

**Emma Evans**

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**From:** Sue Davies - Clerk St Dogmaels Community Council  
[REDACTED]  
**Sent:** 10 December 2024 12:30  
**To:** LDP - For Enquiries  
**Cc:** [REDACTED]  
**Subject:** Local Development Plan Review  
**Attachments:** Annex A Surface and Groundwater Issues.pdf; Annex B Flooding and Sewage Issues.pdf; Response to Local Development Plan 2 - Candidates Sites' Register - St Dogmaels Community Council updated 10-12-24 Final.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** D Rep

EXTERNAL EMAIL – Exercise care with links and attachments E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.

Please find attached St Dogmaels Community Council's comments/observations and supporting information on the Local Development Plan Review.

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Sue Davies, Cert Ed, PSLCC

Clerk to St Dogmaels Community Council  
[REDACTED]

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Dim ond y sawl y mae'r ddogfen hon wedi'i chyfeirio atynt ddylai ei darllen, a'i defnyddio ganddynt ar gyfer ei dibenion bwriadedig; ac ni ddylid fel arall ei hatgynhyrchu, copio, lledaenu, datgelu, addasu, dosbarthu, cyhoeddi na'i rhoi ar waith chwaith. Os ydych chi wedi derbyn yr e-bost hwn trwy gamgymeriad, byddwch cystal a rhoi gwybod i ni ar unwaith trwy ffonio 07493087151 a'i ddileu oddi ar eich cyfrifiadur ar unwaith.

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## **Response to Local Development Plan 2 - Candidates Sites' Register - St Dogmaels Community Council**

**Site proposal 209**, Land at Western Solar, Croft, Ti yn Western Sola.

St Dogmaels Community Council supports the inclusion of this site for housing for factory workers. The Community Council is well aware of the eco credentials of the company which it has incorporated in its' previous builds resulting in low impact homes built to a high standard at an affordable build cost. The Community Council would welcome such an initiative in its' ward.

### **Site 480 Talar Aur Croft Housing**

St Dogmaels Community Council supports the 'red' recommendation for this site.

### **Site 521 Opposite Dwyllan, Boat Park**

St Dogmaels Community Council recognises this as a sensitive site, outside the current boundary.

Any development there could impact the adjacent SSSI and River Teifi SAC.

It would also visually impact the approach to the village as a key site beside the B4546.

The Community Council notes that no use has currently been suggested and requests that any future development which might be proposed on this site be sympathetic to the locations and to the fact that it is outside the boundary.

### **The Community Council strongly objects to candidate site proposals:**

129 Adjacent to Dovepoint Fach

173 North of Bryncoed

205 Land at Cefn Farm, Longdown Bank

264 East of Y Glandy, Mwtshwr Lane

265 East of Y Glandy, Mwtshwr Lane

The above sites all have very poor access across largely single track road / track. The highways in the adjacent built up areas of the village could not support the additional traffic which would be generated if the sites were to be developed. There is little or no opportunity for developers to address the problems given the topography and current housing on the approaches.

In addition footpath 87/25c runs along the current access to sites 264 and 265 and the Council would require that the footpath be kept open and safe for use at all times should any development take place.

### **FURTHER:**

The Council has submitted a number of files (including photographic showing flooding, water runoff and the impact of such events that St Dogmaels Community Councils asks are examined as evidence that sites

129 Adjacent to Dovepoint Fach

173 North of Bryncoed

205 Land at Cefn Farm, Longdown Bank

264 East of Y Glandy, Mwtshwr Lane

265 East of Y Glandy, Mwtshwr Lane

Are and will remain unsuitable for development.

St Dogmaels Community Council also refers to Annex A and Annex B in support of its objections.

Should there be any opportunity for verbal evidence to be given as to any of the above, at any time in the LDP2 process the Community Council would be happy to arrange for this to be provided. The Council is also happy to provide accompanied site visits should the opportunity arise.

