

Simon Clement

From: Owain Enoch [REDACTED] on behalf of LDP
Sent: 26 June 2026 11:50
To: EED Forward Planning
Cc: Beau J Gray; Tom Evans
Subject: RE: Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin (CDLI) 2018-2033 / Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033

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Rhybudd: E-bost allanol yw hwn ac nid oedd yn tarddu o'r Cyngor. Byddwch yn ofalus wrth glicio dolenni neu atodiadau agoriadol. Pan fyddwch yn ansicr, defnyddiwch y botwm 'Report Message'.

Bore da Ian,

Thank you for the opportunity to make comments on the Matters Arising Changes.

Swansea Council is broadly supportive of the Carmarthenshire's rLDP and we would emphasise the continued and constructive collaborative working between our respective LPAs on a number of issues.

We object, however, to Policy INF4 as amended through Matter Arising Change (MAC 036) , and — in the spirit of the joint working between our two authorities on the shared Burry Inlet and Loughor Estuary — offer the following observations.

We note that the compensatory surface water removal requirement is, in substance, a response to a shared infrastructure-capacity issue: the limited hydraulic headroom of the combined sewer network serving catchments in both authorities' areas, which discharge to the same waters (i.e., areas connected to Gowerton or Llanelli Coastal WwTW). In this respect, the policy aligns with the joint approach set out in the Memorandum of Understanding (MoU) on the protection of hydraulic headroom so as to mitigate the risk of combined sewer overflow (CSO) spills and their consequent loading on the protect shellfish waters. It is our understanding, based on discussions, that the interest that compensatory surface water removal in fact serves is the shellfish water protected areas of the Burry Inlet, designated under the Water Framework Directive — a bacteriological water-quality interest, addressed by reducing combined sewer overflow spill frequency. That is a distinct matter from the nutrient-enrichment interests of the European Marine Site under the Habitats Regulations.

Consequently, and in the interests of accuracy, it is proposed to replace the reference to 'Carmarthen Bay and Estuaries European Marine Site' with 'Water Framework Directive'. This change would ensure that the policy aligns more closely with its principal purpose. It would also reflect the origin of the joint approach itself: the MoU was brought about as a response to the long-standing failure to meet the water-quality standards for the shellfish waters.

In relation to the second paragraph of the policy, it is noted that the reference is limited to minor developments whilst the first paragraph relates to major developments. The omission of major from the second paragraph would seem at odds with the overall approach in relation to nutrient mitigation.

It is proposed to add 'major' alongside minor within the second paragraph. This reference to majors would reflect the constantly evolving picture in respect of the understanding of nutrient mitigation and what contribution the removal of surface water as a mitigation measure could make in this regard.

In relation to the term "*will be required to remove*" surface water - this suggests that there are no examples where on a case by case basis that requirement will not need to be applied. It also leaves no route to the use of surplus betterment (paragraph 11.209) — under which a development that cannot reasonably achieve removal itself draws on surplus already secured on the register. It is proposed to amend the policy through the replacement of "will" with "may". This would ensure the policy is better aligned and allows a degree of flexibility. Additionally, the proposed inclusion of the "*quantifiable amount calculated as 0.013 litres/second*" (reasoned justification, new paragraphs added after paragraph 11.205) does not reflect how this is calculated in practice. This is typically done on a case-by-case base, using the latest evidence available to determine likely foul flows. It is noted in this regard that liaison can be undertaken with consultees, including DCWW and NRW, as appropriate. As such, a case by case approach is considered to be wholly appropriate. You may wish to agree that it may well be the case that over the Plan period, potential future DCWW investment may mean that the position in respect of the need for surface water removal to be undertaken by developers will be no longer applicable, therefore again – flexibility is key.

We appreciate that the above proposed changes may result in the requirement for some consequential amendments to the reasoned justification but hope that such amendments are not extensive. Also, with reference to the proposed SPG, we would welcome the opportunity to contribute and comment at the appropriate time should you feel this is helpful.

Thank you diolch
Placemaking and Strategic Planning – Swansea Council

From: EED Forward Planning <EEDForwardPlanning@carmarthenshire.gov.uk>
Sent: 11 May 2026 18:28
To: EED Forward Planning <EEDForwardPlanning@carmarthenshire.gov.uk>
Subject: Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin (CDLI) 2018-2033 / Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033

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Annwyl Syr / Madam

Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin (CDLI) 2018-2033

Fel y gwyddoch efallai, mae CDLI Diwygiedig 2018-2033 Cyngor Sir Caerfyrddin yn destun archwiliad annibynnol a chynhaliwyd sesiynau gwrandawriad ym mis Hydref a mis Tachwedd 2024, ac ym mis Medi 2025.

Mae'r Cyngor wedi llunio Atodlen o Newidiadau yn sgil Materion a Godwyd (MACs) yn bennaf o ganlyniad i Bwyntiau Gweithredu yn deillio o Sesiynau Gwrandawriad yr Archwiliad. Mae angen y newidiadau hyn i wneud y Cynllun yn gadarn ac mae'r Arolygwyr a benodwyd i'r Archwiliad wedi cytuno arnynt i gyd.

