Proposed Development at Roughmoor Lane

Pre-planning consultation

I am pleased to respond to your invitation to comment on outline proposals for development at Roughmoor Lane, Westbury Sub Mendip, prior to submission of an application for outline planning permission. These are personal comments though made from a particular vantage point. I have undertaken, on behalf of the community, to share responses that people have wished to make public on our village website.

If you visit the [website](https://westburysubmendip-pc.gov.uk/news/) you will see over 20 detailed commentaries, each of which has been sent to you individually. What you will also see however are comments posted in response to the items. We have 158 subscribers (around 45% of all the households in the village) who receive alerts every time a news item is posted. These commentaries have also been shared extensively through WhatsApp and other social media. The substantial agreement between these public commentaries and the absence of any contrary opinion in the comments on them should suggest to you that the objections to the plans represent the settled view of the whole community.

Before seeking to summarise the main headings of concern, may I make a few comments on the process. I am very concerned, as are many others, about the unnecessarily rushed timetable for consideration of the proposals and the sketchy nature of the information provided. To provide only a few examples

* To issue a consultation on Xmas Eve seems purposely designed to limit the time available for scrutiny
* The proposal speaks of bat corridors and buffer strips without any of the obvious detail needed to assess their suitability.
* There is no attempt to provide massing and bulking information so that the impact of the development can sensibly be assessed.
* Key issues such as the requirement to provide safe pedestrian access to the village core are simply ignored.

I do not propose to reiterate the detailed concerns expressed in the many individual comments you have received but I summarise below the principal areas of concern. We expect each of them to be addressed in the forthcoming outline planning application, backed by evidence rather than bland assertion. For example, we would expect to see the evidence that what you propose to provide as a bat corridor is actually sufficient in size and detail to serve that purpose.

1. While the local plan speaks of 40 dwellings this plan suggests 60 which represents serious overdevelopment in terms of the overall impact on the character of the village. No attempt is made to justify a 50% increase in dwellings, cars or people. The development should be restricted within the existing allocated site boundaries as defined by the local plan. This area needs to support all actions required to protect amenity, BNG, and attenuation pond. The house numbers will then be closer to that agreed of 40.
2. Development on this scale will generate a substantial increase in both vehicle movements and pedestrians crossing the A 371 which is not addressed in the outline plans. Yet more people will be located to the south of the A371 while the shop, pub, school and village hall lie to the north. The local plan requires “*Safe pedestrian links should be provided to enable access on foot to the village core.”* If a credible response to this condition is not provided the plan should be rejected.
3. Whether housing numbers are 40 or 60 we would expect to see up to date information on traffic on the A371 to help planners assess whether the measures proposed will deal with issues of road safety and congestion. Since many residents will be likely to commute to Bath or Bristol what assessment has been made of the traffic problems on the narrow rural lanes heading north?
4. The plans will generate an increased need for parking while removing existing parking at Mortar Pits. Without safe walking routes the development will cause traffic congestion as people attempt to park in the core area to the detriment of the conservation area. It needs to be demonstrated that on-site parking is adequate to prevent visitor and delivery traffic movements blocking access for agricultural businesses and service vehicles.
5. There is no serious attempt to “*safeguard the amenity of neighbouring residential properties*” either by substantial screening, by locating houses to the south of the plot or putting single storey buildings on the northern side. There is considerable support for a substantial green hedge and path strip along the Roughmoor Lane side of the development which would create a realistic wild life corridor and provide some screening for residents of Roughmoor lane. No consideration appears to have been given to the amenity of residents on Stoke Road, faced with a substantial increase in traffic on that road and increased pollution.
6. The proposals to achieve biodiversity net gain seem token, and also to claim credit for existing features such as the hedge and trees on the playing field. ‘Gain’ needs to be extra. The excessive density reduces the possibility of BNG. The assertion that there will be net gain needs to be backed by evidence rather than assertion. What exactly will be gained?
7. The location of the attenuation pond outside the designated site allows inadequate provision within the site for sustainable drainage, presumably in order to maximise housing density or to prepare for future, undeclared aspirations. It reduces the potential for BNG within the site itself and is clearly contrary to good practice. We need to be assured that the development complies with the phosphates directive.
8. The plan substantially ignores the existing footpath network and makes little effort to show how the development might link to or improve it. A path south to link with the Strawberry line trackbed is welcome though does not represent gain as a footpath making this connection already exists. A direct line would be more sensible.
9. The proposals do not appear to reflect the dark skies policy of the village nor the impact on views out from the AONB including light pollution. It does not appear to recognise that the site is substantially overlooked; from Deer Leap at a distance and Broadhay within the village (both in the AONB) as well as by close neighbours.
10. The proposed location of land for community use at the NW corner of the site is problematic. The consultation acknowledges that the most likely community use would be to locate a larger village hall (made more necessary by the extra numbers it is proposed to add to the population). Locating this asset at the furthest point from most of the village maximises the problems of parking and traffic congestion. Many have suggested locating both parking and community building space on the brown field site to the East, also owned by the Church Commissioners. Since you have no difficulty proposing an attenuation pond outside the development site boundary you should have no problem locating an area for community use. The argument that it is a sensitive site is a red herring since that would be an issue to be addressed by the community.
11. While provision of ‘affordable’ housing within the plan is positive for the village there seems no provision for single storey building which might allow existing residents to downsize without moving away. Generally the plans are so schematic and scant on detail that it is difficult to respond meaningfully. It would be helpful however were you to confirm that the roofline of 2.5 storey housing will be no higher than 2 storey houses.
12. It is disappointing that no attention is paid in these proposals to the Net Zero Carbon Toolkit adopted by MDC or the requirement to provide sustainability statements. Looking, for example, at the alignment of houses it would appear that the layout reflects standard ‘off the peg’ developer practice rather than a need to maximise passive solar heating, or PV generation.

M C Fletcher

26/01/22