

Consultation Response - Roughmoor Lane Development in Westbury sub Mendip

Integrity of process

One might have hoped that with the church commissioners and agents acting for the Church of England it would have been reasonable to expect a healthy focus on community needs and respect for local views. Why then did this consultations start on Christmas Eve with the wrong website, provide too little time for proper responses to be collected, refuse to wait until face to face meetings were possible and organise a zoom meeting at 5pm when many people will be working / travelling / sorting kids? Many are hungry for those in leadership roles to show some integrity.

During the presentation on zoom (which was predictably not inclusive) it became clear that the Church Commissioners are planning to submit an outline application by the end of February with pre-application discussions with Mendip District Council having been underway since last summer. This makes a mockery of this consultation which should be undertaken at the beginning of the process to work up an application – not at the end when many of the decisions on density, layout, community use space have already been cast.

Come on Church of England, Church Commissioners and Agents. Please reset the consultation timetable to encourage and allow real engagement so that local views can be heard and be allowed to influence the proposal.

Housing density

Mendip Local Plan 2 seeks to plan for future housing requirements for the period to 2029. In this plan Westbury Sub Mendip is due to contribute 40 houses. (Table 2: Allocations in Primary and Secondary Villages). There are many local views that were not listened to in the local plan decision but the village has had to accept the local plan allocation on this site. The current proposal for 60 houses does not align with local needs, is more than is proposed by the local plan housing supply commitments. It is completely unacceptable that the village should be faced with having to fight to limit house numbers to 40 only one month after the local plan was adopted.

The site plan shows close to 60 houses in a mix of terraced semi-detached and detached. No information on the mix of sizes or number of bedrooms per property. The presentation of the layout uses suspiciously small footprints with the result that it looks like there is more green space being proposed than will in reality result. If you are going to provide layout plans then please ensure and provide evidence of accurate representation so that you cannot be accused of being disingenuous.

There are numerous material planning reasons why Westbury can only support 40 houses. The proposals for 60 with obvious future plans for a whole lot more needs to be stopped in its tracks. The impact on local school places, community facilities, pedestrian safety, parking, traffic on the A371, AONB, Bio-diversity, phosphate pollution of Somerset levels to name a few. Everybody is asking that you cut the house numbers back to 40 which will align with the local plan and use the adjacent land to the north east more responsibly. See below.

The suggestion of an average of 2.5 stories belongs to an urban setting not this rural one. Any more than 2 stories (and this needs to be a low two stories) is not acceptable in this edge of village, edge of AONB location.

Location of attenuation pond

The surface water drainage infrastructure required by this development should be contained within the area of land allocated for housing in the local plan. By placing the attenuation pond outside of the allocated area more land is available for housing hence the 60 house proposal. Best practice for

SUDS design states that the drainage infrastructure required should be retained within the area of and for development.

AONB

This site is close to the Mendip AONB and will create significant landscape visual impact from the elevated AONB areas immediately to the north. There does not appear to have been any attempt to acknowledge the need to mitigate visual impact from the AONB. This would be better achieved with lower density (no more than 40 houses) a wider more substantial northern green buffer strip (see below) and also a mix of native trees within the development to break up the visual impact

Comments have already been received about the layout not showing the existing footpaths and should these be diverted they should connect with existing routes as well as add to provide public footpath access to the railway line to the south.

Agricultural Buildings Brownfield Site

The agricultural buildings at the northeast corner of this site should be incorporated into this development. There are sound planning reasons to include this brownfield site to provide better access (see below), protect and improve parking areas and to provide land for community use closer to the centre of the village. The only reason the Church Commissioners would exclude this brownfield site at this stage of consultation is to maximise the number of dwellings without having to face up to community needs. More respect for the community would not go amiss.

Access and Roughmoor Lane

The current proposal to re-route Roughmoor Lane by making it subsidiary to the new development is not right both in principle and in practice. The existing properties and farms (with large machinery) that already use Roughmoor lane will outnumber what should only be 40 dwellings and should continue to have direct access onto the A371. The current proposal with corners, narrow widths and the need for Roughmoor Lane users to give way to this new development are unsafe when considering on road parking and the farm machinery in use. The proposed access will also remove the frequently used lay-by parking which needs to be protected even if relocated.

Various options to improve the access currently proposed will become more likely if the brownfield site is incorporated into these plans. This will also have the advantage of also meeting the concerns expressed about the location of any space for community use, safe access and parking for wider community.

Ecology

There are existing records that show that Greater Horseshoe Bats roost in Cheddar Gorge (accounting for 3% of the UK population). The bats were tracked coming out into the wider countryside to forage. They predominantly headed south-east from the gorge along the Mendip scarp and then out on to the moors where they feed on insects such as moths and dung beetles. The routes used and the foraging areas are shown on the attached map and include the old railway line to the south of the site and land to the west of the site. These bats can be very long-lived, up to 30 years and are classified as "very rare".

With the Northern and Eastern boundaries of this site used by the very rare Greater Horseshoe Bats there will be a requirement to beef up the green buffer strips on these boundaries. This will require at least 10 m width to green buffer strips giving room for hedges to be wider and tall enough and allowed for mature trees while also providing space for wildflower mix to support healthy insect population. The 10 m width and planting plans will also be needed need to ensure that that lighting from the development does not impact on these routes. The northern green buffer zone proposed is

welcome but is not wide enough and the requirement needs to be matched along the eastern boundary.

Traffic & Safety

This site is one of many developments that are providing hundreds of additional houses in local villages and in Wells and Cheddar. The traffic from these developments will use the Wells to Cheddar A371 route with its numerous bottlenecks.

The allocation of this site in the local plan did not consider the restrictions of the A371 sufficiently or accurately (survey data suggested less than 1 JHGV per day which is clearly an error). This application should provide a full transport assessment (considering all relevant developments between Wells and Cheddar that will use the A371 route) in order to understand the impact of increased traffic that will have an impact on safety and an increase in significant delays when HGV's need to pass at the numerous points where single file traffic is the only option. This development will increase traffic through the village in the directions of Wells and Cheddar but also north to Bristol through single track lanes. Another reason why the number of houses should be restricted to no more than 40.

Phosphate Pollution

Contrary to what was indicated during the presentation on zoom the Mendip District maps show this area as being within the nutrient neutrality zone. The river Axe and the rest of the Somerset Levels are being polluted with excess phosphates which cannot be entirely removed from sewage treatment. The solutions being discussed with local authorities and Natural England include the need to provide wetlands and more trees to absorb the phosphates being produced by residential development. The planning policy document (WM1: Land south of Roughmoor Lane) for this site refers to "*The potential impact of phosphates should be taken into account in mitigating the environmental impact of the development*". The Church Commissioners should not dodge this responsibility.

Many developers are planning to find a way to buy "phosphate credits" from others and move the problem elsewhere. The Church Commissioners have the land available at this location to lead by example and provide wetlands and trees to ensure a net zero phosphate pollution from this development. The development needs to be limited to 40 dwellings for all the reasons identified above and the land to the south of this development could be used for the appropriate wetlands and / or tree planting necessary to absorb excess phosphates.

Regards

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