Ar y cyd â'r Newidiadau yn sgil Materion a Godwyd hyn, rydym hefyd yn ymgynghori ar ddiweddariadau i'r dogfennau ategol canlynol:

- Adendwm Arfarniad Cynaliadwyedd Integredig (ISA) i'r Newidiadau yn sgil Materion a Godwyd
- Adendwm Asesiad Rheoliadau Cynefinoedd (HRA) i'r Newidiadau yn sgil Materion a Godwyd

Bydd yr ymgynghoriad yn dechrau ar 11 Mai 2026 ac yn cau am 11.59pm ar 26 Mehefin 2026.

Sylwer mai ar gyfer gwneud sylwadau ar y Newidiadau yn sgil Materion a Godwyd, Adendwm yr Arfarniad Cynaliadwyedd Integredig ac Adendwm yr Asesiad Rheoliadau Cynefinoedd yn unig y mae'r ymgynghoriad. Bydd unrhyw ohebiaeth sy'n ymwneud ag elfennau eraill o'r Cynllun yn cael ei hystyried yn ohebiaeth na wnaed yn briodol.

Mae copïau o'r dogfennau ar gael i'w gweld yn electronig mewn llyfrgelloedd (yn ystod oriau agor arferol), ar wefan y Cyngor [Cynllun Datblygu Lleol 2018 - 2033 - Cyngor Sir Caerfyrddin](#), ac ar ffurf copi caled yng Nghanolffannau Hwb y Cyngor ac mewn llyfrgelloedd cyhoeddus. Dylid cyflwyno sylwadau ar y dogfennau a gyhoeddwyd yn ysgrifenedig, gan ddefnyddio ein hadnoddau ymgynghori ar-lein os yw'n bosibl.

Fel arall, mae ffurflenni ar gael i'w lawrlwytho ar dudalen we'r Newidiadau yn sgil Materion a Godwyd. Dylid cyflwyno ffurflenni erbyn y dyddiad cau uchod i:

Polisi Strategol a Chreu Lleoedd,
Lle, Seilwaith a Datblygu Economaidd,
Cyngor Sir Caerfyrddin,
Neuadd y Sir,
Caerfyrddin,
Sir Gaerfyrddin,
SA31 1JP

neu drwy anfon e-bost at: blaen.gynllunio@sirgar.gov.uk

Yn gywir

Ian R Llewelyn
Rheolwr Polisi Strategol a Chreu Lleoedd

Dear Sir / Madam

Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033

As you may be aware, Carmarthenshire County Council's Revised LDP 2018-2033 is subject to an independent examination and hearing sessions took place in October and November 2024, and in September 2025.

The Council has compiled a Schedule of Matters Arising Changes (MACs) primarily as a result of Action Points arising from the Examination Hearing Sessions. These changes are required to make the Plan sound and have all been agreed with the appointed Inspectors of the examination.

In conjunction with these MACs, we are also consulting on updates to the following supporting documents:

- Integrated Sustainability Appraisal (ISA) addendum to the MACs
- Habitats Regulation Assessment (HRA) addendum to the MACs

The consultation will start on 11th May 2026 and close at 11.59pm on 26th June 2026. **Please note that the consultation is for commenting on the MACs, the ISA addendum and the HRA addendum only.** Any correspondence relating to other elements of the Plan will be deemed as not duly made.

Copies of the documents are available to view electronically at public libraries (during normal working hours), on the Council's website [Local Development Plan 2018 - 2033 - Carmarthenshire County Council](#), and in hard copy at the Council's Hwb Centres. Comments on the published documents should be submitted in writing, preferably using our online consultation tools.

Alternatively, forms are available to download on the Matters Arising Changes webpage. Forms should be submitted by the above closing date to:

Strategic Policy and Placemaking,
Place, Infrastructure and Economic Development,
Carmarthenshire County Council,
County Hall,
Carmarthen,
Carmarthenshire,
SA31 1JP

or via email to: forward.planning@carmarthenshire.gov.uk

Yours faithfully

Ian R Llewelyn
Strategic Policy and Placemaking Manager

Polisi Strategol a Chreu Lleoedd | Strategic Policy and Placemaking

Adran Lle, Seilwaith a Datblygu Economaidd | Place, Infrastructure & Economic Development Department

01267 228818 | 2818

sirgar.llyw.cymru | carmarthenshire.gov.wales

Mae croeso i chi gysylltu â ni yn Gymraeg neu Saesneg
You are welcome to contact us in Welsh or English



Mae'r e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac at ddefnydd yr unigolyn neu'r corff y cyfeiriwyd hwy atynt yn unig. Os ydych wedi derbyn yr e-bost hwn drwy gamgymeriad, dylech hysbysu'r gweinyddydd yn y cyfeiriad canlynol: gweinyddydd@abertawe.gov.uk
Bydd yr holl ohebiaeth a anfonir at y Cyngor neu ganddo yn destun cofnodi a/neu fonitro yn unol â'r ddeddfwriaeth berthnasol
Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

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We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.
