

<b>Rep ID:</b> MARL001	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> N/A
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
I think the scale of growth is outrageous. This is a country town with limited facilities for the current population. This figure should be much lower.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
It is important to keep the historical elements of the town and to improve infrastructure. Currently, the beauty of Marlborough is being shadowed by the poor road system and excess building works. Priority should be given to outdoor green spaces, supporting and emphasising the high street and improving the facilities we currently have.	

**MB3. Is this the right pool of potential development sites?**

I believe only 2 sites listed currently can be considered, those being site 1 and site 3. The impact on traffic from site 2 on the already busy road about near Tesco's would cause mayhem and the traffic at rush hour on Salisbury road would not only impact living near it but also anyone commuting to work inside or outside of Marlborough. Site 1 allows for exit to the M4 via hunger goes without impacting Marlborough traffic. Additionally site 3 allows access to Swindon without impacting traffic within the town centre. Additionally, I believe that site 2 is home to nesting bats and dormice. Building on site 2 would decimate these important species.

**MB4. What land do you think is the most appropriate upon which to build?**

Site 1 or site 3

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Yes, I believe site 2 is home to important bar and dormice populations. In this age we must prioritise wildlife and nature. Building on any of the sites must be done in an environmentally friendly way as well as having nature in mind first. Additionally, building next to at John's school will limit any future facilities that need to be built in order to accommodate additional students from the families that move into the new houses.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

The road network needs improving before any more developments are built. Additional capacity at doctors surgeries and schools need to be created before an increase in the local population. Parking in Marlborough also needs to be addressed.

#### **Further comments**

Marlborough is a beautiful town and needs to be preserved as best as possible. I understand the need for more housing and I understand the direct government has given local councils. It is incredibly important not to put strain on the town though so building as few houses as possible will both help the town but also retain the beauty of this historic town. One of the main attractions is the wide open green spaces near Savernake Forest and this must be retained as this brings in tourism.

<b>Rep ID:</b> MARL002	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> None
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Looks well judged, won't ruin the market town feel of Marlborough and avoids impacting on water meadows (flood hazard / biodiversity issue) or on our Downland	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Agree with above, also need to consider rural connectivity(Manton) Urgently need to extend medical provision, especially with the projected increase in elderly people and consider opportunities to extend medical services beyond a GP surgery as access to GWH is tricky for an aging population	

**MB3. Is this the right pool of potential development sites?**

Yes,

**MB4. What land do you think is the most appropriate upon which to build?**

1 and 2 as they have the least impact on the countryside and are already pretty developed.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

As above, rural connectivity an issue in Manton if home working becomes more common

**MB6. Are there any issues or infrastructure requirements that should be identified?**

No

**Further comments**

Seems like a well researched plan

<b>Rep ID:</b> MARL003	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The scale of growth is far too high and needs questioning. The level of housing identified is pitched too high. Marlborough has already provided enough housing.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
The first priority should be to protect and maintain the countryside. The second should be to maintain Marlborough as it is for future generations. To achieve these aims we need strength and determination from councillors to resist the demand to concrete over the countryside and in particular FARMLAND.	

**MB3. Is this the right pool of potential development sites?**

NO!!!! This is farmland and must never be built on. Post Brexit we need this land in order to feed a Nation.

**MB4. What land do you think is the most appropriate upon which to build?**

Brownfield sites only and NEVER farmland.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

The one and only factor that should take precedent is now how to feed a Nation-we need our farmland. All else should come after and only Brownfield sites should be thought of.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

This is still a rural area and we owe it to future generations to preserve that. All the above list will only become issues if we over-build and over-stretch a Community. We cannot keep building on greenfield sites and then wonder what to do about the infrastructure-in other words the level of housing is too great and must be actively refused.

**Further comments**

I understand that Marlborough is a special place and people want to live here. I was born in Marlborough but grew up in Ramsbury-I would like to move back but would never dream of expecting rural fields and land to provide for this wish. We need to preserve our rural Towns and villages and protect our farmers and farmland-that is vital and it is about time that Councils listened.

<b>Rep ID:</b> MARL004	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Resident
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The focus of new house building should be to provide homes for key workers/social housing. The possible housing sites for development identified all seem logical. It is difficult to specify a brownfield target without knowing how much brownfield sites are available but if identified they should be used. Some current retail sites, such as along London Road should be allowed to convert to residential or alternative uses.</p>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>Overall these are the right priorities but it would be good to see three other matters addressed:</p> <ol style="list-style-type: none"> <li>1. A minor injuries unit at Savenake Hospital</li> </ol>	



2. Additional town car parking alongside the Common(on the lefthand side.
3. Traffic entering Kingsbury Hill should be one way only with no access from the High street on the righthand side of the Town Hall.

**MB3. Is this the right pool of potential development sites?**

Yes the pool is sensible but is there any potential to complete a road link from the Pewsey Road to the Salisbury Road above St Johns School?

**MB4. What land do you think is the most appropriate upon which to build?**

Brownfield sites should be prioritised and the land above College Fields/Leisure centre seems the easiest to develop.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Link road between Pewsey and Salisbury main roads but not at the cost of a future railway line(wishful thinking).

**MB6. Are there any issues or infrastructure requirements that should be identified?**

We desperately need another GP surgery possible serving East Marlborough and hopefully independent of the current one. Under housing needs your 20 year projection of population age groups gives no base numbers on which to base a view nor the population of Marlborough perse( I think it is circa 9000) and that the over 70s is about 25%. Heavy goods vehicles need banning from Herd Street/Barn Street and Kingsbury Hill.

I do not have a problem if some High Street retail outlets were used for housing or for other purposes.

**Further comments**

Whilst i have suggested additional car parking on Trees Avenue alongside The Common, people working in Marlborough need an incentivised daily pass. Equally re the pressure sometimes seen on central carparking this could be overcome with some unique new car parking arrangements, such as free parking after 3p.m.(aka Cirencester) where you encourage residents/visitors to spread their shopping time.

Marlborough is fortunate to have a vibrant local economy supported by residents, visitors and tourists alike, we must continue to ensure our town is one of the best place to live, work and enjoy.

<b>Rep ID:</b> MARL005	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> n/a retired
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Relieved the target for housing could be worse. Should only be greater if issues of infrastructure, services etc are adequately addressed. The brownfield target should be as high as possible.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Yes, absolutely the right priorities. I have no expertise in contributing to the third part of the section, I'm afraid.	

**MB3. Is this the right pool of potential development sites?**

Yes, though I think Site 4 is the least suitable (see below)  
It is hard to see any other sites to consider.

**MB4. What land do you think is the most appropriate upon which to build?**

The most appropriate land would be the sites which would maintain Marlborough as a river valley settlement ie sites 12 and 3. At the moment the existing town cannot be seen from a distance at all from any direction. It is only as you approach downhill from the A4, the Pewsey Road, Frees Avenue, Kingsbury Street, Blowhorn and Herd Street that the town is revealed before you. I think Site 4 would be visible from the very places we hope to attract visitors to.  
As for type and form of development: I would feel that affordable housing should be absolutely priority and the majority of housing. I would hope that no buildings should be more than two storeys (max 3). individual houses, semi-detached, terraced, flats all OK but no high rise please. We desperately need young people to support our ageing population and keep our town thriving.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

All the considerations you have very thoroughly outlined must be addressed, otherwise quality of life is very much compromised of course. Again no expertise to help, sorry.  
Site 4: least desirable because of environmental issues as above. Also no obvious access - access from Barton Dene would logically assume that Site 3 should already be developed.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

No

**Further comments**

No, thank you

<b>Rep ID:</b> MARL006	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Brownfield land should be used as much as practicable in any planning. Marlborough is a beautiful town, nestled amongst precious landscapes. Any development must be cognisant of this and aim to focus on brownfield redevelopment.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Climate change and carbon reduction must take centre stage in all development and planning moving forward. These issues can no longer be ignored. Every effort should be made to engage with experts and critique the best available evidence on how to move forward with this priority, learning from towns and cities in other areas of the UK and across the globe so that best practice can be implemented. Developers must step up to the challenge, ensuring all homes are built using sustainable materials, with	

minimal waste and incorporating significant green spaces (with proper natural growth, not fake grass, astro etc which is harmful for the environment and wildlife). Affordable homes are essential but given the relatively easy access to open countryside, wildlife and nature, perhaps more homes could be planned that don't have gardens. This could then accommodate single people or those seeking smaller dwellings, offering a more diverse range of accommodation. Always building to provide a garden is challenging when space is limited. I don't feel development should be needed to enhance Marlborough's business sector. We have an incredible High Street that is losing tenants. This should be the priority for the foreseeable future and enticing in businesses that are climate friendly, ethical and sustainable should be the goal. Traffic in Marlborough is a problem of epic proportions. Every piece of work done on roads, developments etc causes huge tailbacks, bringing the town to a standstill. Parking is also not meeting demand. More needs to be done to develop car-free travel, reduce the number of HGVs passing through the town, improve road infrastructure to support all additional homes. The traffic needs to be given special attention. As does the air quality in and around Marlborough. The town should probably also start planning for car charging points. But getting people out of cars and into buses (preferably electric) or onto bikes has to be the way forward, both in terms of keeping Marlborough moving but also in terms of the health of the residents and visitors breathing in the air. Being in a valley, the air quality is impacted on by the sheer volume of traffic passing through or idling on the High Street and London/Salisbury Roads. Finally, Health Service provision and schooling are essential if any additional numbers are to be added to the town's population. The suggestion that St Johns can keep expanding should be considered carefully. It's an excellent school with an excellent reputation. Can it afford to get much bigger? Instead of expanding the existing Marlborough GP, there should be work done to build an additional surgery to service the extra numbers.

### **MB3. Is this the right pool of potential development sites?**

It is difficult to ascertain where else any building could be done. Marlborough feels packed with homes. Reading the report it looks like careful consideration and analysis has been done regarding each of the sites and it makes sense to restrict the number of separate sites and rather focus building in one area. But this will naturally impact on the existing residents in that area. My personal worry is that Marlborough, as was rightly pointed out in the report, is geographically quite cramped. Trying to expand outwards into the open countryside will start to erode the essence that is Marlborough. I would hope that the bare minimum of development be considered at any one time.

**MB4. What land do you think is the most appropriate upon which to build?**

Developing any disused/empty buildings in the town centre, expecting developers to use acquired buildings, such as the old school plot to add to the housing quota, considering use of empty business dwellings as part of housing stock should all be considered before contemplating digging up more green spaces. It is good to see the neglected Old Emporium opposite the Esso station is being renovated. This was an eye sore for many years and also a lost and wasted space. This is a fantastic project that will hopefully be put to good use once complete.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

I am sure many factors have been considered that perhaps have escaped my attention. Socially, we need to ensure a good spectrum of accommodation to meet the needs of a varied community: we have had what appears to be a significant investment in retirement accommodation within the town. Perhaps the focus now needs to shift to small dwellings for single people, couples or small groups who do not need a large 4-6 bedroom house plus garden. For me environmental consideration should take top priority. Green energy, sustainably sourced materials, lots of natural green spaces built into all designs and plans, preferably incorporated into the buildings themselves. We have to accept that climate change is a real and present challenge and so all development going forward needs to take this into consideration and act on it. And active development of green public transport, perhaps a pedestrian-only area within the town or car free zones/days that enable pedestrians to enjoy what is on offer in the town centre.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

The environment - referring to our air quality, soil quality, and water quality. All development potentially impacts on all of these key areas. Development by nature is a polluting process. The homes or businesses that then emerge need to continue on a trajectory that protects our air, soil and water.



### **Further comments**

I appreciate the opportunity to comment. Although it is probably obvious that my main anxiety concerns our environment and the effects human activity is having on our climate, I can't emphasise this enough. For me, this needs to be the top priority of all planners at this time and in the foreseeable and distant future. Thank you again for the chance to give my views. I wish you all good luck with the consultation and moving forward once it is concluded.

**Rep ID:** MARL007

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

**MB3. Is this the right pool of potential development sites?**

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Whilst I am in agreement with some of the ideas I would like to comment on the building of a new medical centre. The town is desperate for a larger facility and I am amazed that you cannot in some way incorporate the facilities at Savernake Hospital. The building is well equipped with plenty of parking and maybe a shuttle bus could operate from the town. I also think a car park at the rugby club on the common is not a good idea It is a long and dangerous walk into town especially if people have children and push chairs. Making it a park and ride would assist people on the return walk perhaps laden with shopping.

With all the new houses being built in Swindon are people going to be prepared to commute to Royal Wootton Bassett? I live on [ADDRESS REDACTED] and will be concerned with the increase in traffic that more housing will create. An increase in the towns population will put demands on a bigger supermarket as Waitrose is always too busy. Maybe a superstore should be built on the land designated for the new car park?

**Further comments**

<b>Rep ID:</b> MARL008	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The draft WC plan proposed 245 additional houses for Marlborough, which is 65 more the the Neighbourhood Plan. There is appears to be no valid rationale for this. 340 affordable houses will already be re-let between 2019 and 2036, and of the 80 that were re-let between 2016 and 2019 only 19 were taken up by local people. It is very clear that there is no need for any more houses beyond the existing commitments of 440.</p>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

**MB3. Is this the right pool of potential development sites?**

The proposed sites added to the WC Local Plan include land behind Barton Park/College Fields which would require use of a public green space to access. This is a recreational area used widely by local families and the loss of this access to green space would have profound impact on the wellbeing of the residents, in particular the children. The fields behind College Fileds and Barton Park are also green belt land, part of which is above landscape eyeline, and would be completely inappropriate, particularly when it has been clearly established that there is no requirement for addition housing above the sites already proposed.

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

This plan was developed pre-Covid and now needs review further to the dramatic changes to work and living arrangements brought about by the pandemic over the last 12 months. There will be a host of redundant commercial office space which could be easily converted to housing and could place housing where remaining employment will be, reducing requirement for traffic pollution and would support the Council's sustainability targets. There is now a need to think creatively about repurposing existing space and buildings, rather than pushing forward with new builds on green belt land.

**Rep ID:** MARL009

**Consultee code:** General Public

**Consultee Organisation (if applicable):** Retired

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

About right to meet the affordable housing needs of the community. There are not many brownfield sites but if one is available it should be used.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

Housing should be first. Traffic and parking are next, the through route (A346) should be de-primed to reduce through traffic. The health facility should be improved and there is an opportunity to build a new medical centre next to the leisure centre, creating a wellbeing hub, in the Neighbourhood Plan.

**MB3. Is this the right pool of potential development sites?**

Partially, there is a good site solution in the Neighbourhood plan.

**MB4. What land do you think is the most appropriate upon which to build?**

Brownfield sites and land adjoining existing modern developments.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

The Rawlings Well site is unsuitable due to flood risk.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Public transport is very poor, leaving people dependant on cars. The Leisure Centre is very run down and needs investment. The Health Centre needs to have more capacity.

**Further comments**

Marlborough needs to have a good compromise between meeting its social needs (housing especially) and protecting its environment. The parking capacity of the town needs to be increased, traffic pollution will be solved by getting rid of petrol and diesel engines but there will still be cars. We need more parking.

Rep ID: MARL010

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

Just about correct

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

When looking to purchase a 1 or 2 bedroom property, there is really very little available with 100% Freehold. Most properties of this category are sold either as social housing, shared ownership, or let with, in many cases, unappealing & restrictive contractual terms for the first-time buyer and setting up a monopoly.

100% Freeholds sales need to be more easily available and provided in future planning to retain the younger local people in the area rather than forcing them out through unsuitable contractually restrictive so called "affordable" stock.



**MB3. Is this the right pool of potential development sites?**

Yes the correct pool but we would make the following comment re plot 661.  
Chopping Knife Lane Development (SHELAA Sites 660 & 661) – The proposed Plot development is adjacent to the existing St John’s Park development where any road connection between the Plot 661 and St John’s to say White Horse Road, will aggravate an existing congestion on this White Horse road. This issue arises from insufficient parking slots, resulting in vehicles parking on the road to reduce the road to a “single” track. This makes passing oncoming vehicles almost impossible. Indeed, vans parked on the bends make it dangerous where visibility is reduced to see what is coming in the opposite direction. Any such road connection needs to take this problem into account with its solution, which may include a one-way routing for instance.

**MB4. What land do you think is the most appropriate upon which to build?**

Priority order should be 2,1,3 then 4 for the above plots

**MB5. Are there important social, economic or environmental factors you think we’ve missed that need to be considered generally or in respect of individual sites?**

Traffic Congestion at A4 Double Mini Roundabout - The 4 way junction of A4 London Rd with Salisbury Rd and George Lane is certainly not improving and leading to obnoxious fumes for those forced to use this route with cars or walking, particularly to Marlborough Busines Park, Premier Inn and Marlberg Estate. With recent road servicing & repairs of roads in this locality, it has clearly shown traffic gridlock on a number of occasions.  
Any further loading of the traffic system with proposed housing developments needs to address this issue once and for all.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Besides the need for more 100 Freehold housing for first time buyers with 1 or 2 bedrooms as mentioned in MB1 answer there is a growing issue with Medical Centre Access as:

New Barton Dene Medical Centre – Given the wide population region the Medical Centre needs to cater for, transport and travel of people to the Centre would need to include cars as buses are not easily and suitable for many of the visits, particularly for those people living in the countryside many miles away. Public car parking is strongly needed to provide the access; not only for medical/Doctor meetings but for prescriptions (deliver/collect), blood tests, injections, and other ancillary health practices, mostly requiring a relatively short stay period. Also, places for future AI Self Drive Cars to dock and avoid roving during the appointment will be needed.

By not having public carparking spaces, it is making worse the access for medical needs which surely the population has a right to?

**Further comments**

<b>Rep ID:</b> MARL011	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Wiltshire Council - Councillor
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The Local Plan responds to the draft Marlborough Area Neighbourhood Plan which has yet to be agreed by residents. The Local Plan includes green field sites (3622, 3326, 3626a, 3626b and 565) which are no longer part of the draft MANP as Preshute Parish within which this land sits, have withdrawn due to objections over the inclusion of these green field sites. Preshute Parish Council have commenced their neighbourhood plan which specifically excludes development on these fields ie. the Marlborough Downs within the ANOB.</p>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

The proposed developments on green field Marlborough Downs open land will have harmful landscape and visual impacts to the ANOB These sites are also unsustainable with limited access. Their development would place undue pressure on the local infrastructure — Wiltshire officers have themselves identified issues with landscape and traffic. The local plan does not include any employment land whilst proposing significant housing development, this is unsustainable.

**MB3. Is this the right pool of potential development sites?**

Brownfield sites

**MB4. What land do you think is the most appropriate upon which to build?**

Brownfield

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Marlborough is an Air Quality Management Air, the majority of pollution comes from traffic. Adding more housing without local employment opportunities will inevitably increase the number of vehicles on the constrained historic roads and increase pollution significantly.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Historic road network on constrained sites are not suitable for expansion or significant improvement.

## Further comments

The 'Planning for Marlborough' January 2021 states that a further 245 homes to be accommodated up until 2036 and that 'this level of growth represents the highest tested distribution for new homes at Marlborough.

This distribution has been chosen solely to enable the Marlborough Area Neighbourhood Plan steering group to deliver the affordable homes their work has indicated are required as a priority for the settlement. This level of growth does however represent a challenge given Marlborough sits within a constrained location compared to the wider (Wiltshire) Housing Market Area. Delivering this growth will require careful balancing against the need to protect the attractive qualities of the wider Area of Outstanding Natural Beauty.' It then goes on to state 'needs for development land should be met as far as possible on brownfield sites in order to help minimise the loss of greenfield land. The Council suggests that a target of 160 homes could be built on brownfield sites over the next 10 years.' THEREFORE, green field sites of particular landscape value within the ANOB need not, and should not be taken forward for development. Green field sites 3622, 3326, 3626a, 3626b and 565 sit above the town and have limited physical access onto already busy roads, they are highly visible and of particular landscape significance. The Parish within which they sit is currently drafting a Neighbourhood plan which specifically rejects their use. They should not be taken forward as SHELAA.

<b>Rep ID:</b> MARL012	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Wiltshire Council
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The Local Plan responds to the draft Marlborough Area Neighbourhood Plan which has yet to be agreed by residents. The Local Plan includes green field sites (3622, 3326, 3626a, 3626b and 565) which are no longer part of the draft MANP as Preshute Parish within which this land sits, have withdrawn due to objections over the inclusion of these green field sites. Preshute Parish Council have commenced their neighbourhood plan which specifically excludes development on these fields ie. the Marlborough Downs within the ANOB.</p>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

The proposed developments on green field Marlborough Downs open land will have harmful landscape and visual impacts to the ANOB. These sites are also unsustainable with limited access. Their development would place undue pressure on the local infrastructure — Wiltshire officers have themselves identified issues with landscape and traffic. The local plan does not include any employment land whilst proposing significant housing development, this is unsustainable.

**MB3. Is this the right pool of potential development sites?**

Brownfield sites

**MB4. What land do you think is the most appropriate upon which to build?**

Brownfield

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Marlborough is an Air Quality Management Air, the majority of pollution comes from traffic. Adding more housing without local employment opportunities will inevitably increase the number of vehicles on the constrained historic roads and increase pollution significantly.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Historic road network on constrained sites are not suitable for expansion or significant improvement.

## Further comments

The Planning for Marlborough' January 2021 states that a further 245 homes to be accommodated up until 2036 and that 'this level of growth represents the highest tested distribution for new homes at Marlborough.

This distribution has been chosen solely to enable the Marlborough Area Neighbourhood Plan steering group to deliver the affordable homes their work has indicated are required as a priority for the settlement. This level of growth does however represent a challenge given Marlborough sits within a constrained location compared to the wider (Wiltshire) Housing Market Area. Delivering this growth will require careful balancing against the need to protect the attractive qualities of the wider Area of Outstanding Natural Beauty.' It then goes on to state 'needs for development land should be met as far as possible on brownfield sites in order to help minimise the loss of greenfield land. The Council suggests that a target of 160 homes could be built on brownfield sites over the next 10 years.' THEREFORE, green field sites of particular landscape value within the ANOB need not, and should not be taken forward for development. Green field sites 3622, 3326, 3626a, 3626b and 565 sit above the town and have limited physical access onto already busy roads, they are highly visible and of particular landscape significance. The Parish within which they sit is currently drafting a Neighbourhood plan which specifically rejects their use. They should not be taken forward as SHELAA.



<b>Rep ID:</b> MARL013	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> None (Individual Wiltshire resident)
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The proposed scale of growth is too high.</p> <ul style="list-style-type: none"> <li>Any further housing requirements in Marlborough will require building on green field site(s) in the AONB with the consequent permanent loss of this precious and finite resource to current and future generations. The AONB surrounding Marlborough is of outstanding landscape value with wonderful open, wide-ranging vistas which will be negatively impacted by further housing development.</li> <li>Marlborough does not need more net housing. The attractiveness of Marlborough as a place to live – compact, characterful and with easy (walking distance) access to AONB countryside – means there is a permanent and irresolvable gap between housing demand and supply, no matter how many houses are built. Chasing more housing is a fool's errand that ends with over-development and permanent loss of the AONB landscape. The planning process needs to protect against this muddled thinking and incremental erosion of the landscape.</li> <li>Recent past developments in Marlborough have failed to deliver affordable housing sustainably that meets the needs of low paid local resident despite commitments to do so. Many compromises in the planning, development and implementation</li> </ul>	

stages have resulted in poor outcomes. This core driver (of affordability) for expansion is being used, intentionally or otherwise, as the mechanism to justify development approval, but is simply resulting in more market-priced housing creating ever greater strain on Marlborough's infrastructure but without the outcomes (of affordable housing) it sought to deliver. Given the constrained environment of Marlborough, any development for affordable housing should be directed to brownfield sites, lessons should be learnt from the past and new (economic) solutions need to be found to encourage a greater proportion of a site to be earmarked for affordable housing and for this to be sustainable (eg. no right to buy). There should be a brownfield target and it should be set higher than the 160 homes proposed. Every effort should be made to avoid building on a green field site in the AONB.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

In a supplementary document to the Marlborough Area Neighbourhood Plan (MANP) entitled "MANP Supporting Statement on Housing Proposals Jan 2021 FINAL", it says that affordable housing should meet the local needs of those on low pay. I agree with and support the inclusion of this clarification, otherwise the term 'affordable housing' is entirely subjective and open to endless interpretation and abuse. The same supplementary document concedes that the objective of 'affordable housing' for the low paid will not be met, stating "affordable in planning terms will rarely mean genuine affordability when compared with local incomes". On this basis, the priority around affordable housing is insupportable since the requirement in Marlborough for it to be affordable to low paid local residents cannot be met and this priority needs to be removed from the WC Local Plan. A key priority, which may be out of scope, is the management of through traffic along the A346 and specifically the de-priming of the A346 and removal of the high volumes of HGV and commercial vehicle transit traffic through Marlborough that represents a major safety, noise and air pollution hazard to residents.

**MB3. Is this the right pool of potential development sites?**

Site 1 should be removed from the potential development site list. Development here will have a very negative impact on the vistas and landscape along the Kennet valley to the East of Marlborough. It will encroach on the river Kennet and SSSI and have a strong negative impact on wildlife and biodiversity.

Just one green field site should be chosen to minimise the impact of development on the landscape setting, minimise the impact on current residents and minimise the impact on the functioning of the town during development. [The MANP is currently proposing some development on each of sites 1, 2 and 3 which is a particularly poor outcome and makes no sense.]

The old St Peter's school site development needs to be included in the development plans and needs to include an affordable housing target of 40% minimum, aligned with Core Policy 43.

#### **MB4. What land do you think is the most appropriate upon which to build?**

If a green field site needs to be chosen, Barton Dene (site 3) should be the preferred site. It sits in a well screened valley which shields the impact of development on views and the site is already surrounded on 3 sides by housing. It is a large site, which together with the College Fields site (site 4) at a later stage, has the potential for further contiguous development close to town and beyond the needs of the 2036 time horizon. Choosing Barton Dene should mean development of only one green field site in Marlborough over a timeframe that stretches beyond 2036. The site is closest to town of the 4 green field sites.

If further development land is required, site 2 should be preferred over site 1. Site 2 is in an enclosed valley setting and development here would not impact the wonderful vistas along the Kennet Valley.

