

## Statement of Evidence

<b>Site Address:</b> North Dock, Llanelli
<b>Planning Reference(s) / Local Plan Reference(s):</b> Deposit LDP Reference – PrC2/h4 Outline Planning Application Reference: S/38285
<b>Date:</b> 24/04/2024

### Purpose of this Statement of Evidence

This Statement of Evidence has been prepared to address issues of deliverability in respect of the development at North Dock, Llanelli, shown edged in red in Appendix 1.

It addresses the following deliverability indicators:

1. The planning status of the site.
2. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.
3. Any progress with site assessment work required for an application submission and / or before development may lawfully commence.
4. Any relevant information about financial viability affecting the commencement of development.
5. Any relevant information about site ownership and access constraints affecting site assessment or the commencement of development.
6. Any relevant information about infrastructure provision necessary to support / enable the development.
7. Expected delivery and build-out rates.

#### 1. The planning status of the site.

1.1 The subject site of 6.6 hectares has been included in the Deposit Revised LDP under site reference PrC2/h4, the allocation is for a total of 210 dwellings. The site is owned by the Llanelli Waterside Joint Venture – a partnership between Carmarthenshire County Council and Welsh Government.

1.2 Further information on the planning status is outlined below.

## 2. Any progress being made towards the submission of application(s) required to be granted before development may lawfully commence.

2.1 The long-standing planning application, originally approved in April 2008, sought outline planning permission to create a mixed-use urban development comprising: A range of new homes including apartments and houses (use class C3) A hotel (use class C1); offices (use class B1); commercial uses including small scale retail/local shops.

2.2 A variation of Planning condition to extend the time period for the submission of reserved matters and the commencement of development on the land was withdrawn on the 15<sup>th</sup> November 2013.

2.3 An outline planning application (S/38285) was submitted on 1<sup>st</sup> November 2019, and subsequently approved on the 2<sup>nd</sup> November 2021, for the construction of a residential development of up to 210 units with associated landscaping and infrastructure works.

2.4 The initial approach taken during the design process for this application was to work from the design approved by Carmarthenshire County Council under the application S/18032. When considering the opportunities and constraints on the site the following was established:

- Change to the proposed main access road into the site to allow for the retention of the substation and potential links to future developments such as the future land bridge proposed as part of the redevelopment of North Dock.
- Retained the concept of the proposed gardens facing the coastline along the western boundary.
- Faced dwellings outward onto open space to the northwest, due to the need for natural surveillance over this space and define a clear public boundary.
- Altered character of footpath along the southern part of the site to now form a more relaxed shared surface/pedestrian solution.

## 3. Any progress with site assessment work required for an application submission and / or before development may lawfully commence.

3.1 Site inspections and survey work have been carried out to prepare the reports required as part of the outline planning application. The following reports have been submitted with the outline planning application and are available to view on the Council's website:

- Air Quality Assessment
- Arboricultural Report
- Coal Mining Risk Assessment Report

- Design and Access Statement
- Draft Transport Statement
- Ecological Assessment
- Engineering Assessment
- Flood Consequences Assessment
- Historic Environment Desk Based Assessment
- Noise and Vibration Assessment
- Phase I Desk Study Report
- Pre- Application Consultation Report
- Sandy Roundabout – Capacity Assessment
- UXO Desk Study & Risk Assessment
- Drainage Strategy and Water Quality Statement
- Japanese Knotweed Eradication Scheme Report
- Reptile & Bird Survey
- Brownfield Mitigation Strategy

#### 4. Any relevant information about financial viability affecting the commencement of development.

4.1 Alder King were appointed in June 2023 to complete a financial viability assessment of the development site as part of a review into the Joint Venture land holdings. The report shows that based on the affordable housing allocation of 20% within the LDP the site is valued at £600,000.

#### 5. Any relevant information about site ownership and access constraints affecting site assessment or the commencement of development.

##### Ownership

5.1 The freehold of the land is owned by Carmarthenshire County Council and is included as a portfolio site for the Llanelli Waterside Joint Venture, a partnership between Carmarthenshire County Council and the Welsh Government.

##### Access

5.2 The site is accessed via gated access along the eastern boundary, as well as an access road which serves the former factory. These link with Traeth Ffordd which runs along the east/north-east boundary of the site and continues along the perimeter of North Dock.

5.3 The perimeter of the site is secured by post and wire fencing along the north, east and west and wooden fencing securing the boundary adjoining Pentre Doc Y Gogledd which forms the residential development to the South.

5.4 The Millennium Coastal Path is located to the west of the site, directly adjacent to its boundary. A public footpath runs through the centre of the site, below the former factory and links the coastal path to Traeth Ffordd. A small number of trees run adjacent to this footpath, with an electricity substation and pumping station to the north.

