Reponses to Question 14 – Marlborough Community Area - Core Policy 14
Please note that this document should be read in conjunction with the Consultation Statement January 2012 Report and the User Guide for the Record of Comments.

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<td>28</td>
<td>I thank you for your invitation to participate in the preparation of this project but as we have been Wiltshire residents for something under eight years I hardly feel qualified to contribute anything of any significance. There are only two matters about which I feel very strongly indeed: first, the possible acquisition of the Ivy House Hotel by Marlborough College, which would effectively forever deny access to a Grade 11 listed building to the citizens of Marlborough, and second, the diminished role of Savernake Hospital in our local community, especially the closure of its Minor Injuries Department -- neither of which, unfortunately, would appear to fall within your remit. With thanks and regrets</td>
<td>CP3</td>
<td>Noted - the council will work actively to ensure that current uses (including hotels) are protected and secured where appropriate. The council is also working proactively with infrastructure providers to ensure that adequate service provision, including health care, is delivered alongside new development.</td>
<td>Hotel retention / infrastructure</td>
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<td>56</td>
<td>Re Infrastructure Requirements In addition I believe improving the outdoor sporting facilities in the town is critical. Other local towns have community sports hubs that are shared between sports clubs, general public usage and the schools. In Marlborough, the outdoor sports facilities at the state schools are seriously lacking. Marlborough Tennis club still does not have a permanent home. Many of the sports clubs rely on the goodwill of the the College, and therefore have restrictive availability on pitches. The planned additional housing and increased population will exacerbate the situation and the provision in Marlborough will be even less fit for purpose. It's time to prioritise sport.</td>
<td>CP3</td>
<td>Noted – CP3 seeks to provide infrastructure requirements for Wiltshire’s communities. This includes ‘place shaping requirements’ such as leisure and recreation provision. The council will also work with providers, local communities and other key stakeholders to develop a community infrastructure levy (CiL), as a further source of funding for improvements in local and strategic infrastructure.</td>
<td>Infrastructure</td>
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<td>102</td>
<td>You do not mention the north-south lorry problem in the town. Traffic in the town must be one of the residents’ main complaints and it is not addressed. Swindon and Salisbury will grow and with it there will be more activity between them, exacerbating the current lorry problem. It may be that some long distance trips will go via A34 and M4 but I imagine that this will not be sufficient to overcome the unsatisfactory situation of lorries lumbering up the hills on A346 on both sides of the town. There could be secondary effects on Salisbury. A business seeking good transport links is likely to prefer a location near A34 than A346 if contact with the north is desirable. The A346 is not a good route generally and extra traffic congestion in Marlborough might be a deciding factor. There should be some proposal for a north-south by-pass of Marlborough, even if it has to go to the end of the plan period.</td>
<td>SO8</td>
<td>Noted - the consultation document includes a number of core policies to promote sustainable forms of transport. CP47 (movement of goods) seeks to achieve a sustainable freight distribution system which makes the most efficient use of road, rail and water networks. A bypass will not be considered within this plan.</td>
<td>Transport</td>
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<td>147</td>
<td>There needs to be more specific consideration to the fact that this area sits within the protected landscape of the North Wessex Downs AONB. Although no strategic housing allocations have been proposed into the AONB, which supports national guidance, further comment should be provided on how the 441 houses will be provided without damaging and lasting impact on the AONB through the need for greenfield site releases. For example has the Council assessed its SHLAA and is confident that the 441 figure can be met without the need for greenfield site releases? If so this should be confirmed in the Core Strategy. Alternatively if this is not the case how is the Council going to reconcile the potential release of greenfield sites whilst not impacting on national guidance that seeks to conserve and enhance the AONB. This is particularly important in the Marlborough area as there are little or no greenfield sites left that if released for housing would not cause lasting damage to the AONB. Further specific reference should also be made to the Avebury WHS and its OUV. For example some of the most recent development to have occurred in Marlborough is visible from the Rideway area within the Avebury WHS. Further greenfield site releases around Marlborough may therefore extend the visible impact of the settlement deep into existing protected parts of the AONB and WHS.</td>
<td>AONB - CP40 - SO5</td>
<td>Noted - the Marlborough Community Area Strategy makes specific reference to the AONB and the need to protect and enhance the valued local landscape of the area. The proposed delivery of housing (441 new homes) will need to be sympathetic to the community areas rich natural and historical assets. The consultation document includes policies which seek to achieve this goal (SO5). The consultation document makes specific reference to OUV within core policy 40. Any new development must not adversely affect the OUV of the world heritage site, its significance, authenticity, integrity or its setting.</td>
<td>AONB / WHS</td>
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We suggest the following changes to the spatial strategy set out for Marlborough Community:

1) Ramsbury should be identified as a rural 'growth pole' since according to Draft Topic Paper 3. (Settlement Strategy - Appendixes) it has a population of 1,500, a level 2 journey to work service, is well served by public transport, has potentially high broadband speed, good cellular radio coverage and highway capacity, has 2 recreation fields, 2 children's play areas, 6 indoor/outdoor sports pitches, 19 sports/social clubs and is served by the mobile library. The only service apparently missing is a Public House. 2) Draft Topic Paper 3. (Settlement Strategy - Appendixes) tells us that there are sites with a total area of 24.42ha considered suitable and available in and around Ramsbury. Given that Core Policy 39 - Housing Density advises a minimum of 30dph then the village could provide up to 732 additional dwellings - only a little shy of the total of 850 additional dwellings proposed for the whole of the Marlborough Community Area. 3) In terms of phasing Ramsbury should be at the head of the queue with site reference 1087 identified for early release.

Notes - Additional work is being undertaken to consider small settlements classification and the subsequent strategy which will be applied to them. It is not considered appropriate for the core strategy to identify a phasing programme for individual large and small villages.

A345 and Wiltshire Councils Core Strategy on Transport 2011-2026. The Durrington Town Council are concerned that the A345 does not come into the Wiltshire Council Core Strategy as any kind or type of highly used Highway North to South through Wiltshire County. As the Core Strategy covers the next 15 years the Council feel that this is a serious omission. All the Town and Parish Councils named below are affected by this problem of through traffic North to South from the A303/M3 through to the A4/M4. There are great concerns by all these Councils (listed below) along the A345 through the Pewsey and Avon Valleys, in that Wiltshire Council has omitted the A345 from every part of this New Core Strategy regarding Highway Transportation across Wiltshire. The question is WHY? The Councils who have very great concerns are: Durrington Town Council, Figheldean Parish Council, Netheravon Parish Council, Enford Parish Council, Upavon Parish Council, Manningford Parish Council, Pewsey Parish Council, Wilcot/Huish/Oare Parish Council Marlborough Town Council. There is firm evidence that the A345 is being used by ALL SORTS of vehicular and Heavy Goods traffic along this small fragile unsuitable Drovers Road as a short cut North to South across Wiltshire. The Council must either recognise this situation or declassify this "A" road to a "B" road and remove the large HGVs signs (Going North) at Manningford and Sharcott which are at present directing all Heavy Goods Vehicles through Pewsey Village up to the A4 at Marlborough and beyond. Then they should Re-sign the Road at the A303 Countess Roundabout Amesbury and the A4 at Marlborough as being Unsuitable for LARGE Heavy Goods Vehicle use. Durrington Town Council is additionally concerned that the signposts at the Solstice Park roundabout in Amesbury encourage people to take the A3028 which is now being used as a rat run for HGVs and cars through to the A345 or on through Larkhill to miss the Countess Roundabout.

The consultation document includes policies to promote sustainable forms of transport (SO8) including policies relating to freight distribution. Officers will consider the issues highlighted including any appropriate revisions to the community area strategy.