The MANP document and AONB state that site 1 is "highly visible in particular from the South and East and from the North side of the river valley. Development would be highly visible and would have a significant impact on the character and quality of these views". The site abuts the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat. Development would have a devastating impact on the setting of grade II listed Elcot Mill, bringing it into the town rather than its current setting outside town. Elcot Mill currently forms part of the unique historic landscape of our countryside asset. There is no suitable road access to the site. Elcot Lane has only single lane access after the railway bridge, which itself has a conservation order on it – it is not possible to widen the road at that point.

There are 170 houses packed in high density on the St John's Park estate. White Horse Road and Chopping Knife Lane as the access to White Horse Road are both reduced to a single lane throughout day and night because parking is so tight and both roads are used to park vehicles. White Horse Road has sharp bends along its length purposefully to slow traffic, and driving visibility is poor.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

- Site 1 is in the North Wessex Downs AONB.
- The site abuts the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat. The River Kennet is a national asset and one of only a few chalk streams in the world.
- Development of site 1 would have a serious detrimental impact on biodiversity, wildlife & bird and river habitats along the river Kennet valley – introducing far greater intensities of noise pollution, air pollution, water pollution and run off, and human impact on wildlife.
- Slow worm, viper, grass snake, field mice and dormice and bats have all been observed on St John's Park housing estate which sits immediately to the south of site 1, and birds of prey and waterfowl are frequently observed over the site 1 field.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Sections 1.7 and 6.8 of the 'MANP Site Assessment Report' (page 5) notes that the withdrawal of Preshute parish council at a late stage of the process negatively impacted the option of proposing a significantly larger development site at Barton Dene (sites 3 and 4). Securing the best outcomes for the contiguous expansion of Marlborough town cannot be allowed to be thwarted by historical parish boundaries (set a century or more earlier) and by what appears to be self-interest from Preshute council to limit development to the west of town. From a Marlborough town development perspective and from a Wiltshire Council perspective

this essentially arbitrary segregation results in sub-optimal outcomes for our town. For Preshute not to participate is wrong – Preshute Parish Council and residents enjoy all the benefits of Marlborough town but makes no housing development contribution to the needs of the town. This issue needs to be addressed by Wiltshire Council to allow Marlborough and the MANP to consider a larger Barton Dene development that may fulfil all or very many of the housing development requirements for Marlborough through to end 2036. The Barton Dene site was the preferred green field option by local residents in an informal survey conducted by MANP prior to Preshute withdrawing their support (sections 5.23 and 5.24 of the MANP).

<b>Rep ID:</b> MARL014	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The proposed scale of growth is too high.</p> <ul style="list-style-type: none"> <li>• Any further housing requirements in Marlborough will require building on green field site(s) in the AONB with the consequent permanent loss of this precious and finite resource to current and future generations. The AONB surrounding Marlborough is of outstanding landscape value with wonderful open, wide-ranging vistas which will be negatively impacted by further housing development.</li> <li>• Marlborough does not need more net housing. The attractiveness of Marlborough as a place to live – compact, characterful and with easy (walking distance) access to AONB countryside – means there is a permanent and irresolvable gap between housing demand and supply, no matter how many houses are built. Chasing more housing is a fool's errand that ends with over-development and permanent loss of the AONB landscape. The planning process needs to protect against this muddled thinking and incremental erosion of the landscape.</li> <li>• Recent past developments in Marlborough have failed to deliver affordable housing sustainably that meets the needs of low paid local resident despite commitments to do so. Many compromises in the planning, development and implementation stages</li> </ul>	

have resulted in poor outcomes. This core driver (of affordability) for expansion is being used, intentionally or otherwise, as the mechanism to justify development approval, but is simply resulting in more market-priced housing creating ever greater strain on Marlborough's infrastructure but without the outcomes (of affordable housing) it sought to deliver. Given the constrained environment of Marlborough, any development for affordable housing should be directed to brownfield sites, lessons should be learnt from the past and new (economic) solutions need to be found to encourage a greater proportion of a site to be earmarked for affordable housing and for this to be sustainable (eg. no right to buy). There should be a brownfield target and it should be set higher than the 160 homes proposed. Every effort should be made to avoid building on a green field site in the AONB.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

In a supplementary document to the Marlborough Area Neighbourhood Plan (MANP) entitled "MANP Supporting Statement on Housing Proposals Jan 2021 FINAL", it says that affordable housing should meet the local needs of those on low pay. I agree with and support the inclusion of this clarification, otherwise the term 'affordable housing' is entirely subjective and open to endless interpretation and abuse. The same supplementary document concedes that the objective of 'affordable housing' for the low paid will not be met, stating "affordable in planning terms will rarely mean genuine affordability when compared with local incomes". On this basis, the priority around affordable housing is insupportable since the requirement in Marlborough for it to be affordable to low paid local residents cannot be met and this priority needs to be removed from the WC Local Plan.

A key priority, which may be out of scope, is the management of through traffic along the A346 and specifically the de-priming of the A346 and removal of the high volumes of HGV and commercial vehicle transit traffic through Marlborough that represents a major safety, noise and air pollution hazard to residents.

**MB3. Is this the right pool of potential development sites?**

Site 1 should be removed from the potential development site list. Development here will have a very negative impact on the vistas and landscape along the Kennet valley to the East of Marlborough. It will encroach on the river Kennet and SSSI and have a strong negative impact on wildlife and biodiversity.

Just one green field site should be chosen to minimise the impact of development on the landscape setting, minimise the impact on current residents and minimise the impact on the functioning of the town during development. [The MANP is currently proposing some development on each of sites 1, 2 and 3 which is a particularly poor outcome and makes no sense.]

The old St Peter's school site development needs to be included in the development plans and needs to include an affordable housing target of 40% minimum, aligned with Core Policy 43.

#### **MB4. What land do you think is the most appropriate upon which to build?**

If a green field site needs to be chosen, Barton Dene (site 3) should be the preferred site. It sits in a well screened valley which shields the impact of development on views and the site is already surrounded on 3 sides by housing. It is a large site, which together with the College Fields site (site 4) at a later stage, has the potential for further contiguous development close to town and beyond the needs of the 2036 time horizon. Choosing Barton Dene should mean development of only one green field site in Marlborough over a timeframe that stretches beyond 2036. The site is closest to town of the 4 green field sites.

If further development land is required, site 2 should be preferred over site 1. Site 2 is in an enclosed valley setting and development here would not impact the wonderful vistas along the Kennet Valley. The MANP document and AONB state that site 1 is "highly visible in particular from the South and East and from the North side of the river valley. Development would be highly visible and would have a significant impact on the character and quality of these views". The site abuts the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat. Development would have a devastating impact on the setting of grade II listed Elcot Mill, bringing it into the town rather than its current setting outside town. Elcot Mill currently forms part of the unique historic landscape of our countryside asset. There is no suitable road access to the site. Elcot Lane has only single lane access after the railway bridge, which itself has a conservation order on it – it is not possible to widen the road at that point. There are 170 houses packed in high density on the St John's Park estate. White Horse Road and Chopping Knife Lane as the access to White Horse Road are both reduced to a single lane throughout day and night because parking is so tight and both roads are used to park vehicles. White Horse Road has sharp bends along its length purposefully to slow traffic, and driving visibility is poor.



**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Sections 1.7 and 6.8 of the MANP site assessment report page 5 notes over the draw of the preshute parish council at a later stage of the process negatively impacted the option of proposing a significantly larger development site at Barton Dene securing the best outcomes for the crew expansion of Marlborough town cannot be allowed to be forwarded by historical parish boundaries sent centuries earlier and by what appears to be self-interest from pro shoot council to limit the development or West of the town from a marble town development perspective and from a Wiltshire Council perspective this essentially unilateral decision of pursuit council to withdrawal have resulted in sub optimal outcomes for our town and the MANP this issue needs to be addressed by Wiltshire Council to allow Marlborough and the MANP to consider a larger Barton Dene development that may fulfil or the all or very many of the housing development requirements from Marlborough through to the end of 2036.

<b>Rep ID:</b> MARL015	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
There is existing brownfield land in Marlborough identified in the draft Neighbourhood Plan which satisfies the need for housing through to 2036. With infill and windfall projects there is a minimal requirement or homes to be built on green field sites which are all essentially AONB.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
There are no plans for growing employment opportunities in the town so Marlborough risks becoming a commuter town with the implications for more air pollution. The Town council has identified the need for affordable homes and has a plan that more than meets that need. The town is full and we should stop creating houses for jobs that do not exist.	

**MB3. Is this the right pool of potential development sites?**

No- Sites 3 and 4 have been rejected before and should be rejected again.

- there are no obvious access points
- land at College Fields and Barton Park will be above the skyline and will require huge amounts of excavation and landscaping.
- the land is AONB
- An unnecessary number of house would fill this land to the detriment of the town - traffic congestion and air pollution are already big problems.
- the land has been rejected previously
- The draft neighbourhood plan has identified sites in the town that are needed to meet the calculated needs and these sites are simply speculative.
- the Wiltshire Plan ignores other sites within Marlborough that have been submitted by land owners and which are far better integrated in to the town.

**MB4. What land do you think is the most appropriate upon which to build?**

I refer you to the Neighbourhood Plan which is focused on largely brownfield sites.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

There is no work in the town to accommodate all the people who will live here. So we will have the prospect of more and more cars polluting a town that is already struggling with poor air quality. The area of College Fields and Barton Park are already busy areas and using this land for more houses will turn the area in to a massive and overwhelming housing estate.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

The roads around Marlborough are already congested and your plans will simply add to the pressures. If you want to alleviate the problems and stop all traffic being moved through a narrow and polluted high street then build a ring road.

**Further comments**

The need for new houses has been addressed by the draft Neighbourhood Plan and whilst elements of this plan need further consideration the plan does take account of the expressed needs of local people. 620 houses will be built in the town in your planning period and that is before windfall sites and further infill sites are considered. The land you have identified for houses is taking a sledgehammer to crack the proverbial nut when there are more sensitive solutions available. Stop destroying the town of Marlborough with unnecessary eyesore developments that simply add to infrastructure problems that the town already suffers from. We do not need huge developments that do not fit with the town.

<b>Rep ID:</b> MARL016	
<b>Consultee code:</b> Other Advisory Bodies	<b>Consultee Organisation (if applicable):</b> Sport England
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
No comment	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Creation of a healthy, inclusive sustainable town. this can be done in part through the use of 'Sport England and Public Health England' Active Design: <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a> when designing new housing and in environmental improvements	

**MB3. Is this the right pool of potential development sites?**

I have a concern over site 3 due to its proximity to playing fields. The housing could create playing blight to the school for the development of artificial grass pitches

**MB4. What land do you think is the most appropriate upon which to build?**

Non- sports land or land impacting on sports facilities

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

See above

**MB6. Are there any issues or infrastructure requirements that should be identified?**

No

**Further comments**

No

<b>Rep ID:</b> MARL017	
<b>Consultee code:</b> Parish/Town Council	<b>Consultee Organisation (if applicable):</b> Preshute PC
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL17
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The proposal for 245 additional houses (in addition to the 280 with planning permission and the 160 forecast on brownfield land) is unsustainable. This development scenario has never been tested. In 2019 WC tested 3 scenarios for Marlborough:</p> <ul style="list-style-type: none"> <li>- 50 houses and no employment</li> <li>- 135 houses and 4ha employment</li> <li>- 245 houses and 3ha employment.</li> </ul> <p>The only scenario tested with NO employment land was 50 houses and this should be the figure in the Local Plan. It is also relevant that in the adopted Core Strategy, 680 houses were proposed for Marlborough linked to 3ha of Employment land. So far 721 houses have been built or have planning permission and no new employment has come forward (and is unlikely to do so). If 50 houses were proposed as the residual housing proposal then NO greenfield sites would be required. The Draft NP for Marlborough proposes 2 brownfield sites for 40 houses and the police station site has been approved for 24.</p>	

The Pool of Potential Development Sites for Marlborough document suggests that great swathes of land in Preshute have potential for development. The Draft Local Plan Review states that 245 houses 'have been chosen solely to enable the Marlborough Area Neighbourhood Plan to deliver the affordable houses its work has indicated as a priority for the settlement'. The MANP need for housing is based on what they have termed a 'Housing Needs Assessment (HNA)', but which was a 2016 public opinion survey with a low response rate.

A March 2020 WC comment on this 'HNA' made the following observations:

- The housing needs survey does not cover the plan period, it covers a 5 year period (2016- 2021).
- In our view, the current HNA is a reasonable starting point but doesn't go quite far enough to justify a different approach to the strategic policies in the Local Plan.
- The evidence base to justify this approach for Marlborough will need to be robust and compelling.'
- it doesn't appear immediately obvious from the current document that there is an overwhelming need to deliver affordable housing/a clear need figure for a given timescale.

To date, no credible, substantive, locally based evidence data has been produced to support a need for 245 (or 180) additional houses.

Preshute is not a part of the MANP. WC say that they are working with the MANP Steering Group, so it is surprising also that WC use a different number than the MANP Steering Group and go on to suggest large areas outside the NP area as having potential when clearly this is not necessary.

It is not up to PPC to comment on another draft NP. However it seems that that the MANP is intended to precede the approval of the WC Local Plan.

WC is the statutory Planning Authority and is responsible for strategic planning. The MANP is proposing strategic development for the period up to 2036 without any strategic basis for it. This appears to suggest that strategic Planning in this area has been subjugated and delegated without any statutory basis to a NP Steering Group. WC seem simply to accept the untested suggestions of a NP Steering Group as a fait accompli without scrutiny, assessment or analysis of its impacts on the environment, character of the AONB or Climate Change, etc.

It is astonishing that a statutory planning authority should promote an unbalanced housing and jobs strategy without even testing it or having any evidence to support it. Not only do WC seem to accept without question the housing suggestions of a NP Steering Group for 180 houses, but compound this error by proposing 245 houses without explanation. The error is compounded further by identifying without reason large areas of the AONB in Preshute as having potential for development and without examining the impact of any of these sites on the character of the AONB, setting of the town or wider landscape impact.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be**



achieved?

**MB3. Is this the right pool of potential development sites?**

The site assessment should be based on up-to-date information. Proper regard should be given to landscape character and the impact of development on the character of the AONB and setting of the town.

In accordance with the NPPF and Core Strategy 2, the pool of available sites should concentrate first on available brownfield sites and unused land within the Settlement Boundary which were put forward by owners in the NP call for sites. The SHELA call for sites has been superceded by the NP call for sites and these are the sites which should be considered.

The Pool of Sites document is inaccurate in that it does not consider available brownfield sites and unused land within the Settlement Boundary first. NPPF policy exhorts Planning Authorities to be pro-active in encouraging, supporting and promoting development of brownfield and unused land in settlements.

The draft NP proposes to allocate two brownfield sites ; -Cherry Orchard for 30 houses and Gas works site for 10 houses. The Pool of Sites should include these.

There are also additional sites which were put forward in the NP Call for Sites which are suitable and achievable and should also be included. These include:

- o Police Station: With a resolution to grant 25 dwellings including 10 affordable - this was submitted after March 2019 and is not included in sites with pp in 2019.
- o St Peter's School: with PP for a hotel and 8 houses. This development appears unviable and the site is for sale. WC prepared a development brief for residential redevelopment and it has a capacity of 25 dwellings.
- o Kennet Tyre Co on London Road: was put forward and assessed for 10 houses.
- o Elm Tree Garage; was put forward with an application for 4 dwellings.
- o Rawlingswell 3.2ha on Kelham Gardens: Was assessed by WC as having a capacity of 60 houses. The actual capacity may be 40-60 after taking into account comments from Environment Agency.

These sites have a combined capacity of 100-120 dwellings. If these are included together with the 40 houses already proposed on brownfield sites, the greenfield requirement would be 20-40 houses . This would necessitate only one greenfield site.

SITE 3622 north of site 3362

This site was not proposed in the NP call for sites and should therefore not have been considered. This site is in open countryside, is in the rural area, has no vehicular or pedestrian access and is on the skyline. It is prominent in the AONB and visible from the large parts of the AONB. It cannot be developed as it has no access or frontage to a highway. Any development here even if it were possible would have a severe and unacceptable impact on the character of the AONB. This site should never have been considered in the first place, but as it was it should have been excluded in the initial sieve as impractical and unacceptable.

#### SITE 3362 north of College Fields

This site was not put forward for consideration by the owners in the NP call for sites and therefore should never have been considered. This site is visually on the skyline from Granham Hill, White Horse Trail, The Wandsdyke ancient long distance path in Marlborough and from further afield and is in the rural area of Preshute. This site has no vehicular access or frontage to any highway. Development here, even if it were practical development would have a severe impact on visual amenity, the character of the AONB and would compromise the setting of the town by introducing prominent development on the skyline contrary to National Policies and WC core Strategy policies.

This area was originally part of a planning application for the development of College Fields/ Barton Park. That application was refused by the planning authority because of its adverse impact on the character of the AONB, setting of the town, and unacceptable visual prominence. That refusal was the subject of an appeal which was called in by the Secretary of State because it involved land in the AONB. The Inspector recommended refusal for similar reason as the planning authority and the Secretary of State dismissed the appeal for the same reasons. A subsequent application for a smaller site area for land below 150m was subsequently granted leaving site 3362 as productive farmland. The landscape has not changed since then.

This site should not have been considered by WC and if it was it should have been excluded in the first sieve as impractical and unacceptable.

#### SITE3261a and 3261b

Site 3261a is a sloping wooded site conspicuous from Granham Hill and The Wansdyke ancient long- distance path in Marlborough. This site forms a key part of the setting of the town and should not be considered for development.

SITE3261b is a large site stretching far into the rural part of Preshute in open countryside. This site has no proper access but its northern boundary adjoins the boundary of a commercial racing establishment, where a number of large equestrian buildings, stables, stores and menages, as well as the owner/trainer's house, have been built. There is a real risk of development of site 3261b leading to coalescence with development on the adjoining land. This site should be excluded from the pool also.

What is clear is that the overall residual need to meet the NP figure is 180 houses not 245, 40 of these are already proposed on brownfield land in the draft NP and there is capacity for at least 100 houses on other known brownfield sites and unused land within the Settlement Boundary, where there is a presumption in favour of planning permission for housing. These sites are all known, available, suitable and achievable and should not be ignored as unknown windfall sites.

This means that if the NP assessment of housing need is accepted then there is a need for only one greenfield site and no need to identify large swathes of land outside the settlement in Preshute.

In fact there is no need for the pool of sites study at all because the NP Steering Group have already identified three possible sites.

Preshute Parish do not comment on whether the 180 houses proposed by the Steering Group can be justified, as this will be up to the SG to demonstrate this to an Inspector. However it is odd that the Planning Authority do not justify this number but simply say it was 'chosen' to meet the SG suggestions.

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Please see PDF attachment MARL17 for complete representation

Our comments on this document only relate to areas within Preshute Parish.

3.2.1 The importance of protecting landscape quality A main aim of National Planning Policy Framework (NPPF) is to promote sustainable development. Part of that strategy is to concentrate development in larger towns and settlements with many services,

reduce the need to travel by car, to encourage development at reasonably high densities and to prioritise development of previously developed land in preference to greenfield development.

Preshute is a rural area and is entirely within and surrounded by the North Wessex Downs AONB. NPPF Policy 172 states that 'great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to these issues'. The policy also states that 'the scale and extent of development within these designated areas should be limited'. It follows this by stating that 'planning permission should be refused for major developments unless very strict criteria are met.'

NPPF policy 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by:

- o Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) and
- o Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

These objectives are carried forward in the Wiltshire Core Strategy. For example, Strategic Objective 5 says 'Protecting and enhancing the natural, historic and built environment'. The Core Strategy states that key outcomes of this Objective will be:

- o The landscape character of Wiltshire will have been protected and enhanced, particularly the special qualities and scenic beauty of the AONB.

Core Strategy 2 confirms that the strategy is to prioritise the re-use of previously developed land to deliver regeneration opportunities and to limit the need for development on greenfield sites. The strategy states that 'within settlements - such as market towns - there is a presumption in favour of sustainable development. This is intended to focus development on land within settlement boundaries. The strategy continues 'outside defined limits of development (i.e. Settlement Boundaries) development will not be permitted'.

Core policy 51 Prioritises landscape protection. The policy recognises that 'the principal pressure on the landscape arising from new development is the erosion of the separate identity, character, visual and functional amenity of settlements, and their setting and impacts on open countryside'.

Para 6.83 of the Core Strategy states that 'Proposals for development within or affecting AONBs should demonstrate that they have taken account of the objectives, policies and actions set out in management plans, documents prepared by AONB officers and biodiversity plans, landscape studies, etc. for the AONB'.

Core strategy 2 also states that 'A sustainable pattern of development, including improvement to the self-containment levels of the main settlements and a reduction in the need to travel, will have contributed towards meeting climate change obligations'. The draft Local Plan for Marlborough contravenes this sustainable objective as no employment land is proposed alongside the 245 suggested new houses.

The WC Employment Land Study concludes that there is a need for 6ha of additional employment land needed in this Economic and Housing Market Area. The draft LP understandably allocates all this to Royal Wootton Bassett, which has more business infrastructure and good access. It is unsustainable and illogical to allocate 245 houses to Marlborough when all the new jobs will be in Royal Wootton Bassett. This will lead to increased commuting, pollution and congestion and is contrary to the aims of addressing Climate Change.

Preshute Parish were alarmed, surprised and very disappointed that these obvious proposals for a protected landscape area appear to have simply been put aside in preparing the 'Pool of Potential Development Sites' document.

Preshute PC object to the 'Wiltshire Council Local Plan - Planning for Marlborough' paper because:

The proposals for new houses in Marlborough should be 50 residual, which is the only number of houses with NO new employment provision that WC have tested.

This number can be accommodated on brownfield land - no new greenfield land in the AONB needs to be allocated.

WC have provided no evidence on the need for more houses in Marlborough at all and simply rely on suggestions made by the MANP Steering Group, which are themselves the result of a low turnout public opinion survey (and termed a 'Housing Needs Assessment') conducted in 2016 and cannot now be relied upon.

No substantive new evidence to support the need for more housing in Marlborough has been brought forward to justify a 245 figure.

The chapter on Pool of Potential Sites is therefore superfluous and can be omitted.

Preshute PC further object to the 'Pool of Potential Sites' paper because:

- o It excludes any consideration of brownfield sites, assuming they are all unknown windfalls despite two being proposed for allocation in the draft MANP and several being proposed by owners in the NP call for sites,
- o It includes large areas of greenfield AONB when none or very little is required
- o It includes sites which were not submitted in the NP call for sites
- o It includes sites with no access or road frontage and which are prominent on the skyline, and sites which would represent large incursions into sensitive parts of the AONB.
- o This approach is contrary to the NPPF and Core Strategy. These documents emphasise the need to prioritise development of brownfield and unused land in settlements and protect the character of the AONB as a national asset and interest of acknowledged importance.
- o WC have not given sufficient or any real weight to the importance of protecting the AONB and seem to have had a casual approach to identifying sites without any proper landscape evaluation.

**Rep ID:** MARL018

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

**MB3. Is this the right pool of potential development sites?**

The sites excluded are correctly excluded.

**MB4. What land do you think is the most appropriate upon which to build?**

Sites 2,3&4 are the closest to the town centre.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Historically the town has developed most housing to the east further housing in the east (site1) would be too distant for people to walk to the town which will result in added traffic and parking difficulties.

The major built social infrastructure schools and sports centre are to the west or west of centre of the town again this would require driving to access these from site 1.

Site 1 is adjacent to a recent development on the site of a former school and hence was considered a brown field site, it does however extend into an extremely beautiful valley.

I disagree very very strongly about the impact on the Area of Outstanding Natural Beauty for site 1. Standing on the escarpment footpath above Chopping Knife Lane it is very clear the devastating impact development would have on the Area of Outstanding Natural Beauty.

Site 1 sites in the Kennett Valley and is a rural walking recreational route to Ramesbury and Littlecote.

Site 1 is almost flat and alternative use to housing could be for Cricket and Rugby Club relocation, in this way it could be landscaped to preserve the green rural feel of the area while providing additional resources identified in the report.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Improved sports centre  
Improved medical centre  
A good area for sports pitches

**Further comments**

<b>Rep ID:</b> MARL019	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL19
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MB3. Is this the right pool of potential development sites?</b>	
The sites excluded are correctly excluded for the reasons given. Small infill should be used wherever possible in sites that may be identified at a later date.	



I am concerned that the growing spread of the town. It is reaching a point that is not sustainable by current resources. In particular a town of this size needs people to be able to walk to the town centre schools and recreation. Sites 660 & 601 are too far from the town centre, they are the furthest site, and community facilities that will add to traffic load and add to already congested streets and car parks at key times. Other sites are closer to the town centre and built community resources schools and Leisure Centre that are to the west of the town.

**MB4. What land do you think is the most appropriate upon which to build?**

I am very concerned that in considering sites 660 & 661 the report underestimates the impact on the Area of Outstanding Natural Beauty additional houses will have. The development sits in the Kennett Valley floor a much-used valley walking route to Ramesbury, Littlecote and beyond. Higher is a second footpath on the chalk ridge above Chopping Knife Lane. I attach pictures taken from there today (attachment MARL19).

The first photograph is of the site looking West towards Marlborough the development site is the ploughed field.

The second photograph is the site looking east.

The third photograph is of a recently built development in Chopping Knife Lane. This sort of development would be replicated throughout the valley floor. This development was on the site of a former school so was considered a brown field development.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Please see photo's in attachment MARL19

<b>Rep ID:</b> MARL020	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The proposed number of new houses on top of the 440 already committed is going to put great pressure on the town's infrastructure. I understand that of the 80 affordable-rent homes that were re-let between 2016 and 2019, only 19 places were taken by local people (was this because there was higher need from outside the Marlborough area?)	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Although commuter patterns may change because of the pandemic, it does not make sense environmentally to build a large number of additional housing where there is not the accompanying local employment opportunities.	
<b>MB3. Is this the right pool of potential development sites?</b>	

**MB4. What land do you think is the most appropriate upon which to build?**

Brownfield sites should be given considered before any other.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Any new development must have first to take a measure of the baseline of biodiversity and then be required to ensure that there is no net loss but there should be a biodiversity net gain.

All new development must require the highest standards of energy efficiency and heat pumps, not gas boilers plus solar PV where appropriate for the direction to the sun.

Road infrastructure must be designed for cycling safety and include pedestrian 'short-cuts'.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

The surgery should remain in a central location.

There should not be any plan for a large increase in availability of non-resident car parking as this will result in yet more traffic at a time when it is essential to manage demand not cater for growth. Even with the switch to electric vehicles, there remains significant environmental impacts.

