

Re: Land adjoining Green Meadow, Pilot Street, St Dogmaels.

Response from St Dogmaels Community Council

to Geraint John Planning Ltd, Office 16 (House 1, 2nd Floor), The Maltings, East Tyndall Street, Cardiff, CF24 5EA. consultations@gjplanning.co.uk

Red texts indicate quotes from documents supplied by the Developer.

Principle of the Development

1. The principle of the residential development of this site has previously been established through the approved Outline (ref. 06/0422/PA) and Reserved Matters (ref. 10/0806/PA) applications, whereby the design, scale and layout of the site have been considered acceptable.

As the proposed site is located within the settlement boundary of St Dogmaels, but is unallocated for development, it is considered to be a windfall site

The previous applications were prior to the adoption of the current LDP in 2013.

Between 2013 and 2020, 12 units were completed within St Dogmaels Boundary (*Pembrokeshire County Council Local Development Plan Annual Monitoring Report - 7 1 st April 2019 – 31st March 2020*).

Including the still extant permission for 16 properties at Awel y Mor, the application, if approved, will significantly increase development in the village, over and above that indicated in the currently adopted LDP.

In light of this the Community Council believes that any additional development allowed should reflect the 'LDP housing requirement (s5.36) derived from Welsh Government's 2008-based household projections in which 'A major driver of the housing requirement is the reduction in the average size of households, and particularly the increase in single-person households. This changing nature of household provision is one aspect of the increasing need for homes'.

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| The Community Council requests that the developer demonstrates and justifies how it has arrived at this particular mix of housing, having regard to development plan policies. |
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(Affordable) Housing Numbers / Density

The price point of the proposed dwellings is not accessible to local people. The affordable housing schemes currently offered (namely Help to Buy) would not cover properties costing above £250k and, at this price, would still require a £1250 deposit and approx. £187500 mortgage and the proposed dwellings, being attractive to higher wage earners.

Given that 'Pembrokeshire has a high level of need for affordable housing, as evidenced by the number of people identified as being in need on the Common Housing Register - over 2,150 at March 2015 and by evidence from the *2014 Local Housing Market Assessment* (a need of 1,641 Affordable Homes each year)', (*Pembrokeshire County Council Affordable Housing Supplementary Planning Guidance Adopted 14th September 2015*) and further 'the Pembrokeshire 2014 Local Housing Market Assessment indicated that the predominant need for affordable housing in all parts of Pembrokeshire is for social rented properties (83%)' the Community Council would wish to see the report on on-site provision or financial mitigation to provided as a s106 Commuted Sum.

Given that the s106 Commuted Sum will be prioritise for expenditure 'in the communities in which they are generated [...] on Affordable Housing schemes within the Town or Community Council and adjoining Community Council areas within which it was generated within 3 years' (*Pembrokeshire County Council Affordable Housing Supplementary Planning Guidance Adopted 14th September 2015*) and there being

extremely limited building opportunities remaining in St Dogmaels due to land supply, the Community Council would prefer to see affordable housing units provided on site.

Planning Policy Wales 2 establishes a set of 'key planning principles' to ensure that the planning system facilitates the right development in the right place. This includes creating sustainable and cohesive communities, for which housing development is a key element.

Planning Policy (edition 11) - In assessing the Sustainable Benefits of Development account must be taken of Social Considerations:

What are the short and long-term consequences of the proposal on St Dogmaels, including its composition, cohesion, character, how it functions and its sense of place?

How would the proposal support the development of more equal and more cohesive communities?

How has the housing need been identified for the nature of the proposed development eg large detached houses?

What consideration has been given to the community's need for affordable housing?

What consideration has been given to the housing needs of older people, including supported living and care?

What consideration has been given to the provision of a mix of market and affordable house types, tenures and sizes?

Design and Visual Impact

5.8 Policy GN 2 (Sustainable Design), acknowledges that development will be permitted where "It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context," and "is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout."