5.5 The site will be accessed via the existing gated access point located mid-way along the eastern boundary of the site. This main street will lead directly into the development, with secondary shared surface streets navigating through the site in a looped arrangement.

5.6 One of the aims of the proposed development is to link the site with the existing Coastal Park and associated areas of public open space. Pedestrian access links already exist through the site, connecting east to west and Coastal Park with the site and remaining North Dock area.

### Accessibility

5.7 In terms of public transport, the nearest bus stop is located along Cambrian St, to the east of North Dock. These offer services to and from Llanelli town centre and surrounding areas and are accessible from the site via a footbridge over North Dock to Cambrian St. North Dock is well served by cycle network infrastructure. The National Cycle Network route 4 runs to the west and provides a high-quality cycle route along the coast, with other routes passing into Llanelli itself.

## 6. Any relevant information about infrastructure provision necessary to support / enable the development.

6.1 The Council letter of 22<sup>nd</sup> September 2020 states that 'The SoCG provides an opportunity for 'statutory consultees – notable Natural Resources Wales (NRW) and Dwr Cymru Welsh Water (DCWW) to be consulted early.' We therefore consider below responses from DCWW, NRW and Carmarthenshire Highways and Transport in relation to the planning application which demonstrates that subject to the conditions and agreements specified there are no outstanding objections.

### DCWW

6.2 A response to planning application S/38285 from DCWW dated 31.01.19 is shown in Appendix 2.

### NRW

6.3 A response to planning application S/38285 from NRW dated 18.01.19 is shown in Appendix 2, with further comment below.

## Ecology

### **6.4 Designated Sites**

*As previously mentioned, the site lies adjacent to the Burry Inlet and Loughor Estuary Site of Special Scientific Interest (SSSI), Carmarthen Bay and Estuaries Special Area of Conservation (SAC), Burry Inlet Special Protection Area (SPA) and Ramsar site.*

*There is therefore a requirement to assess any potential impacts under the Conservation of Habitats and Species Regulations 2017. Regulation 63 of the Regulations, requires the competent authority to undertake a test of the likely significant effects of the proposal on the European designated sites.*

*If it cannot be demonstrated that there will not be a significant effect, either alone or in combination with other plans and projects, you are required to undertake an appropriate assessment of the implications of the proposed scheme for the sites in view of the conservation objectives, before granting planning permission.*

### **6.5 Protected Species**

*We welcome the ecology survey report entitled 'North Dock ND1 Development Site, Llanelli. Ecological Assessment. 2017' by Pryce Consultant Ecologists, dated 14 February 2018. The bat surveys in 2017 found that a single non-breeding pipistrelle bat was roosting on the corner of the main building on the site (building A).*

*We note that the proposed mitigation for the loss of this building as set out in paragraph 4.1.4.3 of the report and note that it accords with the requirements of the already obtained European Protected Species Licence no. 77835.*

*Otters are a feature of the Carmarthen Bay and Estuaries SAC, and we note that the report references suitable otter habitat 50m north east of the eastern boundary of the site. We advise that the development will need to consider potential impacts on otters from lighting spillage/pollution which may occur from the new development, and a mitigation lighting plan will be required to be produced.*

**Condition:** *The production of a lighting plan which demonstrates how lighting of suitable otter habitats will be avoided. The lighting plan should be agreed prior to works commencing on site and shall be implemented as agreed.*

**Reason:** *For the protection of Otters, a European Species and feature of the SAC.*

*We also advise that the recommendations made in Section 6 of the report are followed and fully implemented on site. The recommendations relating to Section 7 habitats and species under the Environment (Wales) Act 2016 should be discussed with the LPA's Ecologist.*

### **6.6 Pollution Prevention**

*The biggest risk from a pollution point of view occurs during construction. We advise that you should therefore plan the works carefully, so that contaminated water cannot run uncontrolled into any watercourses (including ditches) and the designated*

*sites are protected from pollution. A method statement detailing all necessary pollution prevention measures for the construction phase of the development should therefore be produced.*

**Condition:** *No development approved by this permission shall be commenced until a method statement detailing all necessary pollution prevention measures for the construction phase of the development is submitted and approved in writing by the LPA.'*

## 6.7 Carmarthenshire Highways and Transport Department

A response to the planning application S/38285 from Carmarthenshire Highways and Transport, dated 27.03.19 is quoted in appendix 2

## 6.8 Impact on the Community/Welsh Language –

A scheme at this location will provide a range and choice of house types and tenures, including affordable elements. It is not considered that the development of the site for housing will have any significant adverse impact upon the Welsh language or any local communities.