Funding should be improving road safety for cyclists and access to town by public transport.

**Further comments**

<b>Rep ID:</b> MARL021	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> N/A
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The current proposals for growth are problematic for a number of reasons:</p> <ul style="list-style-type: none"> <li>• Firstly, further housing development in Marlborough will require building on green field site(s) in the AONB with the consequent permanent loss of this precious and finite natural asset to current and future generations.</li> <li>• Secondly, more housing will only erode the attractiveness of Marlborough as a place to live, which rests on its current compact size, its historic character and access to AONB countryside. Demand to live in the town will always be high and never satisfied. All that will ultimately be achieved is that a beautiful market town and its surroundings will be destroyed by new housing development.</li> <li>• Thirdly, the basis for much of the proposals is to deliver affordable housing sustainably that meets the needs of low paid local resident. This is indeed important and I support it, but all evidence of past initiatives with this goal point to failure as they have simply resulted in market priced housing beyond the reach of many local people</li> </ul>	

- Fourthly, new housing will place even more strain on Marlborough's infrastructure. Peak time congestion is common and parking in the town a real problem at any time of day. More cars will, in turn, generate a major safety, noise and air pollution hazard to residents.
  - Fifthly, other parts of the town's infrastructure would come under in pressure. Thames Water is already having to tanker away sewage and the existing sewerage system cannot meet demand.
- There should be NO building on greenfield sites. Future housing should be a 100% brownfield target!

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

A key priority must be the health and safety of current residents; and in particular the current air pollution within the town. In this context, a particular problem is the excessive through traffic along the A4 and the A346. Steps need to be taken to reduce traffic, not add to it with more housing.

Whilst the plan talks about the need for affordable housing, there is little evidence that this is realisable. In fact, quite the opposite appears to be the case with high market values attached to recent housing development, pushing out opportunities for local residents. As this is an unrealistic priority, there seems very little point in including it in the plan.

Wiltshire Council MUST prioritise AONB and SSI/SSSI sites in this plan, above all other housing development considerations.

**MB3. Is this the right pool of potential development sites?**

Site 1 in the Local Plan for Marlborough (Chopping Knife Lane) should be removed from the site list, for the following reasons:

- Firstly, development here will have a very detrimental impact on landscape along the Kennet valley to the East of Marlborough. It will encroach on the river Kennet and SSSI and have a strong negative impact on wildlife and biodiversity. The MANP document and AONB state that site 1 is "highly visible in particular from the South and East and from the North side of the river valley. Development would be highly visible and would have a significant impact on the character and quality of these views".

- Secondly it will destroy an important recreation space for Marlborough residents and walkers more generally. There is heavy daily footfall along the current footpaths.
- Thirdly, it will envelop the ancient Elcot Mill which is designated a woodland priority area. It would also impinge on an important Roman archaeological site, which will be a field away.
- Fourthly, it will remove the green buffer between Marlborough and Mildenhall, destroying the character of an historic local village.
- Fifthly, there is no suitable road access to the site. Elcot Lane has only single lane access after the railway bridge, which itself has a conservation order meaning it is not possible to widen the road at that point. White Horse Road and Chopping Knife Lane as the access to White Horse Road are both reduced to a single lane throughout day and night because parking is so tight and both roads are used to park vehicles.
- Finally, it will exacerbate current sewerage problems with Thames Water frequently having to unblock the local sewerage system.

**MB4. What land do you think is the most appropriate upon which to build?**

It building has to go ahead in Marlborough – which I stress I believe is unnecessary, unwanted by many and problematic – then Barton Dene (site 3) is the better site. It sits in a well screened valley which shields the impact of development on views and the site is already surrounded on 3 sides by housing. It is a large site, which together with the College Fields site (site 4) at a later stage, has the potential for further contiguous development beyond the needs of the 2036 time horizon. Choosing Barton Dene should mean development of only one green field site in Marlborough over a timeframe that stretches beyond 2036. If further development land is required, site 2 is preferred over site 1. Site 2 is in an enclosed valley setting and development here would not impact the wonderful vistas along the Kennet Valley.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

See above answers.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

As mentioned in previous questions, whilst Thames Water may well support the plan, robust questions will need to be asked as to how the current Elcot Lane sewage treatment works can affectively accommodate a significant increase in the volume of housing, when it is clearly struggling now to meet demand. The casualty in all of this may be the flooding of people homes and the beautiful river Kennet through pollution incidents.

Again, as mentioned before, the roads are not fit for purpose now. Congestion is a very real problem and will only be exacerbated as will the consequential air pollution effecting the health of the residents of the town.

**Further comments**

Sections 1.7 and 6.8 of the 'MANP Site Assessment Report' (page 5) notes that the withdrawal of Preshute parish council at a late stage of the process negatively impacted the option of proposing a significantly larger development site at Barton Dene. Securing the best outcomes for the contiguous expansion of Marlborough town cannot be allowed to be thwarted by historical parish boundaries (set centuries earlier) and by what appears to be self-interest from Preshute council to limit development to the west of town. From a Marlborough town development perspective and from a Wiltshire Council perspective this essentially unilateral decision of Preshute council to withdraw has resulted in sub-optimal outcomes for our town and the MANP. This issue needs to be addressed by Wiltshire Council to allow Marlborough and the MANP to consider a larger Barton Dene development that may fulfil all or very many of the housing development requirements for Marlborough through to end 2036.

**Rep ID:** MARL022

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

Numbers of homes in Marlborough has grown hugely in the last 15 years in percentage terms. Since the number of employment opportunities has not increased by much, the demand for homes in Marlborough must be driven by other factors. One factor must be that Marlborough is a small town with a sense of community. another is that it is surrounded by pleasant countryside with various recreational facilities. I think that what Marlborough Council is calling a "housing need" is in fact a "housing wish", and that the proposed scale of continuing growth will jeopardize the small town feel as outlying housing estates grow more and more. I agree that unused land should be put to good use, but do not agree that brownfield development should be in existing gardens because one persons capital gain becomes another persons loss of environment, views, daylight and wildlife.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**



Yes the priorities look correct. However recent developments seem to have prioritized building of non-affordable housing and I am unclear how the council will stop repeating this when pressurized by developers.

**MB3. Is this the right pool of potential development sites?**

I personally don't know any reasons why these areas should not be developed, but I imagine that those living adjacent to them may be concerned about loss of amenity.

**MB4. What land do you think is the most appropriate upon which to build?**

Re-use of existing developed land is better than expanding housing into green-fields.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Marlborough used to be a town where people could walk everywhere they needed to go - schools doctors, shops etc. Every time the housing is extended it creates homes which are so far out that many cannot or chose not to walk and need car transport, either ferrying or parking. Since the roads and car parking spaces are not being increased in step with the housing development you are creating problems which make Marlborough a less pleasant place to visit. However full marks for the 20 mph speed limit which probably needs to be extended.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

I do not think that moving the doctors surgery from George Lane to College Fields is a good idea, but would support the creation of a second doctors surgery in Marlborough if that made it possible for more people to easily walk to their appointments.

### **Further comments**

1. The housing strategies are based on a false premise that 80 new affordable homes are needed. Marlborough already has 733 affordable homes (plus the 96 new ones being built). These are re-let at the rate of about 20 each year and 80 have been re-let since 2016, meeting the NP figure. The NP does not take any of these into account. 340 affordable houses will be re-let between 2019 and 2036. WC confirm that of the 80 which were re-let 2016-2019 only 19 were taken up by local people. There is no need for any more houses beyond the existing commitments of 440.
2. The 180 houses in the NP and the 245 in Wiltshire's Plan will mean more people, more cars, greater traffic congestion, even poorer air quality and increased pressure on local services. All the new employment in this area will be in Royal Wootton Bassett. More houses in Marlborough would mean that residents will need to commute to work.
3. The proposed new car park will be unlit, unmanaged and has poor pedestrian access, located as it is up a hill away from the High Street. Apart from the Rugby Club, who will use it?
4. The proposed new Medical Centre will have no parking spaces and will likely lead to more on-street parking. Surely the existing Medical Centre could be extended incorporating the adjacent Pharmacy?
5. With the NP and Wiltshire Plan at different stages surely the two plans should be approved at the same time, not a year apart?
6. Both plans pose serious threats to the infrastructure of the Town and the well-being of residents and if unopposed will add more unnecessary homes to an already full Town.

**Rep ID:** MARL023

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

I believe that brownfield sites should absolutely be prioritised, and we should not be building on greenfield sites in our area at all, unless there is absolutely no alternative

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

These are understandable priorities, but I also think that preservation of the countryside environment should be a key priority - equal to the 4 above

### **MB3. Is this the right pool of potential development sites?**

No. The Site 1 area off Chopping Knife Lane I think is absolutely not appropriate for the following reasons:  
Unique Area of Natural Beauty

The open field that currently exists on the site is enjoyed by many residents both in the immediate area, and in the wider community around Marlborough and Mildenhall. This is from both the perspective of the view and landscape, and also as a very well used walking route. It should be seen as a strategically important site of natural beauty. The proximity to the edge of town makes this area a significant asset in terms of natural beauty, and is enjoyed by many walkers and local residents on a daily basis. Removing this will feel like an act of vandalism, and it cannot be replaced or compensated for. The other sites under consideration at Barton Dene and Salisbury Road in particular do not have anything like the same impact on the environment.

#### **Biodiversity**

This proposed development would have a significant impact on wildlife, bird and river habitats along the river Kennet valley. The local woodland habitats and the River Kennet wildlife would both be significantly impacted by a development on this site. In addition to birds of prey, slow worm, vipers, grass snakes, field mice and bats are all observed in this area, and would be impacted hugely by a new housing development on the site.

#### **Traffic Impact**

The proposed access route to the site does not appear to be feasible. The proposed access road is a very steep and narrow road leading down from Chopping Knife lane that already becomes very congested with local residential traffic and the increasing number of delivery drivers. The consequences of using this road as the access route to the new development for 50+ houses would be severe both in terms of safety for residents and also traffic congestion, pollution and inconvenience. I understand from the Zoom consultation meeting in February that the council does not take this into consideration at this stage and instead leaves this to a different assessment subsequently. However, having looked back at previous housing development assessments a few years ago for Marlborough, I noticed that similar concerns were raised at the time about access to this potential site, back when

the current site at Salisbury Road was chosen. The same issues would be in play now, so I think this really needs to be considered as a serious issue of feasibility now, rather than deferring it

#### Lack of Facilities to Support Development at this Site

Unlike the area at Salisbury Road, which has a range of local amenities and facilities in the business park opposite the site, there are no amenities at this end of the town to support a further development at the site off Elcot Lane. All shops and facilities involve a drive, and adding 50+ houses to the area will further result in the need for more people to drive to other parts of the town, increasing traffic in the town in general and associated pollution

#### **MB4. What land do you think is the most appropriate upon which to build?**

Sites 2 and 3. Environmental impact, and impact upon enjoyment of the countryside would be far less at these sites.

#### **MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Yes - as per my answer to point 9

#### **MB6. Are there any issues or infrastructure requirements that should be identified?**

Yes for Site 1 there is likely to be a huge traffic problem: The proposed access route to the site does not appear to be feasible. The proposed access road is a very steep and narrow road leading down from Chopping Knife lane that already becomes very congested with local residential traffic and the increasing number of delivery drivers. The consequences of using this road as the access route to the new development for 50+ houses would be severe both in terms of safety for residents and also traffic

congestion, pollution and inconvenience. I understand from the Zoom consultation meeting in February that the council does not take this into consideration at this stage and instead leaves this to a different assessment subsequently. However, having looked back at previous housing development assessments a few years ago for Marlborough, I noticed that similar concerns were raised at the time about access to this potential site, back when the current site at Salisbury Road was chosen. The same issues would be in play now, so I think this really needs to be considered as a serious issue of feasibility now, rather than deferring it. In addition there are no facilities (supermarkets, leisure facilities) at this end of the town, which will further exacerbate the problem

**Further comments**

**Rep ID:** MARL024

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

The figure should be lower as it does not take into account the views of the local community & the already overburdened public services in the Town.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

Provision of affordable housing is aspirational. In reality most low paid jobs in Marlborough employ people who live either in Swindon, Hungerford, Devizes or Pewsey. Provision of regular bus services from these centres would reduce the number of cars trying to enter an already congested town. There is a solution to traffic congestion & poor air quality due to through traffic - a bypass!

**MB3. Is this the right pool of potential development sites?**

Site 1 contravenes some of WC's core policies, as it merges Minal with Marlborough. There is also the encroachment on the archaeological site of Cunetio. Site 2 & part of site 3 have been included in the MANP. Sites 4 was reviewed by MANP over 2 yrs ago & considered completely unsuitable for for development multiple reasons.

**MB4. What land do you think is the most appropriate upon which to build?**

As commercial premises are vacated & as shopping habits evolve, more emphasis should be on the conversion of existing buildings to residential.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

If development is to take place, there is no mention on the control of light pollution by imposing lighting curfews, implementing smart lighting systems & placing restrictions on commercial & residential security lighting in line with NWD AONB Good Lighting Guide.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

There needs to be greater emphasis on using green walls & roofs to capture & absorb pollutants & contaminants. With increased development there needs to be a water management strategy.



## Further comments

The WC LP consultation presumes that the numbers of houses determined using the standard methodology are valid & robust. However, in recent years this standard approach to determining housing numbers has produced many inappropriate developments in wrong & unsatisfactory places. This does not sit well with local communities. The results indicate that the standard methodology is not fit for purpose & is fundamentally flawed, imposing top down numbers to satisfy central government's manifesto promises & not tailored to address local community need. Use of a top-down method to dictate what will happen where to the exclusion of local sentiment & sensitivity is not the answer. Poor planning in the form of bad or unwanted levels of development has a corrosive effect on people's' health & mental well-being producing an pervasive environment of instability & insecurity in their lives.

This view is echoed by many of those Towns & Parishes in Wiltshire.

A more realistic approach to addressing local community need would be for WC to promote, encourage & actively nurture the establishment of local Neighbourhood Plans, as these can be used to inform the planning process. They would empower communities & give people a say in how their area develops. This can only be beneficial for both Wiltshire Council & local communities.

<b>Rep ID:</b> MARL025	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL25
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The NPPF requires Planning Authorities to promote sustainable development. After taking into account the 154 houses built 2016-2019, the 280 with planning permission, the 160 forecast on brownfield land and the residual proposals for 245 this amounts to a development of 839 houses. This will increase the population by 2,000 people. This level of development in a town of 8,300 people will have a severe impact on the town and is unsustainable.</p> <p>The housing strategy 'has been chosen solely' to meet a requirement for affordable houses suggested by the NP Steering Group. Wiltshire Council provide no objective evidence of their own to support this number. WC have recently stated that that there isn't any over whelming need for affordable housing in Marlborough and the draft Local Plan strategy is at complete odds with this. The SG suggestion comes solely from an opinion survey carried out by Cobweb in 2016. This survey which only covers the period to 2021, is out of date . It is also fundamentally flawed as it ignores the actual availability of affordable houses. The survey suggests a need for 175 affordable houses. 96 new affordable houses are being provided leaving a net requirement for 80 affordable houses according to the MANP Steering Group. However, WC Housing Department have confirmed that between</p>	

2016 -2019, 80 affordable houses have been made available in the 4 years since the survey through re-lets and this meets the SG figure. There is no evidence of a need for further affordable houses as re-lets will continue at 20pa throughout the rest of the plan period providing about 340. WC have confirmed that of the 80 affordable homes provided only 19 were taken up by local people and there is no evidence of any unmet need for local people.

The emerging SS for 245 residual houses and no employment has never been tested. Only one scenario was tested with NO new employment development and this was for 50 residual houses. It is unsound to propose a strategy, the impacts of which have never been tested or considered.

#### Number of Houses

Appendix Two; Planning for Marlborough states in para 12 on page 355 that the number of houses proposed for Marlborough of 245 'has been chosen solely to enable the Marlborough Area Neighbourhood Plan to deliver the affordable homes that their work has indicated are required.' WC has no evidence whatsoever to justify 245 houses. In any event the Steering Group do not say they need 245 houses. The SG say they need 180 houses. Their opinion survey states that 175 affordable houses are required. After taking into account the 96 being built or approved, the SG suggest a requirement for 80 affordable houses.

The SG propose to allocate 180 houses on 5 sites. Wiltshire Council provide no evidence for the assertion that 245 houses are required without any explanation.

#### The Basis for the Housing Strategy

The housing proposals in the Spatial Strategy for Marlborough is based 'solely' on the 'work done' by the NP Steering Group. WC just accept this without scrutiny, consideration, testing or analysis. The 'work done' consists entirely of an opinion survey carried out by Cobweb Consulting in 2016 which asked people over the age of 16 if they were likely to form a new household and/or require a new house by 2021 and what they could afford. The Cobweb report concludes there is a requirement for 175 affordable houses.

Firstly, this is not a generally applicable or reliable methodology for assessing housing needs.

Secondly, anyone intending to move house by 2021 will have done so and this opinion survey is out of date.

Thirdly, Cobweb thought more young people should have responded and so they inflated the figures for people under 30 and did not even rely on the actual survey results. This manipulation of data is confirmed in para 5.3.2 of the Cobweb report. This acknowledged manipulation of out-of-date responses cannot be relied on as a basis for policy.

Fourthly, any proper housing needs study should consider not only an objective assessment of need, but also a factual analysis of supply to arrive at a net requirement for new houses. The housing 'survey' by Cobweb did not to consider the actual supply of affordable houses.

Once the committed affordable houses are taken into account the NP Steering Group suggest a requirement for about 80 if we take the survey at face value.

The largest regular supply of affordable houses is always the existing supply and the number of re-lets this gives rise to.

In a response to a Freedom of Information request (Case ID 202000996), Wiltshire Council confirmed on 8th January 2021 that; in the 2011 census there were 733 affordable homes in Marlborough and in the 4 years 2016 – 2019 inclusive 80 existing affordable houses have been re-let.

Therefore, even the affordable houses which Cobweb says are required have been provided.

Over the plan period it can be expected that 20 pa will be available which would be a further 340 between 2019 and 2036.

Current re-let rates are one re-let per house every 36 years.

There is no evidence of any shortfall in the supply of affordable houses.

Wiltshire Council also confirms that of the 80 affordable houses which were available through re-letting between 2016 and 2019, only 19 were taken up by people living in Marlborough.

There is no evidence of any unmet need for affordable houses for local people in Marlborough which underpins the entire housing strategy.

There is no evidential basis for the number of 245 houses and the emerging Spatial Strategy which is unsound.

The NP link officer made clear at several NP meetings that I attended that WC considered that 50 residual houses was the preferred scenario.

WC also seem to share my view that the NP housing opinion survey provides no basis or evidence for any specific housing proposals. On 11th March 2020 [NAME REDCATED] – the NP link officer sent Marlborough Town Council clerk an email which summarised the views of ‘a group of internal consultees’ and concluded that ‘it doesn’t appear immediately obvious from the current document that there is an overwhelming need to deliver affordable housing.’

There does not appear to be any clear planning rationale why WC now propose 245 houses and the WC plan states that the housing proposals were chosen to reflect a suggestion of the NP Steering Group. This is not a robust, defensible justification for the strategic housing proposals for Marlborough.

I have been involved in delivering affordable housing for many years including being a director of a housing association company and it is wasteful to put scarce affordable housing in a location with no need which only serves to deprive more sustainable locations with a need from meeting it. It is even more perverse to use a fictitious need to justify strategic housing development in a town with no new jobs and poor public transport.

Testing the Emerging Spatial Strategy

The emerging Spatial Strategy which proposes 680 houses, and has no provision for any new employment has never been tested.

Para 12 of the document ‘Planning for Marlborough’ on page 355 of the emerging SS says that ‘245 houses represented the highest tested distribution for new homes at Marlborough’. This statement is incorrect.

In 2019 WC tested 3 scenarios for Marlborough;

50 houses and no new employment;

135 houses linked to 4ha new employment and 245 houses linked to 3ha new employment.

The SS strategy of 245 houses with no new employment has never even been tested. The emerging SS contains no employment and is clearly an unbalanced strategy.

The 2006-2026 Core Strategy required 3 ha of employment land as a balanced housing and jobs strategy. Even that strategy has proved unbalanced as no new employment development has taken place. If 3ha was required as a balanced strategy for 680 houses in the Core Strategy 2006-2026 and which has not been provided, it is unsound and unsustainable for a further 680 houses to have no employment land. This is contrary to the aim of 'facilitating self-containment' in para 24.

It is astonishing that the effect of strategic planning will be to ignore the unbalanced development which has occurred since 2006 and to compound this by proposing a further 680 houses with no employment and without testing the impacts of this approach.

It is unsound to propose a strategy which has never been tested. This level of growth which can only lead to mass commuting by car is contrary to the aim of the emerging SS set out in para 22 'to address climate change and reduce carbon reduction'.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

The NPPF states in para 7, 'The purpose of the Planning System is to contribute to the achievement of sustainable development. Sustainable development has three overarching objectives; economic, social and environmental. These need to be pursued in mutually supportive ways to secure net gains in each objective.

The emerging SS proposes 680 additional houses in Marlborough 2016-2036, however no new employment land is proposed. This will simply increase commuting by car to other towns with jobs and increase the difficulty for people without a car to access jobs at all.

This is contrary to achieving sustainable economic objectives.

WC state that 154 houses were built between 2016 -2019 and that there is pp for 280 houses. WC also forecast that 160 houses will be built on brownfield sites by 2031. WC housing strategy proposes 245, This all adds up to 839 additional houses and will increase the population by about 2,000 people. This level of growth with no new employment serves no social, economic or environmental objective.

The emerging SS ignores the brownfield land development contrary to NPPF policy 118 and 119 which require planning policies to 'give substantial weight to the value of using brownfield land'.

The draft SS relies on large developments in the AONB contrary to NPPF policy 172 which requires 'great weight be given to conserving and enhancing landscape and scenic beauty in AONBs.

The WC Employment Land study concludes that there is a need for 6ha of new employment land in this Strategic Housing and Economic Market Area. The draft SS allocates all 6ha new employment land to Royal Wootton Bassett. The draft SS states that there is a current shortage of employment land in Marlborough. Allocating all the new jobs to Royal Wootton Bassett and strategic housing development to Marlborough is unbalanced and unsustainable.

The emerging SS leading to additional commuting, poorer air quality, congestion and loss of AONB is also contrary to achieving WC aims regarding addressing climate change.

The emerging SS therefore is not a sustainable strategy.

### **MB3. Is this the right pool of potential development sites?**

The Pool of Potential sites is based on out-of- date information, in that it includes two sites which were not put forward in the Neighbourhood Plan Call for Sites. Even if these sites are included for 'plan consistency' across the county these sites and two others should have been excluded at the first sift.

The Draft Local Plan ignores the adverse effects on the AONB contrary to the NPPF and the current Core Strategy.

The only scenario tested assuming no new employment land was for 50 residual houses. This level of growth can easily be accommodated on brownfield sites. There is no need to consider greenfield sites.

The site assessment should be based on up- to- date information and as the whole town is within the AONB proper regard should be had to landscape importance and impact of development on the character of the AONB which is of National Importance.

The pool of available sites should concentrate first on the available brownfield sites and unused land within the recently adopted Settlement Boundary which have been put forward for consideration by owners. I have already drawn attention to these earlier in these comments.

If WC had started from a view that the residual housing requirement was 50 houses there would be no need for any consideration of a pool of potential sites.

#### **SITES WHICH SHOULD NOT HAVE BEEN INCLUDED**

The SHELAA call for sites has been superceded by the Neighbourhood Plan call for sites and only sites put forward in the more recent call for sites for the NP should now be considered as they are up-to-date.

The Pool of Potential sites report contains two sites which should not have been included and if they were included, because of the need in the draft SS for a consistent approach across the county, they should have been excluded in the first sift;

#### SITE 3622 north of site 3362

This is north of the site 3362 and was not proposed in the MANP call for sites and should be excluded. This site is in open countryside, is in the rural area, has no boundary to open country and has no access and is on the skyline. It is clearly prominent in the AONB and visible from large parts of the AONB. It cannot be developed as it has no access and even if it could any development here would severely affect the character of the AONB, visual amenity and setting of the town. This site is outside the recently adopted Settlement Boundary. This site should have been excluded immediately as unsuitable. Development of this site, even if it were possible is contrary to the adopted Core Strategy and policies in the draft Local Plan set out in the paper Empowering Rural Communities and contrary to the NPPF which seeks to prevent major development in the AONB.

#### SITE 3326 north of College Fields

This site north of College Fields was not put forward in the MANP call for sites and should be excluded. This site is also visually prominent from Granham Hill, the White Horse Trail, Wansdyke in Marlborough and further afield and is on the skyline and is in the rural area of Preshute. This site has no access and development here even if possible would have a severe visual impact on the AONB, on the character of the AONB and on the setting of the town and would be contrary to the policies in the Local Plan for rural areas.

This area was originally part of a planning application for the development of College Fields and Barton Park. That application was refused by the previous planning authority because of its impact on the AONB. The refusal was the subject of an appeal. The appeal was called in by the Secretary of State. The Inspector recommended refusal because of its adverse effect on visual amenity, character of the AONB, adverse effect on the setting of the town and in important views from Granham Hill and Manton to the south and the Wansdyke in Marlborough. The Secretary of State dismissed the appeal for the same reasons. The landscape has not changed since then.

Whilst this site was put forward in the SHLAA in 2014, the sensitivity of this site is now recognised by the owners and this site was never put forward in the Call for Sites for the Marlborough Area Neighbourhood Plan. This site is outside the recently adopted Settlement Boundary where development should be prevented and it is in the AONB which the NPPF seeks to protect from large developments. This site and site 3622 should not have been included in the pool of potential sites and if they were they should have been excluded immediately.

#### SITES WHICH SHOULD HAVE BEEN EXCLUDED AT FIRST SIFT DUE TO IMPACT

##### SITES 3261a and SITE 3261b

Site 3162a is a sloping wooded site conspicuous in views from Granham Hill and the Wansdyke in Marlborough. This site forms a key part of the setting of the town.

