**Introduction**

The following comments are based on the schematic design proposals for development of the Land South of Roughmoor Lane, owned by the Church Commissioners, which have been prepared by their agents Lichfields of Bristol for public consultation between 12 January and 26 January 2022 and a virtual Zoom presentation on 20 January.

**Proposals tested against Mendip Planning Policy**

**Number of Homes**

The Agents proposals are described as including:

* *“Up to 60 new homes, comprising a mix of predominantly of 2 storey houses, of which 30% are to be affordable homes.”*

This has been roundly challenged by local residents at the online Zoom consultation and in the many written comment submissions. Justifiably so, as it contradicts the current Mendip Local Plan documents. Part II of the Local Plan (2006 – 2029): Sites and Policies, adopted in 20 December 2021, specifically states for the “Land South of Roughmoor Lane” in section WM1 that:

* *WM1/1. “A minimum of 40 dwellings including affordable housing consistent with relevant policy”*

The specific reference to 40 dwellings was agreed as a modification to the original Plan, which was submitted for examination by the Planning Inspector in January 2019. This modified Local Plan proposes that larger developments of new housing should be centred on market towns, such as Wells, with smaller developments in the 16 Primary Villages, such as Westbury-sub-Mendip, being a rural village with a good range of community facilities.

New housing allocations were based on proportionate growth of not more than 15% over the existing stock during the Local Plan duration in order to avoid imposing “levels of development on Villages that would be out of scale”. The original Local Plan allocation of new housing requirement for WsM was for 50 dwellings, but between 1/4/2006 and 31/3/2013, 10 new completions or consents had been granted and so the housing requirement for the WM1 site was reduced to 40 dwellings. Hence the comment in WM1 that: “The site could provide for the residual housing requirement in the village.” The change from “up to 40 dwellings” to “not less than 40 dwellings” was initiated by the Planning Inspector in September 2021 to ensure that the WsM new housing allocation, under Mendip’s 2012 Housing Distribution targets, were delivered on the WM1 site by 2029.

**Housing Density**

The designated site area for WM1 is approximately 2.33 ha. but extracting the community area, bat corridor, diversion of the Roughmoor lane access to Stoke Road and sewage treatment areas reduces the development area to 1.82 ha. The proposed development of 60 dwellings in 1.82 ha. gives a medium housing density of 33 homes/ha, which is more suited to a suburban site than a rural village. For comparison with the existing Stoneleigh estate, which has a site area of approximately 1.97 ha and 54 dwellings, the housing density is 27.4 homes/ ha. This is distinctly different character from the rest of the existing houses in WsM where the overwhelming majority are 2-storey detached with larger gardens and a housing density of less than 2 dwellings/ ha. The proposed housing density has created a congested layout with street parking and, again in comparison as evident in the Stoneleigh estate with a smaller density, obstructs access for utility and emergency vehicles.

**Type and Style of Housing**

The policies set out in WM1 continue with the requirement that new housing development should:

* *WM1/2 “Have particular regard to site layout, building height and soft landscaping to minimise the visual impact of the development in this rural location.*

Although the proposed 30% of affordable dwellings accords with Mendip policy there is no indication as to the type of “affordable” and whether there will be any priority allocation as first homes for young local people. Storey height should be limited to two storeys, however the proposed development suggests that many of the homes will be 2.5 storeys high, with habitable rooms in the roof space. There are no single storey homes which would be appropriate for mobility impaired residents or local elderly residents who might wish to down size and thus free up family size buildings in the village.

Again, by comparison, of the 54 dwellings in the Stoneleigh estate, 30 are in terraces 8 are semi-detached; and the rest are 2-storey with one loft conversion.

The visual impact of the site, especially for residents along Roughmoor Lane, would be mollified by aligning a terrace of single storey dwellings to the south and parallel to the Lane. These dwellings would be well-orientated to benefit from solar gain and roof-mounted solar panels to provide low-cost, low energy starter homes.

* *WM1/3. “New development should reflect the local materials and style.”*

The site adjoins the AONB and the village conservation area, where traditional materials feature local stone or rendered walls and clay Double Roman roofing tiles in a variety of building styles. This should be reflected in the form and style of this development. It is essential this is a pre-requisite of any outline approval to ensure compliance with Planning policy, including Local Plan Part I: Strategy & Policies – DP4 Mendip’s Landscapes – “location and form do not compromise the setting of the designated area.”

**Impact on neighbourhood**

* *WM1/4. “The site should be designed to safeguard the amenity of neighbouring residential properties.”*

The narrow Roughmoor Lane, often only 3m wide in places, is already well used by large agricultural machinery accessing local farms and contractor base. The proposed development will increase the use of the Robert Glanville Playing Fields and will require improved footpath and cycle access along the lane.