## 7. The landowner's delivery intentions and anticipated start and build-out rates:

7.1 The table below shows the Deposit plan's Housing Trajectory set out in Appendix 7 of the Deposit Plan:

<b>Timescale (Years)</b>	<b>2027/2028</b>	<b>2028/2029</b>	<b>2029/2030</b>	<b>2030/2031</b>	<b>2031/2032</b>	<b>2032/2033</b>
Number of Dwellings Completed	40	40	40	40	40	10

7.2 Based on the progress that has been made to date, it can be confirmed that the site will be developed within the timescales set out above.

- Development brief will be released to market in 2024.
- A preferred developer to be appointed in 2024.
- Reserved matters approval sought and granted in 2025.

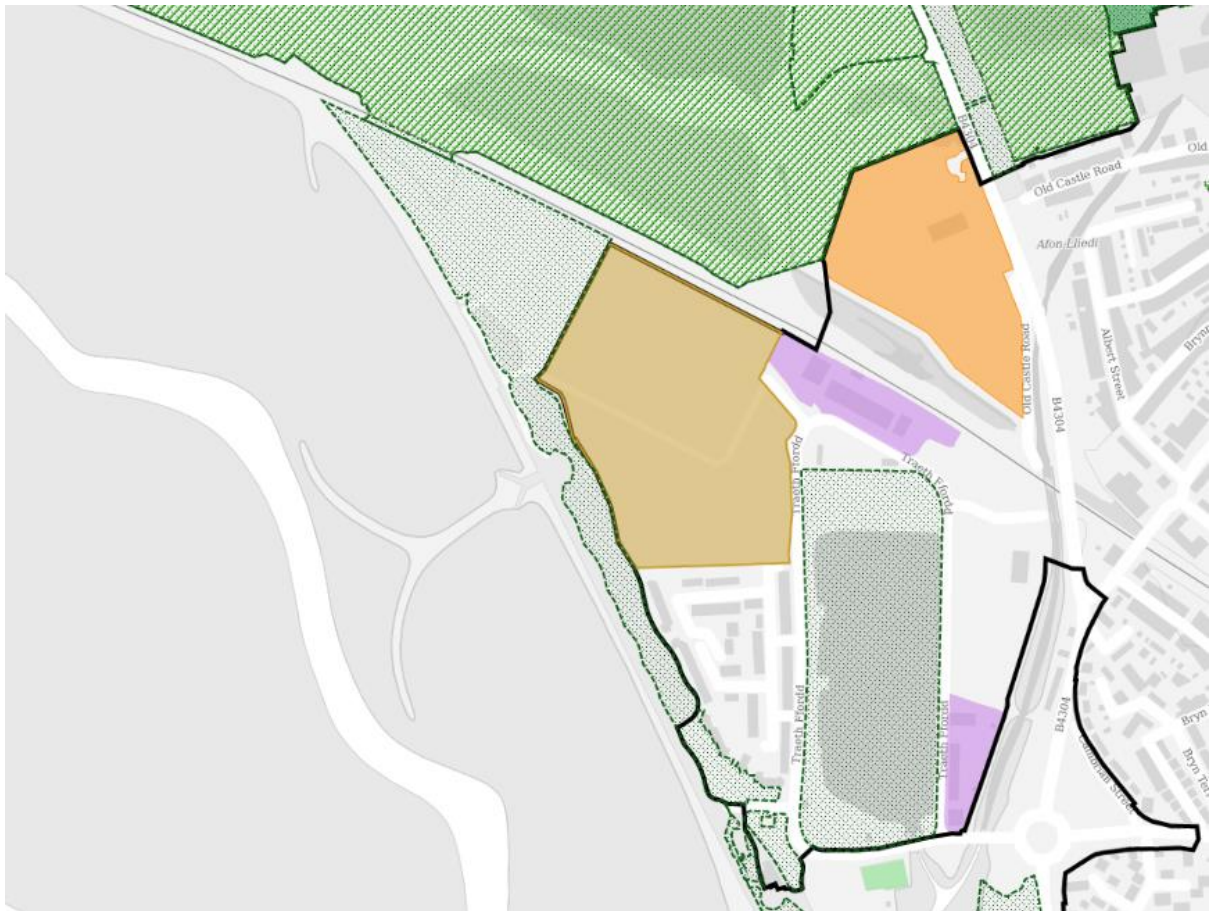
7.3 Further updates can be provided as the planning application and delivery of the site progresses.

### **Deliverability Assessment**

7.4 Based on the above information, it is considered that there is clear evidence that the site is deliverable within the timescales set out in the Deposit plan's Housing Trajectory.