It is disappointing to note that no direct reference has been made in the document to the Wilts & Berks Canal - except, of course, in para 5.11, with which I fully agree in so far as it relates to Melksham. Protection of the whole route of the canal - including its branches - is vital to the plans to restore the canal, the benefits to Wiltshire of which are plain and manifold: 1. It is and will be a major wildlife corridor, protecting habitats from future development. 2. It is, where restored, and will be when fully restored a significant recreational asset along its whole length for cyclists, walkers, canoeists, canal boaters (including tourists), fishermen, wildlife enthusiasts, photographers and other artists, etc. 3. Where and when restored the towpath will provide a mostly flat waterside route for wheelchairs so that the disabled may enjoy the canal and countryside. 4. The Wilts & Berks Canal will provide employment and economic benefits in many locations along the route - as the Kennet & Avon does already. 5. In some areas it will offer an attractive asset to residential developments. These benefits cover several of the strategic objectives included in the document. Please give some recognition of the importance of the protection and restoration of the route.

Comments noted – officers will consider the need for a policy relating specifically to the canal and appropriate wording to be included within the community area strategy for Marlborough.
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<td>976</td>
<td>The Council should include a strategic site allocation on &quot;land west of Salisbury Road, Marlborough&quot; [1] as part of the policy for delivering growth at the town. The site has potential for up to 230 dwellings plus a range of other uses as part of a mixed use scheme. The justification for a strategic site allocation on land west of Salisbury Road is as follows: The site should be considered strategic to the delivery of growth in the Marlborough Community Area and should be allocated as such in the Core Strategy (see response to Core Policy 2 regarding the approach to strategic site allocations). The site is needed now to resist applications on unplanned sites given the lack of a deliverable five year supply in the Eastern area. The Council's own evidence base supports the context for bringing forward this site with the Strategic Sites Background Paper (2009) concluding that it is the preferred option for growth because &quot;it is well located for access to employment and education facilities, potentially increasing the opportunity for greater self-containment in Marlborough ...&quot; This is supported by the findings of the accompanying Sustainability Appraisal (2009) and the proximity to existing schools (St. Johns), employment (Marlborough Business Park) and retail (Tesco) present real opportunities to maximise self-containment and delivery a truly sustainable scheme. Identifying the site at this stage would not prejudice the community plan/unique plan-making process, with The Crown Estate having already undertaken workshops with Marlborough Town Council and Savernake Parish Council in early 2011. This consultation has already led to the identification of constraints and opportunities which are now addressing as part of technical work to support the site's early delivery. There are a range of wider benefits that can be realised, including: - Provision of a sustainable access link (for pedestrians and cyclists) through to the new St. John's School, together with a coach/vehicle drop-off area on Crown land if required. This could reduce congestion through the town at peak times, by intercepting traffic that may otherwise use George Lane (and other residential streets surrounding the school). - Strong landscape planting both within and on the edge of the development to help enhance the development's setting within the AONB. The Crown Estate's wider landholding also offers significant potential to deliver wider landscape enhancement to the town's setting. - Ecological enhancements in response to the site's setting adjacent to the Savernake Forest SSSI as well as the Savernake Tunnel bat roost. [1] As described on page 91 of Draft Topic Paper 14: Site Selection Process</td>
<td>Comments noted – the council will consider the appropriateness of identifying this site as strategic in line with the strategic sites methodology.</td>
<td>Strategic sites</td>
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<td>1030</td>
<td>We note that no strategic sites are allocated in this policy, despite various options having been considered in the 2009 consultation. We welcome the commitment in paragraph 5.10.4 to protect and enhance the local landscape as part of the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and any development should be assessed for its impact on the AONB. It is also important that any development protects and enhances the Savernake Forest SSSI and River Kennet SSSI, County Wildlife Sites such as Chopping Knife Lane Bank (SU26.56) and other important species and habitats, including bats. We would like to see these points reflected in the Core Policy itself.</td>