Site 3261b is a long site stretching far into open countryside in the AONB. This site has no access and should be excluded. The northern edge of the site has a boundary with a commercial racing establishment where a number of large equestrian buildings and the trainer/owners house are located. The field immediately adjacent to the north edge of this site is used for commercial

eroding the rural character of the area and AONB. This risk of coalescence is plain to see from Granham Hill and this would adversely affect the setting of the town and enjoyment and character of the AONB

If the emerging SS had scrutinised the flawed 'housing needs survey' and the actual evidence for the supply of affordable houses it would be clear that there is no requirement for large numbers or indeed any more affordable houses. The alleged need for affordable houses is the entire basis of the MANP strategy and by extension the entire basis of the WC draft Local Plan in as far as it relates to Marlborough. A proper analysis would show that there is no need for any greenfield sites at all. Indeed the only scenario which WC have tested which has no new employment is the scenario for 50 houses. There are known brownfield sites for 50 houses including the police station approved for 24, St. Peter's school, Gas works, and Resource Centre.

Identifying large sites in the AONB as having development potential is contrary to NPPF para 172 which states; 'The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, none of which apply here.'

The Pool of Potential Sites report gives insufficient weight to this National Policy and ignores the need to protect the AONB.

#### **MB4. What land do you think is the most appropriate upon which to build?**

##### **Brownfield Sites:**

Wiltshire Council forecast that 160 houses will be built on brownfield sites by 2031, and assumes these are unidentified sites and should be ignored. This is flawed because in the case of Marlborough there are brownfield sites which were proposed by the owners in the call for sites for the Marlborough Area Neighbourhood Plan. They are all available, suitable and achievable and are within the Settlement Boundary, close to the town centre and suitable. These sites are;

- Police Station on George Lane subject to a planning application for 24 houses,
- Elm Tree Garage on London Road subject to an application for 4 houses
- St Peters School on London Road with a development brief prepared by WC -for 25 houses. The site has planning permission for a hotel and 8 houses although this appears to be unviable.
- Land off Cherry Orchard near St John's School, with capacity for 30 houses and is allocated in the emerging Neighbourhood Plan
- Gas Works on Kelham Gardens , site put forward in the MANP call for sites 10 houses. This site is allocated in the emerging Neighbourhood Plan,
- Kennet Tyre Co site on London Road, assessed by WC as suitable for 10 houses put forward in the MANP but ignored.



-Rawlingswell off Kelham Gardens, this 3.2ha site was put forward in the MANP call for sites is available and assessed by WC as suitable and achievable for 60-80. Much of the site is outside the functional flood plain and has capacity for 40 -60 houses. The SS deletes all this site for no reason.

There is no reason why these sites should not be allocated.

The Emerging Spatial Strategy has as a main objective: 'To maximise the use of previously developed land', and states that; 'Development Plans should identify as much brownfield land for development as possible'.

The SS should take these known and suitable sites into account with a capacity of at least 120 -130 houses.

NPPF para 117 sets out the imperative of having 'objectively assessed housing needs' and 'making as much use as possible of Previously developed land'; NPPF para 118 (c) states that 'Planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs,

NPPF para 119 exhorts Planning Authorities to take a proactive role in identifying and bringing forward suitable land including brownfield.

The Planning Authority should strive to maximise use of these brownfield sites and unused land and not simply ignore them.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Impacts on existing residents

Pages 9-11 of the Marlborough paper (pages 361-363 in the SS), sets out various issues such as need for more sports pitches, public open space, shortage of parking, congestion on various routes, air quality falling below WHO standards in the Air Quality Zone, shortage of employment land etc. The SS contains no certainty or firm proposals to address these.

The emerging SS will simply exacerbate these problems to a considerable degree and reduce the quality of life of local people.

The emerging SS also requires large scale development in the AONB, has provided no proper landscape assessment and takes a very casual attitude to environmental impact.

The emerging SS is untested, unsound and is unsustainable and WC confirm the environmental risks of this strategy which you also say may cause unacceptable harm to the character of the AONB.

It seems that WC has simply accepted suggestions of the Steering Group at face value based on an out of date and manipulated survey, takes no account of actual supply of affordable housing, ignores known brownfield sites put forward by owners and maximises the development of greenfield land to promote an unsustainable strategy which has never been tested.

The strategy has no benefits whatsoever for local people.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

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**Further comments**

For full representation, please see attachment MARL25. Some comments included below not fitting the prescribed questions:

Responsibility for Strategic Planning

WC are the Statutory Local Planning Authority responsible for strategic planning. The only adopted Strategic plan is the Wiltshire Core Strategy with a timescale up to 2026.

The Marlborough Area Neighbourhood Plan has been published for public consultation and is progressing ahead of the Strategic Local Plan Review . The draft NP has a timescale up to 2036 and proposes strategic development.

There is no strategic plan for the period covered by the draft NP. Government policy states that NPs must be 'in general conformity with the Strategic plan'. There is no strategic plan for the NP timescale and so it cannot be 'in general conformity' with strategic planning.

The housing provisions in the adopted Core strategy requires 680 houses in Marlborough by 2026. So far this has already been exceeded with 721 built or with pp. No further strategic development is needed to satisfy the adopted Core Strategy as this has been met.

The draft NP is setting a new strategic policy.

The draft SS states that its housing policies 'have been chosen solely ' to conform to a suggestion by the NP Steering Group.

This means that strategic planning has in effect been delegated to a NP Steering Group. This is an abrogation of strategic planning by the WC who have in effect 'sub-contracted' strategic planning the Steering Group, without evidence, scrutiny or testing and is contrary to the Town and Country Planning Act.

Governance of Marlborough Area Neighbourhood Plan and impact on Draft Local Plan

There may be a governance issue concerning the MANP in that a member of the Steering Group who has attended about 50 meetings of the SG is [TEXT REDACTED]who have put forward sites for development to the SG of which the [TEXT REDACTED] is a member. The [TEXT REDACTED] have been involved throughout the entire NP process and land put forward by [TEXT REDACTED] to the SG is in fact proposed for development in the draft NP. This conflict of interest and the appearance

of bias seems inescapable and the NP may be fatally flawed. It is not clear that the SG has abided by its own terms of reference regarding the role of representatives of organisations.

The WC draft Local Plan simply takes forward the conclusions of the NP Steering Group. If the NP is found to be flawed then the WC may be also flawed in as far as it relates to Marlborough as it accepts the Neighbourhood Plan SG conclusions and simply rolls these forward in the Local Plan without any independent evidence or even testing of impacts.

#### Governance

There is also a governance issue in relation to the preparation of the draft NP which also impacts on the draft WC Local Plan which simply applies the flawed NP proposal to its own plan.

[TEXT REDACTED] has been a member of the SG from the inaugural meeting to the present day and has attended about 50 meetings of the SG.

[TEXT REDACTED] are promoting land in the NP area for residential development. Greenfield land owned by [TEXT REDACTED] was submitted to the SG by the [TEXT REDACTED] for development in response to the SG call for sites. The [TEXT REDACTED] clearly have a financial interest in the outcome of the NP which was being prepared by the SG of which [TEXT REDACTED] is a member.

This is contrary to codes of conduct, Nolan principles, natural justice and Government advice and seems to be a conflict of interests. The land put forward by [TEXT REDACTED] for residential development which is owned by the College is allocated for development in the draft NP .

In addition land owned by [TEXT REDACTED] organisation is also allocated for a replacement medical centre which presumably would be sold to a developer. This land is not identified on any plan however it has been described by the SG chairman as being in front of the leisure Centre. This general site area was never put forward in the Call for Sites The medical centre idea has not been asked for by the Clinical Care Commission or anyone else and is simply added as an afterthought as a new development opportunity. Both allocations enrich the SG member's organisation. No evidence is provided in the NP as to why the existing Medical Centre should be relocated and no plan showing where the new centre would be apart from stating that it would be on College land and appears to be in an area which was never put forward in the Call for Sites.

The outcome of all this is that it may give rise to the appearance of bias, but this may be for others to judge under The Planning and Compulsory Purchase Act 2004.

As the SS accepts the suggestions of the NP Steering Group 'solely' as the basis for its own strategy, if the NP is found to be flawed then the SS is also flawed in as far as it relates to Marlborough.

If the SS proposed that the residual number of houses required for Marlborough were 50, which is the only number tested without any employment land then the possible appearance of bias would not arise as there is ample scope for 50 houses on brownfield land, including the 40 already identified in the draft NP, the police station and St Peter's School, and there would be no requirement to allocate any greenfield sites in the AONB.

## CONCLUSION

The housing strategy in the draft LP was chosen 'solely' to facilitate the affordable housing suggested in the emerging Marlborough Area Neighbourhood Plan. By simply accepting the suggestions of the Steering Group and following the NP and accepting all its proposals, it appears that WC have given up their proper role as strategic planning authority. The NP proposals have not been scrutinised or analysed and the strategy has never been tested. It is unsound for WC to simply accept the NP proposals. It is also unsound to put forward a strategy which has never been tested.

There is no credible evidence to justify the affordable housing proposals in the Marlborough Area Neighbourhood Plan which takes no account of actual supply and is based on an out- of- date opinion survey. The draft SS simply applies the Neighbourhood Plan SG suggestions as a basis for its own Local Plan without question. WC have no evidence to justify its own housing proposals for Marlborough.

The SS ignores suitable, achievable and available brownfield sites which were put forward and proposed by owners. The emerging SS will lead to significant commuting by car, and will have an adverse effect on congestion and air quality which is already below WHO limits and is unsustainable and contrary to the aim of addressing Climate Change.

The emerging SS will lead to development of sensitive greenfield land outside the recently adopted Settlement Boundary in the AONB, contrary to Local Plan and NPPF policies.

The emerging SS has not given sufficient weight to the impact of its proposals on the AONB and has not considered the sustainability of its strategy in the round.

The strategy for more large scale housing development in Marlborough with no new employment is unsustainable especially as the required 3ha of employment land required in the current Core Strategy was not delivered.

The only scenario which had no new employment allocation and has been tested by WC was the scenario for 50 houses.

The emerging SS recognises the risks of its own strategy to the AONB- and then ignores this risk.

The appropriate number of houses should be limited to 50 and this can easily be achieved on known brownfield sites.

The balance of housing required in the Swindon Housing Market Area should be allocated to Royal Wootton Bassett, where all 6ha of required employment is also proposed as a balanced sustainable housing and jobs strategy.

There is also a governance issue relating to the SG proposals which allocate land promoted by the employers of a member of the SG. If that plan is found to be flawed, then the draft SS is also flawed as it simply applies the SG suggestions to its own plan.

One site now proposed for development also owned by the College was never put forward in the SG Call for Sites anyway and has been added as an opportunistic afterthought.

The Marlborough Area Neighbourhood Plan does not meet the basic tests as it is not and cannot be 'in general conformity ' to a strategic plan which has not yet been prepared and at the Article 15 review of the NP by WC it should be rejected.

The WC draft SS should be amended and the residual housing proposals should be 50 houses with no greenfield sites necessary.

<b>Rep ID:</b> MARL026	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> None
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
There is no justification for any growth without first addressing the lack of infrastructure.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Priorities 3 and 4 are the most important. Priority 3 should NOT include improved parking, which will simply worsen traffic congestion, but should concentrate on improved public transport (buses) and the encouragement of cycling and walking.	

**MB3. Is this the right pool of potential development sites?**

We shouldn't be considering any.

**MB4. What land do you think is the most appropriate upon which to build?**

Not applicable.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Not applicable

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Transport Opportunities should include better bus services within Marlborough and the surrounding area and better provision for cyclists.

**Further comments**

The last decade has seen an increased population but stagnating or reduced infrastructure. Declining public transport has led to more road congestion and worse air quality. Infrastructure needs to catch up before additional housing can be considered.

<b>Rep ID:</b> MARL027	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> Not Applicable
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Based on the historic re-let rate, I don't understand the need for more houses beyond the existing commitment.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
I believe that of the 80 affordable houses re-let since 2016, less than 25% have been taken up by local people. The proposed plans will mean more people, more cars, greater traffic congestion, even poorer air quality and increased pressure on local services.	

**MB3. Is this the right pool of potential development sites?**

-

**MB4. What land do you think is the most appropriate upon which to build?**

-

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Where is the employment in Marlborough for new people moving in? Again, this appears that it will lead to more commuting and air pollution.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

The proposed new car park will be unlit, unmanaged and have poor pedestrian access. The proposed new Medical Centre will have no parking spaces, which will likely lead to more on-street parking. Has consideration been given to extending the existing Medical Centre, which has a very convenient car park adjacent to it?

**Further comments**

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<b>Rep ID:</b> MARL028	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The proposed scale of growth is too high.</p> <ul style="list-style-type: none"> <li>• Any further housing requirements in Marlborough will require building on green field site(s) in the AONB with the consequent permanent loss of this precious and finite resource to current and future generations. The AONB surrounding Marlborough is of outstanding landscape value with wonderful open, wide-ranging vistas which will be negatively impacted by further housing development.</li> <li>• Marlborough does not need more net housing. The attractiveness of Marlborough as a place to live – compact, characterful and with easy (walking distance) access to AONB countryside – means there is a permanent and irresolvable gap between housing demand and supply, no matter how many houses are built. Chasing more housing is a fool's errand that ends with over-development and permanent loss of the AONB landscape. The planning process needs to protect against this muddled thinking and incremental erosion of the landscape.</li> <li>• Recent past developments in Marlborough have failed to deliver affordable housing sustainably that meets the needs of low paid local resident despite commitments to do so. Many compromises in the planning, development and implementation stages</li> </ul>	

have resulted in poor outcomes. This core driver (of affordability) for expansion is being used, intentionally or otherwise, as the mechanism to justify development approval, but is simply resulting in more market-priced housing creating ever greater strain on Marlborough's infrastructure but without the outcomes (of affordable housing) it sought to deliver. Given the constrained environment of Marlborough, any development for affordable housing should be directed to brownfield sites, lessons should be learnt from the past and new (economic) solutions need to be found to encourage a greater proportion of a site to be earmarked for affordable housing and for this to be sustainable (eg. no right to buy). There should be a brownfield target and it should be set higher than the 160 homes proposed. Every effort should be made to avoid building on a green field site in the AONB.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

In a supplementary document to the Marlborough Area Neighbourhood Plan (MANP) entitled "MANP Supporting Statement on Housing Proposals Jan 2021 FINAL", it says that affordable housing should meet the local needs of those on low pay. I agree with and support the inclusion of this clarification, otherwise the term 'affordable housing' is entirely subjective and open to endless interpretation and abuse. The same supplementary document concedes that the objective of 'affordable housing' for the low paid will not be met, stating "affordable in planning terms will rarely mean genuine affordability when compared with local incomes". On this basis, the priority around affordable housing is insupportable since the requirement in Marlborough for it to be affordable to low paid local residents cannot be met and this priority needs to be removed from the WC Local Plan. A key priority, which may be out of scope, is the management of through traffic along the A346 and specifically the de-priming of the A346 and removal of the high volumes of HGV and commercial vehicle transit traffic through Marlborough that represents a major safety, noise and air pollution hazard to residents.

**MB3. Is this the right pool of potential development sites?**

Site 1 should be removed from the potential development site list:  
- Development here will have a very negative impact on the vistas and landscape along the Kennet valley to the East of Marlborough. The AONB has stated that site 1 is "highly visible in particular from the South and East and from the North side of

the river valley. Development would be highly visible and would have a significant impact on the character and quality of these views”.

- It will encroach on the river Kennet and SSSI and have a strong negative impact on wildlife and biodiversity, and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat.

- There is a lack of facilities to support development on site 1. Unlike the area of Salisbury Road (that is in close proximity to a range of local amenities and facilities in the business park opposite) or Barton Dene (given its proximity to the centre of town and the leisure facilities), there are no amenities at the East end of town to support further development at the site off Elcot Lane. All shops and facilities involve a drive, and adding 50+ more homes to the areas will result in increased traffic in the town and increased noise and air pollution.

- There is no suitable road access to site 1 Elcot Lane has only single lane access after the railway bridge, which itself has a conservation order on it – it is not possible to widen the road at that point. There are 170 houses packed in high density on the St John’s Park estate. White Horse Road, and Chopping Knife Lane as the access to White Horse Road, are both reduced to a single lane throughout day and night because parking is so tight and both roads are used to park vehicles. White Horse Road has sharp bends along its length purposefully to slow traffic, and driving visibility is poor.

Just one green field site should be chosen to minimise the impact of development on the landscape setting, minimise the impact on current residents and minimise the impact on the functioning of the town during development. [The MANP is currently proposing some development on each of sites 1, 2 and 3 which is a particularly poor outcome and makes no sense.]

#### **MB4. What land do you think is the most appropriate upon which to build?**

If a green field site needs to be chosen, Barton Dene (site 3) should be the preferred site. It sits in a well screened valley which shields the impact of development on views and the site is already surrounded on 3 sides by housing. It is a large site, which together with the College Fields site (site 4) at a later stage, has the potential for further contiguous development close to town. Choosing Barton Dene means development of only one green field site in Marlborough over a timeframe that could stretch beyond 2036. The site is by some way the closest to town of the 4 green field sites. Building on sites 3 & 4 will minimise additional traffic that would otherwise arise from new developments on sites 1 or 2. The distance of sites 1 and 2 from town will require residents to drive to centre-of-town facilities and will only add further to Marlborough’s parking problems.

If further development land is required, site 2 should be preferred over site 1. Site 2 is in an enclosed valley setting and development here would not impact the wonderful vistas along the Kennet Valley.

Site 1 abuts the River Kennet Site of Special Scientific Interest (SSSI). Development would have a devastating impact on the setting of grade II listed Elcot Mill, bringing it into the town rather than its current setting outside town. Elcot Mill currently forms part of the unique historic landscape of our countryside asset.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

With regard to site 1:

- Site 1 is in the North Wessex Downs AONB. There are no "exceptional circumstances" provided to support this development. The AONB is a county and national asset that once spoilt with housing development is lost forever, for the current generation and all future generations – they are a finite and limited resource.
- The site abuts the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat. The River Kennet is a national asset and one of only a few chalk streams in the world.
- Development of site 1 would have a serious detrimental impact on biodiversity, wildlife & bird and river habitats along the river Kennet valley – introducing far greater intensities of noise pollution, air pollution, water pollution and run off, and human impact on wildlife.
- Slow worm, viper, grass snake, field mice and dormice and bats have all been observed on St John's Park housing estate which sits immediately to the south of site 1, and birds of prey and waterfowl are frequently observed over the site 1 field.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Sections 1.7 and 6.8 of the 'MANP Site Assessment Report' (page 5) notes that the withdrawal of Preshute parish council at a late stage of the process negatively impacted the option of proposing a significantly larger development site at Barton Dene. Securing the best outcomes for the contiguous expansion of Marlborough town cannot be allowed to be thwarted by historical parish boundaries (set centuries earlier) and by what appears to be self-interest from Preshute council to limit development to the west of town. From a Marlborough town development perspective and from a Wiltshire Council perspective this essentially unilateral decision of Preshute council to withdraw has resulted in sub-optimal outcomes for our town and the MANP. For Preshute not to participate is wrong – Preshute Parish Council and its residents enjoy all the benefits of Marlborough town but make no housing development contribution to the needs of the town. This issue needs to be addressed by Wiltshire Council to allow Marlborough and the MANP to consider a larger Barton Dene development that may fulfil all or very many of the housing development requirements for Marlborough through to end 2036. The Barton Dene site was the preferred green field option by local residents in an informal survey conducted by MANP prior to Preshute withdrawing their support (sections 5.23 and 5.24 of the MANP).

<b>Rep ID:</b> MARL029	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b> none
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
See later sections.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
I support these priorities with the addition of dealing with traffic congestion and air quality issues. Furthermore the over-riding issue of climate change and the need to reduce carbon emissions is not included. So far, there is no evidence that these priorities have been applied in the past or included in any proposals at present.	

**MB3. Is this the right pool of potential development sites?**

See following section.

**MB4. What land do you think is the most appropriate upon which to build?**

See following section.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Yes, see following section.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

35 years of continuous house building around the old central core has converted Marlborough to a dormitory town where residents work elsewhere and use their cars for all journeys. Excessive reliance on cars coupled with through traffic on the A346 and the A4 has produced a range of undesirable impacts. These include dangerously high air pollution levels; random heavy congestion; competition for parking spaces; noise and visual intrusion, and perceived danger in crossing the High Street. The heritage of the town is heavily degraded by the profusion of vehicles that prevent appreciation of its character and history. More housing would create more traffic. It is clear that the town has reached a tipping point where more traffic would produce unpredictable gridlock and greatly increase existing problems. This would affect the viability of the town as a decent place to live

or to have a business. It would increase carbon emissions. The potential for increases in air pollution could lead to legal challenges at all stages of the planning process.

In summary, the proposed local plan does not address the problems caused by earlier development; it does not balance development with protecting the health and welfare of residents; it does not balance development with protecting the environment and heritage of the town, and it does not address the need to reduce carbon emissions.

It follows that there is no justification for further housing development in Marlborough in the local plan for 2026 to 2036.

**Further comments**

See previous responses.



**Rep ID:** MARL030

**Consultee code:** General Public

**Consultee Organisation (if applicable):** none

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

The main reason not to increase the number of houses is that the town will come to a stand still at certain times in the day, causing more pollution and poor air quality which is already a factor in some areas. The estimated number of cars per household for the South West is 1.4 . There is no provision for including cycle ways or cycle parking or for increasing public transport in this plan.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

**MB3. Is this the right pool of potential development sites?**

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Placing the Surgery on the West side of town makes access very hard for the majority of the town. The current surgery is central with good parking near by and bus access available. There is potential space to extend the surgery on the current site,

**Further comments**

There is little room to extend the current business park but one is being built at Royal Wootton Bassett, it would be better to build more housing near there to reduce commuting and pollution travelling from Marlborough.

<b>Rep ID:</b> MARL031	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Overall I am comfortable with the figure. The only area where I am slightly uncomfortable is in relation to employment land. The total amount of employment land may be adequate, but having regard to changing working patterns, is it in the right place? Might there be need, on a small scale, to swap currently residential sites for employment or vice versa? Would the proposed reviewed local plan prevent that from happening? I have in mind also the comments later in the consultation paper itself, in the 'settlement patterns' section, under 'local economy'	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

One of Marlborough's major roles is as the market town, and service centre, for the surrounding villages. It may be that that was intended to be implicit in the existing text, but it is important that is brought out expressly in the place-shaping priorities. There is sometimes a sense in the villages which rely on the town (and on which the town relies) that Marlborough looks very much at itself when considering its development. No doubt that is unfair, but it would be helpful if the local plan brought out specifically that symbiosis, and it could also help shape things like approaches to local transport (public or private) as well as the relationship between housing and employment need.

**MB3. Is this the right pool of potential development sites?**

Other than as mentioned in my answer to MB 5, I am comfortable with the proposed pool of sites

**MB4. What land do you think is the most appropriate upon which to build?**

Other than that there should be a good mix of housing, including housing that is genuinely affordable, I have no comment

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

In relation to site 2, land off Salisbury Road, there is no mention in the consultation paper (though I think it was touched on in the site selection report) that this is immediately adjacent to St Johns School. The existing school site is immediately bounded to the north-west and west by the main road to Pewsey, and to the north-east by existing housing. The school already has only the bare minimum of outdoor sports/recreation space so its only realistic possible direction of expansion would be into part of the land forming Site 2. would it be sensible to acknowledge that in describing, and in due course further evaluating, the site?

**MB6. Are there any issues or infrastructure requirements that should be identified?**

nothing to add

**Further comments**

none

<b>Rep ID:</b> MARL032	
<b>Consultee code:</b> Parish/Town Council	<b>Consultee Organisation (if applicable):</b> Marlborough Area Neighbourhood Plan (MANP)
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Scale of growth – The housing numbers are not clear and clarification is needed on how they are broken down - the Marlborough Neighbourhood area (parishes of Marlborough with Manton, Mildenhall and Savernake) is different from the area used in the Local Plan Review (i.e., the Marlborough Community Area). This also means that comparisons between the 2 plans cannot be properly made.</p> <p>Brownfield sites – The Emerging Spatial Strategy calculates a target using a long-term assessment of the rate at which this type of development has come forward across Wiltshire. One size does not fit all settlements. Any brownfield target needs to be realistic (the figure for Marlborough of 160 is not). Availability is difficult to predict as it is an unknown and largely reliant on the economy. The MANP call for sites identified very few brownfield sites – there are 2 amongst the 5 allocated sites as set out in the Pre Sub Document at Policy MARL1. In summary, these need to be prioritised as they become available (e.g., in future reviews of the MANP). These cannot be dealt with in a uniform way - brownfield sites in the countryside should be dealt differently.</p> <p>Employment Land – No employment sites have been identified in the MANP and the draft Neighbourhood Plan concentrates on using the existing employment land efficiently (Policy MARL6). Omitted from commentary is the impact on housing of the largest</p>	

employers – Marlborough College and the array of retirement and care homes in the town (the latter, in the main, employing low paid workers unable to afford to live in Marlborough). (This was all set out in the Swindon & Wiltshire Joint Spatial Framework document setting out the Swindon Market Housing Area Profile).

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

The priorities listed are right but the MANP is a community-led plan, backed up by evidence and professional analysis. In summary, public consultation identified the main concerns as follows and addresses them through the draft Neighbourhood Plan (Pre-Submission Document)

- Lack of affordable housing
- Lack of car parking spaces
- Lack of medical facilities
- Need for more recreational land
- Protection of our heritage, green and recreational spaces and landscape

Also includes policies on Climate Change, Dark Skies, Valued Community Spaces, Improving Green Infrastructure. The draft policies are:

- MARL1 - Delivering Affordable Housing in Marlborough
- MARL2 – Managing Change at George Lane, Marlborough
- MARL3 – Encouraging Affordable Housing in Mildenhall
- MARL4 – Meeting Local Housing Needs
- MARL5 – Supporting a Thriving Town Centre
- MARL6 – Using Scarce Employment Land Efficiently
- MARL7 - Improving Public Parking
- MARL8 – Delivering new Cemetery Land
- MARL9 – Protecting & Supporting Community Facilities
- MARL10 – Enhancing Marlborough Conservation Area
- MARL11 – Enhancing Marlborough Areas of Special Quality
- MARL12 – Enhancing Manton Conservation Area

MARL13 – Enhancing Mildenhall Conservation Area  
MARL14 – Protecting Local Green Spaces  
MARL15 – Protecting and Improving Green Infrastructure  
MARL16 – Protecting Local Green Spaces  
MARL17 – Protecting Valued Community Open Spaces  
MARL18 – Conserving the Scenic Beauty of the AONB  
MARL19 – Achieving Dark Skies  
MARL20 – Mitigating Climate Change: New Buildings  
MARL21 – Mitigating Climate Change: Carbon Sinking

**MB3. Is this the right pool of potential development sites?**

MANP allocated sites (Policy MARL1) have already been sifted and have been tested against environmental and other constraints – some appearing in WC's Site Selection Report have already been identified as being unviable. The MANP Call for Sites identified 14 potential sites and 9 of these qualified against criteria. The next stage saw these assessed via a sustainability appraisal, an assessment of impact on the AONB, a community survey, a review of community benefits and a viabilities opinion. The next stage saw the process narrow down options to the 5 final site allocations now in the draft Neighbourhood Plan. The whole process is set out in the MANP draft Site Assessment Report.