7.5 The allocation of the site within the LDP for residential purposes has been subject to full consideration through the site assessment methodology. As part of this assessment process a detailed site pro forma has been prepared. The policies and proposals of the LDP are considered sound and deliverable emerging from a robust evidence base and having been formulated, with regard to, and in a manner consistent with the Sustainability Appraisal. This allocation identified within the LDP makes sufficient provision for part of the housing needs of this settlement.

## Appendix 1 – Location Plan of the allocation site





## Appendix 2 –

Consultation Responses from NRW, DCWW & Highways in respect of Planning Application S/38285

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Robert Davies  
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Ein cyf / Our ref: CAS-75935-G4H6  
Eich cyf / Your ref: S/38285

Dyddiad / Date: 18 January 2019

Annwyl / Dear Mr. Davies

**PROPOSAL: CONSTRUCTION OF A RESIDENTIAL DEVELOPMENT OF UP TO 210 UNITS WITH ASSOCIATED LANDSCAPING AND INFRASTRUCTURE WORKS**

**SITE ADDRESS: LAND AT, NORTH DOCK, SEASIDE, LLANELLI, SA15 2LY**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales on the above application, which we received on 14 January 2019.

**We have no further comment to make on the above application. Our advice and position on the proposed scheme has not changed as no new information has been provided and the scheme has not been modified. Our advice on this application is therefore set out in our Statutory Pre-Application Consultation response dated 20 April 2018 (our reference: CAS-58891-B7V7) which is attached to this letter for reference.**

Our comments above only relate specifically to matters that are included on our checklist Natural Resources Wales and Planning Consultations (September 2018) which is published on our website at this link (<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/our-role-in-planning-and-development/?lang=en>).

We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

I hope the above comments are helpful, please do not hesitate to contact me if you have any queries.

Yn ddifffuant / Yours sincerely

**Hannah Roberts**

**Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor**

*Enclosed: NRW's response to the Statutory Pre-Application Consultation dated 20 April 2018.*

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Cardiff  
CF23 8RS

Ein cyf / Our ref: CAS-58891-B7V7  
Eich cyf / Your ref: S17.812

Dyddiad / Date: 20 April 2018

Annwyl / Dear Ms. Stevens

**PROPOSAL: STATUORY PRE-APPLICATION CONSULTATION FOR AN  
OUTLINE APPLICATION FOR THE CONSTRUCTION OF A RESIDENTIAL  
DEVELOPMENT OF UP TO 210 UNITS WITH ASSOCIATED LANDSCAPING AND  
INFRASTRUCTURE WORKS**

**SITE ADDRESS: LAND AT NORTH DOCK, LLANELLI**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales on the above application, which we received on 21 March 2018.

**We recommend that you should only grant planning permission if you attach the following conditions relating to contaminated land, site lighting and pollution prevention measures. These conditions would address significant concerns that we have identified, and we would not object provided you attach them to the planning permission.**

**Contaminated Land**

Based on the information submitted in support of the application, we have concerns with the proposed development due to the previous industrial land uses which may have caused contamination, and proximity of the development to the Burry Inlet and Loughor Estuary Site of Special Scientific Interest (SSSI), Carmarthen Bay and Estuaries Special Area of Conservation (SAC), Burry Inlet Special Protection Area (SPA) and Ramsar site.

Having reviewed the report entitled '*North Dock, Llanelli. Phase I Desk Study Report Opus*', dated November 2017 (Reference V-C8602.13-RepG01-R0), we note it recommends further investigation as set out in Chapter 9 (conclusions and recommendations). We welcome and support those recommendations and will be able to comment on any supplementary information provided under any future planning application.

If no additional information is provided within any future planning application, we would in that instance, recommend to the local planning authority (LPA) that they should only grant planning permission for this scheme if the conditions listed below are attached to the planning permission.

**Condition:** Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the LPA:

1. A preliminary risk assessment which has identified:
  - all previous uses
  - potential contaminants associated with those uses
  - a conceptual model of the site indicating sources, pathways and receptors
  - potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The site investigation results and the detailed risk assessment (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the Local Planning Authority. The scheme shall be implemented as approved.

**Reason:** We consider that the controlled waters at this site are of high environmental sensitivity due to the proximity of the development to the Burry Inlet and Loughor Estuary Site of Special Scientific Interest (SSSI), Carmarthen Bay and Estuaries Special Area of Conservation (SAC), Burry Inlet Special Protection Area (SPA) and Ramsar site and contamination is strongly suspected at the site due to the previous industrial land uses.

**Condition:** Prior to commencement of development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the LPA. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification

plan, and for the reporting of this to the LPA.

**Reason:** To demonstrate that the remediation criteria relating to controlled waters have been met, and (if necessary) to secure longer-term monitoring of groundwater quality. This will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site.