<td>Comments and support noted.</td>
<td>Support / general comments</td>
<td></td>
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<td>1100</td>
<td>Marlborough. We note that there is an allocation of 610 homes at Marlborough (240 within the rest of the community area) but no strategic sites are allocated. As referred to in our 2009 response, Marlborough has a number of environmental features which may pose constraints to developments. Savernake Tunnel is an important bat roost. We advise that the Strategy should make clear that the numerical allocation can be delivered without compromising this roost. Savernake Forest is a SSSI. We advise that the Strategy should make clear that the numerical allocation can be delivered without adversely affecting the features for which the SSSI is designated. Finally, there is no assessment as to whether it is viable to deliver the housing growth in a way which has an acceptable impact on the AONB, and consequently the strategy may be unsound in that this policy is unjustified, not having had due regard to the AONB.</td>
<td>Comments and support noted. Officers will consider reflecting the listed constraints within the core policy wording within the submission draft of the core strategy.</td>
<td>Designations</td>
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<td>1158</td>
<td>2.2.1. Para 5.10.4 (page 84) We suggest that this paragraph should include a bullet point on the historic and natural environment, including the World Heritage Site. 2.2.2. Map 5.13 (page 85) The map does not - and ought to - show the World Heritage Site. 2.2.3. Core Policy 14 (page 86) We object to the absence in this Core Policy of any reference to the historic or natural environment or to the Avebury World Heritage Site.</td>
<td></td>
<td>WHS</td>
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<td>1484</td>
<td>We appreciate the opportunity to comment on the Wiltshire Core Strategy Consultation Document. Our comments in the main relate to the village of Keevil and are set out below. 1. Keevil has been defined as being a large village, something we strongly refute. In the 2009/2010 consultation &quot;Planning for Wiltshire's Future 2026&quot; Keevil was classified as being a small village. Why one year later has it been re-classified as &quot;large&quot;? The number of electors in the whole Parish has remained roughly the same over this entire period - approximately 370. We can appreciate numbers on the Electoral Register may be less than the actual number of residents, but the figure of 410 people stated in the Settlement Strategy as living in the village itself would appear to be very high. Can you explain the source of the information? 2. There are errors in the Draft Settlement Strategy. a) Keevil does not have a Food shop. b) Keevil has never had a Community Mini Bus. It should be made clear that the Post Office opens for half a day a week only. 3. Keevil currently has &quot;An Area of Minimum Change&quot; and a village boundary which we know as a Village Policy Limit. It is important that both of these are retained. 4. We note within the Melksham Community Area at least 4 hectares of employment land has been identified. All available brownfield sites should be utilized before considering any development of greenfield sites.</td>
<td>Comments noted. CP1 CP2</td>
<td>Settlement classification / PDL Levels / distribution of growth</td>
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<td>1713</td>
<td>Table 1 Town 2006 Total Dwellings requirement Growth % 2006-26 Community Area % Population 2006-26 Amesbury 8161 2100 25.7 15.7 Bradford-upon-Avon 4396 510 11.6 11.3 Calne 6914 1240 17.9 22.2 Corsham 4015 1050 26.2 19.0 Devizes 7381 1730 23.4 11.7 Malmesbury 2347 760 32.4 12.9 Marlborough 3280 610 18.6 4.2 Melksham 8309 1930 23.2 13.6 Tidworth &amp; Ludgershall 4121 1750 42.5 50.4 Warminster 7820 1650 21.1 10.2 Westbury 5994 1290 21.5 24.2 Wootton Bassett 4859 920 18.9 10.3 All Market Towns 67597 15540 23.0 From Table 1 above it can be seen that the proposed Housing Delivery for Marlborough town does not provide the 'locally significant development' demanded by Core Policy 1. Whilst there are infrastructure and environmental constraints these are no greater than those affecting other Market Towns. The projected growth of 18.6% in the Plan Period (610 in addition to 3,280 dwellings in 2006) is low.</td>
<td>Comments noted. CP1 CP2</td>
<td>Draft topic paper 3 settlement strategy explains the approach and evidence that has been used to identify the current role of settlements in Wiltshire. This evidence has provided the background to defining a sustainable settlement strategy in the Core Strategy Development Plan Document. The consultation document proposes that large village settlement boundaries are retained as they serve as a useful point of reference as development is expected to take place beyond the current boundary. Where these are reviewed by a subsequent DPD or neighbourhood plan it is expected that the review would then provide for development beyond the current settlement and the new boundary would again form the limit of development.</td>
