



# **CYNGOR CYMUNED LLANDUDOCH ST. DOGMAELS COMMUNITY COUNCIL**

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## **Planning response to**

**22/1051/PA**

Land adjoining Green Meadow, Pilot Street, St Dogmaels, SA43

**Dated: 20<sup>th</sup> April 2023**

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*Excerpts from Application Documents in red*

## **1. Principle of the Development**

As stated in the application

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.

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<sup>1</sup>.

Including the still extant permission for 16 properties at Awel y Mor (a recent pre-planning community consultation indicated a proposal for 29 properties on the site), the application, if approved, will significantly increase development in the village and above that shown in the currently adopted LDP.

This development will provide sufficient 3 and 4-bed housing to meet demand for the next 11 years.<sup>2</sup>

### **Summary comment**

**Community Council believes that any additional development allowed should reflect the 'LDP housing requirement (s5.36) derived from the 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'.**

## **2. Local Housing Availability and Price Point**

The applicant / developer's comment on **demand for 3-4 bed units in the area (as indicated by interest) and that these units will make a valuable contribution to housing needs** is belied by Welsh Government projections (above) and, at the time of preparation of this response, the housing market in St Dogmaels (See Appendix A).

The application for 13 x 4-bedroom detached properties (3 of which have integral garages) and 2 x 3-bedroom properties, all allocated 2 parking spaces, will be luxury properties commanding high prices.

Due to the nature of the site and the relevant development costs, these houses could be expected to have a price point of well over £407k which is currently the average price of a 4-bedroom detached in the village.

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<sup>1</sup> Pembrokeshire County Council Local Development Plan Annual Monitoring Report - 7 1st April 2019 – 31st March 2020

<sup>2</sup> Pembrokeshire County Council and Pembrokeshire Coast National Park Authority Local Housing Market Assessment – July 21

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### The 2020 Affordable Housing Commission report

'Redefining housing affordability. The Commission has adopted a basic tenet: "your housing costs should not exceed 33% of your net income". In addition, incomes are "equivalised" to take account of family size and formation.'<sup>3</sup>

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The price point of the proposed dwellings is not generally accessible to local people (see Appendix B – Local labour market). The affordable housing schemes 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.

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 as evidence from the *2014 Local Housing Market Assessment* (a need of 1,641 Affordable Homes each year).<sup>4</sup>, 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 is disappointed that there is no provision of affordable housing on the site.

It does note that this will be offset by Section 106 commuted funding<sup>5</sup>.

Given that the s106 Commuted Sum will be prioritised 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.'<sup>6</sup> and there being extremely limited development land remaining in St Dogmaels, it is unlikely that the community of St Dogmaels will benefit from such provision.

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.

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<sup>3</sup> <https://www.affordablehousingcommission.org/news/2020/3/23/making-housing-affordable-again-rebalancing-the-nations-housing-system-the-final-report-of-the-affordable-housing-commission>

<sup>4</sup> Pembrokeshire County Council Affordable Housing Supplementary Planning Guidance Adopted 14th September 2015

<sup>5</sup> Section 106 Agreements and Affordable Housing

Planning obligations under **Section 106** of the Town and Country Planning Act 1990 (as amended), commonly known as **S106 agreements**, are a mechanism which makes a development proposal acceptable in planning terms, that would not otherwise be acceptable. An agreement is made with the local planning authority in which you agree to pay money or provide affordable housing to get planning permission. Sometimes what is called a unilateral agreement is used. Unilateral Agreements are almost identical to Section 106 Agreements. They are sometimes referred to as unilateral undertakings.

<https://www.pembrokeshire.gov.uk/adopted-local-development-plan/section-106-agreements>

<sup>6</sup> Pembrokeshire County Council Affordable Housing Supplementary Planning Guidance Adopted 14th September 2015

Planning Policy (edition 11) – ‘In assessing the Sustainable Benefits of Development, account must be taken of Social Considerations’.

#### Summary comment

**While the Community Council does not expect private applicants / developers to address ‘social housing’ where there is a clear alternative within the legislation, a wider range of housing in terms of floor space, to reflect the terraced and semi-detached housing in the locality, as evidenced in the previous application (see below – previously approved application) would assist in meeting community needs.**

The previously approved application in January 2008, which the applicant/ developers claim ‘confirms the principle of residential development on site’. showed 15no. dwellings, with the indicative layout shows 2 pairs of semi-detached dwellings and 11 detached units.