National Planning Policy Context section, PPW10 states that creating and sustaining communities is of a high priority. Figure 3 states: "Creating well designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others."

The outline application comprises 15 detached housing. The surrounding area comprise a mix of detached, semidetached and terraced housing which create a varied street scene. The Community Council considers that the current proposal does not reflect this housing diversity (that is the provision of 15, 4 bed detached properties) is out of keeping with the local area.

The Community Council requests that the developer provide an assessment of housing on the proposed site to indicate how it reflects and enhances the diversity of accommodation available in the immediate locality.

Highways, Access and Parking

A new priority access is proposed from Pilot Street, which is broadly consistent with that of the previously approved scheme, with appropriate visibility provided.

A Transport Note has been prepared by Apex in support of the planning application, which concludes that the “proposals will not have a material impact on the operation of the highways network and no mitigation is required.”

The ‘Transport Note’ basis its traffic impact on the ‘immediate surrounding area [being] primarily residential in nature. As such, movements associated with residential uses are firmly established in this area’.

The Transport Note fails to take into account the fact that the B4546 provides the access route to the popular Poppit beach. The impact of tourist traffic on Pilot Street has been growing.

The figures below provided by Pembs County Council Highways Department refer to the area of the village known as ‘The Moorings’ which lie to the north of Pilot Street on the B4546. During the period 2012 and 2020, with an overall construction of only 12 dwellings within St Dogmaels it is clear that the rise in traffic flow cannot be attributed to any significant development.

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|------|--------------|------|--------|-----------------|------|------|
| 751 | The Moorings | 2017 | April | To High Street | 672 | 754 |
| | | | | To Poppit Sands | 650 | 730 |
| | | | | Combined Flows | 1322 | 1484 |
| 1392 | The Moorings | 2021 | August | To High Street | 1189 | 1414 |
| | | | | To Poppit Sands | 1215 | 1388 |
| | | | | Combined Flows | 2404 | 2802 |

Information provided by Pembrokeshire County Council Highways Department.

‘According to the Welsh Gov Statistical Report, *Wales Tourism Performance Report January to December 2019 11 June 2020*, ‘The strong performance during 2019 resulted in increases in the volume of trips taken in Wales of almost 7 percent’. While it is not clear when future reports will be available due to the impact of COVID the popularity of the staycation, investment in the visitor economy (*The Welcome to Wales: Priorities for the Visitor Economy 2020-25*) it would be reasonable to assume that the significant increase in traffic flow is largely attributable to leisure journeys to the popular Poppit beach. It is therefore, not unreasonable, to assume that the traffic flow between The Moorings to the High Street has increased by a similar percentage. The Transport note assumes ‘residential uses’ but does not address the significant volume of traffic generated for leisure journeys to Poppit sands.

Therefore, the Community Council queries the statement that the development will have ‘will have a negligible impact on the capacity of the local highway network and on the operation of local junctions’.

The survey does not take account of the narrowing of Pilot Street which reduces it to single lane traffic and the limited visibility to the north of the proposed access road which results, during peak tourist times, to gridlock.

Why has the Transport report not taken into account the significant rise in traffic flow during the extended tourism season?

Why has the Transport Report not taken into account the reduction in carriage widths on Pilot Street to either side of the approach to the proposed access road and the impact on traffic flow and pedestrian and cyclist safety?

Will the estate roads, including the access roads be built to a standard which is adoptable by PCC as any future deterioration of access will impact on the larger area?

Displaced parking

While it is noted that the proposal would provide 9 parallel parking spaces on land currently owned by Pembrokeshire County Council (PCC) subject to permission, the informal parking on this land currently accommodates up to 12 vehicles.

A brief local survey suggests at 13 properties on Pilot Street to not have access to private parking. 12 vehicles, belonging to residents regularly use the informal parking provision, while others park in the available on street parking.

The reduction of parking in the area owned by PCC to 9 parallel parking spaces would equate to at least 3 vehicles having to find additional on street parking in an area of the community where parking of any kind is at a premium.