<td>Settlement strategy</td>
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<td>1958</td>
<td>There needs to be more consultation with the local councils re the Settlement Strategy, to agree in which category settlements should be placed. The allocation of settlements appears to have been done without much knowledge of some of them. Bowerhill for example, rather than being assumed to form part of Melksham Town, which it does not, should be placed in the Local Service Centre category as it meets the criteria. It is difficult to understand why large villages are having their boundaries retained whereas smaller villages are not. Please explain. While the Settlement Strategy mentions pockets of deprivation, most of the document involves giving facts or aspirations without saying how they can be achieved.</td>
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The Chapter of Delivery Strategy is difficult to understand and at times seems muddled, especially page 29! Melksham is not seen as a Principal settlement and yet is deemed a “Key strategic location” for employment. Is this to address the perceived imbalance between too much housing and too little employment to date? Are there differing key locations for employment as opposed to housing? Surely the idea is to have both housing and employment under the same category to make areas more sustainable? I think it seems muddled because of word-play/descriptions of “key strategic” and strategic. Which is Melksham, key strategic or strategic or neither and why? It is unclear who will prepare the master plans and what role local councils are to be given in either the master plans or the neighbourhood plans. Map Pg 28- From this it looks as though the Local Service Centres are out in the middle of the countryside. The names of these centres should be put on the map. This section would benefit from having contributions from regional companies involved with building to give it more depth. In the past, investment and creation of extra jobs have not been taken on board by Wiltshire Council where there is controversy over a major planning application. To answer Q2: No because cannot understand what is being proposed - needs to be clarified with less use of the word strategic! There is a basic misunderstanding of the composition of the Community Area as both Berryfield and Bowerhill, described as “towns” on your map Pg 90, are in fact separate communities from Melksham Town within the rural parish of Melksham Without and with village identities. Both regularly enter for the Best Kept Village Competition. Berryfield has a “Village policy limit”. Bowerhill should be identified at least as a large village, if not a Larger Service Centre since it is 2 miles from Melksham and separated from Melksham by green fields. While it is the largest employment area near Melksham, this employment serves the whole of the community area including Bowerhill itself. It has its own level of self-containment with a Residents’ Association, a school, comprehensive recreation facilities, newsletter, a shop and numerous village organisations. Berryfield too has its own residents’ group, play area, allotments etc. Neither area wishes to be part of the Melksham town parish. Berryfield is characterised by having Grade 1 Agricultural land, is very rural, and has more in common with Whaddon than Melksham. Table 5.18 is also misleading because it divides Shaw and Whiteley into two separate villages although traditionally they have grown up together and are linked by sharing a village school, a village shop, a network of footpaths and a playing field. Taken together they are self-contained and offer a wide range of services and facilities. Beanacre also needs to be included as a small village. These corrections would then lie in with your opening statement “A number of villages lie close to the town.” Thus Table 5.18 needs to be amended to include: Market Towns: Melksham Local Service Centres Bowerhill OR in Large Village category Large Villages (Bowerhill) Shaw and Whiteley Small villages Beanacre Table 5.19 also needs to be amended in the light of the proposed changes above, as it is likely the remainder of housing to be identified (736) may be envisaged for the whole area of Melksham, Berryfield and Bowerhill. This needs to be made clear. For infrastructure, (3) more details needs to be given re the community aspiration to improve Melksham Railway Station and services. For (4) this should include the urgent need for provision and enhancement of cycleways not only in the town area, but to link the rural villages such as Beanacre and Broughton Gifford to Melksham so that people can reach them safely without using a car and have a more sustainable means of transport. For (5) the locally well-known and loved Riverside Walk (Melksham’s Millennium project) should be formally recognised as a public footpath and protected as a community asset, for the future. For (6) it appears to be an omission from the Core Strategy that there are no policy statements relating to the restoration/reconstruction of the W&B Canal, given the recent progress with the project and the possibility of commencement of implementation within the period to 2026. However, there needs to be some assurances given that this very welcome development will not be permitted to have a detrimental effect on existing activities and facilities along its route. Also that it will not be allowed to encourage inappropriate development in the countryside, the loss of higher grade land from agricultural use or the coalescence of communities (e.g. Melksham with Berryfield).