**Condition:** Reports on monitoring, maintenance and any contingency action carried out in accordance with a long-term monitoring and maintenance plan shall be submitted to the LPA as set out in that plan. On completion of the monitoring programme a final report demonstrating that all long-term site remediation criteria have been met and documenting the decision to cease monitoring shall be submitted to and approved in writing by the LPA.

**Reason:** To ensure that longer term remediation criteria relating to controlled waters have been met. This will ensure that there are no longer remaining unacceptable risks to controlled waters following remediation of the site.

**Condition:** If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the LPA) shall be carried out until the developer has submitted, and obtained written approval from the LPA for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with.

**Reason:** Given the size/complexity of the site it is considered possible that there may be unidentified areas of contamination at the site that could pose a risk to controlled waters if they are not remediated.

**Condition:** Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the LPA, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

**Reason:** There is an increased potential for pollution of controlled waters from inappropriate methods of piling.

## **Ecology**

### Designated Sites

As previously mentioned, the site lies adjacent to the Burry Inlet and Loughor Estuary Site of Special Scientific Interest (SSSI), Carmarthen Bay and Estuaries Special Area of Conservation (SAC), Burry Inlet Special Protection Area (SPA) and Ramsar site.

There is therefore a requirement to assess any potential impacts under the Conservation of Habitats and Species Regulations 2017. Regulation 63 of the Regulations, requires the competent authority to undertake a test of the likely significant effects of the proposal on the European designated sites.

If it cannot be demonstrated that there will not be a significant effect, either alone or in combination with other plans and projects, you are required to undertake an appropriate assessment of the implications of the proposed scheme for the sites in view of their conservation objectives, before granting planning permission

### Protected Species

We welcome the ecology survey report entitled '*North Dock ND1 Development Site, Llanelli. Ecological Assessment. 2017*' by Pryce Consultant Ecologists, dated 14 February 2018. The bat surveys in 2017 found that a single non-breeding pipistrelle bat was roosting on the corner of the main building on the site (building A).

We note the proposed mitigation for the loss of this building as set out in paragraph 4.1.4.3 of the report and note that it accords with the requirements of the already obtained European Protected Species Licence no. 77835.

Otters are a feature of the Carmarthen Bay and Estuaries SAC, and we note that the report references suitable otter habitat 50m north east of the eastern boundary of the site. We advise that the development will need to consider potential impacts on otters from lighting spillage/pollution which may occur from the new development, and a mitigation lighting plan will be required to be produced.

**Condition:** The production of a lighting plan which demonstrates how lighting of suitable otter habitats will be avoided. The lighting plan should be agreed prior to works commencing on site and shall be implemented as agreed.

**Reason:** For the protection of Otters, a European Protected Species and feature of the SAC.

We also advise that the recommendations made in Section 6 of the report are followed and fully implemented on site. The recommendations relating to Section 7 habitats and species under the Environment (Wales) Act 2016 should be discussed with the LPA's Ecologist.

### **Pollution Prevention**

The biggest risk from a pollution viewpoint occurs during construction. We advise that you should therefore plan the works carefully, so that contaminated water cannot run uncontrolled into any watercourses (including ditches) and the designated sites are protected from pollution. A method statement detailing all necessary pollution prevention measures for the construction phase of the development should therefore be produced.

**Condition:** No development approved by this permission shall be commenced until a Method Statement detailing all necessary pollution prevention measures for the construction phase of the development is submitted to and approved in writing by the LPA.

**Reason:** For pollution prevention and the protection of the designated sites.

The method statement should identify the following as a minimum:

- Storage facilities for all fuels, oils and chemicals.
- Details on any water features on the site and how they will be protected.
- Full details of how any watercourses will be crossed or confirmation that this is not applicable.
- Any sources of pollution (including silt), potential pathways for that pollution to enter any watercourses within the vicinity of the site and appropriate pollution control measures to be implemented on site.
- Details of the nature, type and quantity of materials to be imported on to the site.
- Measures for dealing with any contaminated material (demolition waste or excavated waste).
- Details on waste types that will be produced and how they will be managed.
- Details on any invasive species on site and how they will be managed.
- Identification of any buried services, such as foul sewers, so that they are protected.
- Details of emergency contacts, for example Natural Resources Wales' Pollution hotline 0300 065 3000.

The Method Statement should then be efficiently communicated to all contractors and sub-contractors (for example, via toolbox talks) and any deficiencies rectified immediately.

## **Flood Risk**

We note that in our previous discretionary pre-application response (dated 19 July 2017) that we advised due to the location of the proposals, it would be beneficial for a Flood Consequence Assessment (FCA) to be produced to address any tidal flooding concerns.