Why does the Transport Report not address the issue created by the displaced parking nor any loss of on street parking associated with the creation of the new access?

School

The transport report does not appear to address the fact that vehicle access to St Dogmaels Primary School is via the junction to Feidr Fawr at a priority junction to the south of the site. It appears that no account has been taken of the additional journeys, along Feidr Fawr and Pilot Street to allow for this.

The Feidr Fawr junction also offers the route to access the village Memorial Hall which is a well-used and popular village amenity and to parking for Alexandra Gardens and the adjacent play area, both of which attract significant visits from outside the community.

There is a lack of pedestrian footways as Pilot Street narrows into Grove Terrace forcing pedestrians to walk in the road which the Transport Report does not take into account.

Why does the Transport Report not take account of the additional traffic flow created by the access to the school and village amenities, particularly at the Feidr Fawr junction?

Residential Amenity

As there is a 1.5m minimum suggested safe distance for overtaking in slow moving traffic and Pilot Street is a two-way carriageway, it is already unsafe in terms of safe cycle use, taking into account the narrowing of Pilot Street into Grove Terrace and to the north of the proposed site.

Once entering Grove Terrace and onto the High Street there are limited pedestrian footways to access the consumer facilities available with pedestrians having to walk in the road at the junction of High Streets and Grove Terrace.

Why has the traffic report not taken account of the decrease in carriageway width which impacts traffic low and pedestrian and cyclist safety when these routes would be taken by both pedestrians and cyclists?

Why does the Transport Report not take into account the lack of footways in the areas beyond the immediate site as it implies that there is safe pedestrian access to the High Street?

Public Transport

3.4.2The closest bus stops are served by bus service 405 and 408 which is operated by Richards Bros and this provides 6 to 9 services a day between 07:57 and 19:12. Service number 405 operates from Monday to

Saturday and provides 3 services per day linking to Fishguard and Cardigan. Service number 408 operates Monday to Friday and provides 6 services a day connecting St Dogmaels to Cardigan.

3.4.3 Potential future residents of the site can access the bus services which could be used for commuting purposes to Cardigan. The bus services provide a feasible option for people working full time in this area. They can also be used for leisure, retail and health purposes as well as connecting to additional services from Cardigan.

The report presents a misleading and inaccurate picture of current Bus services. For the majority of the year, the 405 service operates on Thursdays only and provides just three journeys per week. The last 408 bus service between St Dogmaels and Cardigan leaves cardigan at 16:44. It is therefore not feasible that future residents could use the service for commuting or full-time working.

The report should be amended to reflect up to date information and its impact on the future resident’s commuting and accessing full time work (other than working from home) from the site using public transport.

Biodiversity

Will the existing boundary hedgerows be retained?

Will a full site ecology report be made? / Is a site ecology report required?

What proposals are in place to mitigate light pollution from the development post build, in particular with connection to the River Teifi adjacent to the site? The river and it’s banks are a known important wildlife habitat and have SSSI status.

Has a **recent** site study been carried out in respect of Japanese Knotweed? – previously known to be on the site? NB. Cymdeithas Llandudoch have worked with previous site owner on this Invasive non-native species (INNS).

What consideration has been given to include plants/trees which are beneficial to wildlife (pollinators and birds) to improve or mitigate effects of the development of a ‘Green Field’ site? Both on the site generally and in the construction of the ‘Rain Gardens’

As the site/land is historically known to contain at least two INNS – what measures do the developers propose to ensure any remaining plants are not spread?