**MB4. What land do you think is the most appropriate upon which to build?**

See response to MB4 above. The best sites are those already meeting the relevant assessment tests. Development that meets criteria of up to 50% affordable housing should be brought forward.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered**



**generally or in respect of individual sites?**

Highways issues and impact of traffic should be included as a factor.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

MANP has the following comments on topic headings listed:

Education – Numbers for surplus places needs to be consistent and clear. It is important to remember that St John’s (an Academy) has a wide catchment area with students coming by car and bus from, for example, Berkshire and Swindon which will affect projected need for housing.

In an early exercise, MANP sought sites for a replacement for Preshute Primary School, but WC was unable to confirm that there was a need for a new school. (A substantial investment from WC has now been agreed for improving the existing primary school in Manton). However, this is an issue that could be revisited during a review of the Neighbourhood Plan.

Green Infrastructure – MANP Policy MARL15 – Protecting and Improving Green Infrastructure - designates a green infrastructure network. (A policy map is available for this too within the Pre- Submission document). More cycling networks should be provided.

Sport and Leisure Facilities - There is a very real requirement for further outdoor sports facilities especially for young football and rugby players (boys and girls). Flat land is needed for pitches and training areas and though land has not come forward as part of MANP’s call for sites, this should be an ongoing ambition.

It may no longer be the case that the Rugby Club and Cricket Club are still wishing to co-locate – this needs to be checked.

Leisure Facilities/Health – MANP would like to be involved in the Leisure Facility Needs Analysis being undertaken. The MANP Steering Group emphasises that a site adjacent to the existing Leisure Centre has been identified as land suitable for a much needed new surgery (linked to the development of the site at Barton Dene and referred to in Policy MARL1). The preferred option in Wiltshire has been for combined wellbeing centres. This land presents a good opportunity for a combination of improved medical facilities and the health benefits of an upgraded leisure centre.

Housing Needs – This makes specific reference to an increasingly older population. Marlborough already has a large number of retirement complexes and the draft Neighbourhood Plan is looking for affordable homes rather than more care facilities. The Swindon & Wiltshire Joint Spatial Framework document setting out the Swindon Market Housing Area Profile at page 15 states: The affordability of housing is the worst in the county and relatively few affordable homes have been delivered. The local economy – Low levels of unemployment, but also job vacancies in lower paid employment (retail, care homes, etc). These workers have to commute in as house prices are unaffordable. Lack of affordable car parking and poor public transport exacerbate the problem.

Other Topic Points – There is little reference to the importance of heritage a part of place shaping. The MANP Policies MARL10,11,12,13,14 focus on the importance of heritage in Marlborough, Manton and Mildenhall. For Marlborough, a specially commissioned Town Character Study underpins the importance of it.

**Further comments**

<b>Rep ID:</b> MARL033	
<b>Consultee code:</b> Parish/Town Council	<b>Consultee Organisation (if applicable):</b> Marlborough Town Council
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The Town Council endorses the views of Marlborough Area Neighbourhood Plan (MANP):</p> <p>Scale of growth – The housing numbers are not clear and clarification is needed on how they are broken down - the Marlborough Neighbourhood area (parishes of Marlborough with Manton, Mildenhall and Savernake) is different from the area used in the Local Plan Review (i.e., the Marlborough Community Area). This also means that comparisons between the 2 plans cannot be properly made.</p> <p>Brownfield sites – The Emerging Spatial Strategy calculates a target using a long-term assessment of the rate at which this type of development has come forward across Wiltshire. One size does not fit all settlements. Any brownfield target needs to be realistic (the figure for Marlborough of 160 is not). Availability is difficult to predict as it is an unknown and largely reliant on the economy. The MANP call for sites identified very few brownfield sites – there are 2 amongst the 5 allocated sites as set out in the Pre Sub Document at Policy MARL1. In summary, these need to be prioritised as they become available (e.g., in future reviews of the MANP). These cannot be dealt with in a uniform way - brownfield sites in the countryside should be dealt differently.</p>	

Employment Land – No employment sites have been identified in the MANP and the draft Neighbourhood Plan concentrates on using the existing employment land efficiently (Policy MARL6). Omitted from commentary is the impact on housing of the largest employers – Marlborough College and the array of retirement and care homes in the town (the latter, in the main, employing low paid workers unable to afford to live in Marlborough). (This was all set out in the Swindon & Wiltshire Joint Spatial Framework document setting out the Swindon Market Housing Area Profile).

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

Marlborough Town Council endorses the views of the Marlborough Area Neighbourhood Plan (MANP):

The priorities listed are right but the MANP is a community-led plan, backed up by evidence and professional analysis.

In summary, public consultation identified the main concerns as follows and addresses them through the draft Neighbourhood Plan (Pre-Submission Document)

- Lack of affordable housing
- Lack of car parking spaces
- Lack of medical facilities
- Need for more recreational land
- Protection of our heritage, green and recreational spaces and landscape

Also includes policies on Climate Change, Dark Skies, Valued Community Spaces, Improving Green Infrastructure. The draft policies are:

MARL1 - Delivering Affordable Housing in Marlborough

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MARL4 – Meeting Local Housing Needs

MARL5 – Supporting a Thriving Town Centre

MARL6 – Using Scarce Employment Land Efficiently

MARL7 - Improving Public Parking

MARL8 – Delivering new Cemetery Land

MARL9 – Protecting & Supporting Community Facilities

MARL10 – Enhancing Marlborough Conservation Area  
MARL11 – Enhancing Marlborough Areas of Special Quality  
MARL12 – Enhancing Manton Conservation Area  
MARL13 – Enhancing Mildenhall Conservation Area  
MARL14 – Protecting Local Green Spaces  
MARL15 – Protecting and Improving Green Infrastructure  
MARL16 – Protecting Local Green Spaces  
MARL17 – Protecting Valued Community Open Spaces  
MARL18 – Conserving the Scenic Beauty of the AONB  
MARL19 – Achieving Dark Skies  
MARL20 – Mitigating Climate Change: New Buildings  
MARL21 – Mitigating Climate Change: Carbon Sinking

PLUS ALSO:

Missing priority would be support for town strategy. Public transport is an infrastructure priority – land use cannot be looked at in isolation

Additional targets should be to:

- \* reduce air pollution as Marlborough has an Air Quality Management Area
- \* improve public transport provision
- \* increase flood zone designation area to mitigate against higher flooding due to climate change.

### **MB3. Is this the right pool of potential development sites?**

Marlborough Town Council endorses the views of the Marlborough Area Neighbourhood Plan (MANP):

MANP allocated sites (Policy MARL1) have already been sifted and have been tested against environmental and other constraints – some appearing in WC's Site Selection Report have already been identified as being unviable. The MANP Call for Sites identified 14 potential sites and 9 of these qualified against criteria. The next stage saw these assessed via a sustainability appraisal, an assessment of impact on the AONB, a community survey, a review of community benefits and a viabilities opinion. The next stage saw the process narrow down options to the 5 final site allocations now in the draft Neighbourhood Plan. The whole process is set out in the MANP draft Site Assessment Report.

PLUS ALSO - Need for mixed types of accommodation to meet the needs of the community, in particular affordable homes for young people and young families

**MB4. What land do you think is the most appropriate upon which to build?**

Marlborough Town Council endorses the views of the Marlborough Area Neighbourhood Plan (MANP):  
The best sites are those already meeting the relevant assessment tests. Development that meets criteria of up to 50% affordable housing should be brought forward.

**PLUS ALSO:**

New developments should be within easy reach of the town centre, public transport, schools and medical services, without relying on the use of a car – or have their own facilities. New developments should feel part of the Marlborough community. In accordance with the Government and Wiltshire Council's climate emergency declaration the houses should be built to have a low carbon footprint. New developments should have arrangements in place for electric car charging, cycle paths, cycle storage and safe walking routes.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Marlborough Town Council endorses the views of the Marlborough Area Neighbourhood Plan (MANP):

Highways issues and impact of traffic should be included as a factor.

**PLUS ALSO:**

Concern over area 1 being so close to the existing flood zone 3. The existing flood zones 2 & 3 do not take into account the impacts of climate change and the consequent change in the future probability of flooding (ref <https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-zone-and-flood-risk-tables>). Within the timescale of this local plan it is likely, due to climate change, that we will have more severe storms with higher levels of rainfall than previously, leading to more flooding and a need to expand the designated flood zones 2 & 3.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Marlborough Town Council endorses the views of the Marlborough Area Neighbourhood Plan (MANP)

MANP has the following comments on topic headings listed:

Education – Numbers for surplus places needs to be consistent and clear. It is important to remember that St John’s (an Academy) has a wide catchment area with students coming by car and bus from, for example, Berkshire and Swindon which will affect projected need for housing. In an early exercise, MANP sought sites for a replacement for Preshute Primary School, but WC was unable to confirm that there was a need for a new school. (A substantial investment from WC has now been agreed for improving the existing primary school in Manton). However, this is an issue that could be revisited during a review of the Neighbourhood Plan.

Green Infrastructure – MANP Policy MARL15 – Protecting and Improving Green Infrastructure - designates a green infrastructure network. (A policy map is available for this too within the Pre- Submission document). More cycling networks should be provided.

Sport and Leisure Facilities - There is a very real requirement for further outdoor sports facilities especially for young football and rugby players (boys and girls). Flat land is needed for pitches and training areas and though land has not come forward as part of MANP’s call for sites, this should be an ongoing ambition.

It may no longer be the case that the Rugby Club and Cricket Club are still wishing to co-locate – this needs to be checked.

Leisure Facilities/Health – MANP would like to be involved in the Leisure Facility Needs Analysis being undertaken. The MANP Steering Group emphasises that a site adjacent to the existing Leisure Centre has been identified as land suitable for a much needed new surgery (linked to the development of the site at Barton Dene and referred to in Policy MARL1). The preferred option in Wiltshire has been for combined wellbeing centres. This land presents a good opportunity for a combination of improved medical facilities and the health benefits of an upgraded leisure centre.

Housing Needs – This makes specific reference to an increasingly older population. Marlborough already has a large number of retirement complexes and the draft Neighbourhood Plan is looking for affordable homes rather than more care facilities. The Swindon & Wiltshire Joint Spatial Framework document setting out the Swindon Market Housing Area Profile at page 15 states: The affordability of housing is the worst in the county and relatively few affordable homes have been delivered.

The local economy – Low levels of unemployment, but also job vacancies in lower paid employment (retail, care homes, etc). These workers have to commute in as house prices are unaffordable. Lack of affordable car parking and poor public transport exacerbate the problem.

Other Topic Points – There is little reference to the importance of heritage a part of place shaping. The MANP Policies MARL10,11,12,13,14 focus on the importance of heritage in Marlborough, Manton and Mildenhall. For Marlborough, a specially commissioned Town Character Study underpins the importance of it.

PLUS ALSO:

Affordability calculations need clarifying. Marlborough is not well served by buses – none to connect to trains in Bedwyn, none to Devizes, none to Hungerford, Swindon buses are infrequent and stop at night, Pewsey does not line up with office hours (do they connect with trains?) Not enough within town to business park, e.g. Tesco bus.

Concerns about encroachment o the AONB surrounding the town

The need to secure future youth facilities for Marlborough particularly the long term status of the much used Community & Youth Centre at the Salisbury Road Recreation Ground currently under only a short term lease to the Town Council from local authority landowner, Wiltshire Council (which closed the building in 2016/17). The freehold should now be transferred to ensure that this community asset is retained.

**Further comments**



**Rep ID:** MARL034

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

I think the level of expansion is about right, but more emphasis should be placed on building on brownfield sites before any more greenfield sites are built on. I also believe more emphasis should be placed on providing new access roads to these new developments and not doubling the number of properties that need to be accessed from only one point.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

Marlborough really needs an additional medical centre. There are now several dentists but only 1 Medical Practice. It should be a priority to ensure that a medical centre location remains within the town centre.

Also, any new medical centre built outside of the main town areas should retain a satellite office within the main town area to allow access for those who cannot walk that far or have their own transport.

**MB3. Is this the right pool of potential development sites?**

I don't know of any others.

**MB4. What land do you think is the most appropriate upon which to build?**

Brownfield sites and limited greenfield sites.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

There are more than enough retirement home developments in Marlborough so no additional ones should be permitted.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

The Figure 1 map is very unclear, particularly with having spread each of the words in the key out with superfluous spacing as it makes them difficult to read.  
As previously mentioned, new additional access roads would be needed to the Chopping knife Lane and Salisbury Road areas to provide alternate egress rather than single bottle-neck access at one point only. Modern estate roads all tend to be narrow and wiggly, not allowing enough parking areas - particularly in rural areas where there is a much higher chance of a household requiring more than one vehicle - and vehicles have generally got bigger, not smaller increasing the pressure on narrow roads.

Traffic management at the A4/A346/George Lane area needs significant research into how it can be redesigned to prevent the massive build-up of traffic trying to get out from the south onto the A4, particularly on Fridays or holiday weekends. The problem has been exacerbated with the building of the Salisbury Road Business Park and the housing development and the pressure on that junction will only be increased if additional housing is built beyond the current Salisbury Road development.

The Housing Needs topic expects the older population to increase, of course it will with all the retirements homes built over the last few years, but so few truly affordable homes, particularly for young people starting out, or those having to restart after a failed relationship, potentially on their own with so few 1 bed dwellings available at truly affordable levels.

A solution – other than raising parking charges - needs to be found to the lack o f additional parking areas for visitors, tourists, and locals looking for short-term parking. Consideration should be given to a Park and Ride system.

#### **Further comments**

The Figure 1 map is very unclear, particularly with having spread each of the words in the key out with superfluous spacing as it makes them difficult to read.

Page 3 of the Planning for Marlborough document – I don't understand how images of 12 house shaped icons with a row of unrelated numbers underneath them illustrates "The result of this work suggests the scale of growth". It is very unclear.

I really don't understand the 'Green blue infrastructure' entries or what the arrows are supposed to represent. This too is very unclear.

The Wiltshire Local Plan states that 'Marlborough St Johns can be expanded to supply new secondary school places.' But the Marlborough Neighbourhood Plan states that "the school is currently oversubscribed." Surely only one of those statements can be true?

**Rep ID:** MARL035

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

**MB3. Is this the right pool of potential development sites?**

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

I have made comments via your website on Marlborough LP but would like to add this article as a must read when any new houses are to be built in Wiltshire.

Thanks, [NAME AND ADDRESS REDACTED]

<https://www.theguardian.com/artanddesign/2021/mar/06/eco-homes-become-hot-property-in-uks-zero-carbon-paradigm-shift> :

Many other councils are following Exeter's lead. Norwich completed the country's largest Passivhaus social housing scheme in 2019, winning the prestigious RIBA Stirling Prize in the process, while York is planning an even more ambitious scheme by the same architects, Mikhail Riches. Cardiff University built an "energy positive" solar house in 2015, using low-cost, off-the-peg materials, with features that have since been replicated in more than 1,400 affordable and low-carbon houses across Wales. Oxford has started work on its first zero-carbon council homes, while Enfield council's huge £6bn Meridian Water development is also targeting net zero....

There are now about 30,000 homes at the masterplan stage that meet the Passivhaus target for a space heating demand of just 15 kWh/sq metre/year (compared with the current average of 54 kWh/sq metre/year), equating to a massive reduction in carbon. "Now our approach is really in the mainstream, as one of the few proven routes to net zero."

<b>Rep ID:</b> MARL036	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The scale of growth is too high. There is no justification for building more market priced housing in Marlborough, at the expense of destroying green field sites in an AONB, and negatively impacting Heritage Assets.</p> <p>The NPPF provides for an exception to the requirement to “provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas”, where “the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”</p> <p>Paragraph 172 of the NPPF states that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.” It also states that in these cases “Planning permission should be refused for major development other than in exceptional circumstances”</p>	

There is no benefit to allowing the building of further market priced property in Marlborough. It irreparably damages the AONB, and will do nothing to improve the availability of affordable housing in the town. This means there are no exceptional circumstances which justify overruling the clear provisions of the NPPF.

Any development of Green Field sites should be exclusively for affordable housing (For the avoidance of doubt, “affordable” should mean accessible to those in the lowest third of earners in Marlborough, who provide many of the services that make the town what it is.)

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

Objective i)

“Housing provision will prioritise local needs for affordable homes. This will require enough new housing whilst respecting the objectives of Area of Outstanding Natural Beauty designation;”

This should be changed to read;

“Housing provision will prioritise local needs for affordable homes. This will enable enough new affordable housing whilst preventing loss of land in the Area of Outstanding Natural Beauty for market priced houses;”

Objective iii) should refer to the need to select development sites based on proximity to the town centre, minimising the need for residents to drive to access local services.

**MB3. Is this the right pool of potential development sites?**

Site 1: “Land at Chopping Knife Lane” is inappropriate for development. The proposal set out is for a major development in a highly visible area of an AONB, extremely close to the River Kennet SSSI.

Development here would represent the first expansion of the town eastwards onto a greenfield site in the AONB, and would run contrary to the (draft) aims of “respecting the objectives of Area of Outstanding Natural Beauty designation” as well as creating further congestion in the town centre.

This site would seriously impact the Heritage Assets of Elcot Mill and Elcot Barn, in the following ways:

a. The most obvious public value of Elcot Mill as a heritage asset are the views of its frontage within the beautiful, unspoilt valley from the popular footpaths MARL22 and MILD18. The proposed site would bring a new development up to the boundary of the site, destroying this public benefit.

b. Development of a site immediately uphill from Elcot Mill would create an unbroken stretch of developed land from Chopping Knife lane down to the boundary of the property, risking severely increased drainage onto land surrounding the building in periods of wet weather. As with many old buildings, Elcot Mill and Elcot Barn are both prone to issues related to damp. Any development which is likely to increase the level of moisture around the building, risks exacerbating problems relating to damp which could eventually compromise the structural integrity of these Heritage properties.

c. In addition to point (b) above, the houses nearest the boundary of the site immediately to the south of Elcot Mill would block winter sun to the property, slowing the essential process of moisture evaporation from the brickwork and further exacerbating damp issues.

Better alternatives exist than Site 1, particularly the site South of the A4 (London Road). This site is well screened and would have minimal impact on the views toward the town or in the Kennet Valley AONB from any direction. It is closer to the town centre, and the owner's proposal would support more affordable houses than the Chopping Knife Lane site.

#### **MB4. What land do you think is the most appropriate upon which to build?**

Brown field sites are the most appropriate on which to build. However, given the need for more affordable housing in the town, all development should be limited to housing affordable to the lowest 1/3 of earners in the town.

This will reduce the total area of land required for building. Sites should be selected, for their proximity to the town centre (to minimise generating traffic by making it easy for residents to walk to services).

Given the range of sites available, there is no excuse for impacting on Heritage Assets or their setting. Sites which do so should be ruled out.

Damage to the AONB should be resisted, and if unavoidable, sites should be prioritised based on impact on the surrounding area. For example Sites 2 and 3 sit in enclosed valley settings, which would minimise impact on the views along the Kennet Valley.



**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

I think too little emphasis is given to provision of affordable housing, and instead it is used as an excuse to allow development of market priced housing on an AONB. This is extremely short sighted and will result in irreparable damage to the town and its surroundings.

Additional consideration needs to be given to the impact of development on SSSI's. For example in the case of Site 1, development would have a serious detrimental impact on biodiversity, wildlife & bird and river habitats along the river Kennet valley. The site would run next to the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat. Development would lead to far higher levels of air, noise and water pollution and run off.

Development should be limited to the minimum number of properties required to meet the need for affordable housing. Prior to adopting the plan, the Council should set out how it intends to ensure that any affordable housing developments remain affordable in the long term.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

There are high pollution levels along key highways in Marlborough particularly along London Road, Herd Street and Salisbury Road and the high density of HGV traffic passing along the A346 through Marlborough. We need concrete action to limit HGV and other commercial goods through traffic passing along the A346 through Marlborough and not just talk about frameworks and agreements. The town council's "long term aim to de-prime the A338/A346" needs to be translated into specific steps that lead to this outcome within the timescale of this 2016-2036 plan.

**Further comments**

**Rep ID:** MARL037

**Consultee code:** Other Advisory Bodies

**Consultee Organisation (if applicable):** North Wessex Downs  
AONB

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

Yes we support the needs for development to be met as far as possible on brownfield land followed by greenfield sites within the settlement boundary before greenfield sites outside of the settlement boundary are required. If it is possible to have a higher target then the AONB would endorse this approach.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

Priority 1 should be to provide enough housing to meet the assessed need that is landscape led in response to the special qualities of the AONB which conserves and enhances the landscape and scenic beauty of the protected landscape.  
Climate change should be in all priorities

Biodiversity and enhancement of river Kennet a SSSI should be included in addition to flood risk and water management.

**MB3. Is this the right pool of potential development sites?**

No. All in sensitive areas, not helped by the sloping topography of the landscape.

Sites within including former centre off Chery Orchard. Maps should include brownfield sites being considered in addressing brownfield target.

All sites given sensitive location and size would in our opinion result in major development and therefore para 172 of the NPPF should be addressed at the plan stage as allocation deems development to be acceptable in principle.

**MB4. What land do you think is the most appropriate upon which to build?**

Affordable housing is in need in addition to accommodating an aging population but not in the form of flats, single storey buildings.

Brownfield land and land within settlement boundary should be considered first before greenfield sites outside of the SB. Of those identified and from the work we did for the Core Strategy, parts of site 1 and 3 could accommodate some development to meet the target of 85 dwellings required to meet the shortfall between assessed need and brownfield target/existing allocations/permissions.

Oppose sites 2 and 4 entirely.

NPPF 172 states that development within AONBs should be limited, and, other than in exceptional circumstances, major development should be refused. The Planning Practice Guidance, paragraph 041 of the landscape section of the Natural Environment chapter, is clear that within AONBs policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan making process.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered**

**generally or in respect of individual sites?**

Site selection process/report fails to pick up ecological value of former railway tunnel and the significant Bat Habitat (roost/swarming).  
Special qualities such as dark skies should be addressed. Reducing light pollution is a factor in addressing climate change.  
Biodiversity and natural capital

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Natural capital, it should sit within green infrastructure

**Further comments**

Allocations and policies should be landscape due to the sensitive landscape of Wiltshire which includes 3 AONBs this is not evident in the plans or supporting documents. We recommend you take a look at West Berkshires Local Plan review which we have worked with the LPA on and from the offset sets out to be landscape led which is evident in an AONB development policy being one of the first in the plan.

<b>Rep ID:</b> MARL038	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Para 9 – 680 homes were identified and over 700 were built. The second set of 680 reflects the MANP view of what is required which is based on flawed assumptions for affordable homes (both the Cobweb 2017 survey and the 2020 update which also ignore existing properties coming available each year). I think WC should independently assess the need and this should reflect a) whether we need to attract people to local employment opportunities b) the NET need for houses for local residents – affordable and otherwise. If there are no new local jobs, it is difficult to suggest there is a need for growth in housing unless the demographics suggest more local young people are coming into the local housing market than people leaving it. No new employment land has been identified for Marlborough so any growth in housing will attract those commuting to work elsewhere. This adds congestion and pollution in a constrained environment and puts pressure on local amenities (education, sports facilities, GP surgery , parking etc) that struggles to cope today.</p>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be</b>	

**achieved?**

A valid (and credible) evidenced based case for more affordable housing to address local needs has not been given but it is reasonable to assume the greatest need is for one bedroom flats to enable young people to step onto the rented or purchased housing ladder, outside the family home. There are no new local job opportunities evident so new family housing will encourage commuting. Shaping priority ii seems a mix of points; what is meant by 'self containment'? Tourism can be promoted and may generate some new (if low paid) jobs but the impact on congestion and pollution needs to be mitigated – different traffic management solutions and de carbonising schemes are required now to improve the air quality in many roads that already exceeds targets and will be responsible for the poor health of many local residents. The town centre strategy needs to precede a decision to build more houses so we know if it possible to mitigate the effects. After, is too late.

**MB3. Is this the right pool of potential development sites?**

Outside of brownfield, all proposed sites around Marlborough are compromised due to being in an AONB. Any sites in an AONB should be resisted unless there is clear evidence of need that can only be met using such sites. This has not yet been evidenced due to flawed housing need assessment. Any site must have access that will minimise congestion at key points, particularly A4/Salisbury Road/George Lane and the A4 (east) into the High Street.

**MB4. What land do you think is the most appropriate upon which to build?**

Brownfield must be prioritised – targeting homes for local first time renters / buyers; close to town with less need for car use.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

In the absence of employment opportunities, there is a real risk of new houses being bought by commuters making Marlborough even more of a dormitory town. Affordable housing will not be taken up by local young people unless there is employment – they are in effect forced to go to Swindon, Chippenham etc. All that will happen is more housing will be built to cover what on paper is required for young people but is actually taken by non-local residents. This dilemma must be tackled e.g. by a focus on Housing Association rented properties made available to local residents only. There is plenty of market housing for others.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

A potential conflict of interest has been highlighted in that Marlborough College staff are on the MANP Steering Group and are also offering land for development. This need not be an issue if properly managed but there has been no oversight by any official body to consider or review any risk of bias.

There is no meaningful attention being paid to the need for sports/recreational land. The Common needs full protection from a variety of schemes and The Commons Act 2008 is not being used to control the situation.