We note the submission of the FCA 'North Dock Llanelli', prepared by Opus, dated March 2018. Although the site is currently classed as Flood Zone A, the FCA correctly identifies that there is a risk of tidal flooding in the future, once an allowance for sea level rise due to climate change is accounted for. The estimated flood levels provided in Table 2-1 of the FCA are considered acceptable. The FCA suggests that the site could be raised to mitigate against future sea level rise, which is feasible.

It also identifies that vehicular access to the site could be compromised in a future climate change scenario, but safe pedestrian access would remain via an alternative route north over the railway line. We advise that access arrangements are a matter to be discussed and agreed with the LPA.

Section 2.4 of the FCA suggest the sea defences running along the coastal frontage near to the site are an NRW asset, however please note these are an LPA asset.



## **Foul Water Disposal and Memorandum of Understanding**

We advise that since 2007, issues have come to light regarding the foul and surface water drainage networks in this area. This has resulted in additional pollution and nutrient loading spilling into the Burry Inlet (Carmarthen Bay and Estuaries) SAC. As such, a Memorandum of Understanding (MOU) has been prepared to enable development in this area to go forward.

Protection of the water environment is a material planning consideration and we advise that the LPA must be satisfied that the proposed method of foul and surface water drainage from the proposal will not cause any detriment to water quality.

We recommend the LPA consults with Dwr Cymru/Welsh Water (DCWW) to ensure hydraulic capacity exists at the treatment works to accommodate the flows from this development, without causing pollution.

We also remind you that to accord with the terms and content of the agreed MOU, foul connections should only be allowed when compensatory surface water removal or suitable improvement scheme has been implemented within the same catchment.

For larger scale developments, bespoke solutions will be necessary, depending on the size and location of the development. We recommend that applications such as this are discussed with the Technical Advisors Group.

The agreed relevant details must be recorded on the LPA's register of compensatory surface water disposal.

With regard to surface water disposal, it is imperative that no surface water is allowed to enter the sewerage infrastructure. This is to avoid hydraulic overloading of the sewerage system.

We also recommend that the LPA's Drainage Engineers are consulted in relation to the surface water proposals. This is to ensure there is no connection of surface water to the main sewerage system.

Our comments above only relate specifically to matters that are included on our checklist Natural Resources Wales and Planning Consultations (March 2015) which is published on our website at this link (<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/our-role-in-planning-and-development/?lang=en>).

We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

I hope the above comments are helpful, please do not hesitate to contact me if you have any queries.

Yn ddiffuant / Yours sincerely

**Hannah Roberts**

**Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor**

Carmarthenshire County Council  
Ty Elwyn  
Town Hall Square  
LLANELLI  
SA15 3AP

**Date: 30/01/2019**  
**Our Ref: PLA0039907**  
**Your Ref: S/38285**

Dear Sir

**Site: Land at North Dock, Llanelli.**

**Development: Construction of a Residential Development of up to 210 dwellings and associated Landscaping and Infrastructure works.**

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

We would request that if you are minded to grant Planning Consent for the above development that the **Conditions and Advisory Notes** listed below are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets.

## **SEWERAGE**

### **Conditions**

No development shall commence until a drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall provide for the disposal of foul, surface and land water, and include an assessment of the potential to dispose of surface and land water by sustainable means. Thereafter the scheme shall be implemented in accordance with the approved details prior to the occupation of the development and no further foul water, surface water and land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

The proposed development site is crossed by a number of public sewers with their approximate position being marked on the attached Statutory Public Sewer Record. Their position shall be accurately located, marked out on site before works commence and no operational development shall be carried out within 3 metres either side of the centreline of each of the public sewers.

Reason: To protect the integrity of the public sewers and avoid damage thereto protect the health and safety of existing residents and ensure no pollution of or detriment to the environment

### **Advisory Notes**

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of [www.dwrcymru.com](http://www.dwrcymru.com)

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

This proposed development is located in an area which has the potential to discharge into national and international designated waters. The Loughor Estuary forms part of the Carmarthen Bay & Estuaries European Marine Site which is the collective name for three European 'Natural 2000' designated areas, namely Carmarthen Bay & Estuaries Special Area of Conservation, Carmarthen Bay Special Protection Area and Burry Inlet Special Protection Area.