Rain Garden Plantings

| Latin Name | Common Name | Native to UK | Wildlife benefit | Maintainence | Comment |
|---------------------|--------------------|--------------|----------------------------|--|--|
| Carex Pseudocyperus | Cyperus Sedge | Yes | Potentially when in flower | Cut to ground level annually in autumn | Similar to Pendulous sedge |
| Helleborus foetidus | Stinking Hellebore | No | None found | | Potentially harmful if ingested. May cause severe discomfort. Skin irritant if |

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|--|--|--|--|--|--------------------------------|
| | | | | | touched – gloves when Handling |
|--|--|--|--|--|--------------------------------|

Information from the RHS (Royal Horticultural Society) website

St Dogmaels Community Council currently maintains and monitors over 100 bio diversity areas on the Pinog. The Community Council has a significant programme in place to contain Pendulous Sedge. The proposal to introduce a near relative with similar growth habits to the Pendulous Sedge, that is Carex Pseudocyperus, causes some concern.

There is also concern about the use of Helleborus foetidus given its toxicity.

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| The Community Council requests that an alternative species be used. |
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Heritage

The Welsh Language and Placemaking

The Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its use and the Thriving Welsh Language well-being goal.

Planning authorities must consider the likely effects of their development plans on the use of the Welsh language as part of the Sustainability Appraisal. Planning authorities should seek to ensure a broad distribution and phasing of development that takes into account the ability of the area or community to accommodate development without adversely impacting use of the Welsh language.

Sustainable Developments

The Design and Access Statement provided by Geraint John gives some of the context for planning applications.

Additional context for **Sustainable Development** is provided here as that contained in the above document is selective and does not address a number of material issues:

1. The over-arching obligations in Future Wales

The Well-being of Future Generations (Wales) Act 2015 influences the way we plan for new development; it demands that development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales. Under the commitment to delivering sustainable development we will maximise our contribution to each of the well-being goals.

Planning Policy Wales 2

This establishes a set of 'key planning principles' to ensure that the planning system facilitates the right development in the right place. This includes creating sustainable and cohesive communities, for which housing development is a key element.

Planning Policy (edition 11) - In assessing the Sustainable Benefits of Development account must be taken of Social Considerations:

What are the short and long-term consequences of the proposal on a community, including its composition, cohesion, character, how it functions and its sense of place; and how does the proposal support development of more equal and more cohesive communities?

How would the proposed major development contribute to the achievement of the seven well-being goals as required by the Well-being of Future Generations Act?

How has this proposal taken into account the ability of the area or community to accommodate development without adversely impacting use of the Welsh language?

How does this proposed development enable the Welsh language to thrive in a language sensitive area?

How does this proposed development benefit the local people of St Dogmaels and enrich their community?

Flood Risk

St Dogmaels Community Council fully supports the submission and queries raised by St Dogmaels Footpath Association / Llwybrau Llandudoch (attached as Appendix A) and considers its support of the attached document to be a significant part of its concerns with regard to the proposed development and requests that it is informed, in full, in any response to the document.

The Community Council stresses the importance of footpath 87/28 as a community amenity and as part of the popular Coast Path. Any adverse impact on the path would be wholly unacceptable.

The Community Council fully supports the proposal contained in the St Dogmaels Footpath Association / Llwybrau Llandudoch submission that a 2-metre strip adjacent 87/28 be made available so if the path integrity is damaged, the path could be moved inland.

Would the developer offer this 2-metre footpath safeguard strip?

The Community Council notes that the with the exception of private gardens, following the implementation of the landscape proposals, the management of landscape areas at the site will be undertaken by a suitably qualified contractor to be appointed by the site operator.

Given that areas of landscape are integral to supporting water run off on the site the Community Council queries who the designated 'site operator' will be?

The Community Council queries how long the 'site operator' will be appointed for?

The Community Council queries what long term maintenance arrangements for the landscape areas will be put in place given parts of it are essential the draining of the site?

The Community Council also queries what short and long term arrangements will be put in place for maintenance of any specific drainage arrangements on and from the site including, but not exclusively any SuDS feature such as a large swale / small basin.?

What calculations have been done to measure the level of phosphates your development will generate, and what calculations to mitigate and offset any phosphate levels?

