Comments from Emma Giffard

Comments regarding the Westbury Sub Mendip Roughmoor Lane development proposals:

I am not opposed to development in principle on the proposed site. However, there are some significant gaps in the available information that cause concern, as well as some concerns with the proposal itself.

1.)    The local plan states a minimum of 40 dwellings on the site. The proposal is for 60 dwellings, which is a very significant 50% increase on this threshold. The density is too high for this rural village setting, in particular with regard to there being adequate space for gardens, parking, community green space, habitat and SuDS features. 40 dwellings would be an appropriate number for the size of the site and the capacity of the local facilities.

2.)    I am particularly concerned about the Sustainable Drainage System (SuDS) scheme for the site. Best practice is for surface water to be dealt with on site, but this plan uses an off-site attenuation pond presumably to maximise the number of houses on the development site. This is not best practice. With no water channel leading to the attenuation pond on the plan, presumably there is an intention to use buried infrastructure such as attenuation tanks. This is a method that should only be used as a last resort, for example in city settings with no space. Good SuDS schemes daylight features wherever possible, rather than using culverts or tanks.

It makes financial sense for the Church Commissioners to incorporate a high quality SuDS scheme into the site – however this does not look to me to be a high quality SuDS scheme. Typically, developments with well designed SuDS schemes are more saleable and can attract a higher premium. Maintenance and capital costs are lower with SuDS than with traditional drainage. There are significant health and wellbeing benefits, but these are lost when the SuDS are relegated to a single poorly designed off site pond.

In short, the SuDS scheme in this proposal looks like an afterthought. SuDS need to be properly integrated into a development site. They are a wonderful part of a development when done well – increasing amenity and biodiversity value, reducing pollution as well as reducing flood risk. Many of these benefits will be lost if the SuDS scheme goes ahead as proposed.

There is no sign of the varied SuDS interventions that a good scheme might include – naturalised swales, green roofs, tree pits, rain gardens or on-site wetland areas. Will there be permeable paving, and if so, will this be linked to underground attenuation? What will be the maintenance arrangements for the SuDS on site?

Although the site is in flood risk zone 1, the environment agency flood risk maps show surface water flow paths that cause real concern – surface water flooding is incredibly difficult to accurately predict or model. We have recently seen devastating impacts of surface water flooding in communities such as Chard, where recent developments have been impacted by flooding. These residents are not covered by the Flood Re insurance scheme because they are new build homes, and now struggle to get insurance. Poorly designed SuDS and having too high a density of dwellings on a site are some of the biggest risk factors for surface water flooding on new developments, both of which are of a concern here. If these issues are not addressed, it will have the potential to create real problems for the residents of these new properties.

3.)    Housing of 2.5 stories is not in keeping with the rest of the village or with the rural setting – dwellings should be a maximum of 2 stories, with a variety of dwelling sizes.

4.)    There needs to be a proper road crossing on the A371 – this is absolutely crucial. As a parent with young children, it feels as though we take our lives in our hands every time we cross from one part of the village to the other. With community facilities such as the park, church and potentially the village hall, on one side of the main road, and facilities including the shop, school and pub on the other, it is inevitable that village residents have to frequently cross the road. There is NO properly safe way of doing this, especially for children. A solution to this for pedestrians absolutely must be found, with a proper crossing point.

I am closely involved with the school as a Governor, and I know the school would welcome families to the village – however it is currently very challenging for the school to use facilities such as the park or church, because of the road. It requires a squadron of teachers to ensure safe crossing, which is only feasible on days when the whole school is invested in sports day or a church event. A safe crossing would benefit the school as well as the wider village.

5.)    There is no mention in the current plans about the future sustainability of the houses in this development. I appreciate that this is outline planning, and that more detail would be forthcoming at the full planning stage. However, there is no suggestion that this has been considered. The UK Climate Change Committee has stated that the houses that we are building in this country are unfit for the future. There needs to be adequate provision for heat resilience – we have locked in future problems in hundreds of thousands of recently constructed homes that will require costly retrofitting. Water reuse, rainwater harvesting, electric car charging points and solar power all need to feature strongly with every single dwelling on site. Many of the SuDS features if there was a good design would help in this regard - for example, green roofs not only reduce flood risk but they also help with heat resilience.

6.)    Active travel – I am pleased to hear that a future connection to the Strawberry line is being protected. The bus stop must be designed and located well to ensure ease of use – and this also ties into the crucial need for a safe crossing, so that residents feel confident about using bus routes in both directions. Because of the pinch point on the A371 to the North West of the proposed development, traffic often backs up while waiting for traffic coming the other way. The bus stop needs to consider this and be appropriately located.

7.)    Biodiversity net gain – it feels that adequate space to deliver habitat and biodiversity outcomes has been sacrificed in order to fit in more dwellings. We are in an area with a very high proportion of ash trees, most of which are being lost to ash dieback. So the provision of tree planting of native species is crucial. We have a population of swifts and bats in the village which need to be properly supported with swift boxes and bat friendly habitat. Biodiversity net gain must be a real ambition of the plans, not just lip service to the principle.

8.)    Dark skies – this is a dark skies village and there should be no streetlights in the development.

9.)    Community facility – if this is to be a village hall, it would make much more sense for this to be built with significant parking in the area of dilapidated farm buildings which I believe is also under the ownership of the Church Commissioners. The church, shop, school and pub could then also both benefit from the additional parking that would be provided in this more central location. There is currently nowhere near adequate parking in the village, and when there is an event such as a school play or a church service such as a funeral, this causes problems.