Sue Davies

St Dogmaels Community Council PO Box 103 Llandysul SA44 9BH



**Surface and Groundwater Issues specific to Candidate Sites 205, 264, and 265 with reference to investigation information supplied as part of Planning Application 23/1100/PA, Arwel y Mor.**

*23/1100/PA is under consideration as at November 2024. Said application site is located below candidate site 205 and uphill from sites 264 and 265. Local knowledge indicates that ground and drainage conditions, identified in application 23/1100/PA must be considered to be the same or very similar to the candidate sites.*

*Compiled from original materials kindly provided by Mr. and Mrs. A. Wislocki*

**Briscwm Stream Catchment Area – review of the current application and its implications. Similar conditions and requirements would apply to candidate sites 205, 264, 265**

**Drainage Concerns**

**1. Proposed Drainage Strategy:**

- The developer for application 23/1100/PA has stated that infiltration is not viable for this development due to site conditions. Instead, surface water from privately owned permeable areas and PCC (Pembrokeshire County Council) adoptable highway structures will be captured and redirected into Dwr Cymru-adoptable basins and attenuation tanks.

**2. Potential Impacts:**

- Once the proposed system reaches capacity or becomes silted, it risks increasing and accelerating surface water flows into the drainage system feeding the Briscwm Stream.

**3. Existing Infrastructure Challenges:**

- The Briscwm Stream is culverted beneath the B4546 road and a garage forecourt using an ancient cobble-based, slate-lined structure. Despite periodic clearance, the culvert is unable to manage surcharged flows, leading to backup and flooding in adjacent gardens and onto the B4546 near the SsangYong garage.



**4. Historical Flooding Issues:**

- Previous developments, at Awel y Mor, have exacerbated flooding. Significant flooding occurred in 2012 and 2016, affecting Mwtshwr properties and the road.



- In response, PCC installed an “off-site culvert connection” on Mwtshwr in 2016 to divert water into the Briscwm Stream. However, surcharged conditions from the proposed development may aggravate flooding upstream of the B4546 culvert and at the SsangYong garage.



Mwtshwr road flooded

Flooding of Mwtshwr prior to the installation of culvert connection to divert the existing housing on the developed part of the Awel y Mor site towards the Briscwm stream

Awel y Mor Culvert Outlet adjacent Mwtshwr



##### 5. Recent Flooding Events:

Similar flooding conditions were observed at this site as recently as November 2024.

##### 6. Downstream Impact:

The Mwtshwr culvert has redirected surface water to the Briscwm Stream, worsening downstream flooding across the B4546 and affecting properties in St. Dogmaels, such as 1 Water Street and 1 Brooklyn Villas, which have installed floodgates.



Flooding of culvert under the B4546 road into St Dogmaels has occurred even after excavation of the culvert outflow to the Teifi and clearing of all debris affecting the culvert under the B4546 and showroom forecourt

Flooding of residential gardens in David St and the B4546. Residents' concerns are that the inclusion and development of candidate sites 264, 265 and 205 will increase the incidence and severity of flooding



Gardens flooded to back of David Street



View from 1 Brooklyn Villas kitchen on B4546



Gardens flooded by Briscwm stream at back of David St, losing 15 of garden

## Concerns About the Proposed Sites based on information from application 23/1100/PA

### 7. Drainage Feasibility:

- A site investigation in March 2023 at the site of proposed 23/1100/PA development revealed that infiltration is not feasible, and water must be directed to nearby watercourses at a Greenfield runoff rate. The assumption of 95% absorption and 5% runoff raises concerns about the system's capacity during extreme weather events.



**8. Climate Change and Surcharge Risks:**

- Surcharge conditions, exacerbated by climate change, make it difficult to accurately calculate inflow rates, basin and tank capacities, or the behaviour of ground and surface water.

**9. Existing Issues with Adjacent Sites:**

- Current culverts occasionally fail to manage water from Awel y Mor, with videos showing surface water bypassing the culvert and flowing onto adjacent land.

Rain run-off from site above Mwtshwr  
onto Maesmynach



St Dogmaels Community Council  
supports the information that  
infiltration is no viable with local glacial  
clay. The adjacent photo is taken from  
Meini'r Abad showing how rain above  
the 23/1100/PA development site  
streams over the clay soil, almost  
unchecked to the Briscwm stream



**10. Increased Impermeability:**

- Development on candidate sites will increase impermeable surfaces and event where permeable surfaces are mooted, these often silt up, highlight the risk of reduced effectiveness over time.

