

**From:** [Griffiths Dewi](#)  
**To:** [NDF](#)  
**Subject:** National Development Framework consultation 2019  
**Date:** 14 November 2019 14:02:26  
**Attachments:** [image001.png](#)

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Dear Sir/Madam

Please find attached representation from Dwr Cymru Welsh Water on the draft NDF.

**Representation:**

We support the production of a National Development Framework for Wales and we note that Strategic Development Plans are to come forward in each of the three regions to establish the spatial strategy, housing requirement etc for those areas.

As a statutory undertaker we aim to have early and meaningful consultations with Local Planning Authorities regarding their LDP aspirations as it allows us an opportunity to assess the capacity of our infrastructure to accommodate proposed growth. The spatial strategy of the NDF provides information relating to the amount of housing growth anticipated in a region and the main areas within a region where growth will be focussed. It is useful to have this broad indication within the NDF of where strategic growth will be focussed and the approximate housing requirement that will need to be provided for, however we will need to await consultation on the SDPs for further information regarding the breakdown of growth between settlements to allow us to assess the potential impact of growth upon our infrastructure. For example, not every settlement is served by its own Wastewater Treatment Works (WwTW), the catchment area of some WwTW cover numerous settlements therefore the impact on our assets will be dependent upon the amount of growth proposed within individual catchment areas. Where the total growth identified exceeds the theoretical design capacity of our WwTWs then improvements to provide further capacity would be required.

There is currently a lack of clarity regarding the process for undertaking SDPs which, in turn, risks hampering asset planning by utility providers. Our infrastructure investment is delivered via 5 year Asset Management Plans (AMPs) and we rely on the planning process to provide a reasonable level of certainty about where and when growth is likely to occur. Potentially introducing and distributing allocated sites into a number of different plans may result in a more fragmented picture of the expected development of a particular area. In addition, the disparity in adoption timescales between the various plans may impact upon the certainty that we require to inform our investment planning. As such we would welcome the opportunity for early engagement with LPAs on the SDPs to enable us to contribute to their development in accordance with policy 16 of the NDF.

Looking ahead, Welsh Water is embarking on the preparation of Drainage and Wastewater Management Plans (DWMPs) and we understand that the Welsh Government has informally indicated that it is minded to making them statutory in due course. Growth information is built into our DWMP and forms an important element of our planning which aims to understand how we will continue to deliver effective sewerage services for a growing population in the face of climate change and other challenges. Critically the DWMP considers the impact of changing population served on our assets and the subsequent effect on the environment. As such we believe that the DWMPs will play a key role in delivering a holistic, prioritised approach to the management of our drainage and sewerage networks in the years ahead, and will complement other planning documents including the NDF, SDP and LDPs. To maximise the potential benefits we will work closely with local authorities in the preparation of our DWMPs.



**Dewi Griffiths**

**Forward plans officer | Developer services | Dwr Cymru Welsh Water**

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