

For Office Use Only

Date Received:

Comment Number:

Customer Number:

Replacement Local Development Plan Comments Form

Comments are encouraged via the Council's website <http://conwy.jdi-consult.net/ldp> using the on-line form available.

Alternatively, comment forms should be returned to:

The Strategic Planning Policy Service, Conwy County Borough Council, PO Box 1, Conwy LL30 9GN or by e-mailing cdll.ldp@conwy.gov.uk

1. Personal Details	
Title	Mr
First Name	Dewi
Last Name	Griffiths
Job Title*	Forward Plans Officer
Organisation*	Dwr Cymru Welsh Water
Address Line 1	Kinmel Park Depot
Line 2	Royal Welch Avenue
Line 3	Bodelwyddan
Line 4	Denbighshire
Postcode	LL18 5TQ
Telephone No.	██████████
E-mail Address*	████████████████████

2. Agent Details (if any)
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.

* Where relevant

Consultation Paper 1: Priority Issues, Vision and Objectives

Question 1: Do you agree that the RLDP Structure should be aligned to reflect the obligations of the WFG Act and the subject areas set in PPW (Edition 10)?

[Click here to enter text.](#)

Question 2: Do you think that this is the right Vision for the Conwy RLDP?

[Click here to enter text.](#)

Question 3: Do you think the Vision is well placed to deliver Sustainable Places in Conwy?

[Click here to enter text.](#)

Question 4: Do you agree with the Objectives?

[Click here to enter text.](#)

Question 5: Are there any other objectives that should be considered?

[Click here to enter text.](#)

Consultation Paper 2: Strategic Growth and Spatial Distribution Options

Question 1: Which Settlement Hierarchy do you consider to be the best option? (Refer to Background Paper 3 'Hierarchy of Settlements' for greater assessment of the Options)

We note that the Council are seeking to allocate development in accordance with a settlement hierarchy and that the level of growth to be allocated to specific settlements will be consulted on at later stages of the plan process. In order to accurately assess how growth will impact upon our infrastructure we will need to know the amount and distribution of growth. In accordance with paragraph 5.3.4.10 of the LDP Manual (edition 2, August 2015) we welcome early engagement in the LDP process as it enables us to inform the LPA's decision making based on the capacity of our infrastructure and we would be pleased to work with your Authority in examining the impact of the proposed options on our assets once further information is available.

We note that the consultation reflects national guidance in stating that most development should be directed towards existing towns. We have provided information in our response to question 11 about how our Wastewater Treatment Works (WwTW) catchments relate to the main settlements in Conwy County.

Question 2: Are there any other settlement hierarchy options you would like to put forward?

[Click here to enter text.](#)

Question 3: Do you agree with the figures and rationale for Growth Option 1?

[Click here to enter text.](#)

Question 4: Do you agree with the figures and rationale for Growth Option 2?

[Click here to enter text.](#)

Question 5: Do you agree with the figures and rationale for Growth Option 3?

[Click here to enter text.](#)

Question 6: Do you agree with the figures and rationale for Growth Option 4?

[Click here to enter text.](#)

Question 7: Do you agree with the figures and rationale for Growth Option 5?

[Click here to enter text.](#)

Question 8: Do you agree with the figures and rationale for Growth Option 6?

[Click here to enter text.](#)

Question 9: What is your preferred growth option?

Welsh Water has no real preferred growth option from those under consideration. We look to the adopted Local Plan to guide us where future investment in our infrastructure may be required and we aim to ensure that sufficient capacity exists to accommodate domestic development, however if a lack of capacity is identified we look to address this through capital investment in our Asset Management Plans (AMP). To support this investment planning we require some certainty in terms of growth areas and site allocations.

Water and sewerage undertakers are subject to a regulatory price review by Ofwat every 5 years where customers' bill prices are set for the forthcoming 5 years. Our investment funds are raised through customers' bills therefore the amount of funding available for delivering infrastructure in a given AMP is determined by the outcome of the price review. We are currently delivering the AMP6 programme which covers investment for the period 2015-2020, this will be followed by AMP7 for the investment period 2020-25, AMP8 for 2025-2030 etc. The Conwy Replacement LDP, once adopted, will have a timeframe that runs until 2033 therefore any investment required in our infrastructure to accommodate growth can be considered for inclusion in future AMPs. An adopted LDP helps strengthen the case Welsh Water can put forward in relation to projects requiring AMP funding.

Disparity between the LDP's timeframes and those of the AMP can mean that allocations may need to be delivered in advance of any potential AMP funding. In such cases developers can progress a site by funding the necessary infrastructure themselves, either by requisitioning the required improvements through the provisions of the Water Industry Act 1991 or by a developer contribution via a Section 106 Agreement of the Town and Country Planning Act 1990.

Question 10: Are there any other options we should include?

Click here to enter text.

Question 11: What is your preferred spatial growth option?

We are pleased that the document recognises the importance of ensuring that new development areas can be served, or are capable of being served, by appropriate infrastructure. We will need to know the level of growth in each settlement and the specific location of proposed allocations in order to accurately assess the capability of our existing water and sewerage networks, and Wastewater Treatment Works (WwTW), to accommodate development.

The consultation document highlights the settlements that would be impacted by the various growth distribution options under consideration. Not every settlement in the County is served by its own WwTW, the catchment area of some WwTWs cover numerous settlements. The five largest WwTWs in the County serve the majority of the population as detailed below, and as such are likely to accommodate the majority of the growth options outlined in the consultation document. Many of the rural villages are served by their own WwTWs.

WwTW	Settlements served
Ganol:	Conwy, Glan Conwy, Deganwy, Llandudno, Llandudno Junction, Mochdre, Penrhyn Bay, Rhos on Sea, Colwyn Bay, Old Colwyn.
Kinmel Bay:	Abergele, Llanddulas, Towyn, Kinmel Bay.
Llanfairfechan:	Llanfairfechan, Abergwyngregyn.
Penmaenmawr:	Penmaenmawr, Dwygyfylchi.
Llanrwst:	Llanrwst, Llanddoged and Melin-y-Coed.

On a more site specific level, some settlements have instances of flooding in the public sewerage system that, depending on their location in relation to site allocations, may need to be resolved to allow development to proceed. Potential developers can either wait for Welsh Water to resolve these flooding incidents, subject to funding being available through the AMP process, or progress the required improvements through the sewerage requisition provisions of the Water Industry Act 1991. In such cases a Hydraulic Modelling Assessments may be required to determine an adequate point of connection to the public sewer and developers would be expected to fund the assessment at pre-planning stage. The findings of a HMA would identify the extent of any necessary upgrades to the sewerage network. Where proposed allocations are crossed by water mains and/or public sewers, protection measures in the form of easement widths or a diversion of the pipe would be required which may impact upon the housing density achievable on site.

Question 12: Are there any other options we should include?

Click here to enter text.

(Continue on a separate sheet /expand box if necessary)

Signature: Date

Publication of your comments:

Please note that all comments received will be made available publically and published on the Council's website:

<http://conwy.jdi-consult.net/ldp>

Link to Privacy Notice: www.conwy.gov.uk/spps/privacypolicy