

Pembrokeshire County Council

Dear Planning Team,

Re: Planning Ref 20/0908/PA

Plot 5 -Site Opposite Berwyn, St Dogmaels Road, Cardigan, SA43 3HP

**Proposal to build over route of PROW 87/24C and divert onto unstable slope
(Y Feidr B4546 to Mwtshwr)**

Further to our objection based mistakenly on Section 119 of the Highways Act 1980, St Dogmaels Footpath Association members and Officers have instructed me to express further objection and extreme concern re the proposed obstruction and diversion of PROW 87/24C under Section 257 of the Town and Country Planning Act 1990.

Our Concerns

- 1. At present the construction of section of 87/24C on the development site is accessible to many local residents and is a popular link path between the South end of St Dogmaels and the B4546 to Cardigan/allotments etc. It has a steep gradient and comprises a sloped section and a flight of 25 steps with risers between 4 and 7 inches, with a handrail.**
 - a. It is a much used, well-constructed and well maintained footpath.
 - b. It is used by local residents - families taking children to school, residents walking to and from Cardigan with shopping, people being dropped by the bus with heavy shopping from Cardigan, less agile and older people including those with walking sticks. It is not just used by fit walkers.

- 2. The route proposed for 87/24C on the development site is on made-up recently bull-dozed unconsolidated steeply sloping land with no lateral support which can only be assessed by a site visit. Any solution will be an engineering challenge, and could destabilise the stream bank further.**
 - a) The slope proposed for this footpath's route is constantly moving with large stones having slipped down the slope several feet downwards to the stream in only 3-4 years. The stream is constantly undercutting the bank so there is continuous movement with what looks like a backscar at the top.
 - b) The on-going movement of this slope will present PCC with on-going maintenance costs at a time when PCC does not have the finance for carrying out the present PROW maintenance duty.
 - c) We have had a previous example of a disabled access footpath constructed on made up land with a lesser gradient leading from St Dogmaels Car Park to the Pinog Village Green which had an initial cost of ~£40,000 and even with subsequent remediation by PCC of over £20,000 the path is heaving and slumping creating multiple trip hazards.
 - d) Fundamental to any proposed diversion is that this unstable unconsolidated steep slope undermined by the Briscwm stream would have to be properly stabilised.

- 3. The slope gradient of any diversion must be no steeper than the present route.**

- 4. Any steeper gradient is against the spirit of the Active Travel Act and the Well Being of Future Generations Act as making it steeper would be very unpleasant, difficult and inaccessible to less agile path users.**
 - a) Any diversion must be **equally accessible** to the local residents who use the path at present, young and old, agile or not so agile.
 - b) The proposed steps require a handrail on the stream side to assist children getting up the steps, and to provide support for those with issues climbing such a long flight of steps or carrying shopping.

- c) The alternative route around St Dogmaels comprises narrow roads with no pavements and blind corners
- 5. The proposed footpath diversion ends on the private estate road, not on the B4546. A footpath should go from a Highway to a Highway. The diverted footpath should be a clear route to an acceptable standard from a highway (Mwtshwr) to a highway, the B4546 - with protection from vehicles parking on it etc.**
- a) What are users of the footpath meant to do? – walk on the estate road or across the boulder and rock strewn verge adjacent to road?
 - b) The standard of path on the estate must be clarified as PCC Group Engineer S. Bengier states this estate road will not be considered for adoption for public maintenance (as an Unclassified Road) (letter 16th February 2021)
 - c) As an un-adopted road there is no guarantee it or any pavement will be maintained to any standard satisfactory.
 - d) Estate roads and pavements can end up in such poor condition that people walk in the road to avoid slips and trips on uneven and eroded unadopted estate pavements (for example Maesmynach in St Dogmaels)
 - e) Parking in front of the proposed garage will result in people walking in the road which is unacceptable.
- 6. Permitted development rights on the garage must be removed or owners and users of the property will park outside the garage and cause walkers to walk on the road**
- 7. We are opposed to hedges in a confined steep space like this as shade and leaves make paths slippery and require PCC maintenance. The hedges will make the steps much darker, less useable in low light and unsafe when people are using these steps to come back home at dusk.**
- a) Hedges will need constant cutting back and maintenance – an unnecessary cost to PCC Countryside Dept when funding is so limited.
 - b) The present 25 steps keep in reasonable condition because they have the sun all day, they dry out quickly and do not become slippery with moss or fallen leaves.
 - c) A flight of steps, shaded and covered with leaves would be slippery and dangerous and PCC would be liable
 - d) Hedge roots will make the surface uneven
- 8. The width of the path, the risings and treads, landings and passing places should conform to present urban path requirements, not widths from the 1950s.**
- a) The present path which is only 80cm wide works only because it is straight with no bends or hidden corners so people can wait at the top or at the other side of the stream bridge for on-coming pedestrians, to pass. It is not wide enough to allow passing.
 - b) The diverted path should be 1.4m wide to allow people to pass as with a bend in the route, the view of other on-coming walkers is hidden
- 9. The Planning conditions should include commitment to keep the footpath and bridge structure in good condition in perpetuity as part of any permission, as works to create the path on this unstable fill slope could destabilise the bank by the bridge and cause the bridge structure to become unuseable/unsafe.**

We would be grateful for all these points to be taken into account
 If there is an opportunity to speak about these issues we would like to make our points in person

Many thanks
 Gill Wislocka
 Sec St Dogmaels Footpath Association