A key fundamental issue associated with any proposed development(s) located on both the Carmarthenshire and Swansea side of the Estuary is the potential impact of any revised or additional water discharges, either foul or surface water, will have on the local drainage systems and ultimately the designated waters. Dwr Cymru Welsh Water is contributing towards improving the water quality in the Estuary by undertaking key infrastructure improvements at its Northumberland Avenue and Llanant Waste Water Treatment Works which are designed to improve arrangements for dealing with surface water, provide ultra violet treatment and phosphate removal.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.  
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in  
Welsh and English

Dŵr Cymru Cyf, a limited company registered in  
Wales no 2366777. Registered office: Pentwyn Road,  
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Rydym yn croesawu gohebiaeth yn y  
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng  
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn  
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

Equally developers too, can also play a significant part in mitigation measures by incorporating sustainable drainage facilities within their proposals. It is essential therefore, that as a pre-requisite of any development being considered for approval that such matters are effectively controlled through planning conditions.

## **SEWAGE TREATMENT**

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

## **WATER SUPPLY**

Due to the size of development In order to establish what would be required to serve the site with an adequate water supply, it will be necessary for the developer to fund the undertaking of a hydraulic modelling assessment on the water supply network. We are aware that the developer has received a quotation to carry out the Hydraulic Modelling Assessment but has yet to progress with the assessment.

In light of this we recommend the imposition of the following condition:

No development shall commence until a scheme for the supply of potable water to the development has been submitted and approved by the local planning authority. Thereafter the scheme shall be implemented prior to the occupation of any of the dwellings.

Reason: To ensure the development is served by an adequate supply of potable water to protect the health, safety and amenity of the residents of the development.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

If you have any queries please contact the undersigned on 0800 917 2652 or via email at [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com)

Please quote our reference number in all communications and correspondence.

Yours faithfully,



**Clare Powell**  
**Development Control Officer**  
**Developer Services**



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.  
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in  
Welsh and English

Dŵr Cymru Cyf, a limited company registered in  
Wales no 2366777. Registered office: Pentwyn Road,  
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y  
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng  
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn  
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

**CONDITIONS FOR DEVELOPMENT NEAR WATER MAINS**

Location: LAND AT NORTH DOCK, SEASIDE, LLANELLI, SA15 2LY

Date: 04.02.19

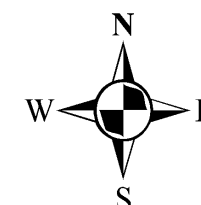
The development of the site with our water main located as shown on the attached plan will involve certain conditions which must be strictly adhered to. These are:-

1. No structure is to be sited within a minimum distance of **3** metres from the centre line of the pipe. The pipeline must therefore be located and marked up accurately at an early stage so that the Developer or others understand clearly the limits to which they are confined with respect to the Company's apparatus. Arrangements can be made for Company staff to trace and peg out such water mains on request of the Developer.
2. Adequate precautions are to be taken to ensure the protection of the water main during the course of site development.
3. If heavy earthmoving machinery is to be employed, then the routes to be used in moving plant around the site should be clearly indicated. Suitable ramps or other protection will need to be provided to protect the water main from heavy plant.
4. The water main is to be kept free from all temporary buildings, building material and spoil heaps etc.
5. The existing ground cover on the water main should not be increased or decreased.
6. All chambers, covers, marker posts etc. are to be preserved in their present position.
7. Access to the Company's apparatus must be maintained at all times for inspection and maintenance purposes and must not be restricted in any way as a result of the development.
8. No work is to be carried out before this Company has approved the final plans and sections.

These are general conditions only and where appropriate, will be applied in conjunction with specific terms and conditions provided with our quotation and other associated documentation relating to this development.

















PLA0039907 Sewer Plan






**LEGEND(Representative of most common features)**

### Waste network:

	Foul chamber		Outfall
	Surface water chamber		Lampole
	Combined chamber		Storm Overflow
	Combined sewer overflow		Rising main
	Special purpose chamber		Gravity sewer
	Treatment works		Private sewer
	Pumping station		Private sewer subject to Sect. 104 adoption agreement

NB: Sewer symbol colour indicates the type.

RED	- Combined		<b>Private Sewer Transfer</b>
GREEN	- Surface Water		
BROWN	- Foul		

**Inspection Chamber**

**Lateral Drain**

**Notes:**

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

Dwr Cymru Cyfyngedig (the Company) gives this information as to the position of its underground apparatus by way of general guidance only and the agent understands that it is based on the best information available and no warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. The onus of locating apparatus before carrying out any excavations rests entirely on you. The information which is supplied to you is, as far as it is known, correct and is based on the best information available to the Company. From 1991 which is based upon the best information available and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a water main or other underground apparatus which is not shown on the records. It is further to be noted that, even if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision of the New Roads and Street Works Act 1991 and the provisions of the Public Health Act 1960.

Service pipes are not generally shown but their presence should be anticipated.

