

From: BarryVale FOE [REDACTED]

Sent: 06 March 2026 12:03

To: LDP [REDACTED]

Cc: [REDACTED]

Subject: Re: Sewage services for the RLWP development sites

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Dear Victoria,

Thank you for signposting me to the Infrastructure Delivery document. I see this falls short of detailing the new sewerage infrastructure central to unlocking the development of allocated sites stated in para.i

Para. 3.104 mentions SuDS to prevent surface water entering the sewer system, but nothing on WW's strategic plan for local authority schemes to divert existing highway drainage into surface water out of their sewers.

Para.3.105 says the obvious that capacity may not exist within the existing sewerage network, but does not include sewage treatment capacity and does not specify where it's lacking. There's a comment for NW Barry that pumping capacity "may"not exist.

Para.3.108 says capacity constraints at treatment works and improvements as being in the current AMP or not, so why not be specific on the programme to 2030 ?

We see no mention of the Vale's Bathing beaches (several new ones) and policy to ensure sewage discharges do not undermine attaining Bathing Water standards; does this issue not belong in the RLDP, setting out divided responsibilities of VoG, NRW and DCWW (cf. Watchtower and Ogmere-by-Sea beaches closed 2024,5)?

On specifics, KS4 and KS5 say of capacity limits at West Aberthaw works that "DCWW has confirmed that upgrades are planned as part of the AMP8 programme 2025 and 2030". Can you provide documents on this?

WW said in 2015 they "planned" upgrades so questions are obvious - is the W.Aberthaw upgrade still not programmed and committed? Are the plans sufficient to take the much bigger numbers of homes now planned. Will land purchase and planning consent be needed? Will the developers proposing local sites have to pay via S.106?

On Model Farm, WW said the developer would have to undertake a sewerage HMA which L&G have been unwilling to progress, doubtless because their Viability Assessment showed the development was uneconomic. Such an HMA may show the need for sewer links across unexplored land, possibly uncovering archaeological constraints, causing delays of several years.

It seems you have not followed Council's Methodology based on the Development Plans Manual

to require this developer to reappraise existing LDP site allocations without extant planning permission through the candidate site assessment process.

I don't see that the Employment Land Study indicating (3.1) Model Farm to be a "realistic development proposal" over-rides the DPM guidance on examining viability constraints, so is this decision documented, please ?

In view of the response deadline, we look forward to a timely response. We'd ask that you consider the above omissions, deem that a firm Statement of Common Ground with DCWW similar to that of 2015 is required at this stage, and issue amendments to this draft RLDP to cover them.

Regards,

-- Max Wallis (

Friends of the Earth Barry&Vale