**This applicant claims that ‘The opportunity to include smaller and / or different unit types was explored as part of the design process, however due to the infrastructure requirements, this is not practically possible or achievable’. Summary comment Given the previous application, being cited as confirming ‘the principle of residential development on site’ included a wider range of properties, the Community Council questions why this cannot be replicated in some manner.**

### 3. Tenure of buildings

The Local Planning Authority has powers to control the occupation of dwellings or request further information if deemed necessary.

*The Community Council understands that amendments to*

- The Town and Country Planning (Use Classes) (Amendment) (Wales) Order 2022; and
- The Town and Country Planning (General Permitted Development etc.) (Amendment) (Wales)

Will allow the local planning authority to make local amendments to the planning system through an Article 4 Direction, allowing them to consider whether planning permission is required to change from one use class to another (as specified in the amended legislating) and to control the number of additional second homes and short-term lets in an area.

Given that St Dogmaels had, in 2022-23 16% second homes, that is 122 second homes out of a total of 783 dwellings<sup>7</sup> plus a significant number of short-term holiday lets, local concern is that the

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<sup>7</sup> <https://www.pembrokeshire.gov.uk/enhancing-pembrokeshire-grant-funding-criteria/funding-available-in-each-towncommunity-council-area>

proposed development will become second and short-term let holiday homes given that there is not an active local market for larger dwellings (see Appendix A).

#### **Summary comment**

**The Community Council requests that consideration be given to the implementation of an Article 4 Direction to require planning permission for change of use from residential for the properties.**

## **4. 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, states that creating and sustaining communities is of a high priority. "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 application comprises 15 detached houses. The surrounding area comprises detached, semi-detached and terraced housing, creating a varied street scene.

#### **Summary comment**

**The Community Council does not support the current proposal as it does not meet local need, reflect the current varied housing stock and does not meet the requirements of the legislation cited above.**

## **5. 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' bases 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 does not appear to take into consideration that the B4546 provides the access route to the popular Poppit beach. The impact of tourist traffic on Pilot Street is growing.

The figures below provided by Pembrokeshire 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.

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, and 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 attributable primarily to leisure journeys to the popular Poppit beach.

It is not unreasonable, to assume that the traffic flow between The Moorings, a relatively small estate, 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.

It should also be noted that Cardigan RNLI station is located at Poppit sands and RNLI volunteers use the B4546 as a main access route. Traffic issues during the summer tourist season, where Pilot Street and Grove Terrace have become gridlocked, have impacted launch times and put lives at sea at risk.

### **Summary comment**

**The Community Council cannot support the applicant / developer's statement that the development will not impact the highway, on the basis that residential use 'is established in the area'. The B4546, not withstand any immediate local issues (see below), is a tourist access route to the popular Poppit beach. Any additional local traffic will impact the highway and vehicle movement at peak times.**

*Applicants comment: The statement that 'the site location will encourage and promote sustainable travel behaviour, attract residents who choose not to own a car or have low car ownership'*



The Community Council sees no information to support this statement. The Office of National Statistics indicates that while 'working solely from home' is still an option there is a significant proportion of working adults who do not have this option<sup>8</sup>.

- Among working adults who have worked in the last seven days, 16% reported working from home only and 28% reported both working from home and travelling to work over the period September 2022 to January 2023.
- Workers in the highest income band, those who were educated to degree level or above, and those in professional occupations were most likely to report home only or hybrid working.
- Self-employed workers were twice as likely to work from home only (32%) compared with employees (14%).
- 8% of workers in Wales were more likely to travel to work (58%) than those in England.

16- to 24-year-olds were most likely to report travelling to work without the option to work from home (79%)

Appendix B shows a snapshot of local employment opportunities. Access to a high percentage of the identified jobs would not be possible using public transport (See Appendix C for an outline of available public transport services).

Travel time by foot or bicycle would, other than for work in nearby Cardigan, be an issue.

### **Summary comment**

**The Community Council sees no evidence, given the nature of the proposed housing, if it is to be utilised by those living and working on the broader community, that the proposed development will not lead to an increase in traffic. Such increase will be reflected by both access to employment, access to local services and leisure.**

**If the housing becomes short term holiday lets or second homes it is unlikely that those visiting will use public transport and will be car users.**

## **6. Further to the impact on the Highway**

### 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, 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.

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<sup>8</sup> <sup>8</sup> Characteristics of homeworkers, Great Britain: September 2022 to January 2023. Office of National Statistics. <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/characteristicsofhomeworkersgreatbritain/september2022tojanuary2023>

The Feidr Fawr junction also offers the route to access the village Memorial Hall, a well-used and popular village amenity, and to parking for Alexandra Gardens and the adjacent play area, 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.