**11. Flooding Risks to Properties:**

- Downstream properties along the Briscwm Stream and B4546 face significant flooding risks, as evidenced by the included photos.

**12. Geological Complexity:**

- The area's geology—characterized by sand lenses, clay layers, and a high-water table—complicates drainage solutions. Past excavations revealed pressurized groundwater in sand layers that caused water to rise like a fountain and destabilized foundation work.

**Infrastructure and Capacity Challenges**

**13. Briscwm Stream Catchment Area Constraints – see diagrams 1 and 2**

- The infrastructure includes:
- A 200-year-old culvert under the B4546 with limited capacity, which frequently causes flooding during heavy rain, especially during high tides or north winds. (Refer to Photos 7 and 8.)
- Limited drainage infrastructure on Mwtshwr, which directs surface water to the Briscwm Stream but is unable to manage high volumes effectively.
- The Briscwm Stream itself, which lacks the capacity to handle heavy rainfall, resulting in flooding of gardens and homes.



#### 14. Impacts of Recent Culvert Installations:

- The additional culvert link between Mwtshwr and the Briscwm Stream has increased flow during heavy rains, displacing sleeper bridges and flooding footpaths and back gardens.

Diagram 1

Off-site culvert connection - Mwtshwr

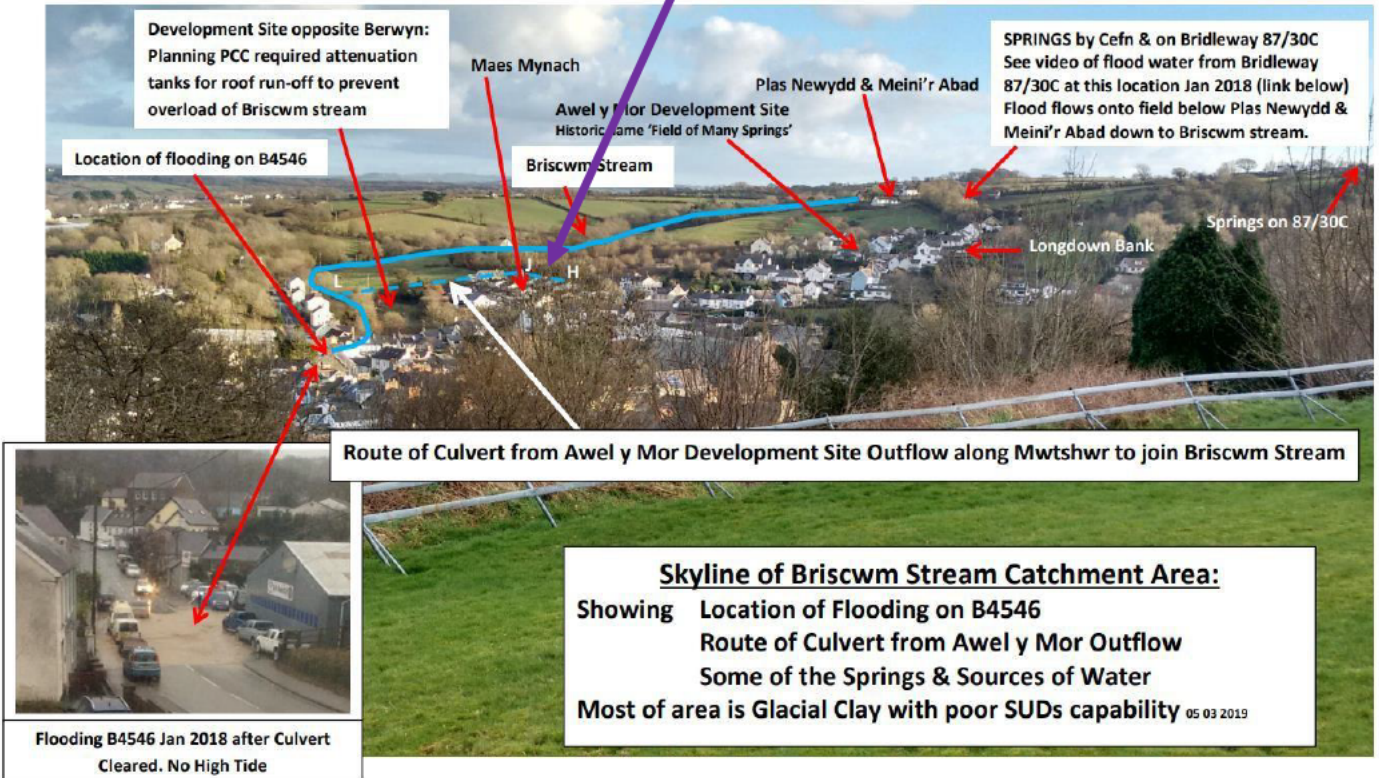
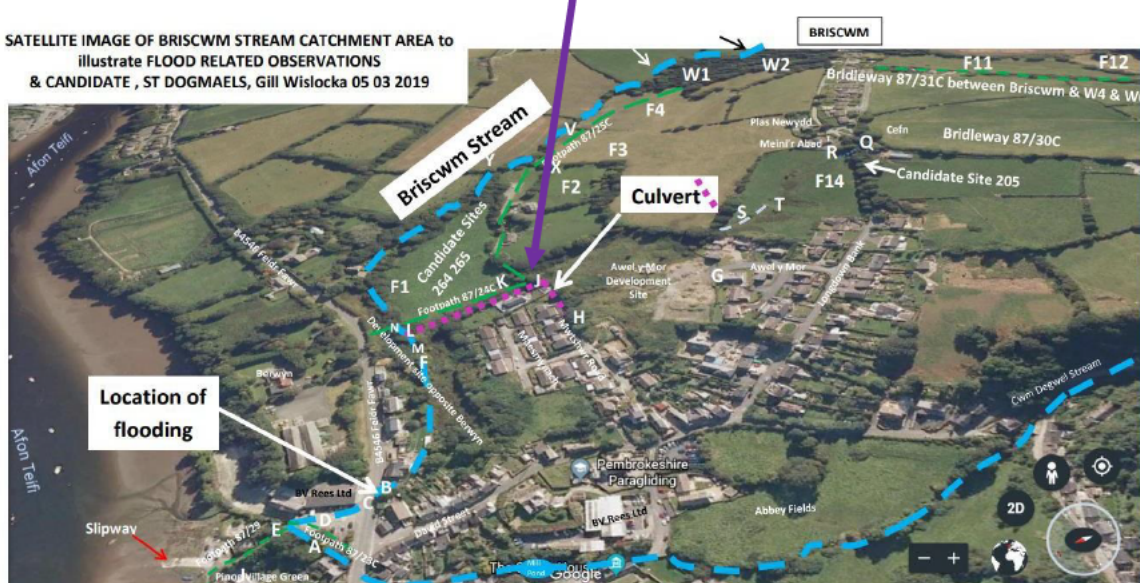


Diagram 2

Off-site culvert connection -

SATELLITE IMAGE OF BRISCWM STREAM CATCHMENT AREA to illustrate FLOOD RELATED OBSERVATIONS & CANDIDATE, ST DOGMAELS, Gill Wislocka 05 03 2019



## **Additional Geological and Hydrological Concerns**

### **15. Local Hydrology:**

- The Welsh name of the area translates to "field of many springs," reflecting the abundance of groundwater sources.

### **16. Past Development Issues:**

- Excavation at Awel y Mor revealed layers of sand and clay with highly pressurized groundwater, requiring substantial engineering solutions to stabilize structures.

### **17. Future Development Challenges:**

- Springs may shift, impacting neighbouring properties. Runoff from proposed sites must be managed to prevent further degradation of roads like Maesmynach and avoid flooding steep garden banks.

### **18. Increasing Climate Risk:**

- With climate change, extreme weather events and surcharged drainage conditions are expected to become more frequent, raising concerns about infrastructure resilience.

## **Conclusion**

The proposal of any future developments on candidate sites 205, 264, and 265 must comprehensively address the hydrological and geological complexities of the area.