**Further comments**

<b>Rep ID:</b> MARL039	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>Summary of Proposals  The draft local plan proposes 680 houses 2016-2036.  After taking account of the 154 houses built between 2016-2019 and the 280 houses with Planning Permission this leaves a residual requirement for new land for 245 houses to 2036.  WC also forecast that there will be 160 houses built on brownfield sites in the settlement boundary to 2031.  It can therefore safely be assumed that in the period 2016-2036 there will 839 additional houses in Marlborough by taking account all of the above provisions. This is likely to increase the population by over 2000 people.  WC propose no additional employment land in Marlborough during the plan period.  Absence of any evidence  WC have no evidence to support or explain or justify this number of houses.  Instead, WC has arrived at the requirement based 'solely to enable the Marlborough Area Neighbourhood Plan Steering Group to deliver affordable homes their work has indicated are required as a priority for the settlement'.</p>	



But, the MANAP housing strategy is flawed;

It is based on an opinion survey put to residents in 2016 asking if they were likely to move by 2021 and what they could afford. From this survey the Steering Group calculated a need for 175 affordable houses. 96 are already committed leaving a residual requirement for 80

The Steering Goup Chairman on 26th January 2021 Zoom meeting admits this is a novel and unique way of calculating housing needs and is not a recognised Planning Housing Needs Analysis Calculation.

A proper Housing Survey should also take into consideration the actual availability of existing affordable houses, and the turnover of these.

The exercise undertaken by the Steering Group which is out of date anyway and only covers the period up to 2021, supplies insufficient evidence to support the housing strategy AND even if it was correct fails to take into account the actual supply of affordable houses.

A public opinion survey which takes no account of the 733 existing houses (soon to be 829), and their relet rate cannot be relied upon for a strategic plan.

No evidence has been provided to support any particular number of market houses.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

**MB3. Is this the right pool of potential development sites?**

Sustainability and Employment Land

The LP should ensure sustainable development and the Government and WC have made it clear that a main objective is addressing climate change. One of the main causes of climate change is carbon emissions caused by transportation especially commuting by car.

National Guidance makes clear that sustainable development has 3 linked objectives; economic, social and environmental.

WC employment land survey has identified the need for 6ha of new employment land in that part of the Swindon Housing and Employment Market Area in Wiltshire.

The Local Plan allocates all of the 6ha of employment land to Royal Wootton Bassett.

In order to reduce commuting, car usage, congestion, carbon emissions etc new housing should be located close to new jobs. It is incomprehensible that the LP allocates 680 houses to Marlborough and all the new jobs to Royal Wootton Bassett.

Public transport in Marlborough is very limited and so the additional population will need to commute to jobs by private car, causing pollution congestion adverse effect on air quality and additional carbon emissions.

This serves no economic, social or environmental objective and is unsustainable and contrary to Government guidance and Wiltshire Councils own aims.

There are no obvious locations for a new business park or industrial estate in Marlborough which in any event is in the AONB where such development would be precluded.

Unsurprisingly no commercial developer has ever put forward a new business park in Marlborough and even the 3 ha of employment land required in the 2006 Core Strategy has never materialised.

Local Plan Strategy has never been tested

The Draft LP states that 245 houses was the highest number of houses tested – see para 12 –this is incorrect.

In 2019 WC tested 3 scenarios for Marlborough

245 houses linked to 3ha of employment

135 houses linked to 4ha employment land

50 houses with no employment land

Therefore, the only scenario which has been tested with no new employment land is for 50 houses.

It is extraordinary and remiss that WC propose a strategy which they have not actually tested.

This is even more extraordinary because the 2016 Core Strategy required 3ha of employment land to be provided alongside 680 houses. This employment land has also not been delivered although 721 houses have been built or have planning permission.

Any testing of strategies should take the shortfall of employment land provision into account.

Impact on the town and residents

WC have never tested the strategy of 245 new houses with no employment land.

WC have also never tested the impact of the unprecedented growth of the town which is implied by the 154 houses built since 2016, 280 with pp, 160 on brownfield land + 245 additional houses.

The impact of this level of growth on a small market town with a population of 8300 with limited services and facilities and poor public transport will be profound and have an adverse effect on local residents and the environment.

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Brownfield and Greenfield AONB sites

WC forecast that 160 houses will be built on Brownfield sites by 2031.

This seems a very reasonable assumption. However, in the Local Plan, WC incorrectly dismisses their own forecast by describing the 160 houses as being on unknown windfall sites. This is incorrect because many of the Brownfield sites have been identified and put forward by the owners in the NP call for sites.

These include the police station already approved for 24 houses; St Peters School which has a development brief for residential development prepared by WC ; Rawlingswell which WC say has a capacity for 60 houses in the SHLAA ; the WC owned Resource Centre with a capacity for 30 and the gas works site with a capacity for 10.

It is therefore unnecessary for any Greenfield sites outside the settlement boundary in the AONB to be even considered.

It is therefore extraordinary that in the Pool of Potential Sites Chapter WC suggest that huge swathes of land in the AONB have potential when no Greenfield sites are even necessary.

WC seem to have taken a casual approach to the character of the AONB, contrary to national guidance and Wiltshire Councils own policies. The landscape was designated an area of outstanding natural beauty to ensure its protection from urbanisation and this should be the most important guiding principle. This principle always applies even if there is a shortfall in the 5-year land supply in Wiltshire as a whole. A shortfall in the 5-year supply is not a reason to prejudice the integrity of the AONB.

The sites identified would involve substantial sprawl into protected open countryside of national importance implying development on the skyline adversely affecting the setting of the town and with adverse effects on important views from numerous public vantage points.

In addition, Site 3 was never even put forward by the owners in the NP. The SEA which considered the other Greenfield Sites put forward for the Neighbourhood Plan highlighted serious environmental impacts on the landscape, air quality and congestion. WC seem to have ignored these impacts.

None of these Greenfield sites needs to be considered though bearing in mind the known availability of brownfield sites of substantial capacity.

Relationship between the Local Plan and Neighbourhood Plan

WC are the statutory Local Planning Authority responsible for Strategic Planning.

The adopted Core Strategy has policies up to 2026. The housing requirement in that plan for Marlborough has already been exceeded. There is therefore no need for additional houses up to 2026 and it is the role of WC to prepare strategic guidance up to 2036.

It seems that the Steering Group preparing the Marlborough Area Neighbourhood Plan has taken it upon themselves to decide Strategic Guidance. It is surprising and contrary to the Planning Act for a Planning Authority to follow the guidance of a Neighbourhood Plan Steering Group, especially when that guidance is based solely on an out-of-date opinion survey, and when the resulting strategy has never been tested.

This seems to be an unsound approach because NP's should be in conformity with the adopted Strategic Plan rather than deciding a strategic policy themselves.

The WC LP appears to be written to conform to the suggestions of a Neighbourhood Steering Group which turns the Planning system on its head and is therefore unsound.

**Rep ID:** MARL040

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

There should be a brownfield target. Although residents have requested affordable low-cost homes, this is partly in response to the excess of homes for the over 50/60s that have been built, causing an imbalance in the population. Planning another 245 homes in Marlborough by 2036 is simply unrealistic. The town centre has to accommodate not only the local traffic but all the traffic passing through on the A4 and the Swindon to Salisbury route and from the Pewsey Road. The town has not adjusted to the new housing development on the Salisbury Road as the lockdown has reduced traffic flow. It only takes one set of traffic lights in Marlborough for roadworks to cause total chaos.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

Marlborough is a popular tourist destination and town visited by people in Wiltshire and Swindon for its attractive town centre. At some point, possibly already reached, it will cease to be attractive due to lack of parking, congestion and poor air quality. Any further expansion is unsustainable.

The reality is that housing needs to be where the employment opportunities are. To reduce congestion and pollution it makes sense to build new homes in Swindon, Calne and Devizes where there are a range of employment opportunities.

### **MB3. Is this the right pool of potential development sites?**

I think you need to seriously reconsider any further development.

Site 1 If further development is essential, part of this site could be developed but there must be a gap between Mildenhall and Marlborough. This will impact a very beautiful area and will increase congestion from the London Road to the town centre, already impacted by the Savernake development. I hope the planners and committee members involved in these decisions actually live here, to experience the problems which arise.

Site 2 Extending the Salisbury Road site is possibly preferable to the alternative sites but will impact traffic congestion on the Salisbury Road.

Site 3 and Site 4. These sites are both in an area of outstanding natural beauty. Whilst landowners are constantly wanting to make money selling agricultural land, I hope the planning department will act responsibly and try to preserve this area for future generations.

### **MB4. What land do you think is the most appropriate upon which to build?**

I think it is inappropriate to consider any expansion to the town other than on brownfield sites.

Site 3 and Site 4. These sites are both in an area of outstanding natural beauty. Whilst landowners are constantly wanting to make money selling agricultural land, I hope the planning department will act responsibly and try to preserve this area for future generations. Both sites would increase traffic in the town centre – simply unsustainable.

Site 1 If further development is essential, part of this site could be developed but there must be a gap between Mildenhall and Marlborough. This would impact on a very beautiful area and would increase congestion from the London Road to the town centre, already impacted by the Chopping Knife Lane development. I hope the planners and committee members involved in these decisions actually live here, to experience the problems which arise.

Site 2 Extending the Salisbury Road site is possibly preferable to the alternative sites but will impact traffic congestion on the Salisbury Road.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

The main constraint on any further development of Marlborough is the traffic management. All traffic goes through the town centre and there is no rail link. There is no bypass and for this reason it should not be considered for further expansion.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

A Safe Cycle Network in Marlborough would be a great asset to the town.

**Further comments**

Marlborough is a magnet for the towns and villages in the surrounding area as well as for tourists from all over the world. Further development is unsustainable due to the road network and congestion in the town centre.

**Rep ID:** MARL041

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

Growth proposed for Marlborough is excessive. Growth as proposed will mean unacceptable pressure on the town centre's shopping capacity and local services. Similarly concerns over air quality from increased traffic particularly as development will increase the town's dormitory nature as people have to commute away for work.

It is unclear that the assessment for affordable homes takes in to account turnover. If not by assuming occupiers don't leave regularly then the need for such housing will be wrongly inflated.

New housing proposals should tie in with employment growth opportunities. In the Swindon Housing Market Area Royal Wootton Bassett is proposed for employment growth. Consequently, housing development should match so should be constrained in Marlborough. Also Wiltshire adopting a green agenda would place homes in proximity to jobs.

Marlborough, constrained by its geographic setting in the North Wessex Downs Area of Outstanding Natural Beauty, is not suitable for employment growth. Hence the need for significant housing development must be questioned. In reality Marlborough should be seen as having reached its sensible limit to housing growth. To go further would simply mean Marlborough increasingly



being a dormitory for people working elsewhere in the Housing Market Area. This would not fit with the wider 'build back greener' agenda which presumably underpins Wiltshire's planning.  
Overall use of brownfield sites must be maximised and loss of greenfield sites in an AONB must be minimised.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

Affordable housing proposals aren't much use unless there are local jobs available to match. The plan must not encourage dormitory use of such properties by people working elsewhere within the Housing Market Area or beyond across the county boundary. Doing so would be contrary to a 'build back greener' agenda.  
Any affordable housing must have a 'local tie' requirement so that it is targeted at truly local needs.

**MB3. Is this the right pool of potential development sites?**

This plan is missing the development site identified as 'Land off Cherry Orchard' described in Marlborough's draft Area Neighbourhood Plan.  
There is an error in the document as the map on page 7 and the text on page 8 are not consistent. The map marks areas 3 & 4 but the descriptions on page 8 are reversed. See also the map on page 7 of the [WLP\\_Market\\_Town\\_Site\\_Selection\\_report\\_for\\_Marlborough\\_FINAL.pdf](#)

**MB4. What land do you think is the most appropriate upon which to build?**

Use of brownfield sites must be maximised and loss of greenfield sites in an AONB must be minimised.  
Marlborough should only have minimal development as the town centre infrastructure is effectively maxed out with the town at its current size. The town has reached its natural limit to growth, particularly as positioned in the Wiltshire AONB.  
Housing density should be high to minimise the amount of land required. The points to more smaller properties rather than large.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

A green agenda for Wiltshire should protect greenfields not target them for development.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Lack of safe cycle path routes into and within the town centre, especially from the western side where the A4 provides the only route into town.

**Further comments**

**Rep ID:** MARL042

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

The proposed scale of growth seems to go above and beyond what the town can realistically support or needs.

- Any further housing requirements in Marlborough will require building on green field site(s) in the AONB with the consequent permanent loss of this precious and finite resource to the wildlife that currently call it their home and to the future generations of residents in the town. The AONB surrounding Marlborough is of outstanding landscape value with wonderful open, wide-ranging vistas which will be negatively impacted by further housing development.
- Marlborough does not need more net housing. The attractiveness of Marlborough as a place to live – compact, characterful and with easy (walking distance) access to AONB countryside – means there is a permanent and irresolvable gap between housing demand and supply, no matter how many houses are built. Attempting to squeeze more housing in to an already compact environment seems to be only because there is a policy to grow irrespective of the impact. One size does not fit all and over-development and permanent loss of the AONB landscape needs to be protected by a planning process that challenges and prevents this irrationality and the consequent incremental erosion of the landscape.

- Recent past developments in Marlborough have failed to deliver affordable housing sustainably that meets the needs of residents on lower incomes despite commitments to do so. There are so-called affordable properties (a relative phrase at best) which remain empty because of the poor accessibility and connectivity to/from and within the town. This does not attract people to live in Marlborough.
- This core driver (of affordability) for expansion is being used, intentionally or otherwise, as the mechanism to justify development approval, but is simply resulting in more market-priced housing creating ever greater strain on Marlborough's infrastructure but without the outcomes (of affordable housing) it sought to deliver.
- Given the constrained environment of Marlborough, any development for affordable housing should be directed to brownfield sites, lessons should be learnt from the past and new (economic) solutions need to be found to encourage a greater proportion of a site to be earmarked for affordable housing and for this to be sustainable (no right to buy) so as to maintain the stock and not provoke a clamour for more affordable houses in the future. There should be a target which focuses ONLY on brownfield locations and which prevents building on a green field site and certainly not in an AONB.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

In a supplementary document to the Marlborough Area Neighbourhood Plan (MANP) entitled "MANP Supporting Statement on Housing Proposals Jan 2021 FINAL", it says that affordable housing should meet the local needs of those on low pay. This is of course a relative statement as land and housing costs in Marlborough are more expensive than elsewhere, whereas pay tends to be relatively static irrespective of where people live. Building new affordable housing stock on AONB is not going to achieve this objective.

It important to have a 'horses for courses' approach and there should be a limit set on what the term 'affordable housing' really means as otherwise the interpretation will be a never ending story. The same supplementary document concedes that the objective of 'affordable housing' for the low paid will not be met, stating "affordable in planning terms will rarely mean genuine affordability when compared with local incomes". Setting some kind of threshold as what affordable means in Marlborough would be a useful barometer against which to measure suitability of a scheme.

A key priority, which is having a significant detrimental effect on air quality, is the management of through traffic along the A346. There are far too many HGVs using the A346 and this causes traffic congestion, is a safety risk to people in the town, crossing the road etc and pollution levels are known to be too high. De-priming the A346 must now be an urgent next step. This would

remove the high volumes of HGV and commercial vehicle transit traffic through Marlborough and thereby significantly reduce the levels of major safety risk as well as noise and air pollution hazards to residents.

**MB3. Is this the right pool of potential development sites?**

Whatever the outcome of this current exercise, it is imperative that solutions are found that negate any detrimental impact on the fragile eco-system along the Kennet valley to the East of Marlborough. It will encroach on the river Kennet and SSSI and have a strong negative impact on wildlife and biodiversity. It is an AONB and as such 'site 1' of the MANP should be removed from the potential development site list.

There are far stronger and less controversial options including the land at the south side of the A4 (almost opposite the entrance to Barnfield) or a further evolution of the site at Barton Dene – which is far better served by local public transport. See also the response to Q4.

**MB4. What land do you think is the most appropriate upon which to build?**

The concept of building on a green field site is one that should, wherever possible, be avoided. It is for this reason that option 1 (Elcot Lane) should be avoided. As an AONB and with shockingly poor accessibility would make this wholly unsuitable. Barton Dene (site 3) has many plus points, not least amongst which is that it sits in a well-screened valley which shields the impact of development on views and the site is already surrounded on 3 sides by housing. It is a large site, which together with the College Fields site (site 4) at a later stage, has the potential for further contiguous development beyond the needs of the 2036 time horizon. It is also served by buses on the town circular bus route which provides for better lower carbon accessibility for the people living there.

If Barton Dene is not big enough to satisfy the appetite, then site 2 would be a better option as it too is in an enclosed valley setting and development here would not have the same impact on the fragile eco-system of the Kennet Valley.

To further support this perspective, the MANP document states that site 1 is “highly visible in particular from the South and East and from the North side of the river valley. Development would be highly visible and would have a significant impact on the character and quality of these views”. The site abuts the River Kennet Site of Special Scientific Interest (SSSI) and the woodland

area between the water works and Elcot Mill which is designated a woodland priority habitat. Development would have a devastating impact on the setting of grade II listed Elcot Mill, bringing it into the town rather than its current setting outside town. Elcot Mill currently forms part of the unique historic landscape of our countryside asset.

Accessibility to the site is very poor as there is no suitable road access to the site. Elcot Lane has only single lane access after the railway bridge, which itself has a conservation order on it – it is not possible to widen the road at that point. There are already 170 houses packed in high density on the St John's Park development. White Horse Road, with Chopping Knife Lane as the access to White Horse Road, are both in effect reduced to a single lane throughout day and night because parking is so tight and both roads are used to park vehicles. White Horse Road has sharp bends along its length, purposefully to slow traffic, and driving visibility is poor.

Neither of these roads has the ability to be widened and with a potential doubling of the number of properties (and most these days have 2 vehicles), the forecast traffic and safety issues do not in fact really bear thinking about.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Generally, any increase to the size of the town needs to be properly planned to include not only development of the housing stock but also the adequacy of local services, water, power, sewerage, schools, health care, transport and connectivity. Traffic congestion in the town centre is an issue. There is a plan to look for additional parking but what is needed is better, low carbon, public transportation that can serve all the main areas of the town and encourage people to leave their cars at home. This would have the double effect of lowering carbon emissions and reducing town centre congestion. This cannot be done using the minimalist, some might suggest half-hearted bus services that the town has today. A proper solution using low carbon minibuses within the town on a regular interval pattern and serving all the main parts of the town, would be an excellent place to start.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Much was made in recent times of the possibility to restore a railway connection to Marlborough. There was tentative support from WCC but no real progress has since been made. A proper push to get modern tram/trains (the solutions are all there – I am

a transport professional) back to Marlborough, pushed by committed WCC officers is achievable and MUST be included in the local plan for Marlborough.

### **Further comments**

Sections 1.7 and 6.8 of the 'MANP Site Assessment Report' (page 5) notes that the withdrawal of Preshute parish council at a late stage of the process negatively impacted the option of proposing a significantly larger development site at Barton Dene. Securing the best outcomes for the contiguous expansion of Marlborough town cannot be allowed to be thwarted by historical parish boundaries (set centuries earlier) and by what appears to be self-interest from Preshute council to limit development to the west of town.

From a Marlborough town development perspective and from a Wiltshire Council perspective this essentially unilateral decision of Preshute council to withdraw has resulted in sub-optimal outcomes for our town and the MANP. This issue needs to be addressed by Wiltshire Council to allow Marlborough and the MANP to consider a larger Barton Dene development that may fulfil all or very many of the housing development requirements for Marlborough through to end 2036.

<b>Rep ID:</b> MARL043	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
The proposed greenfield growth is disproportionate to the size of the town, and all growth should be restricted to brownfield sites.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Preserving the AONB is the guiding principle and the priority. Growth of more housing into the protected landscape of the AONB without further employment will be detrimental to the town, its infrastructure and air quality etc and is unnecessary due to the availability of brownfield sites	



**MB3. Is this the right pool of potential development sites?**

No - the pool of sites are all in the AONB and would all have a detrimental effect on the highest parts of the AONB

**MB4. What land do you think is the most appropriate upon which to build?**

Brownfield sites

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> MARL044	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The draft local plan proposes 680 houses 2016-2036.          After taking account of the 154 houses built between 2016-2019 and the 280 houses with Planning Permission this leaves a residual requirement for new land for 245 houses to 2036.          WC also forecast that there will be 160 houses built on brownfield sites in the settlement boundary to 2031.          It can therefore safely be assumed that in the period 2016-2036 there will 839 additional houses in Marlborough by taking account all of the above provisions. This is likely to increase the population by over 2000 people.          WC propose no additional employment land in Marlborough during the plan period.</p>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

WC forecast that 160 houses will be built on Brownfield sites by 2031.

This seems a very reasonable assumption. However, in the Local Plan, WC incorrectly dismisses their own forecast by describing the 160 houses as being on unknown windfall sites. This is incorrect because many of the Brownfield sites have been identified and put forward by the owners in the NP call for sites.

These include the police station already approved for 24 houses; St Peters School which has a development brief for residential development prepared by WC ; Rawlingswell which WC say has a capacity for 60 houses in the SHLAA ; the WC owned Resource Centre with a capacity for 30 and the gas works site with a capacity for 10.

It is therefore unnecessary for any Greenfield sites outside the settlement boundary in the AONB to be even considered.

It is therefore extraordinary that in the Pool of Potential Sites Chapter WC suggest that huge swathes of land in the AONB have potential when no Greenfield sites are even necessary.

WC seem to have taken a casual approach to the character of the AONB, contrary to national guidance and Wiltshire Councils own policies. The landscape was designated an area of outstanding natural beauty to ensure its protection from urbanisation and this should be the most important guiding principle. This principle always applies even if there is a shortfall in the 5-year land supply in Wiltshire as a whole. A shortfall in the 5-year supply is not a reason to prejudice the integrity of the AONB.

The sites identified would involve substantial sprawl into protected open countryside of national importance implying development on the skyline adversely affecting the setting of the town and with adverse effects on important views from numerous public vantage points.

In addition, Site 3 was never even put forward by the owners in the NP. The SEA which considered the other Greenfield Sites put forward for the Neighbourhood Plan highlighted serious environmental impacts on the landscape, air quality and congestion. WC seem to have ignored these impacts.

None of these Greenfield sites needs to be considered though bearing in mind the known availability of brownfield sites of substantial capacity.

**MB3. Is this the right pool of potential development sites?**

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

The LP should ensure sustainable development and the Government and WC have made it clear that a main objective is addressing climate change. One of the main causes of climate change is carbon emissions caused by transportation especially commuting by car.

National Guidance makes clear that sustainable development has 3 linked objectives; economic, social and environmental. WC employment land survey has identified the need for 6ha of new employment land in that part of the Swindon Housing and Employment Market Area in Wiltshire.

The Local Plan allocates all of the 6ha of employment land to Royal Wootton Bassett.

In order to reduce commuting, car usage, congestion, carbon emissions etc new housing should be located close to new jobs. It is incomprehensible that the LP allocates 680 houses to Marlborough and all the new jobs to Royal Wootton Bassett.

Public transport in Marlborough is very limited and so the additional population will need to commute to jobs by private car, causing pollution congestion adverse effect on air quality and additional carbon emissions.

This serves no economic, social or environmental objective and is unsustainable and contrary to Government guidance and Wiltshire Councils own aims.

There are no obvious locations for a new business park or industrial estate in Marlborough which in any event is in the AONB where such development would be precluded.

Unsurprisingly no commercial developer has ever put forward a new business park in Marlborough and even the 3 ha of employment land required in the 2006 Core Strategy has never materialised.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

## Further comments

### Absence of any evidence

WC have no evidence to support or explain or justify this number of houses.

Instead, WC has arrived at the requirement based 'solely to enable the Marlborough Area Neighbourhood Plan Steering Group to deliver affordable homes their work has indicated are required as a priority for the settlement'.

But, the MANAP housing strategy is flawed;

It is based on an opinion survey put to residents in 2016 asking if they were likely to move by 2021 and what they could afford.

From this survey the Steering Group calculated a need for 175 affordable houses. 96 are already committed leaving a residual requirement for 80

The Steering Group Chairman on 26th January 2021 Zoom meeting admits this is a novel and unique way of calculating housing needs and is not a recognised Planning Housing Needs Analysis Calculation.

A proper Housing Survey should also take into consideration the actual availability of existing affordable houses, and the turnover of these.

The exercise undertaken by the Steering Group which is out of date anyway and only covers the period up to 2021, supplies insufficient evidence to support the housing strategy AND even if it was correct fails to take into account the actual supply of affordable houses.

A public opinion survey which takes no account of the 733 existing houses (soon to be 829), and their relet rate cannot be relied upon for a strategic plan.

No evidence has been provided to support any particular number of market houses.

Local Plan Strategy has never been tested

The Draft LP states that 245 houses was the highest number of houses tested – see para 12 –this is incorrect.

In 2019 WC tested 3 scenarios for Marlborough

245 houses linked to 3ha of employment

135 houses linked to 4ha employment land

50 houses with no employment land

Therefore, the only scenario which has been tested with no new employment land is for 50 houses.

It is extraordinary and remiss that WC propose a strategy which they have not actually tested.

This is even more extraordinary because the 2016 Core Strategy required 3ha of employment land to be provided alongside 680 houses. This employment land has also not been delivered although 721 houses have been built or have planning permission. Any testing of strategies should take the shortfall of employment land provision into account.

Relationship between the Local Plan and Neighbourhood Plan

WC are the statutory Local Planning Authority responsible for Strategic Planning.

The adopted Core Strategy has policies up to 2026. The housing requirement in that plan for Marlborough has already been exceeded. There is therefore no need for additional houses up to 2026 and it is the role of WC to prepare strategic guidance up to 2036.

It seems that the Steering Group preparing the Marlborough Area Neighbourhood Plan has taken it upon themselves to decide Strategic Guidance. It is surprising and contrary to the Planning Act for a Planning Authority to follow the guidance of a Neighbourhood Plan Steering Group, especially when that guidance is based solely on an out-of-date opinion survey, and when the resulting strategy has never been tested.

This seems to be an unsound approach because NP's should be in conformity with the adopted Strategic Plan rather than deciding a strategic policy themselves.

The WC LP appears to be written to conform to the suggestions of a Neighbourhood Steering Group which turns the Planning system on its head and is therefore unsound.

<b>Rep ID:</b> MARL045	
<b>Consultee code:</b> Other Advisory Bodies	<b>Consultee Organisation (if applicable):</b> The Campaign to Protect Rural Wiltshire (CPRE)
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
Agree that this was about the right level of development for Marlborough. New housing should be in line with employment opportunities. There is a strong need for affordable housing.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
Place Shaping Priorities There should be a new design guide for WC. Government's new interest in design should be rigorously followed.	
<b>MB3. Is this the right pool of potential development sites?</b>	

We suggest that rather than using all of some sites perhaps some development on all the sites might be a way forward. We have a preference for the St Johns site (Chopping Knife Lane (Area 1)), though possibly unwise for us to specify any site and to wait for NP preferences.