#### **Summary comment**

**The Community Council considers that the adjacent junction and lack of footways needs to be sufficiently considered concerning the impact on the Highway and pedestrian use (see Residential Amenity below).**

### **7. 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 pedestrian and 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 Street and Grove Terrace.

The proposal to provide stepped access from the estate to off-road routes and Maeshyfyrd should be more inclusive . Ramped access that conforms to Pembrokeshire County Councils Access Guidelines should be provided. Any access should be adopted highway or PRoW to ensure ongoing maintenance.

#### **Summary comment**

**The Community Council does not consider that the proposed stepped access is inclusive and addresses the lack of footway along the B4546.**

### **8. Displaced parking – Highways land**

While it is noted that the proposal would provide 7 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 local survey suggests that 13 properties on Pilot Street have no 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, to 7 parallel parking spaces would equate to at least 5 vehicles having to find additional on street parking in an area of the community where parking of any kind is at a premium.

## Summary comment

**While the Community Council accepts that much of the current parking provision is 'informal' the reduction in available space will be detrimental to the area and impact the highway due to increased parking on Pilot Street and in the immediate area.**

## 9. Biodiversity

### Water Gardens and landscape planting

No plan to ensure long term sustainability/maintenance of the Water Garden run off facility. Possible failure of the water gardens to cope with surface run off due to lack of maintenance or removal (where on private property) will likely lead to flooding during periods of high rainfall.

No plan regards to future maintenance of the proposed Wild meadow sites. Without a management plan these areas would turn to rank grass areas.

### Trees (Tree Evaluation Survey)

Loss of a Mature Oak (*Quercus robur*) tree classified from the Tree evaluation survey as of 'High Quality & Value'. Oak trees are recognised as excellent wildlife habitats. Within St Dogmaels there are very few mature Oaks in existence and therefore the loss of one for this development would likely have a high impact on biodiversity.

### Knotweed

Knotweed identified in 6 areas; no knotweed removal plan was submitted. During groundworks possibility of the plant being spread across the site and beyond. St Dogmaels CC have a successful Knotweed eradication program in place and this may undermine the CC project.

### Hedgerows (Ecological Appraisal report -June 2021)

Loss of High value biodiversity hedges. The value of the Hedgerows existing within the site are assessed as "Moderate and loss or damage to this habitat would be **major**, without mitigation (Ecological Appraisal report -June 2021)". The report recommends retention of Hedgerows on the Southern (TN8) and Eastern (TN9) boundaries, with a **2 Metre** protection zone from the base. No plan for ongoing maintenance of hedges to retain their biodiversity value.

### Bats (Bat Survey report undated but field visit in July 2021)

Bats: The old Smithy site was identified as having a small number of bats emerging during the filed survey 2x Greater Horseshoe, 2 X Soprano Pipistrelle, plus Soprano Pipistrelle and other Myotis species were detected within the surroundings. Whilst mitigation has been suggested to replace the Old Smithy as a potential roost, increased activity, especially during the development works could result in the loss of the site as bat habitat. Bats Access was not available to the inside of the Smithy. "A European Protected Specie Licence will be required for works to be undertaken on the former Smithy at the site"

## Summary comment

The Community Council recognises that this site acts as a corridor for wildlife in the centre of the village. Whilst mitigation actions are recommended to alleviate some of the identified biodiversity intrusions, loss of an open area previously unbuilt on would be likely have a detrimental effect. Any planning approval should insist that the mitigation advice is implemented in full.

The Community Council objects to the loss of a high biodiversity value tree (oak) and moderate biodiversity value trees from the site which will be detrimental to the area given its position alongside the tidal Afon Teifi and impact on the Community Councils biodiversity improvement programme in the SSSI adjacent Alexandra Gardens and the Pinog.

## 10. Heritage

The Applicant / Developer recognises that the Welsh Language has a significant role within the local community, however makes no further statement on the matter.

### The Welsh Language and Placemaking

The Welsh language is part of the social and cultural fabric. 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.

#### **Summary comment**

**The Community Council does not consider that the applicant has considered the impact on the community, and its Welsh language and heritage of providing only 3 and 4 bedroomed luxury builds which do not meet local need.**

## **11. Flood Risk/Drainage**

***'Flood Consequences Assessment and Drainage Strategy Report June 2021' claim that:***

***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.***

**A number of issues relating to Flood the issues have not been dealt with as detailed below and on sections 12 and 13 of this response.**

It is noted that 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. The current applicant's conclusion with regard to water volume through the existing drainage system does not appear to have taken account of previous works.