The Community Council policy is not to support connection of new builds to the existing sewerage system solely due to significant system overloads, not always associated with high rainfall or flooding, resulting in the egress of raw sewage in Water Street. Dwr Cymru is aware of the issues and has installed alarms to allow over pumping of raw sewage at these times. However, this must be considered a palliative response to the overarching question of the capacity of the current sewage infrastructure within the village of St Dogmaels.

General:

Should the development be given permission the Community Council would be concerned with regard to the impact of residents during the works in regard of noise, vibration and access issues.

What mitigation measures would be put in place to ease the construction impact on residents and the adjoining properties?

What measures will be put in place to ensure safety and free passage on the nearby Graig Public Footpath (PP87/28) during the development build process and will the developer guarantee that the path will remain open throughout?

Appendix A

Re: Land adjoining Green Meadow, Pilot Street, St Dogmaels.

Response from St Dogmaels Footpath Association / Llwybrau Llandudoch

**to Geraint John Planning Ltd, Office 16 (House 1, 2nd Floor), The Maltings,
East Tyndall
Street, Cardiff, CF24 5EA. consultations@gjplanning.co.uk**

Footpath PP87/28, the Graig Footpath which is part of the Wales Coast Path runs along the East perimeter of the development site 'Land adjoining Green Meadow, Pilot Street.'

Between 8 Oct 2019 and 17 Nov 2020, the pedestrian counter on the Graig Footpath recorded **49,471** people including local residents, children walking to school and walkers used this Public Right of Way to avoid the narrow and hazardous section of Pilot Street, which has no pavement, in places narrows to 3.2 metres, is single lane for 60 metres and often causing tailbacks of 20+ vehicles adjacent the proposed entrance to the development site.

The Developer has separated their ownership of the land on which the Graig footpath runs (CYM172725) from their ownership of the development site. CYM 172725 is owned by a company Pembrokeshire Haven Developments Ltd. with close links to the developer.

Re the 'Flood Consequences Assessment and Drainage Strategy Report'

St Dogmaels Footpath Association's 50+ members' together with St Dogmaels Community Association's knowledge and experience of this development site and the sewage system come to different conclusions from 'Flood Consequences Assessment and Drainage Strategy Report' by PHG Consulting which states:

*'1.1.2 The purpose of the report is to wholly assess the site, identifying existing sources of flood risk to the site while ensuring that surface and foul water drainage can be discharged from both parcels without a detrimental impact on the downstream catchment.
1.1.3 The report demonstrates how the drainage for the whole development will be discharged and how flows will be managed to prevent increased flood risk on-site as well as downstream.'
3.1 'The surface water management proposals are to be designed to ensure no adverse effects and/or flooding are generated both within the development and the wider catchment.'*
And concludes

4.2.3 Furthermore, this report demonstrates that both the foul and surface water discharge from the proposed development can be managed and discharged acceptably.

The 'Flood Consequences Assessment and Drainage Strategy Report' fails to consider that this development site is part of a catchment area drainage system with culverted water courses running under Pilot Street, onto and across the development site.

We consequently consider that the calculations for 1 in 30 and 1 in a 100 year etc: risk of flood have flawed basis.

The historical name of one of the houses above the development site is Deg Fynnon (10 wells/springs)

Much of the hillside above is clay with springs such as behind Arfryn, Castle View and Avondale all the way to Sunnyside and Capel Degwel.

Some springs run all year others appear with heavier rain.

On the West side of Pilot St., in heavy rain events, a sheet of water runs down the clayey hill above Pilot St, down the cliff faces behind the houses.

Rainfall does not all end up in the combined sewer but is linked to culverts under the road.

We consider that the 'Flood Consequences Assessment and Drainage Strategy Report' by PHG Consulting Engineers is in error as it erroneously states '... no identified watercourses or ditches within the total development boundary'.