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<td>1978</td>
<td>Although Marlborough is not identified for new strategic employment growth this seems to ignore the possibilities of home working via the internet and the improved Broadband. ‘No further convenience retail provision outside of Marlborough will be supported’ as written this seems to be at odds with earlier statements about village and community resilience and the efforts made to keep village / community shops open. Is this aimed at larger chain type retailers? The bullet point beginning ‘The important and highly valued local landscape …’ is laudable in its intent but will require much more detail (e.g. as in the former Kennet District planning guidance and policies) for effective comment. Without such policy detail, PC’s and others will find it difficult to make “material” planning application responses which have weight. Given the envisaged increase in population and the envisaged need to expand the GP provision has any thought been given to increased emergency response (other than the ambulance station) and policing needs? What thought has been given to the impact of increased traffic on Marlborough and the need for an improved road network? Have park and ride possibilities been considered; the excessive parking in Marlborough High street detracts from its charm and grandeur almost as much as the huge trucks which pass along it. A bypass for the A4 would improve the quality of life in Marlborough but this would be a major project.</td>
<td></td>
<td>The provision of advanced telecommunications including super-fast broadband within Wiltshire is a key priority identified within ‘securing the delivery of infrastructure’ page 31. It is considered appropriate for a further supermarket to be developed at Marlborough. The plan also considered essential infrastructure provision including healthcare facilities and emergency services. Any future development will also be required to adequately assess road traffic impact and any subsequent implications. A bypass is not considered within the plan.</td>
<td>Infrastructure / transport</td>
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<td>2149</td>
<td>The Ball Family Trust would like to put forward the land to the north of Rhyls Lane Lockeridge (as depicted by the red line in the plan attached) to be included in the Wiltshire Core Strategy Consultation Document of land available for future development.</td>
<td></td>
<td>Area of land noted.</td>
<td>Development land</td>
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<td>2164</td>
<td>Question 14 - Marlborough Community Area (Core Policy 14) We note that the majority of proposed development in this area will be residential dwellings in Marlborough town. Map 5.13 does not specify where proposed development will be located in relation to the Flood Zones. Part of the town of Marlborough is located within Flood Zones 2&amp;3. Development in FZ 2 &amp; 3 could only be considered once all other options for development in Flood Zone 1 have been exhausted. However, as noted in section 6.10.1 there should be sufficient land in FZ1 to accommodate the proposed housing. The following villages also include a flood risk constraint which is currently mapped as Flood Zones 2&amp;3: Aldbourne, Ramsbury, Avebury/Trusloe, Oxford, Chilton Foliat, East Kennett, Froxfield, Fyfield, Ogbourne St George, Winterbourne Monkton and Winterbourne Bassett. As discussed above for Marlborough, there should be sufficient land in FZ1 to accommodate residential development, but if it is intended to allocate any sites in the Core Strategy that fall within FZ2/3, then a SFRA Level 2 would need to be undertaken as part of the evidence base for the Core Strategy. The Level 1SFRA should be referred to as a starting point when considering development in these locations.</td>
<td></td>
<td>Comments on flood impact noted.</td>
<td>Flooding</td>
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<td>2188</td>