The proposal for the extension of the St Johns estate (Area 1) are being criticized both by residents of Mildenhall who say it is closing the green space between the village and the town and current residents of the St Johns estate and Chopping Knife Lane who are concerned about traffic levels and road infrastructure to the lower estate.

Preshute Parish Council have left the NP so the development at Barton Dene would be smaller than originally planned unless a developer works with Preshute Parish as well.

**MB4. What land do you think is the most appropriate upon which to build?**

Nothing to say

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

Nothing to say

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Urgent need for a new medical Centre and schools (NP also identifies these). Marlborough has had a significant influx of elderly/retired people in recent years. The old police station has been suggested to the CCG but not progressed yet.

There is a serious traffic problem (congestion and pollution).

**Further comments**



<b>Rep ID:</b> MARL046	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Barton Willmore LLP
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> Marlborough College	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL46
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>We welcome the review of the local plan. This review is pressing and timely as the Council cannot demonstrate five years' supply of housing land and the 'presumption in favour' is activated as per paragraph 11(d) of the NPPF. This also presents the opportunity for the MANP to be prepared on a consistent basis with the emerging local plan, addressing the issues raised by paragraph 29 of the NPPF. At the same time, the local plan can be formulated with the benefit of the extensive work on local needs and the community's aspirations that underpins the emerging MANP.</p> <p>The local plan is to set its housing requirements through the application of the standard methodology, the current iteration of which identifies a requirement for 2,042 homes a year, a decrease of 58 from the adopted Core Strategy (2015) requirement for 2,100 dwelling per annum. It is noted that the current consultation identifies the standard method figure as the lower limit of likely housing need. A Local Housing Need Assessment (2019) has been undertaken for Wiltshire. This takes account of longer-term migration and economic forecasts and identifies a higher housing need of 2,282 dwellings per annum for Wiltshire (see table</p>	

at paragraph 2.17 of the Wiltshire Council Local Plan: Emerging Spatial Strategy, January 2021), an increase of 182 dwellings per annum from the adopted Core Strategy requirement.

Whilst there will no doubt be debate as to the County wide requirement, a further core issue is the spatial distribution of that requirement in a manner that would contribute to sustainable development (as per paragraph 7 of the NPPF) and ensure that the needs of communities are met and planned for. The local plan will be informed by a range of technical assessments and studies. This includes settlement hierarchy and local housing needs. The MANP is important in informing the local plan in this respect but not determinate.

Marlborough town is identified in the Core Strategy as a Market Town defined as 'settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities' with 'potential for significant development' (Core Policy 1). The emerging local plan continues to define Marlborough as a Market Town (see Emerging Spatial Strategy January 2021, page 3).

Given the location of Marlborough within the AONB and having regard to the high level of affordable need identified by the MANP and the aspirations therein, the emerging local plan spatial strategy proposes to continue the Core Strategy requirement for 680 new homes but taking this forward to the period 2016 to 2036 (see paragraph 3.69). Based on previous completions, the emerging spatial strategy identifies a residual requirement for 245 homes in Marlborough to 2036 (see page 19) but notes that this exceeds total assessed need (see paragraph 3.69). The Local Housing Needs Assessment (2019) is the latest evidence-base document considering housing need in Wiltshire and this identifies need for each housing market area but not individual settlements. It is therefore unclear from the local plan review consultation documents what the 'total assessed need' for Marlborough is and how this relates to the distribution of the housing requirement (top-down vs. bottom up). This should be clarified through iteration of the local plan. The MANP provides a locally based assessment of need that should inform the local plan.

Both the emerging local plan and MANP seek to provide a spatial framework for the community's needs over the plan period to 2036 in a sustainable manner. This can be achieved in a manner that is consistent with the spatial strategy that underpins the emerging local plan and also the MANP, and will meet the identified housing requirement and local needs.

The local plan is not spatially constrained in the way that the neighbourhood area is (with the late withdrawal of Preshute constraining the neighbourhood area further) and can and should consider the contribution that the Marlborough area can make to meeting the wider requirements of the wider area in a comprehensive way, including the parish of Preshute and the County in a manner that is commensurate with the identified local needs as evidenced.

It is understood that Preshute Parish has now been designated as a neighbourhood area and intends to bring forward its own neighbourhood plan. Preshute is a rural parish, with just 193 residents (Census 2011), that is functionally related and dependent upon Marlborough town for local services and facilities and hence, reliant upon the MANP or the local plan to plan for the

provision thereof. The withdrawal of Preshute from the MANP, from a planning perspective, is disappointing in that it removes the needs of Preshute from the remit of the MANP. Be that as it may, it now falls to the emerging local plan to consider the needs of Preshute in the wider context of delivery and the role of the Preshute Neighbourhood Plan moving forward. It is unlikely that any neighbourhood plan for Preshute will be significantly progressed by the time of the submission of the MANP or the local plan. The wider area of Barton Dene is identified in the emerging local plan and this area was previously considered in the preparation of the MANP but was discounted due to the withdrawal of Preshute. It is a sustainable and suitable location that provides the opportunity to meet the needs of Marlborough and the surrounding area including Preshute.

The land north of College Fields (part of Site 4) also falls outside of Marlborough Town and within Preshute Parish. Previous discussions have considered the need for a new site for Preshute Primary School. With the plan period running to 2036, it is sensible for the Council to plan for such sites. The land to the north of College Fields continues to be promoted by the College to provide for a new primary school site, facilitated by additional residential development with the potential access from College Fields through the existing area of open space and providing such compensatory open space as would be required to account for that accommodating the access.

## **MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

### **Local Needs**

It is important to recognise, as indeed the draft MANP does, that all communities need to continue to evolve and develop. If local needs are not met, then the vitality and economic health of the community is undermined. The MANP correctly seeks to ensure that affordable housing and health needs, amongst others, are met as part of a mixed and balanced community.

Failure to do so, and to constrain further the supply of homes (of all tenures and affordability), will result in house 'price' or rent growth, exacerbating current affordability issues without any mechanism for the community to respond.

A proportionate and balanced approach must be taken, based on evidence. This is the approach that the MANP seeks to adopt and one that the College supports.

The MANP is predicated on meeting local needs. The College supports the identification of local needs and the importance of the MANP in identifying and providing a spatial framework for those needs to be met. The MANP, being at an advanced stage, provides useful evidence to inform that preparation of the local plan.

The evidence base that has been assembled to inform the MANP has identified a need for 35 new affordable homes per annum (see Housing Needs and Requirements Study 2017 and Affordable Housing Needs Update 2020) as well as a range of social and community issues. One of which is the need to expand the existing GP surgery.

#### Affordable housing need

The evidence that supports the draft MANP identifies a need for 35 new affordable homes per annum (Affordable Housing Needs Update 2020, paragraph 2). This is based on a local needs survey where 175 respondents identified a need to move to affordable homes within the next five years (split between 107 affordable/ social rent and 68 shared ownership). The 35 dwellings per annum is an average of this figure over the five-year period.

Whilst every household in the neighbourhood area was sent a questionnaire, only 24% were completed. The affordable housing needs were based on responses received. It is therefore likely that there are households that did not respond, or indeed are in need but did not consider themselves to be so, and the full affordable needs for the neighbourhood area are greater. The need for 35 affordable homes per annum ought therefore be taken as a minimum.

Wiltshire Council have queried the robustness of the estimate for affordable housing need given that this was based on questionnaire responses that identified a need to move to affordable accommodation within the next five-year period (i.e. short-term) rather than being based on 'backlog need and newly emerging demographic need over the full plan period to 2036' (Affordable Housing Needs Update 2020, paragraph 3). Wiltshire estimates a need of 50 to 250 affordable homes in Marlborough to 2036. The Affordable Housing Needs Update (2020) sets out several sensitivity tests comparing the MANP estimate of affordable need to

Wiltshire's evidence and extending the time period to 2036.

The sensitivity tests consider demographic and affordability evidence alongside the apportionment of county-wide affordable need and identify affordable need in the neighbourhood area to be within the range of 32 to 39 dwellings per annum and therefore supporting the level of need identified through the original needs survey for the full plan period to 2036. It is noted that this is an unconstrained estimate but it is clear that there is a significant need for affordable homes in the neighbourhood area (some 525 affordable homes for the 15-year MANP period from 2021 to 2036).

The MANP rightly seeks to strike a balance between the delivery of new market and affordable homes and protecting the special character of the area which includes the AONB. Through increasing the proportion of affordable homes on each proposed site allocation to 50% from the Wiltshire general requirement of 40%, the MANP proposes to allocate sufficient land to deliver circa 86 affordable homes from a total of 180 homes (see Supporting Statement on Housing Proposals, January 2021). Whilst this will go some way to addressing affordable need in the neighbourhood area, taken over the MANP period to 2036, it provides only five/ six affordable homes per annum against an identified need of 35. The number of affordable homes the MANP seeks to deliver also falls notably short of Wiltshire's upper estimate of 250 homes, noting that the MANP's own evidence advises a significantly higher affordable need.

The local plan can therefore go further and consider land outside the defined boundary of the MANP. This includes Sites 3 and 4. The neighbourhood area is constrained by the boundary of Marlborough Town and the parishes. Preshute withdrew from the MANP at a late stage and therefore constrains the assessment of options to meet wider community needs, upon which the residents of Preshute Parish rely. The Wiltshire local plan is not constrained in this way and there is an opportunity for the MANP to work with the Council to identify further opportunities to assist the provision of affordable homes in the local area in the context of the pressing need identified.

#### Healthcare needs

The Council's latest iteration of the Infrastructure Delivery Plan is dated December 2016 ('the IDP'). This identified an 'essential (necessary)' need to expand primary healthcare facilities in Marlborough, noting that local practices were 'already undersized for the number of current patients' and that expansion was required to 'meet the impact of new housing' (reference MAR005, page 10).

The current position in respect of healthcare facilities in Marlborough has not been published in an update to the IDP to support this local plan review consultation. However, it is understood from the emerging MANP and draft policies therein that there is a pressing need to relocate and expand the Marlborough Surgery.

The land at Barton Dene is located in proximity to Marlborough High Street, making it easily accessible by a range of transport modes. It is also adjacent to the Marlborough Leisure Centre. The location of a new medical centre within this site provides the opportunity to create a health and wellbeing hub whilst also providing sufficient land to accommodate a medical centre to meet existing and projected increases in need as would arise from new housing in the town/ neighbourhood area.

#### Primary school need

Appendix 1 of the IDP identifies the need for a new site to facilitate the expansion of Preshute Primary School in Marlborough as 'essential (necessary)' (reference MAR001, page 9). The IDP notes that, whilst there were 'some surplus spaces' at the time that the 2016 IDP was prepared, existing schools could not expand to accommodate further housing.

An updated position on Preshute Primary School has not been published. However, the school has not relocated and it is understood that a new site has not been identified. The local plan will cover the period to 2036 and should take the opportunity now to plan for the need for the expansion of education facilities in Marlborough to ensure that suitable, available and developable land is identified and that the needs of the community are met and can be met in the future.

The land north of College Fields (the southern part of Site 4) could accommodate a new primary school of the size identified in the IDP alongside new homes and open space. It is suitable, available, developable and deliverable. The College will work with the Council to explore the need and delivery of a new primary school site.

**MB3. Is this the right pool of potential development sites?**

**MB4. What land do you think is the most appropriate upon which to build?**

Site 3: Land at Barton Dene

The land at Barton Dene includes SHELAA sites 565, 3626a and 3626b. The site is currently an arable field with trees/ hedgerows marking its boundaries, a copse of trees within the northern part and several College houses. The site sits within a dry valley. At a higher level to the east are College sports pitches/ facilities. To the north and west, elevated above Site 3, is open countryside.

5.2 Key information:

- Site area: 16.21 hectares
- Capacity to deliver: circa 130 homes
- Access from: Barton Dene (existing) with potential new second access from College Fields adjacent to the Marlborough Leisure Centre
- Opportunity for: land for a new medical centre together with new homes
- Affordable: 40% affordable with 10% discount market rent for qualifying current and former College employees

The most recently published SHELAA is dated August 2017. This includes the southern part of Site 3 (SHELAA reference 565).

However, the northern part (SHELAA reference 3626a and 3626b) was submitted as part of a Call for Sites in December 2017 (submission dated 15 December 2017). This part of the site, and assessment thereof, is not included in the 2017 SHELAA

In respect of the southern part of Site 3 (reference 565), the 2017 SHELAA assesses the site as suitable for residential development, available, deliverable and developable in the short-term (see page 41 of Appendix 5.8).

The characteristics of the northern part of Site 3 (references 3626a and 3626b) are similar to the southern part (reference 565) and should thus be comparably assessed as suitable for residential development, available, deliverable and developable in the short-term.

The College has undertaken work in support of the promotion of Site 3 through the emerging MANP (prior to the withdrawal of Preshute). This has included landscape and visual assessment to understand the relationship to, and visibility within, the wider landscape and AONB. This identifies that Marlborough has developed as a linear settlement broadly following the alignment of

the River Kennet with built development extending into the dry valleys to the north. The Barton Dene site sits within a dry valley. The Landscape Assessment concludes that development could be successfully accommodated within the existing and an extended

landscape framework on the site and would follow the existing pattern of settlement growth in the northern part of Marlborough, appearing well integrated into the landscape and townscape setting. This is on the basis that development does not extend above the 155m AOD contour to minimise visibility within views of the AONB from the southern side of the Kennet valley. Based on this assessment and retention of existing trees/ hedgerows and the existing PRowS (MARL43 and PRES43), the developable area of the site is reduced to circa 6 hectares with an estimated capacity for 130 homes.

There is an existing vehicular access to the site from College Fields via Barton Dene. Technical assessment of this existing access confirms that it has capacity to accommodate the trips associated with a 130-home development with localised widening and priority working where it passes through the Barton Farm complex. There is potential for a second vehicle access (or emergency/ cycle/ pedestrian access) to be provided from College Fields adjacent to the Marlborough Leisure Centre access. The second access provides the opportunity to mitigate the impact of additional traffic movements on the setting of the listed buildings at Barton Farm, albeit initial heritage work has identified that any such impacts would be at the lower end of 'less than substantial harm' as per the NPPF.

Sufficient land is available within the site to accommodate a new medical centre to allow relocation of the existing Marlborough Surgery from its site at George Street (as per the emerging MANP). It is envisaged that this would be located in proximity to College Fields to provide convenient access and to the Marlborough Leisure Centre where it provides the opportunity to create a health and wellbeing hub for the town.

#### Site Assessments

The Stage 2 site assessments for the three SHELAA sites that fall within Site 3 are provided at pages 11/12 and 14/15 of the Site Selection Report for Marlborough (January 2021). These assess the three components separately, providing slightly different assessments for each. The characteristics of all parts of Site 3 are similar and should be comparably assessed as a whole. For example, the southern part of Site 3 (reference 565) and the eastern element of the northern part (reference 3626a) scores 'green' for access which we would support as there is an existing established access from College Fields via Barton Dene. However, the western element of the northern part of the Site (references 3626b) scores 'amber' for access when the same existing access that scored 'green' for the southern/ eastern parts of the site extends through to the northern part. It is clear that this ought to score 'green' for all component parts of Site 3.

Likewise, traffic is scored as 'red' for the southern part of Site 3 and the eastern element of the northern part (reference 3626a) owing to proximity to the Marlborough AQMA whereas it scores 'amber' for western element of the northern part (reference 3626b). The scale of development that could be accommodated within Site 3 (i.e. circa 130 homes) is not of a strategic scale that

would generate high levels of traffic. However, it will increase traffic and the impact of that on existing highway infrastructure and air quality would require assessment, albeit no part of Site 3 falls within the AQMA. Moreover, any impact on air quality ought to be capable of mitigation. As such, all of Site 3 should be identified as 'amber'.

Landscape scores 'amber' for the southern part of Site 3 and 'red' for the northern. The landscape and visual assessment undertaken identifies that development can be accommodated within the northern part up to the 155m AOD contour without being unduly visible from the southern side of the Kennet valley and, whilst the landscape impact of development within Site 3 will require careful consideration, this can be managed/ mitigated.

This ought to be reflected in the score with all of Site 3 being assessed as 'amber' in this regard.

Drawing the above together, the following schedule provides a single assessment for Site 3 reflecting the similar characteristics for the whole site and the area as submitted by the College to the Call for Sites: [schedule visible within attachment MARL46].

#### SITE 4: College Fields

The land to the north of College Fields is identified in the SHELAA as site 3326. The site is currently an arable field with trees/ hedgerows marking its boundary. The site sits above the College Fields development broadly rising up from east to west, with the western extent being more visible in the wider landscape. Open countryside is located to the east, west and north.

Key information:

- Site area: 7.7 hectares
- Capacity to deliver: 25 to 50 homes (depending on land requirements for school)
- Access from: College Fields across the existing area of open space and/ or through Site 3 (Land at Barton Dene)
- Opportunity for: land for a new 2FE primary school; compensatory public open space together with new homes
- Affordable: 40% affordable

The SHELAA 2017 identifies this site as suitable for residential development, available, deliverable and developable in the short-term (page 49 of Appendix 5.8). The College confirms that this assessment remains correct.

The SHELAA advises an indicative capacity for this site of 249 homes for the College's land (i.e. SHELAA reference 3326: the southern part of Site 4). Landscape and visual assessment has been undertaken to understand the visibility of this site in the wider landscape. This identifies the central and eastern parts at a lower level and having greater potential for accommodate development in the context of views towards the AONB from the southern side of the Kennet valley. It is considered that the site (reference 3326) has capacity for between 25 and 50 homes in addition to sufficient land to provide compensatory and enhanced open space if access is to be taken through the existing College Fields area of open space and a new 2FE primary school.

Alternatively, or in addition, access can be provided from the Barton Dene site (Site 3).

#### Site Assessment

The Stage 2 site assessment for the southern part of Site 4 (reference 3326) is provided at page 11 of the Site Selection Report for Marlborough (January 2021). In respect of accessibility, the site is well located immediately adjacent to an existing,



established residential area and within walking distance of Marlborough town centre and the amenities therein. The site does not benefit from an existing vehicular access but there are options to provide this including from College Fields and through the adjacent Land at Barton Dene (Site 3). Further assessment is required on the provision of an access. On this basis, the 'amber' rating is appropriate.

The scale of development that could be accommodated within this site (i.e. circa 25 to 50 homes) is not of a strategic scale that would generate high levels of traffic. However, it will increase traffic and the impact of that on existing highway infrastructure and air quality would require assessment, albeit no part of the site falls within the AQMA. Moreover, any impact on air quality arising from a development of this scale (either alone or in combination with Land at Barton Dene) ought to be capable of mitigation. As such, this site should be identified as 'amber'. It should also be noted that in the event that Preshute School is relocated, then this would lead to a reduction in traffic in Manton.

In the Council's assessment, landscape scores 'red'. The landscape and visual assessment undertaken for the College identifies that development can be accommodated within this site without being unduly visible from the southern side of the Kennet valley provided that it is limited to the lower central and eastern parts of the site. The site is sufficiently large to allow appropriate landscape mitigation/ buffers whilst still making a meaningful contribution to the delivery of new homes and other facilities. This ought to be reflected in the score with this being revised to 'amber'.

Drawing the above together, the following schedule provides a revised site assessment for the southern part of Site 4: [Schedule available within attachment MARL46].

Whilst overall, the College agrees with the conclusion that both Site 3 and Site 4 should be taken forward for further assessment, it considers that both perform more strongly than shown in the current Site Selection Report for Marlborough (January 2021). The College would welcome the opportunity to assist the Council with the next stage of site assessment including making available the technical assessments undertaken to date.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

## Further comments

PLEASE SEE ATTACHMENT MARL46 FOR FULL COMMENTS

These representations are submitted on behalf of Marlborough College ('the College').

Marlborough College is a first-class educational establishment with a strong and important role in the local community. The College is a focal point of the historic town, located centrally within the town and in proximity to the High Street. The College is a well-established employer within Marlborough, as well as a significant landowner with an estate of over 100 hectares in and around the town including a wealth of heritage assets ranging from local to national significance. The College is a long-term custodian within the town and has a vested interest in ensuring that the future needs of Marlborough are met in a sustainable manner and that the development plan provides a sound policy basis for the spatial planning of these needs within the overall spatial framework.

The College welcomes the opportunity to engage in the local plan review and has promoted some 23.44 hectares of land at Barton Dene and to the north of College Fields through the emerging stages of the local plan (including the December 2019 Call for Sites: submission dated 15 December 2017). Whilst submitted, at that time, as a single site, these sites are identified separately in the consultation draft as Marlborough Site 3 and the southern part of Site 4 (SHELAA references 565, 3626a & b (Site 3) and 3326 (southern part of Site 4)). Site 4 is in two separate ownerships.

The College is also engaging in the preparation of the Marlborough Area Neighbourhood Plan ('MANP'), the spatial remit of which has been reduced as a result of the late withdrawal of Preshute Parish from the neighbourhood area, which is now taking forward its own neighbourhood plan. The emerging MANP has identified the southern part of Site 3 (Land at Barton Dene: SHELAA reference 565) in the regulation 14 consultation draft to provide for circa 40 homes and land for a new doctors' surgery (identified in the draft MANP as MARL1.3: Land at Barton Dene). Whilst the College supports the MANP and this draft allocation, the local plan is not so spatially constrained and the College considers that the wider Barton Dene site represents a suitable location for development to meet identified needs, including additional much needed affordable homes and the provision of a new doctors' surgery, to serve both the MANP area, Preshute Parish and the wider area.

The land to the north of College Fields (the southern part of Site 4) continues to be promoted by the College to provide for a new primary school site, facilitated by additional residential development. There is potential for access to be provided from College Fields across the area of open space and the proposal would therefore include replacement, enhanced open space. Our understanding is that the northern element will be promoted separately, and the College

is in dialogue with the promoter. A number of technical assessments have been undertaken which are ongoing as the proposals progress and the College continues to engage with the local plan, MANP and wider stakeholders.

#### MANP

The response of the MANP to the identified needs is to propose the allocation of five sites to provide a total of circa 180 homes (draft policies MARL1.1-5). As stated, the MANP is constrained by the spatial limitation of the designated neighbourhood area, which has been reduced to respond to the withdrawal of Preshute Parish. Whilst Preshute Parish has decided to withdraw from the neighbourhood area, its residents will remain dependant and reliant upon Marlborough Town for local services, facilities and new homes, unless the local plan or the Preshute Neighbourhood Plan seeks to allocate land to meet such needs as may arise through

its own neighbourhood plan.

The most appropriate approach is for both the MANP and the local plan to be progressed in tandem, whereby the most suitable and appropriate strategy can be adopted. This could include the allocation of additional land, for example at Barton Dene and/ or College Fields, to deliver additional housing to meet the residual requirement identified in the emerging local plan review and provide a greater contribution to affordable housing which both the local plan and MANP identify as a key objective (see MANP Pre-Submission Plan November 2020, paragraph 5.2)

#### Conclusion

The College welcomes the review of the Council's local plan and the clear intent to work with the Marlborough Area Neighbourhood Plan to provide for the local needs of Marlborough and the surrounding area.

The two sites at Barton Dene (SHELAA reference 565, 3626a and 3626b: Site 3) and College Fields (SHELAA reference 3326: southern part of Site 4) provide the opportunity to contribute to meeting the housing and health/ educational needs of the area in a comprehensive and sustainable manner with the extent of development those sites can accommodate informed by the robust technical assessment and high quality landscape and design interventions, rather than administrative parish boundaries. The College considers that both sites perform more strongly than assessed at Stage 2 of the site selection process. The College would be pleased to work with the Council and share the technical assessments undertaken to date to inform the Stage 3 assessment of the sites to ensure that their potential to contribute to the growth and evolution of the area is realised.

The College's comments can be summarised as:

- The identification of local needs that respond to the identified needs of the local community, and will allow the community to evolve and develop, are supported.
- There is a clear and pressing need for affordable homes in the Marlborough area that justifies the allocation of land beyond that provided for in the draft MANP in a manner that is consistent with the emerging MANP.
- The College's Land at Barton Dene (Site 3) can make a valuable contribution to the provision of new homes including affordable homes in addition to land for a new (expanded) GP surgery.

- The College's Land at College Fields (southern part of Site 4) can make a further contribution to the provision of new homes and also provides sufficient land to accommodate a new site to which Preshute Primary School could relocate along with high quality open space.
- Both sites have been assessed through the Stage 2 site selection process as appropriate to take forward for further consideration. The College supports this but considers that both sites perform more strongly than assessed which should be reflected in the next stage of assessment.
- Such 'objections' that the College has made are technical and relate to the relationship of the MANP to the emerging local plan and how the identified needs can be appropriately met. They do not undermine the support of the College for the aims and objectives of the MANP or the local plan review, nor the role that the College's land can play in meeting identified needs. The College will continue to engage in the formulation of the MANP and stakeholders

<b>Rep ID:</b> MARL047	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Great Bedwyn Climate Action Group
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The scale of growth should reflect recent changes in commuting and new patterns of employment, to minimise travel associated with work and encourage people to use low impact forms of travel eg. active travel and public transport. Bring back the rail link between Marlborough and Great Bedwyn !</p> <p>Yes, at least 40% of development should be on brownfield sites.</p>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<p>Put the environment at the centre of thinking about where to develop and what to build. WCC officers have written an excellent summary of the issues and ways to achieve the vision they set out in your Climate Strategy Discussion Document, but many of</p>	

these seem to have been ignored by those working up local plans. All developments should contribute towards reaching net zero by 2030 – not just those owned or operated by the Council. This is not about net zero for WCC estate, it is about Wiltshire as a whole moving towards net zero, and the Council using every lever at its disposal to promote or enforce this !

**MB3. Is this the right pool of potential development sites?**

Probably. But it is more important to ensure that the right kind of buildings are built, meaning low or zero carbon homes with their own renewables, provision for EV charging and with steps taken to avoid future summer over-heating, and the consequent demand for air conditioning. See: How new social housing can help fight climate change, <https://theconversation.com/how-new-social-housing-can-help-fight-climate-change>

**MB4. What land do you think is the most appropriate upon which to build?**

There are over 1 million people on housing waiting lists so low cost, sustainable housing that does not place people in fuel poverty (having to decide whether to buy food or heat their house), should be an absolute priority.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

In the words of your own Council officers (from the Climate Strategy Discussion Document):  
"Use the Local Plan review to increase renewable energy capacity, to consider the role of off-grid solutions (such as district heating) and other opportunities to use energy most efficiently.  
• Work with partners to encourage local innovation using new technologies and develop a skilled local workforce  
• Explore the role of community energy in increasing renewable energy generation and supporting uptake of micro-generation, car clubs and other local initiatives"  
Also, WCC needs to consider imposing a requirement on housing and other developers to demonstrate clear evidence of delivering social, environmental and economic benefits aligned with the principles of a 'just transition'. This will be critical to

supporting community energy & climate action projects in the future, and could create a major incentive for the commercial sector to partner with such organisations.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

In the words of your own Council officers (from the Climate Strategy Discussion Document):

“Use the Local Plan review to increase renewable energy capacity, to consider the role of off-grid solutions (such as district heating) and other opportunities to use energy most efficiently.