* *WM1/5. “Opportunities should be taken to maintain or enhance biodiversity and particular consideration will be needed of the impact on designated sites. 0.13 ha of accessible bat habitat should be provided.”*

**Biodiversity Impact**

Roughmoor Lane provides a Bat foraging corridor and sustains a significant Glow-worm presence, which has been well-documented over the last 6 years or more. Our village ecology expert suggests the proposed corridor will need to be at least 12m wide.

There is a suggestion of tree planting, which should be agreed in consultation with the WsM Tree Group to ensure an appropriate selection of native species to encourage biodiversity.

.

Within the Westbury community, there is a strong community engagement and expertise within the various Village interest groups, including the Westbury Society, Wildlife and Tree groups. Their concerns and suggestions deserve particular attention and consideration, given the strength of comments submitted at short notice in response to the inadequate and hastily compiled information provided for the public consultation on 20 January 2022. The bat corridor provision and other biodiversity proposals presented to date are clearly inadequate for this site.

**Safety Concerns**

* *WM1/6. Further investigation will be required of traffic impacts and a safe access onto the A371 will be required. Safe pedestrian links should be provided to enable access on foot to the village core.*

The Y-junction of Roughmoor Lane and Stoke Road with restricted sight lines and pinch-point in the road width is already a traffic hazard and cause of congestion queues. Development on this scale will generate a substantial increase in both vehicle movements and pedestrians crossing the A 371. The proposed changes with a zig-zag configuration and loss of the pull-in and parking spaces at Mortar Pitts is not an acceptable improvement. Yet more people will be located to the south of the A371 while the shop, pub, school and village hall are on north side of the A371. This proposal does not address the local plan requirement that “*Safe pedestrian links should be provided to enable access on foot to the village core.”*

Existing footpaths across the site appear to have been ignored and routes through the development seem neither clear nor continuous.

* *WM1/7. The impact on nearby listed buildings and the Conservation Area will need to be carefully considered*.

There is no evidence of anything more than a token consideration of this in the current proposal. To the north-east of the site, there is a 3.5ha area of brown-field land with semi-derelict farm buildings, which lie directly between the development site and the three grade II listed buildings of the church and Court House Farm. The land is also owned by the Church Commissioners and, besides being a visual eyesore in the heart of the Village, is a prime area for redevelopment for community use, primarily to provide desperately needed off-road car-parking for the Village Shop, School, Hall and Pub, but also as a potential site to relocate the Village Shop with more space, café and meeting room.

* *WM1/8. Up to 0.1ha of land will be made available for the delivery of a community facility. No further contributions towards community facilities will be sought from the site.*

The current proposal allocates an area to the far north-west of the site, furthest removed from the Village core. Given the current problems of congested access along Roughmoor Lane, it presumably would encourage access through the narrow roads of the new housing estate. Given that the Village hall has recently been refurbished in its current location, there is no pressing need or benefit from moving to a new location away from its current central location.

**Conclusion**

The current proposal appears to be hastily prepared, is not acceptable and does little to address the relevant policies recently adopted in the Local Plan Part II or the needs and aspirations of the Village community. It suggests a focus on maximising financial return for the Church Commissioners’ beneficiaries above their ESG commitments and wider community benefit.

The Village is rightly proud of its community spirit, heritage and location at the foot of the Mendip Escarpment, adjacent to the AONB. It expects and deserves a high-quality sustainable development for this site, comprising dwellings which meet the local housing need for low-cost, highly energy-efficient homes in a pleasant environment.

These are aspirations that accord easily with those reflected in the recent **Report of The Commission of the Archbishops of Canterbury and York on Housing, Church and Community**. The following extract from “Coming Home: Tackling the Housing Crisis Together”, Executive Summary, February 2021, p.11 states:

“We are also **determined to address the legal and institutional barriers to using church land for social and environmental benefit**. If our recommendations are accepted, **we expect to see more truly affordable homes being built on church land** and a shift towards new developments that give a **much higher priority to community infrastructure and environmental sustainability**.”

The complimentary report “Strategic Land ESG Integration” report 2021, commits the Church Commissioners to espouse best practice of environmental and society practice in its real estate investment and management.

For a satisfactory conclusion to developing the Church Commissioners land in WsM, the Village community will need to see more meaningful consultation which addresses the full range of sustainable development considerations, respecting environmental, social and economic factors.

To be effectively delivered, this paradigm shift in approach will need to be engendered in consultants and not least in the selection of a developer who can demonstrate a real commitment to:

* best practice in sustainable development, including their consultants
* is a member of the Considerate Contractors Scheme
* delivering homes ready for Net Zero Carbon emissions

Tony & Tina Westcott

26 January 2022