We know:

- a) There are a number of water courses to the West (uphill) side of Pilot Street which discharge under the road onto/under/through the development site.
- b) The sound of the stream is obvious on the development site side of Pilot Street from a manhole immediately opposite the stream running between Castle View and Avondale. It has a broken concrete/rebar cover and is beside the telegraph pole.
- c) As evidence, attached are 2 photos, one of the location of the stream between Avondale and Castle View that is culverted under Pilot St. onto the development site and a second of water flow in stream between Avondale and Castle View
- d) Also attached is a picture of the manhole with the roadside view of the stream immediately behind.
- e) Some water courses were clearly identified by St Dogmaels Community Association when managing the invasive species Himalayan Balsam which spread from gardens above Pilot St, through culverts under Pilot St into a ditch on the Southern edge of the development site and also on a more northerly route through the site to the Teifi cliff face.

The previous owners of the development site, Chalcroft Property Developments Limited, provided £720 to St Dogmaels Community Association/Cymdeithas Llandudoch to assist in clearing the Himalayan Balsam that was spreading from behind houses the other side of Pilot Street down these watercourses and culverts onto the present development site.

Perhaps the ditches were obliterated when heavy machinery graded the surface of the development site recently.

- f) Some years ago the previous land owner carried out works which disrupted the flow of water into the grated chamber beside the Graig Footpath which discharges into the river Teifi causing a large flow of water over and under the Graig Footpath at about SN 16349 46290, causing path erosion and some subsidence of the path.

We consider that a proper geophysical survey and flood assessment that takes into account the development site having a gradient of 1:5 and being part of a water catchment area is required.

Development will totally change the hydrology.

We consider the summary of GroundSolve's a Geo-environmental report for the proposed development in April 2021 (1.5.1) describes the site stratigraphy as '*approximately 0.3m topsoil (average) over Glacial Till overlaying suspected mudstone bedrock which prevented further progression of trial pits*', to be superficial.

Glacial till covers a wide range of grain sizes from boulders at one extremity to clay at the other, and can be highly variable over a short distance due to complex glacial and fluvio-glacial history of this area.

If it is a high clay content glacial till it would be prone to movement especially on this 1:5 slope.

If you are doing construction you want to know more than 'suspected mudstone'. Again, if it is mudstone, then it is likely to be highly impermeable and thus prone to surface or shallow groundwater/perched water tables and therefore instability of the ground.

Land stability is an issue in this area as result of the conditions described above, which include reactivation of ancient landslips eg St Dogmaels landslip over 20 years ago

In addition there are more recent examples close by e.g.

- i. the face collapse behind Avondale on Pilot Street opposite the development site which resulted from the removal of trees, shrubs and other vegetation whose roots had provided ground stability.
- ii. Less than a mile away towards Cardigan, with similar geology and on the St Dogmaels side of the Teifi river bank, is Bryn Onnen. Built only 30 years ago this development has terrible issues with subsidence. We have been told the parking area next to and above the river for the apartments has had estimates this year ranging from £50k to £90k to drive piles into the ground to stop it falling away into the river. Another area has dramatically sunk where a road drainage pipe has broken because of this subsidence and eroded the soil away. One owner has had to spend thousands to stop his garden falling into the river.
- iii. Also there have been reports that when the previous developers were putting in footings they required more than twice as much concrete as planned, to create stability.

Concerns re Combined Sewer Overload

We are very concerned about proposals in paragraphs 2.7.1 and 3.1.6 and 3.4.1 and 4.1.3 proposing potential huge loading of the combined sewer with surface water (see underlined words below)

'2.7.1 The existing surface water drainage within the site will be diverted/extinguished if no longer in service and the existing adopted combined sewer will remain within the proposed highway extent, providing an exceedance flowpath to the low point of the site plateau, ensuring risk to property is negligible.'

'3.1.6 DCWW records confirm that a combined sewer runs through the lower section of the site. This will provide a discharge location for all foul flows as well as controlled and attenuated surface water discharge should higher-order arrangements not be suitable.'

3.4.1 Due to the lack of soil permeability to support drainage fields and dedicated foul infrastructure, it is proposed that the existing DCWW combined sewer provides a point of connection to all site generated (and off-site diverted) flows.