The significant risks to downstream properties, coupled with the limitations of existing infrastructure, necessitate rigorous evaluation and robust engineering solutions to mitigate flooding and environmental impacts.

Given the weight of local knowledge and evidence St Dogmaels Community Council **does not support** the inclusion of candidate sites 205, 264 and 265 in the LDPII



**Appendix B – records of flooding of B4546 and Water Street 1953 to 2019**

1953-83	1984-93	1994-12	2013	2014	2015	2016	2017	2018	2019
0-2paHS	0-2paHS	0-2paHS	August work starts on site opposite Berwyn	14/10/2014	10/01/2015	05/01/2016	03/01/2017	02/01/2018	
				07/11/2014	14/01/2015	07/01/2016	04/01/2017	05/01/2018	
					March foundation for the 2 houses adjacent B4546 started	09/01/2016	05/01/2017	09/01/2018	
						10/01/2016	22/01/2017	15/01/2018	
						11/01/2016	26/01/2017	16/01/2018	
						12/01/2016	02/02/2017	17/01/2018	
						13/01/2016	03/02/2017	21/01/2018	
						15/01/2016	04/02/2017	26/01/2018	
			15/12/2013			16/01/2016	21/02/2017	27/01/2018	
			16/12/2013			17/01/2016	01/03/2017	28/01/2018	
					?? When work started on lower plots?	18/01/2016	15/03/2017	29/01/2018	
						21/01/2016	17/03/2017	30/01/2018	
						22/01/2016	22/03/2017	16/02/2018	
						23/01/2016	14/04/2017	17/02/2018	
						24/01/2016	15/04/2017	18/02/2018	
						25/01/2016	17/04/2017	20/09/2018	
Exceptional	0-2paHS					26/01/2016	18/04/2017	18/12/2018	
High Tide	Flood				30/11/2015	27/01/2016	26/05/2017		
	Max 2pa				03/12/2015	28/01/2016	02/06/2017		
	at High				04/12/2015	29/01/2016	30/06/2017		
	Springs				06/12/2015	09/02/2016	01/07/2017		
					12/12/2015	10/02/2016	02/07/2017		
					24/12/2015	19/02/2016	15/09/2017		
					27/12/2015	01/03/2016	16/09/2017		
					28/12/2015	30/03/2016	18/09/2017		
					29/12/2015	31/03/2016	30/09/2017		
					30/12/2015	Awel y Mor Culverted	08/10/2017		
					31/12/2015		09/10/2017		
						05/04/2016	10/10/2017		
						21/04/2016	11/10/2017		
						26/07/2016	02/11/2017		
						23/08/2016	03/11/2017		
						01/09/2016	04/11/2017		
						02/09/2016	16/11/2017		
						05/09/2016	17/11/2017		
						28/09/2016	21/11/2017		
						03/10/2016	22/11/2017		
						17/10/2016	23/11/2017		
						18/10/2016	28/11/2017		
						19/10/2016	29/11/2017		
						20/10/2016	Culvert cleared		
						21/10/2016	09/12/2017		

						24/11/2016	10/12/2017		
						09/12/2016	15/12/2017		
						23/12/2016	16/12/2017		
						29/12/2016	17/12/2017		
							21/12/2017		
							22/12/2017		
							28/12/2017		
0-2	0-2	0-2	Two	Two	Thirteen	Forty-five	Forty-nine	Sixteen	

## Appendix D – Briscwm Stream Catchment Area

### Sewage

St Dogmaels Community Council welcomes Dwr Cymru's restriction on connection to mains foul service until such time as works on Cardigan Sewage works is completed.

It is hoped that the completion of such works will relieve the pressure on the infrastructure in St Dogmaels in such a way as to significantly reduced over pumping and spillage of raw sewage from foul mains in the village.

It offers the following information to illustrate its concerns that works in Cardigan may not directly alleviate the issues with the sewage infrastructure within St Dogmaels, which is ageing and was not designed to accommodate any significant development.

#### 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'

*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.*

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.

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

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

Collated: Gill Wislocka 05 02 2022<sup>2</sup> Updated

2 <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>