The Community Council thanks *St Dogmaels Footpath Association / Llwybrau Llandudoch* for permission to use extracts and references, below, from the Association's response to the application, which is submitted separately.

*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 [St Dogmaels Footpath Association / Llwybrau Llandudoch ] 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 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.*

#### **Failure**

- A. To recognise the larger rainfall catchment area, plus the**
- B. The Proposal that 2.7.1 existing surface water drainage within the site will be diverted/extinguished if no longer in service** [when rainfall levels vary and some drainage is seasonal].
- C. not complying with Dwr Cymru's Conditions re**  
*'no further surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage system.'*

#### **could lead to:**

- surface flooding,
- undermining of the PROW
- hydrostatic loading behind the proposed high retaining walls damaging PROW [and of significant concern for other areas of the site]
- further overloading of St Dogmaels sewage system
- more pollution with sewage of the Teifi River named as the 9<sup>th</sup> most polluted river in the UK with sewage

It is stated in the Flood Consequences Assessment and Drainage Strategy Report that 'Flow control devices are not required as the free discharge is available due to the tidal nature of the estuary and therefore restriction will only occur should the outgoing pipe diameter of the existing pipework be smaller than the proposed site connection. The existing outgoing pipework diameter and condition have not been confirmed at the time of writing and it is recommended that this is done before detailed design,

Should the existing arrangement after being 'refreshed' not prove adequate, it must not be supposed that the necessary permissions will be granted for works in the SSSI, which by the applicant's admission it wishes to avoid as 'headwall works in the SSSI which would be both technically challenging in terms of installation as well as environmentally'.

#### Pembrokeshire County Council Highways Response

The Community Council notes the suggested position of ramped access to footpath PP87/28 between properties 11 and 12 'via the location of the SAB' . Given the Community Council's concerns that the current drainage proposals may prove inadequate and require additional works, said works will impact on PROW access at this point.

Access to PROW 87/28 needs to be provided

- at the Northern end of the development as proposed in the application
- linking to Maeshyfyd, and
- at the Southern end directly onto Alexandra Gardens Village Green.

The Community Council fully supports the proposal of ramped access rather than stepped access.

There is further concern that access to footpath PP87/28 adjacent plots 11 and 12 'via the location of the SAB', given the current condition of the path at this location may increase the likelihood of collapse of 87/28. PCC's Atkins Report of 06 12 2004 lays out the difficulty of making 87/28 wheelchair accessible hence the Community Councils request for the Southern link to end directly onto Alexandra Gardens Village Green.

Access provided at the proposed North and South points would allow an alternative route should 87/28 be damaged or obstructed.

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The Statutory SuDS Standards provide a framework in the form of principles and standards, together with guidance for ensuring good quality SuDS on new developments which will stand the test of time<sup>9</sup>.

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<sup>9</sup> <https://www.pembrokeshire.gov.uk/planning-contacts/sustainable-drainage-approving-body-sab>

### **Summary comment**

**Given the uncertainty of the condition and suitability of the existing site drainage systems to be utilised, the Community Council believes that the applicant should provide a drainage assessment and design that recognises the above SuDS standards and remove any ambiguity as to the ongoing performance of drainage on the site.**

**There is extreme concern with regard to the need for more information into the condition and structure of the presumed existing drainage, chamber and outfall from the site which is proposed to be utilised to minimise groundwork and installation within the estuary bounds.**

**The Community Council requests that a full assessment of the currently available drainage on site be undertaken and the appropriate SuDS scheme supplied before approval of the application.**

**The Community Council supports the concerns expressed in the *St Dogmaels Footpath Association / Llwybrau Llandudoch* submission including the following:**

**Given the complexity and implications, not just for the Public Right of Way used by 50,000 people a year, this application requires a proper geophysical survey and flood assessment that takes into account issues raised here and by the community council.**

**In addition, NRW should be formally asked about their view in relation to the infill proposals:**

**As the retaining walls will inevitably be provided with drainage across the footpath via "weep holes" to relieve the pressure of ground water build up behind it, this relief water will inevitably drain into the Teifi.**

**This means that this water enters the SAC.**

**NRW must be assured that no backwash of the large quantity of imported fill could negatively affect any element of the ecosystem of the SAC.**

**NRW should be formally asked about their view of this and the form of permanent monitoring of drained water quality they would require to guarantee no negative impact to the SAC.**

**The design of this relief drainage is not provided within the detailed planning application submission documents therefore NRW have not been given the opportunity to comment on this issue as the Statutory Consultee on environmental matters.**



## 12. Sewage infrastructure

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.