4.1.3 Infiltration has been excluded by site investigation work and the nearby watercourse (The Teifi) has been proposed as a runoff destination for surface water flows should the existing discharge method be maintainable. A new headwall within the sensitive estuary is discouraged and as such, should the status quo not be suitable, both surface water and foul flows will be discharged to the existing DCWW combined sewer which crosses the site.

- Sometimes it is only in heavy rainfall that the purpose for surface water drainage is recognised and appreciated.
- At present with heavy rainfall streams re-appear flowing from the development site and across the Graig Footpath.
- The '*flowpath to the low point of the site plateau*' is the Graig Footpath and Teifi cliff slope and the '*risk to property*' is NOT '*negligible*.' The Graig Footpath has great value to our community as a safe alternative to walking the narrow Pilot street section with no pavement or safe walking space. Between 8 Oct 2019 and 17 Nov 2020 **49,471** people including local residents, children walking to and from school and long distance walkers used this Graig Footpath.
- In heavy rain, water has flowed over the surface of the site to a South East corner and over the Graig Footpath, causing erosion.
- In heavy rain, water has been observed coming up the grated chamber. Whatever drainage system is attached to the grated chamber it is not fit for purpose at present and therefore not suitable to support this development.
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- The developers proposal that *4.1.3 should the status quo not be suitable, both surface water and foul flows will be discharged to the existing DCWW combined sewer which crosses the site.*

The present sewage system for St Dogmaels cannot cope during heavy rainfall, yet the developers propose jeopardizing the whole village sewage facility by using the existing adopted combined sewer

- as the *exceedance flowpath 2.7.1,*
- for *controlled and attenuated surface water 3.1.6,*

- *all site generated (and off-site diverted) flows 3.4.1,*
- *or should the status quo not be suitable, both surface water and foul flows will be discharged to the existing DCWW combined sewer which crosses the site 4.1.3,*

We will have even more episodes of overpumping of raw sewage into the SSSI of the River Teifi

(Will St Dogmaels become a Site of Special **Sewage** Interest?)

There have been episodes when the combined sewer has overflowed onto the Village Green to the south of the development site creating a pond of sewage some 15 foot wide, 20+ foot long over a foot depth along the length of the Footpath 87/28. If this reoccurs this is a public health hazard as thousands of people walk this Footpath and Village Green.

Concerns re ‘3.1 Surface Water Management Approach’ which states

‘The surface water management proposals are to be designed to ensure no adverse effects and/or flooding are generated both within the development and the wider catchment.’

‘3.1.1 Surface water management proposals for the new development have been prepared to meet the following principles:

- *Positively drained surface water runoff from the site will be captured and discharged to the estuary freely, in line with G2.1 of the Sustainable Drainage systems standards for Wales...’*

However, any surface water runoff captured and discharged into the estuary will pass through the CYM172725 along which the Graig Footpath is constructed, potentially destabilising the path.

1. We need to know:

a) What % area will be hard surface (roof, road, pavements etc)?

Given the statement ‘3.1.4 Site investigation carried out reported that Infiltration rates were unlikely to be sufficient in supporting soakage solution due to the glacial till underlying the site and has therefore been discontinued at this stage.’

b) What % area is permeable e.g. ‘rain garden’

c) Evidence of adequacy for surface water management which does not just rely on discharge to the grated chamber mentioned below in 3.1.5 as Footpath members have seen water come up from the grated chamber and flow over the Footpath in heavy rainfall.

Concerns re ‘3 Discharge to a watercourse.’

3.1.5 The exceedance flows from the site currently discharge both to the site boundary and a grated chamber within the site from which all flows enter the Nant Teifi. It is suggested that the latter pathway is confirmed and if possible, the status quo is maintained to prevent new headwall works within the estuary due to its status. Should outgoing pipework be found to be smaller than connecting pipework of the proposed site and insufficient to convey site flows, attenuation will be required to ensure no flooding occurs in the

transition to the existing pipework. It is suggested that this be done in a SuDS feature such as a large swale / small basin.

