's duty to confirm which WwTW the site would connect to and its compliance with permit conditions.

We acknowledge the Council's intention to produce "multilayered" guidance for strategic and developer led mitigation for developments in the freshwater catchments and we would advocate for close collaboration with DCWW on this approach, particularly if it relates to any public sewerage assets. On this point, DCWW is undertaking its source apportionment modelling programme which is programmed to conclude in Spring 2027 and will be important to ensure any mitigation measures are aligned with the modelling findings. As highlighted above (MAC 036), we remind that surface water removal may not secure nutrient neutrality but could be considered as part of the mitigation strategy. We note the Council's proposal to produce a library of resources to assist developers in this matter, alongside external sources, and welcome the intention to regularly update the library which can align to any further updates in NRW's planning advice.

Lastly, we welcome the addition of a new paragraph to reflect the requirements of TAN 15 and advocate for early engagement with the SAB and any other stakeholder, including DCWW, where the drainage proposals will have an impact on their interests. We also welcome the production of an SPG to support this Policy, in relation to a nutrient mitigation toolkit alongside the aforementioned 'Burry Inlet' SPG to consider sustainable management of surface water drainage.

MAC 125 Appendix 9

We note that a new appendix is included to provide site information for the regeneration and mixed-use sites, including the infrastructure requirements. DCWW has made representations at the Deposit Plan consultation stage to highlight sewerage and water infrastructure requirements associated with proposed sites. The appendix will need to accurately reflect our representations and recognise that the demands on our infrastructure changes over time, and the capacity of existing infrastructure to accommodate the proposed allocations may change over the course of the LDP period. Notwithstanding this information, we have made comments on specific sites below:

- **PrC1/MU2 Pibwrlwyd** Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- **PrC3/MU1 Emlyn Brickworks** Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- **SeC16/MU1 Beechwood, Llandeilo** Reinforcements will be required at Ffairfach Wasterwater Treatment Works (WwTW).
- **PrC1/MU3 Nant y Caws** There are no public sewers nearby therefore the provisions of WG Circular 008/2018 "Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" apply.

MAC 126 Appendix 10

We note that a new appendix is included to provide site Information on allocated sites, including the infrastructure requirements DCWW has made representations at the Deposit Plan consultation stage to highlight sewerage and water infrastructure requirements associated with proposed sites. The appendix will need to accurately reflect our representations and recognise that the demands on our infrastructure changes over time, and the capacity of existing infrastructure to accommodate the proposed allocations may change over the course of the LDP period. Notwithstanding this information, we have made comments on specific sites below:

- **SUV11/h1 Alltwallis** Reinforcements will be required at Alltwallis WwTW
- **PrC2/h20 Harddfan, Bryn** A scheme has been delivered, and capacity is available at Llangennech WwTW

- **PrC2/(v) Heol y Mynydd, Bryn** Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- **SeC6/(iii) Forest Rd, Hendy** Llannant WwTW limited capacity, AMP8 scheme being delivered by 2030
- **SEC7/h3 Golwg yr Afon, Llangennech** A scheme has been delivered, and capacity is available at Llangennech WwTW
- **SEC7/h4 Opposite Parc Morlais Llangennech** A scheme has been delivered and capacity is available at Llangennech WwTW
- **PrC3/(i) Emlyn Brickworks** Hydraulic Modelling Assessment (HMA) of the water supply network will be required.
- **SeC12/h1 Trem y Ddol Newcastle Emlyn** Reinforcements will be required at Adpar WwTW
- **SeC12/h3 Rear of Dolcoed Newcastle Emlyn** Reinforcements will be required at Adpar WwTW
- **SeC19/h1 Land at Park View, Trevaughan** Whitland WwTW has limited capacity, AMP8 scheme being delivered by 2030
- **SeC19/h2 Land at Whitland Creamery** Whitland WwTW has limited capacity, AMP8 scheme being delivered by 2030
- **SeC20/h3 Land off Clifton Street** Laugharne WwTW has limited capacity, AMP8 scheme being delivered by 2030
- **SuV55/h2 Glandy Cross** There are no public sewers nearby therefore the provisions of WG Circular 008/2018 "Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" apply.
- **SuV56/h1 Efailwen** There are no public sewers nearby therefore the provisions of WG Circular 008/2018 "Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" apply.

Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.

Tick here if you are submitting additional material to support your representation.

4. Ymddangosiad mewn unrhyw Sesiynau Gwrando yn y dyfodol

Mater i'r Arolygwyr yw penderfynu a oes angen cynnal Sesiwn Wrando yn y dyfodol o ganlyniad i ystyried sylwadau ar y Newidiadau sy'n Codi. Dim ond y personau sy'n cyflwyno gwrthwynebiadau fydd â'r hawl i fynychu unrhyw Sesiynau Gwrando pellach

4. Appearance at any future Hearing Sessions

It is for the Inspectors to determine whether a future Hearing Session is necessary as a result of the consideration of representations on the Matters Arising Changes. Only those persons making objections will have the right to attend any further Hearing Sessions

Nid wyf am siarad mewn gwrandawliadau cyhoeddus posibl yn y dyfodol ac rwy'n fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygwyr

X

I do not want to speak at potential future public hearings and am happy for my written representations to be considered by the Inspectors.	
<i>Rwyf am siarad mewn gwrandawiadau cyhoeddus posibl yn y dyfodol.</i> I want to speak at potential future public hearings.	
5. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed. 5. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.	
<i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.	
<i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i> I wish to be heard in English.	

Nodiadau cyfarwyddyd

Guidance notes

Mae Cynllun Datblygu Lleol Sir Gaerfyrddin yn cael ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni gofynion gweithdrefnol ac a yw'n gadarn.

'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:

- 1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*
- 3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)*

Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/broffion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

The Carmarthenshire Revised Local Development Plan (LDP) is being examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r MAC's neu'r dogfennau atodol. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn gwrthwyneubu am fwy nag un MAC, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw.

Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the MAC's or the supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you want to object to more than one MAC, it is not always necessary to complete separate forms for each part of your representation.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.