There have been significant escapes of raw sewage in Water Street. St Dogmaels (see Appendix D for details). Not all of the outages were associated with incidents of flooding.

Dwr Cymru is aware of the issues.

The Community Council also notes the incidences of pumping from the Combined Storm Overflows (see Appendix D for details), which while, the Council accepts are currently legal, does not point to sufficient capacity in the existing system.

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.

The overarching question is of the capacity of the current sewage infrastructure within the village of St Dogmaels.

### Summary Comment

**The Community Council maintains its objection to new development because the existing sewage infrastructure is already insufficient to meet demand.**

The 'Flood Consequences Assessment and Drainage Strategy Report June 2021' states:

'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'.

**The Community Council has significant concerns that if a viable SuDS scheme is not investigated, provided and approved, the alternative of connection of run off to the existing sewage infrastructure would result in overload of sewage infrastructure (see Appendix D).**

### 13. PP87/28, the Graig Footpath which is part of the Wales Coast Path

The Community Council thanks *St Dogmaels Footpath Association / Llwybrau Llandudoch* for permission to use extracts and references from its response to the application, which is submitted separately.

#### Site Stability

The applicant/developer proposes importing infill material without any stability assessment of the site<sup>10</sup>.

Given the proximity of the Graig Footpath, 87/28 Public Right of Way to the site the Community Council has significant concerns with regard to the impact of this measure.

This path is a significant and important Public Right of Way (PRoW). It offers a safe link between two parts of the village and is part of the Wales Coast Path.

It provides a safe off-road route for children going to school, pedestrian commuters and visitors.

The alternative route along Pilot Street, is very narrow, frequently congested and much of its length has no footways, which results in pedestrians sharing the highway with vehicles.

Data supplied from Pembrokeshire County Council's usage counter situated along the Graig Path shows that over 50,000 people use the path annually.

As can be seen from the photographs below, the earth banks between the development site and the Public Right of Way are simple earth, rock and root and therefore do not form a stable retaining wall. The handrails are not structural.



1. <sup>10</sup> **The Geotechnical Report identifies land instability as an issue:**  
The Geotechnical Report states of p27 *'the top of the slope is heavily surcharged, (overloaded) this raises the potential to create land instability. It is therefore recommended that a slope stability assessment is carried out'*  
No site stability assessment has been provided.

As stated in the applicant / developer's PAC Report p16, 'the developer is legally bound and obliged not to cause damage or obstruction to the Public Right of Way without appropriate permission'.<sup>11</sup>

Considerations of soil stability and consequent construction methods are not integral to this proposal.

There is no Stability Assessment of the bank between the Development Site and the 87/28 Public Right of Way despite the proposal to import material to create raised gardens with Retaining Walls approximately 2.25 – 3.15 m high:

*Drawing DS100 below shows the retaining wall as a black dotted line*



### Construction Environment Management Plan

The CEMP outlines and details measures to be adopted throughout construction to ensure that impacts on the local area are minimised as far as possible.

The CEMP mapping fails to show the Public Right of Way. The CEMP also fails to address the fact that the footpath is used by approximately 50,000 pedestrians annually. Given the intention to work on the banks adjacent the footpath, site work will impact users. There is direct access to the development site from the PRoW

No evidence of how the identified land instability and compaction of infill material could destabilise the bank of the Public Right of Way

### Access to 87/28 Public Right of Way and nearby Green Space

<sup>11</sup> In UK law Public Rights of Way are Highways (Highways Act Section 1980 S. 139)  
The Highway Authority duty to assert and protect the rights of the public to the use and enjoyment of any Highway, and also to prevent their obstruction. (Highways Act 1980 Section 130 (1)(2))

The applicant / Developer have not addressed the provision of wheelchair accessible routes, in particular but not exclusively a route some 40m long from the development site to Alexandra Gardens Village Green, Play Area and school, the provision of which would also accord with the applicants/developers own Design and Access Statement.<sup>12</sup>

While the Community Council notes the various stepped accesses to and from the site, these fail to comply with PCC's guidelines on design and are not inclusive for all potential users, in particular pushchair and wheelchair users.

While the Community Council notes the intended site management plan, following completion, such access points should be adopted as PROW to ensure future maintenance and access for all.