2. What is the developer proposing as appropriate drainage of the development site that acknowledges the existence of the Graig Footpath and guarantees no adverse impact on the Graig Footpath?
3. The drainage strategy schematic /SUDs shows the treated surface water discharging to an 'existing drain to tidal estuary' with the report suggesting that if the pipes aren't the correct size they will have to replace them or use an attenuation swale/small basin
How will this be done without materially impacting the integrity and stability of the parcel of land containing the Graig Footpath, Registered Public Right of Way 87/28 and part of the Wales Coast Path which is particularly vulnerable to water erosion from up slope?
4. What investigations have been made into the condition and structure of the presumed existing chamber and outfall from the site which is proposed to be utilised to minimise groundwork and installation within the estuary bounds.
5. We would expect the developer to offer/be obliged to preserve a 2 metre strip adjacent 87/28 so if the path integrity is damaged, the path could be moved inland
Would the developer offer this 2 metre footpath safeguard strip?
6. What else would the developer do to protect this well used popular cliff side Public Right of Way, Graig Footpath, part of the Wales Coast Path 87/28?
7. How will the developer protect the integrity of the retaining wall between the site and the Graig Footpath during works and into the future?
8. Has the developer called on drainage/Dwr Cymru experts to see if there are drainage records?
9. Has the developer mapped the springs/small drains which flow from the site towards the Graig Footpath
10. How will the developer ensure future maintenance of the trees which impact on the Graig Footpath
11. Why not provide more trees on site to provide rain interception (by leaves)?
12. How is the developer ensuring that the Japanese Knotweed on site has been adequately dealt with before works start, when in grading the land they probably have spread the Japanese Knotweed further?
13. How will the developer deal with the asbestos in the shed near the South East end of the development site which was identified when the local community (with the MP

and AM taking part) had a clean-up in this location prior to the opening of the Wales Coast Path?

14. As the developer has failed to find the surface water courses it would seem very wise to build a series of swales along the whole length of the site.
15. Re 3.2.5 The SAB process will follow the pre-planning consultation and will include a pre-SAB and full SAB application via Ceredigion County Council. Why Ceredigion as the development is in Pembrokeshire?
16. There should be restrictive covenants in place requiring owners to have plants and shrubs and not e.g. astro turf or hard surfaces in order to maximise infiltration potential

Scroll down for photographs

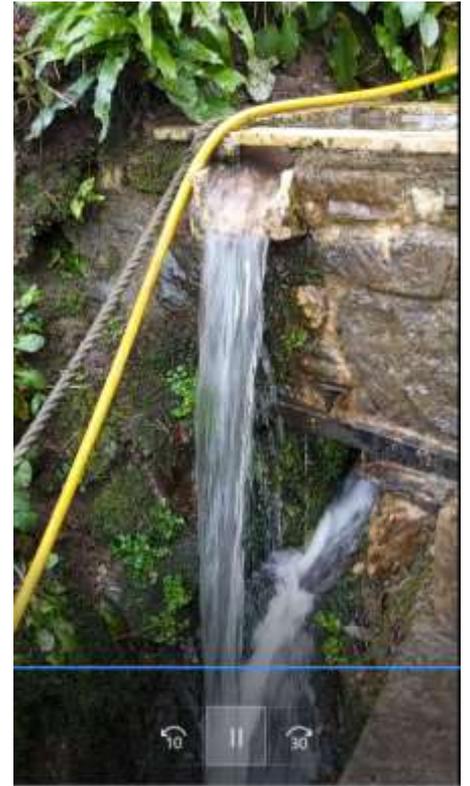


See below

1

2

Appendix A



1. Photo of location of the stream between Avondale and Castle View that is culverted under Pilot St. onto the development site.
2. Photo of water flow in stream between Avondale and Castle View
3. Photo of the manhole with the roadside view of the stream between Avondale and Castle View