<td>Throughout this section of the document the issues facing Marlborough and the strategy for future growth in the town is discussed in some detail, however all of the other settlements in the Community Area seem to have been entirely forgotten. In fact the only other settlement mentioned in this section, albeit briefly, is Avebury. It is important that sufficient housing development is encouraged in each of the settlements within the Community Area to enable them to address their own local community needs. Indeed during the Wiltshire 2026 consultation which took place in the Marlborough Community Area one of the main issues raised was that the role of villages and their ability to accommodate growth was considered to have been underestimated. It is therefore considered that Core Policy 14 does not do enough to ensure that local housing needs in smaller settlements and in other rural areas will be satisfied over the coming plan period. Ramsbury is one such settlement that will require a certain amount of growth to meet the needs of the local community in the years leading to 2026. Whilst some areas of the settlement are subject to certain constraints there are two sites in the ownership of The SDBoF which could be brought forward for development. See chapter 5 of the submission document for the full response to question 14 which highlights the merits of the land in the ownership of The SDBoF.</td>
<td></td>
<td>The draft strategy enables development to take place in a sustainable appropriate fashion across the settlement hierarchy. This includes development at both large and small villages. It is anticipated that neighbourhood plans will enable communities to identify development sites.</td>
<td>Settlement strategy</td>
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<td>2263</td>
<td>It is considered inappropriate to place a presumption against further out-of-centre retailing in Marlborough through the emerging planning policy. Instead the Core Strategy policy should be formulated in a manner that requires all applications for new retail development to be considered in light of the key retail policy tests of PPS4 and the emerging NPPF: i.e. having regard to the sequential approach and impact.</td>
<td></td>
<td>Comments noted.</td>
<td>Retail</td>
</tr>
<tr>
<td>2333</td>
<td>Please see attached documents for comments about Marlborough Community Area section.</td>
<td></td>
<td>Comments noted.</td>
<td>General comments</td>
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<td>2400</td>
<td>We have a further comment to make about Topic Paper 3: Settlement Strategy. This is linked into the general development strategy set out in Core Policy 1. The methodology used to determine the settlement hierarchy is considered to be unsound because it does not reflect Government policy on sustainability. It gives insufficient weight to the key characteristics to be taken into account when deciding future housing distribution throughout the area. Our focus is on Core Policy 14 Marlborough Community Area although the results have implications for the whole district. The assessment begins with a Basic Analysis which acts as an initial filter (see paragraph 2.18) and this should be given greater weight. Whilst other factors will affect sustainability/housing needs (i.e. population, transports, leisure, etc) these are not, in our opinion, as important as having a Primary School or Village Store. Certain settlements should rise up the hierarchy whilst others drop out. The local planning authority should not be allowing additional housing just because there is currently a village boundary. Many villages have lost certain facilities and may no longer be classified as being sustainable. A place of worship/village hall on its own cannot be seen as contributing to sustainable development and reducing the reliance upon the private car. We represent a client who owns land on the edge of Chilton Foliat. This settlement has been identified as a suitable location for infill. It should, however, been seen as a suitable location where small sites on the edge of the settlements could be released for housing. A number of other smaller villages within the Marlborough Community Area are too small/or only have one of the four basic facilities used in the initial filter. They are: Axford, East Kennett, Froxfield, West Overton, Winterbourne Bassett, and Winterbourne Monkton. The settlements listed above should be removed from the list in Core Policy 14. Alternatively, the villages listed above could be added to a new category in Core Policy 1. This could be entitled, ‘Small Villages not suitable for growth’ where only strict infill development will be allowed.</td>
<td>CP1</td>
<td>Noted - National policy, particularly in the form of PPS3 &amp; PPS4, states that through the Core Strategy the council should promote greater levels of development at settlements with the facilities and infrastructure to support that development and provide the best opportunity to offer jobs and homes in the most sustainable manner. Comments relating to the settlement strategy will be considered where appropriate.</td>
<td>Settlement strategy</td>
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<td>2468</td>
<td>The Agency supports modest housing growth in Marlborough and is encouraged that there is a reasonable amount of developable land in and around the settlement which is well related to the existing built up area. We are also encouraged that Marlborough is not identified as a location for strategic employment growth. We acknowledge the intention to provide 1ha of employment land and 850 dwellings in the community over the plan period (2006-2026).</td>