### **Summary Comment**

**The Community Council has significant concerns with regard to the stability of the site, not least any works on or adjacent PROW 87/28 which could cause damage, instability or erosion of the path, which may lead to its future closure.**

**Current information provided with regard to stability and hydrology is insufficient to offer any reassurance that this significant development will not adversely impact PROW 87/28 either during the construction phase or in the future.**

**The Community Council would wish to see these links listed below comply with the appropriate legislation and guidance, and said accesses to be adopted as PROW.**

- **access from the North end of the development site to the existing PROW 87/28,**
- **the access to Maeshyfyd and also**
- **the wheelchair access on to Alexandra Gardens,**

**Further to concerns about the retention of the access and amenity provided by PROW 87/28 the Community Council requests, that if planning permission is given a 2m strip be allocated within the site, which aligns with the boundary banks of the existing footpath. Said space being allocated and maintained to provide an alternative route in perpetuity should the footpath fail.**

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<sup>12</sup> Green Infrastructure – Fails to integrate development with adjacent green space of Alexandra Gardens  
3.14 Para 2.4 notes that 'Green infrastructure plays a fundamental role in shaping places and our sense of well-being, and are intrinsic to the quality of the spaces we live, work and play in'. 3.15 PPW11 promotes the integration of green infrastructure into new developments, stating within Paragraph 6.2.5 that 'The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design'.

## 14. Landscape Management Plan

### Management Responsibilities

The Community Council notes the provision for ongoing site maintenance but has concerns that these will be difficult to implement in perpetuity. As much of the landscape relates to site drainage failure of upkeep could have a significant impact.

While planning conditions can be enforced 'covenants' with residents, as shown by local example on the estate at the Moorings, cannot.

An immediate concern is 'Private Bio-Retention areas' shows as part of the site drainage. The applicant acknowledges that, ensuring such areas in private ownership are maintained is not possible. There needs to be an assessment on the overall drainage strategy if these areas are removed or fall into disrepair.

The Council is concerned with regard to the 'adoptable bio retention areas. By whom are these to be adopted and if the stated landscape management plan is not instituted 'in perpetuity' where will the responsibility lie with regard to drainage and flooding issues.

Should further works be required in terms of 'headwall works in the SSSI' where would the maintenance responsibility lie.

### **Summary comment**

**The Community Council has serious concerns that maintaining aspects of the site 'in perpetuity' through the noted management options, will not be sufficient. The dependence of drainage on the site on such maintenance does not meet the 'statutory SuDS Standards to provide a framework in the form of principles and standards, together with guidance for ensuring good quality SuDS on new developments which will stand the test of time'<sup>13</sup>.**

## 15. General

### SAC and SSSI

The Council is aware of the proximity of the SAC and SSSI and understands that the applicant will adhere to all environmental policies to safeguard the same, including any materials introduced to the site.

### Wall instability – Pilot Street

Appendix E shows excerpts from Minutes of [St Dogmaels Community Council] Highways Committee meeting 13.2.19 – Temporary Closure of Pilot Street for Works.

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<sup>13</sup> <https://www.pembrokeshire.gov.uk/planning-contacts/sustainable-drainage-approving-body-sab>

Western Power was to replace existing cabling in Pilot Street. It was found, following surveys that the retaining wall to the West of Pilot Street was unstable and therefore Western Power would not undertake works adjacent to it.

PCC was involved in surveying and monitoring the wall during Western Power works on the opposite side of Pilot Street.

**Given this evidence of instability the Community Council has significant concerns that the increase in heavy site traffic (albeit accessing from the South end of Pilot Street) and works onsite could further destabilise the wall.**

Western Power also noted the springs in the area, which is a feature of the land in an around Pilot Street, including the development site.

**The Community Council does not consider the applicants comments re current hydrology and drainage on the site to reflect the seasonal nature of some of the springs and streams and therefore the Council again stresses its concern with regard to the proposed drainage proposals.**

*Noise*

**Summary comment**

**That should permission be given Pembrokeshire County Council undertake background noise level readings in Pilot Street before construction starts. Should there then be complaints of noise nuisance there would be something in place to compare noise levels and help determine whether there is a need for action.**

## **16. Conclusions**

**St Dogmaels Community Council objects to planning application 22/1051/PA on the basis of the information provided in this document.**

**St Dogmaels Community Council requests that prior to any decision being taken, should the application be referred to the Planning Committee, that Committee members undertake a site visit. The Community Council requests that such a site visit encompass (though not exclusively) the length of Pilot Street and High Street and Footpath PP87/28, the Graig.**

## **Appendix A**

### **Housing St Dogmaels**

Housing in St Dogmaels is made up of Victorian terraced, semi and detached housing with most of the detached houses being of newer construction on the edges of the village, with the exception of a few farm houses.

Taken from Right move website:

Properties in St. Dogmaels had an overall average price of £252,000 over the last year.