**EXACT LOCATIONS OF ALL APPARATUS  
TO BE DETERMINED ON SITE.**















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Map scale: 1:1250  
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### Waste network:

	Foul chamber		Outfall
	Surface water chamber		Lamphole
	Combined chamber		Storm Overflow
	Combined sewer overflow		Rising main
	Special purpose chamber		Gravity sewer
	Treatment works		Private sewer
	Pumping station		Private sewer subject to Sect. 104 adoption agreement

NB: Sewer symbol colour indicates the type.

RED	• Combined		<b>Private Sewer</b>
GREEN	• Surface Water		
BROWN	• Foul		
			<b>Inspection Chamber</b>

**Lateral Drain**

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

Dair Cymru Cŵylgreding ("the Company") gives this information as to the position of its underground apparatus by way of general guidance only and on the strict understanding that it is based on the best information available and no warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. The onus of locating apparatus before carrying out any excavations rests entirely on you. The information which is supplied to you is based on the best information available to the Company as at the date of the issue of the information. From 1981 which is based upon the best information available and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a water main or other underground apparatus which may be situated in the vicinity of the Company's apparatus. Therefore, if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision of the New Roads and Street Works Act 1991 and any subsequent legislation.

Service pipes are not generally shown but their presence should be anticipated

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Head of Highways and Transport

5123

S/38285

S/38285/P016927/(H&T)/GM

27<sup>th</sup> March 2019

PROPOSED CONSTRUCTION OF A RESIDENTIAL DEVELOPMENT OF UP TO 210 UNITS WITH ASSOCIATED LANDSCAPING AND INFRASTRUCTURE WORKS

LAND AT, NORTH DOCK, SEASIDE, LLANELLI, SA15 2LY

I refer to your consultation request on the above planning application and would comment as follows:

**Recommendation:**

Any permission that the Planning Authority may give should include the following condition(s).

**Condition(s):**

1. Prior to use of any access road by vehicular traffic, visibility splay in compliance with Technical Advice Note 18 (Transport) page 44 shall be formed and thereafter retained in perpetuity, either side of the centre line of the access road in relation to the nearer edge of carriageway.
2. Prior to the commencement of development, the written approval of the Local Planning Authority shall be obtained for a scheme of parking and turning facilities within the curtilage of the site, and this shall be dedicated to serve the proposal. The approved scheme is to be fully implemented prior to any part of the phase being brought into use, and thereafter shall be retained, unobstructed, in perpetuity. In particular, no part of the parking or turning facilities is to be obstructed by non-motorised vehicles.
3. All surface water from the development herewith approved shall be trapped and disposed of so as to ensure that it does not flow on to any part of the public highway.

Head of Planning Services

**FAO: ROB DAVIES**

**CIVIC OFFICES, CRESCENT ROAD,  
LLANDEILO CARMS**

4. No surface water from the development herewith approved shall be disposed of, or connected into, existing highway surface water drains.
5. Prior to the commencement of development the written approval of the Local Planning Authority is to be obtained for a scheme detailing the provision and frequency of use of facilities for washing down the wheels of vehicles prior to entering the public highway.
6. No development shall take place until a detailed Construction Traffic Management Plan is submitted for the written approval of the Local Planning Authority and thereafter shall be implemented in full and as agreed.
7. Before any development is commenced a detailed Travel Plan, setting out ways of reducing car usage and increasing walking and cycling to and from the development, shall be submitted to and agreed in writing by the Local Planning Authority. The detailed Travel Plan shall be implemented in accordance with the approved details at a timescale to be approved in writing by the Local Planning Authority.

**Reason(s):**

In the interests of highway safety.

**Other Observation(s):**

1. The planning permission hereby granted has been subject to a commuted sum financial contribution of £35,000 towards highway improvements at the Sandy Roundabout and Active Travel improvements between the Millennium Coastal Park, the site and Llanelli Railway Station.
2. Any amendment or alteration of an existing public highway in connection with a new development shall be undertaken under a Section 278 Agreement of the Highways Act 1980. It is the responsibility of the developer to request the Local Highway Authority to proceed with this agreement and the developer is advised that the total costs of entering into such an agreement, as well as the costs of undertaking any physical works on site, shall be met by him.
3. It is the responsibility of the developer to contact the Streetworks Manager of the Local Highway Authority to apply for a Streetworks Licence before undertaking any works on an existing Public Highway.
4. Prior to beneficial occupation of the development herewith approved, provision of a public bus service to serve the site should be considered in consultation with the Carmarthenshire County Council. It is recommended that a joint approach be made for service improvements in conjunction with other development proposals in the area e.g. Llanelli Wellness and Life Science Village.

**S G Pilliner.**

Head of Highways and Transport  
Pennaeth Priffyrdd a Thrafnidiaeth