<td></td>
<td>Support noted.</td>
<td>Support</td>
</tr>
<tr>
<td>2636</td>
<td>Highway improvements should be the precursor to any development in the town. No adequate vehicle management strategy is offered; free flow of traffic and parking at sensible prices should be included. Development in Marlborough should only take place when the Nitrogen Dioxide levels are at a safe level. Villages: Ramsbury/Aldbourne &amp; Axford: Every effort should be made to manage traffic and parking. The consultation document includes policies to promote sustainable forms of transport (SO8) including policies relating to freight distribution. Officers will consider the issues highlighted including any appropriate revisions to the community area strategy. New development will also be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal.</td>
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<td>No.</td>
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<td>Cross Reference</td>
<td>Officer Comments</td>
<td>Issue</td>
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<td>2694</td>
<td>We would like the following additional information considered as an issue that needs addressing: Savernake Forest is a potential SAC (EU Habitats Dir) for the known and well studied large Barbastelle population. Barbastelle bats have a large foraging range and it is imperative that flyways and commuting routes linking Savernake forest with the wider landscape are maintained and enhanced. Marlborough Tunnel (Disused Railway Line) exceeds SSSI criteria, comprising a nationally important hibernation site for Myotis nattereri and also M. daubentoni, M. mystacinus, Plecotus auritus and Barbastella barbastellus. This site also comprises a significant swarming site for mating bats during the autumn months; further study is needed to clarify how large the catchment of this swarming site but it is likely to attract bats from much of central Wiltshire if not beyond. This location should be notified SSSI and the core strategy should lend support in this objective. This location may be threatened by housing development on the edge of Marlborough through loss of commuting routes (including from increased lighting levels) and increased disturbance of the tunnel and swarming areas. Appropriate management and safeguard of the tunnel should be funded through section 16 agreements.</td>
<td>Comments noted. Officers will consider reflecting the listed constraints within the core policy wording within the submission draft of the core strategy.</td>
<td>Designations</td>
<td></td>
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<tr>
<td>2710</td>
<td>We would like the following additional information considered as an issue that needs addressing: This Community Area includes a number of small to medium-sized Horseshoe roosts in local houses and churches as well as limestone mines within the Cotswold Hills AONB. These Horseshoe populations are also linked to those of the Bath &amp; Bradford on Avon Bats SAC. Significant Serotine bat roosts are also known in this area. Key commuting routes and foraging areas along landscape features such as the Kennet &amp; Avon Canal will be retained and enhanced and protected from inappropriate development in key settlements such as Devizes.</td>
<td>Comments noted. Officers will consider reflecting the listed constraints/information within the core policy wording within the submission draft of the core strategy.</td>
<td>Designations</td>
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</tbody>
</table>
Question 14

Comment No. 28
Mrs P M Smith

Comment No. 56
Mrs Karen Davis

Comment No. 102
David Feather

Comment No. 147
Mr Andrew Lord
Planning Advisor North Wessex Downs AONB

Comment No. 445
Mr C Gorringe
Mr Tony Thorpe
Tony Thorpe Associates

Comment No. 707
Mrs M A Towle
Durrington Town Council

Comment No. 880
Brian De’ath

Comment No. 976
Mr David Fovargue
Principal Consultant AMEC
Unknown

The Crown Estate

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Ms Jenny Hawley
Environmental Intelligence Officer
Wiltshire Wildlife Trust

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Charles Routh
Planning and Local Government
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Vice-Chairman The Avebury Society

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K & M Link

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Clerk Melksham Without Parish Council

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Mr D Chapman
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Miss Katherine Burt
Planning Liaison Technical Specialist Environment Agency (Wessex Area)

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Partner Smiths Gore

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Sir / Madam Unknown
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Sainsbury's Supermarkets

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Chairman Campaign to Protect Rural England - Wiltshire Branch

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