The average selling price in Pembrokeshire is £268,515.00 so St Dogmaels is priced towards the top end of the market for Pembrokeshire due to its river and seaside location.

#### **Average prices in St Dogmaels**

Detached properties: average price of £308,500.

Semi-detached properties: average price £238,167.

Terraced properties: average price of £191,750

Average sale time, for North Pembrokeshire and South Ceredigion, from posting to acceptance of offer is approximately 16 weeks

**At present there are 18 properties** on the market in St Dogmaels.

#### **There are:**

2 x 1-bedroom flats

2 x 2-bedroom houses

**7 x 3-bedroom properties priced from £200,00.00 to £525,00.00**

**6 x 4-bedroom properties priced from £250,00.00 to £450,00.00**

1 x 7-bedroom property priced at £575,00.00

#### Period on housing market

1 x 4 bed 2 years

1 x 4 bed 1 year

2 x 4 bed 8 months

1 x 4 bed 6 months

1 x 7 bed 18 months

1 x 3 bed 13 months

1 x 3 bed 6 months

The average price of a 4-bedroom detached property in the village (as of 9/04/2023) is £407,00.00

it should be noted that several of the larger properties (8) have had their prices reduced from the original sale price suggesting that the demand for properties of this size is limited.

## **Appendix B**

### **Snapshot of local labour market**

From internet searches on 11/4/23

Covering

Cardigan

New Quay

Aberporth

Tanygroes

And surrounding area

Found 76 local jobs

11 are unpaid voluntary jobs

9 are paid over £30,000/ year (Full Time)

56 are paid under £30,000.

Of which;

17 are part time at less than £12/ hour

39 full time with a **maximum** annual salary of £22,000\*

\* Some are advertised as full time but then state hours as less than the standard 36 hour week and thus may not be full time. Many of these are advertised as salary of between £9 to £12/hour

4 state that the applicant must have a car as employment criteria, but as others are caring roles this would likely be the case also.

Of the paid jobs

20 are in Hospitality

15 are in Retail

9 are care or support work

22 range from office, veterinary, labouring, warehouse to healthcare (specialist role)

For information the Mortgage loan rate against income is set at 4.5 X Salary (maximum)



## **Appendix C**

### **Public Transport**

The village is served by the 408 bus service connecting the village to Cardigan. The Poppit Rocket service has been withdrawn.

There are only 6 buses a day (not hourly) which serve the Cardigan Integrated Health Centre (CIHC).

It has been estimated that in order to reach significant centres for employment and hospitals serving the area (including major A&E departments, notwithstanding the Minor Injuries Unit at the CIHC, for which there are 6 buses daily) one way journey times are (not inclusive of waits for service connections)

Aberystwyth (Bronglais hospital) + 1.25 to 2.25 hours from Cardigan

Carmarthen (Glangwili Hospital) + 1.75 hours

Haverfordwest (Withybush Hospital, currently 3 services a day) + 1.25 hours

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 to full-time work and impacts the ability of residents to attend appointments and socialise, other than within the village.

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

## **Appendix D**

### **Sewage outages – Water Street, St Dogmaels**

Flooding and Sewage Outages Water Street St Dogmaels 2020 -2023

Water Street and B4546

August 2020

16<sup>th</sup> August **Sewage outage**

17<sup>th</sup> August **Sewage outage**

18<sup>th</sup> August **Sewage outage**

28<sup>th</sup> August **Sewage outage**

October 2020

3<sup>rd</sup> October **Sewage outage**

7<sup>th</sup> October **Sewage outage**

25<sup>th</sup> October **Sewage outage and Flooding across B4546**

29<sup>th</sup> October **Sewage outage**

30<sup>th</sup> October **Sewage outage**

Dec 2020

15<sup>th</sup> December **Sewage outage and Flooding across B4546**

17<sup>th</sup> December **Sewage outage**

Jan 2021

19<sup>th</sup> January **Sewage outage and Flooding across B4546**

20<sup>th</sup> January **Sewage outage**

21<sup>st</sup> January **Sewage outage**

-

Feb 2021

19<sup>th</sup> February **Sewage outage and Flooding across B4546**

20<sup>th</sup> February **Sewage outage and Flooding across B4546**

21<sup>st</sup> February **Sewage outage and Flooding across B4546**

22<sup>nd</sup> February **Sewage outage and Flooding across B4546**

23<sup>rd</sup> February **Sewage outage and Flooding across B4546**

2023

**23<sup>rd</sup> March Sewage outage**

'Overpumping'

Dwr Cymru's response to FOI:

*'The sewerage flow from St Dogmaels is pumped over to Cardigan WwTW (?Welsh Water Treatment Works) for full biological treatment and disinfection prior to continuous discharge into the Teifi.*

*There are however 4 CSO's (Combined Storm Overflows) located in St Dogmaels which do discharge into the Teifi intermittently during storm events<sup>14</sup> and operate in order to protect the sewerage network and properties from flooding.*

*Please find attached the CSO discharge figures for the four CSO assets located in St Dogmaels and the discharge numbers and duration (hours) for 2020 – 2021 are provided in the Spill Figures tab.*

*The volume of storm discharges from these and all of our CSO's across our operating area in Wales is not recorded, therefore cannot be provided as our regulator only requires us to record each storm event and its duration.*

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<sup>14</sup> For reference this would be equivalent to 'storm events' every 1 in 7.16 days (2022) at the Moorings end of St Dogmaels

We have also attached the total daily volumes (TDV) of treated effluent that is discharged from our wastewater treatment facility in Cardigan'

EDM Data St Dogmaels.xlsx [Protected View] - Microsoft Excel non-commercial use

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	B	C	D	E	F	G
			2020		2021	
			Spills No	Duration (h)	Spills No	Duration (h)
St Dogmaels Main Ps	BH0074507		32	220.75	15	139
St. Dogmaels SPS No.2 CSO	BP0318101		115	2050.75	79	1518.5
St Dogmaels, Rear Of Ph, Maeshyryd CSO	BH0074508		90	949.75	45	565.25
St Dogmaels CSO	BH0074511		3	0.75	2	0.5

2022	
Spills No	Duration (h)
0	0
85	1226
18	49
2	5

(St Dogmaels SPS No 2 CSO is the Combined Sewer Outflow to the North of the Moorings Slipway)

### **Combined Sewer Outflow discharge figures presented as days per year instead of hours**

St Dogmaels SPS No 2 Combined Sewer Outflow (to the North of the Moorings Slipway)

- 2020:** 2050.75 hours discharging untreated effluent into the Teifi  
**Equivalent to non-stop 85.45 days i.e. almost 3 months i.e. 1 in every 4.27 days**
- 2021:** 1518 hours discharging untreated effluent into the Teifi  
**Equivalent to non-stop 63.25 days i.e 2 months i.e. 1 in 6 days**
- 2022:** 1226 hours discharging untreated effluent into the Teifi  
**equivalent non-stop 51.08 days i.e 2 months i.e. 1 in 7.16 days**

St Dogmaels, Rear of Public House Maeshyryd, Combined Sewer Outflow

- 2020:** 949.75 hours discharging untreated effluent into the Teifi  
**equivalent non-stop 39.57 days i.e. 5.65 weeks i.e. 1 in every 9.22 days**
- 2021:** 565.25 hours discharging untreated effluent into the Teifi  
**equivalent non-stop 23.55 days i.e. 1 in 15.5 days**
- 2022:** 49 hours discharging untreated effluent into the Teifi  
**equivalent non-stop 2.04 days a year**

St Dogmaels Main Pumping Station

- 2020:** 220.75 hours discharging untreated effluent into the Teifi  
**equivalent non-stop 9.19 days a year**
- 2021:** 139 hours discharging untreated effluent into the Teifi  
**equivalent non-stop 5.79 days a year**
- 2022:** 5 hours discharging untreated effluent into the Teifi

## Appendix E

### Excerpt from Minutes of {St Dogmaels Community Council} Highways Committee meeting 13.2.19 – Temporary Closure of Pilot Street for Works

Present: *Chairman: Cllr E Rees. Cllrs J Hutchings, G Wislocka, P Hutchings*  
*Clerk*

For Western Power (WP): Mr Paul Jones and Mr Jeremy Thompson

#### Background to works

Issue in Pilot Street is replacement of poles adjacent the retaining wall.

Western Power undertook a structural survey early in 2018 which confirmed that works could not take place adjacent the wall.

Involving Pembs CC and CC M James in early 2018 it was agreed that power lines and BT services should be run underground on the opposite side of the road to the wall (one location only wiring to run up wall – wall stable at this location).’

#### General

WP is aware that the area has springs rising in it and will take this into account during the works and reinstatement.

Pembs CC will install monitoring equipment, during the works, to monitor the stability of the retaining walls. This will follow a structure survey by PCC team prior to start of works.’

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<sup>15</sup> <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en>

<https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/sites-of-special-scientific-interest-responsibilities-of-owners-and-occupiers/?lang=en>

<sup>16</sup> with 2022 data from Top of the Poops | Waterway | River Teifi (top-of-the-poops.org)