- Work with partners to encourage local innovation using new technologies and develop a skilled local workforce
- Explore the role of community energy in increasing renewable energy generation and supporting uptake of micro-generation, car clubs and other local initiatives”

**Further comments**

There seems to be a worrying disconnect between the welcome (and adventurous) Council decision to declare a Climate Emergency 2 years ago and the excellent recent work done by council officers writing the 80-page Climate Strategy Discussion Document versus the work of some other departments, as shown in these local plan documents. This disconnect suggests a failure of governance at a senior level and requires urgent action to bring all WCC departments up to speed with the implications of climate change, if the Council’s declared intention of moving itself and the rest of the County towards net zero by the end of this decade is to remain plausible.

Wiltshire is fortunate to have a strong history of community support for environmental action with several Transition towns, the Wiltshire Climate Alliance <https://www.wiltshireclimatealliance.org.uk/>, Danny Kruger MP’s recent Climate Summit and many local community energy groups. Speaking on behalf of the Great Green Bedwyn community energy group, we would like to see WCC convene a forum to update these groups on Council & wider Wiltshire progress towards net zero, and to promote local and county-wide discussion and action. There are probably several thousand people across the county keen to help the Council to achieve its carbon reduction aims who can help spread and socialise these ideas and bring local communities with them. So, please do use us !

One practical step would be to for WCC to become a member of Community Energy South, who can then channel support to Wiltshire community energy groups, which are currently excluded from CES support. Another is to impose a requirement on housing and other developers to demonstrate clear evidence of delivering social, environmental and economic benefits aligned with the principles of a ‘just transition’. This will be critical to supporting community energy / climate action projects in future, and could create a major incentive for the commercial sector to partner with such organisations.

**Rep ID:** MARL048

**Consultee code:** Developer/Agent

**Consultee Organisation (if applicable):** Land Value Alliances LLP

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** yes

**If this representation refers to attachment(s), these are listed below:**  
MARL48

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

LVA consider the proposed level of growth appropriate and consummate to Marlborough.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

LVA are in agreement with the suggested place shaping priorities.



**MB3. Is this the right pool of potential development sites?**

LVA consider the Council should undertake detailed assessment of the availability, suitability, deliverability and viability of brownfield sites with a view to providing a sensible method to assessing the level of greenfield sites that will be required.

**MB4. What land do you think is the most appropriate upon which to build?**

LVA believe that Land at Kelham Gardens can make an important contribution to the brownfield target for Marlborough. A Boundary Plan is provided. The brownfield site of 0.3 acres located within the settlement boundary is proposed as an allocation for a flatted scheme of approximately 10 homes under Policy MARL1 Site 5 in the draft Marlborough Neighbourhood Plan. LVA consider the site should also be identified for development within the Local Plan Review.

The site is developable, available and can be delivered in the short term and there are no restrictions or problems inhibiting development of this site. In terms of viability, we are not aware of any abnormal development costs at this stage in respect of delivering scheme that could be viably developed as a location for open market residential use, thus contributing towards the housing requirements of Marlborough.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

No comment.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

No comment.

## Further comments

[site plan for Marlborough representation attached at attachment MARL48]

The enclosed representations have been prepared by Land Value Alliances LLP (“LVA”) and relate to the Wiltshire Local Plan Review (“LPR”) consultation taking place 13 January to 9 March 2021.

LVA is an investor and planning project manager in UK land and property, with a concentration of projects around the South West including a number in Wiltshire. We focus on forming responsible alliances with all stakeholders, including Local Planning Authorities to create developments which add value to communities. We believe our approach of creating working ‘alliances’ leads to better development.

LVA has a strong interest in Wiltshire’s spatial planning and has specific vested interests in relation to land across the County, all of which represent sustainable, appropriate growth opportunities for their respective settlements. Where relevant, these representations highlight the availability, suitability and deliverability of sites for development in the following locations:

- Land north of 16 Bradford Road, Corsham (See Appendix 1 for Plan)
- Land at Sandlease Farm, Worton (See Appendix 2 for Plans)
- Land south of B3098, Urchfont (See Appendix 3 for Plan)
- Land at Kelham Gardens, Marlborough (See Appendix 4 for Plans)

Plans of individual sites are appended to this letter.

LVA has a further land interest in Land at Glenmore Farm, Westbury, representations of which are made to this consultation under a separate submission by Boyer Planning.

LVA provide comments on the following consultation content:

- Emerging Spatial Strategy
- Planning for Corsham
- Planning for Marlborough
- Empowering Rural Communities

LVA strongly endorses a plan-led approach to development and would welcome the opportunity to work with Wiltshire Council to achieve high quality development on its sites. All are suitable, available, and immediately developable.

<b>Rep ID:</b> MARL049	
<b>Consultee code:</b> Developer/Agent	<b>Consultee Organisation (if applicable):</b> Wood Group Ltd
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b> The Crown Estate	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL49a, MARL49b, MARL49c, MARL49d, MARL49e, MARL49f
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
See response to the Emerging Spatial Strategy on our response to the approach to brownfield targets.	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
No comment	

### **MB3. Is this the right pool of potential development sites?**

Comment on the exclusion of Ma2 (page 17 of the Marlborough Site Selection paper)

This site should not fail the first stage of the Council's site assessment and should form part of the pool of potential development sites.

The reasoning for its rejection is not justified and unsound. The transport, ecology and heritage matters identified can be addressed in a similar way to the other options taken forward for further assessment at Marlborough. The conclusion that it is 'unnecessary' to consider the site given the presence of other site options is at odds with the purpose of the first stage of the site assessment process – to identify what land is available and then to invite comments on the pool of sites.

### **MB4. What land do you think is the most appropriate upon which to build?**

The Crown Estate supports the inclusion of Site 1 at Chopping Knife Lane (comprising SHELAA parcels 660 and 661) and Site 2 at Salisbury Road (Ma1) as potential development sites, both of which are sustainable and suitable locations for residential development.

The Crown Estate is working with Marlborough Town Council to support the sites for inclusion in the MANP, both of which are allocated for 50 homes in the Regulation 14 draft of the MANP.

Site 1 - Chopping Knife Lane (660 & 661 combined)

The Crown Estate support the allocation of 50 homes on the western part of this site as is currently proposed in the MANP, reflecting the levels of growth proposed as part of that plan, comprising site 660 only. This works as a stand-alone site with access readily available via the Crest Nicholson scheme to the south, off White Horse Way. This site should therefore be allocated for development.

Evidence previously submitted to Marlborough Town Council in support of this allocation is appended, comprising: 1. Illustrative Masterplan, 2. Transport Technical Note, 3. Heritage Note and 4. Landscape Note. In addition, the more comprehensive solution combining 660 and 661 – as preferred in the Site Selection Report and previously identified by The Crown Estate – has also been presented to Marlborough Town Council, should this be required to meet the additional housing needs identified by Wiltshire Council. As well as delivering new homes, this scheme could establish a longer-term landscaped boundary to the north east of Marlborough (maintaining the buffer between Marlborough and Mildenhall), provide a visually contained site in AONB

terms, and provide additional recreational benefits for Marlborough, including a riverside park. This option was submitted to Marlborough Town Council in 2019 and is appended for reference (5. Combined Option - referred to as 'Option B' because this sat alongside 'Option A' which comprised the western part of the site only, i.e. the part of the site now proposed for allocation in the Reg 14 draft of the MANP) With respect to the considerations noted on page 8 of the Planning for Marlborough report, the attached heritage note and masterplans reflect the setting of the Grade II listed Elcot Mill and Stable Block, groundwater issues can readily be dealt with (as The Crown Estate did on the Salisbury Road site), and the proposed landscape boundary would help to maintain the buffer between Marlborough and Mildenhall.

#### Site 2 – Salisbury Road (Ma1)

As with Site 1, The Crown Estate is supporting Marlborough Town Council's allocation of this site for 50 homes through the MANP process. This site should be allocated for development.

Our previous submission to the MANP in support of this site is enclosed, providing a high-level concept for how this opportunity might be realised. In response to the AONB and site's natural topography, development would be kept on the lower slopes and access would be secured via the adjoining Salisbury Road Strategic Site (WCS Core Policy 14) which is already under construction. The southern part of the site would deliver additional landscaping and ecological habitats and physical and visual separation from the railway tunnel and associated bat colonies, and from Pantawick Wood to the south. In transport terms, the site can utilise and enhance existing pedestrian and cycle connectivity through to St John's Academy, the town centre, Tesco and Marlborough Business Park, as a sustainable location for development. A coordinated approach to providing an enhanced northern link with adjoining Wiltshire Council-owned land is also possible.

With respect to the considerations noted on page 8 of the Planning for Marlborough report, The Crown Estate has already factored in flood risk and surface water drainage to its emerging concept, comprising a lined SUDs feature which connects through to the adjoining Salisbury Road scheme to the east (taking account of the restrictions on infiltration drainage given presence of the SPZ1). Further assessments can be undertaken as detailed designs progress.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

No comment.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

No comment.

**Further comments**

For detailed supporting evidence, see attachments:  
MARL49a: illustrative\_masterplan  
MARL49b:transport\_technical\_note\_draft\_access\_design  
MARL49c: transport\_technical\_note  
MARL49d:heritage\_note  
MARL49e: landscape\_and\_visual\_technical\_note  
MARL49f: combined\_option

<b>Rep ID:</b> MARL050	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The scale of growth is too high. There is no justification for building more market priced housing in Marlborough, at the expense of destroying green field sites in an AONB, and negatively impacting Heritage Assets.</p> <p>The NPPF provides for an exception to the requirement to “provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas”, where “the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”</p> <p>Paragraph 172 of the NPPF states that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.” It also states that in these cases “Planning permission should be refused for major development other than in exceptional circumstances”</p>	

There is no benefit to allowing the building of further market priced property in Marlborough. It irreparably damages the AONB, and will do nothing to improve the availability of affordable housing in the town. This means there are no exceptional circumstances which justify overruling the clear provisions of the NPPF.

Any development of Green Field sites should be exclusively for affordable housing (For the avoidance of doubt, “affordable” should mean accessible to those in the lowest third of earners in Marlborough, who provide many of the services that make the town what it is.)

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

Objective i)

“Housing provision will prioritise local needs for affordable homes. This will require enough new housing whilst respecting the objectives of Area of Outstanding Natural Beauty designation;”

This should be changed to read;

“Housing provision will prioritise local needs for affordable homes. This will enable enough new affordable housing whilst preventing loss of land in the Area of Outstanding Natural Beauty for market priced houses;”

Objective iii) should refer to the need to select development sites based on proximity to the town centre, minimising the need for residents to drive to access local services.

**MB3. Is this the right pool of potential development sites?**

Site 1: “Land at Chopping Knife Lane” is inappropriate for development. The proposal set out is for a major development in a highly visible area of an AONB, extremely close to the River Kennet SSSI.

Development here would represent the first expansion of the town eastwards onto a greenfield site in the AONB, and would run contrary to the (draft) aims of “respecting the objectives of Area of Outstanding Natural Beauty designation” as well as creating further congestion in the town centre.

This site would seriously impact the Heritage Assets of Elcot Mill and Elcot Barn, in the following ways:



- a. The most obvious public value of Elcot Mill as a heritage asset are the views of its frontage within the beautiful, unspoilt valley from the popular footpaths MARL22 and MILD18. The proposed site would bring a new development up to the boundary of the site, destroying this public benefit.
- b. Development of a site immediately uphill from Elcot Mill would create an unbroken stretch of developed land from Chopping Knife lane down to the boundary of the property, risking severely increased drainage onto land surrounding the building in periods of wet weather. As with many old buildings, Elcot Mill and Elcot Barn are both prone to issues related to damp. Any development which is likely to increase the level of moisture around the building, risks exacerbating problems relating to damp which could eventually compromise the structural integrity of these Heritage properties.
- c. In addition to point (b) above, the houses nearest the boundary of the site immediately to the south of Elcot Mill would block winter sun to the property, slowing the essential process of moisture evaporation from the brickwork and further exacerbating damp issues.
- Better alternatives exist than Site 1, particularly the site South of the A4 (London Road). This site is well screened and would have minimal impact on the views toward the town or in the Kennet Valley AONB from any direction. It is closer to the town centre, and the owner's proposal would support more affordable houses than the Chopping Knife Lane site.

#### **MB4. What land do you think is the most appropriate upon which to build?**

Brown field sites are the most appropriate on which to build. However, given the need for more affordable housing in the town, all development should be limited to housing affordable to the lowest 1/3 of earners in the town. This will reduce the total area of land required for building. Sites should be selected, for their proximity to the town centre (to minimise generating traffic by making it easy for residents to walk to services).

Given the range of sites available, there is no excuse for impacting on Heritage Assets or their setting. Sites which do so should be ruled out.

Damage to the AONB should be resisted, and if unavoidable, sites should be prioritised based on impact on the surrounding area. For example Sites 2 and 3 sit in enclosed valley settings, which would minimise impact on the views along the Kennet Valley.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

I think too little emphasis is given to provision of affordable housing, and instead it is used as an excuse to allow development of market priced housing on an AONB. This is extremely short sighted and will result in irreparable damage to the town and its surroundings.

Additional consideration needs to be given to the impact of development on SSSI's. For example in the case of Site 1, development would have a serious detrimental impact on biodiversity, wildlife & bird and river habitats along the river Kennet valley. The site would run next to the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat. Development would lead to far higher levels of air, noise and water pollution and run off.

Development should be limited to the minimum number of properties required to meet the need for affordable housing. Prior to adopting the plan, the Council should set out how it intends to ensure that any affordable housing developments remain affordable in the long term.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

There are high pollution levels along key highways in Marlborough particularly along London Road, Herd Street and Salisbury Road and the high density of HGV traffic passing along the A346 through Marlborough. We need concrete action to limit HGV and other commercial goods through traffic passing along the A346 through Marlborough and not just talk about frameworks and agreements. The town council's "long term aim to de-prime the A338/A346" needs to be translated into specific steps that lead to this outcome within the timescale of this 2016-2036 plan.

**Further comments**

<b>Rep ID:</b> MARL051	
<b>Consultee code:</b> General Public	<b>Consultee Organisation (if applicable):</b>
Is this response on behalf of someone else/another organisation? No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b>
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The scale of growth proposed, 245 additional homes, is in excess of what Marlborough needs and can accommodate both in terms of land that is suitable for development and infrastructure. Delivering affordable homes for local people is a priority. The MANP, based upon its own housing needs survey, is proposing to build 180 homes during the plan period which will deliver 82 affordable homes. 180 is the maximum number that should be developed up to 2036.</p> <p>Two of the proposed MANP sites are brownfield sites and will deliver 40 houses of which 16 will be affordable. There are no other available brownfield sites at present.</p>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	

Yes, these are the right priorities.

A missing priority is the need to reduce air pollution across the town, which is an AQMA, and there needs to be a 'whole town' traffic management plan to address congestion, noise and pollution caused by HGVs that use Marlborough as a north-south route.

Another priority is the leisure centre which is inadequate in size and quality to meet the needs of the increased population.

Finally, there is need is to improve the green infrastructure promoting safe movements around the town without using the congested and polluted roads. A pressing need is to extend the Chiseldon to Marlborough Railway Cycle Path from its present terminus at Five Stiles Road to the Salisbury Road Business Park. Future planning decisions must prioritise safe walking and cycle routes, such as proposed by MANP, to include a route from Stonebridge Lane to Kelham Gardens.

### **MB3. Is this the right pool of potential development sites?**

No, this is not the correct pool of potential development sites.

Site 1 – Land at Chopping Knife Lane

Only a small part of this land, SHELAA 660 which is immediately to the north of St John's Park, has been identified for development by MANP, however public consultation is heavily opposed due to serious access problems. The adjoining part of this site, SHELAA 661, should not be included in the pool for the reasons stated below under Q5.

Site 2 – Land adjacent to Salisbury Road

Only the northern edge and lower elevation of this site has been identified for development by MANP. The southern, higher part of the site should not be included in the pool for the reasons stated under Q5.

Site 4 – Land at Barton Dene

Only the lower, southern part of this site should be included in the pool for the reasons stated in Q5.

An additional sites that should be considered for inclusion in the pool, as identified in the MANP, is at Cherry Orchard (the former adult training centre).

### **MB4. What land do you think is the most appropriate upon which to build?**

Brownfield sites within the boundary of the present built environment of Marlborough that could deliver affordable homes, as sites become available.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**Site 1 – Land at Chopping Knife Lane**

This site is part of the wider outstanding scenic AONB landscape that includes sensitive ecological and biodiverse environments and nationally important heritage sites. The views from both the north and the south looking down and along the valley show the village of Mildenhall nestling into the valley of the river Kennet and a landscape that is rural in nature with typical Wiltshire landscape characteristics of open downlands, woods and river valley. To the north of the site is the river Kennet Site of Special Scientific Interest and to the north and south are County Wildlife Sites. This easily accessed countryside is highly valued for recreation by the community and visitors and should never be developed. Also, it is important to maintain the separate characters of the historic market town of Marlborough and the small village of Mildenhall with its own distinct identity.

**Site 2 – Land adjacent to Salisbury Road**

The southern part of the proposed development rises steeply and a roofline limit of 150m above OD should be applied to any development to protect views from the wider AONB of the escarpment at Pantawick.

Also, the site is close to the established and nationally important bat colony roost in the disused railway tunnel. Minimising additional light pollution, noise and traffic along their flight paths will be essential to reduce the level of disruption to their habitat.

**Site 4 – Land at Barton Dene**

The northern part of this site occupies a crest on the Marlborough Downs within the North Wessex Downs AONB and would be highly visible from the south. As stated above, this land should not be developed.

The southern part of the site, if developed, should be subject to a roofline limit of 150m above OD.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

St John's Academy admissions policy attracts pupils from outside of what would be the normal catchment area of the school which increases pressure on the road infrastructure at peak times, exacerbating delays and pollution. This may also result in pupils from non-academy primary schools in Marlborough and its surrounding villages having to seek secondary school places elsewhere in the county, adding to traffic flows and pollution.

**Further comments**

<b>Rep ID:</b> MARL052	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Natural England
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL52
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MB3. Is this the right pool of potential development sites?</b>	

#### Planning for Marlborough

It is unclear whether development in Marlborough will have an effect on water abstraction in the Kennet and Lambourn catchment, further consideration is required when considering allocation sites in this area and whether Water Quantity and the impacts on the Kennet and Lambourn SAC.

Site 1 (SHELAA reference 660 and 661) this site is within close proximity to the River Kennet SSSI and proposals should demonstrate how impacts will be avoided, if avoidance cannot be achieved mitigation should be sought. Applications should be accompanied with a flood risk assessment (FRA) highlighting how Greenfield run off rates will be maintained to ensure no impact on the River Kennet SSSI.

Development submissions at this site should be accompanied with Landscape Visual Impact Assessment (LVIA) to assess the impacts on the AONB.

The current visualisation (plan) within the NDP appears to neglect the value of the SSSI designation and does not demonstrate the particular requirement to avoid impacts. Natural England advise all impacts should be assessed before a masterplan is developed and agreed in consultation with Wiltshire Council and Natural England.

Site 2 (SHELAA reference MA2). The Eastern boundary of this site is dominantly priority habitat (see above advice on priority habitats and species).

The area around Savernake SSSI and specifically the disused railway tunnel has demonstrated that the Savernake SSSI is a nationally important Bat hibernation site and is of national importance for an internally protected bat species such as Natterers.

Site 2 would constrain opportunities for improving landscape scale connectivity for the important bat populations as well as other key species (e.g. Duke of Burgundy and dormice etc). Natural England do not therefore support this site as an allocation in Marlborough.

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**



**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

For full Natural England comments, please see attachment MARL52.  
The information transcribed within Representation MARL52 solely relates to the comments "Planning for Marlborough".

**Rep ID:** MARL053

**Consultee code:** General Public

**Consultee Organisation (if applicable):**

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** no

**If this representation refers to attachment(s), these are listed below:**

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

It seems obvious that brownfield sites should be prioritised and green field development should be a secondary consideration. There are traffic pinch points that will need to be addressed that currently constrain development but also emissions are likely to increase at a higher rate in Marlborough as we are located in a valley.

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

The missing priority is pollution from traffic emissions. Under the improvement of infrastructure some further consideration of electric vehicle charging points, if the growth advocated by the Government is met more charging points will be required (good start with the ones George Land car park)

**MB3. Is this the right pool of potential development sites?**

**MB4. What land do you think is the most appropriate upon which to build?**

The river corridor should be protected whenever possible from development as climate change makes drainage even more important. Also wildlife habitats should be preserved.

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

I assume all proposed sites have access issues but on Site 1: Land at Chopping Knife Lane would access be via Chopping Knife Lane? This would seem easier and less disruptive than through the Elcot Lane residential roads and would keep the old railway bridge intact. At a very rough calculation based on the housing density at the nearby Crest Homes development, any development at Site 1 would have around 200 houses at the lower end of the range generating, probably, 400 additional vehicle movements increasing the traffic by over 50% if it used Elcot Lane

**MB6. Are there any issues or infrastructure requirements that should be identified?**

With climate change resulting in more frequent severe events, particularly rainfall, development near the river could result in shorter stormwater runoff time and potential flooding.

**Further comments**

<b>Rep ID:</b> MARL054	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Environment Agency
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL54
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MB3. Is this the right pool of potential development sites?</b>	

**Marlborough**

Whilst site 660 and 661 (called site 1 in final pool) lie in Flood Zone 1 we would recommend that the following text is added specifically for Site 1: Land at Chopping Knife Lane within the Planning for Marlborough report:

The site lies adjacent to the floodplain associated with the River Kennet. Proposals for the development of the site will need to consider the effect of climate change on the fluvial flood levels from the river as they may affect lower areas on the site. The Environment Agency have a hydraulic model of the River Kennet at this location and they should be consulted when planning the development layout. Buildings on the lower part of the site should be made flood resilient. Climate change factors applied to fluvial flood flows should be in accordance with the National Planning Policy Framework and its guidance.

Development Site 2/ma1 lies almost entirely within SPZ 1 for Marlborough public water supply borehole. We recommend this site is eliminated and a more suitable alternative site found.

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> MARL055	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Historic England
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL55
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be</b>	

**achieved?**

A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).

**MB3. Is this the right pool of potential development sites?**

The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.

Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.

**MB4. What land do you think is the most appropriate upon which to build?**

An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful.

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities. Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.

**MB6. Are there any issues or infrastructure requirements that should be identified?**

We note that the historic environment/heritage assets is considered an important component part of Wiltshire's infrastructure; described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.

**Further comments**

It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. Marlborough doesn't appear to have a Conservation Area Appraisal and Management Plan and a setting assessment to inform edge of town expansion would be invaluable.



<b>Rep ID:</b> MARL056	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Railfuture
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL56
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MB3. Is this the right pool of potential development sites?</b>	

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

Although Marlborough has bus links to Bedwyn and Pewsey stations, the town's importance as a tourist destination makes a case in the longer term for reopening one of the two former rail lines from Savernake. We would ask the Council to safeguard the more westerly GWR formation, as it would avoid the tunnel on the former Midland & South Western Junction route.

**Further comments**

**Rep ID:** MARL057

**Consultee code:** Other

**Consultee Organisation (if applicable):** Salisbury Reds (Part of the Go South Coast Group)

**Is this response on behalf of someone else/another organisation?** No

**Organisation being represented (if applicable):**

**Does this representation refer to attachment(s):** yes

**If this representation refers to attachment(s), these are listed below:**  
MARL57

**MB1. What do you think to the scale of growth? Should there be a brownfield target?**

**MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?**

**MB3. Is this the right pool of potential development sites?**

Marlborough

MB3: Pool of Development Sites &

MB4: The Most Appropriate Land to build on

We note that the settlement plan highlights the key transport features including that “Marlborough is well served by bus route with regular services to Swindon, Pewsey and Salisbury and less frequent services to Kennet Valley settlements, Calne and Tidworth”.

The infrequent services referred to above occur once or twice daily and are not suitable for commuters or shift workers and to propose that this is a suitable transport option to justify development on this basis is sub optimal at best. These services include services operated by Salisbury Reds including the 19 to Wilton once per day and X20 to Newbury once per week as well as services of our sister operator Swindon Bus including the 20 and 22 to Hungerford and 42 to Calne operating thrice, once and five times per day respectively. In addition to this eclectic offering, the X76 to Bath operates once per day. Stagecoach operate to Swindon and Hungerford on the 48/48a twice and three times a day respectively and 80 to Swindon slightly more regularly at six journeys although with no Sunday service.

Services to Swindon, Pewsey and Salisbury are hourly via the X5 during the daytime with no evening service – again, to suggest this a positive public transport environment in itself as set out in the paper is misleading. The four strategic sites, whilst they may offer only slightly closer proximity to local town centre circular routes are roughly 400m, 530m, 700m and 700m from any realistic public transport proposition whereas the CIHT guidance suggests for any potential sites to be within between 250-300 metres. Even using the outdated DfT rule of 400m would suggest these sites are not compliant. Accordingly we do not consider the pool of development sites to be suitable in transport terms.

Site 1: Land at Chopping Knife Lane (SHELAA sites 660 & 661) &

Site 2: Land adjacent to Salisbury Road (SHELAA sites MA1) &

Site 3: Land at College Roads (SHELAA sites 3326 & 3622) &

Site 4: Land at Barton Dean (SHELAA Sites 565, 3626a, 3626b)

We OBJECT to the allocation of these sites.

The sites are distant from any public transport network and is also located outside the development boundary. We therefore OBJECT to these proposed allocations as they are not accessible by public transport and the development is therefore unsustainable. This is compounded in that the proposed sites are outside the development boundary and very off-track for existing bus services. Accordingly we would suggest sites in settlements that can accommodate a better level of sustainable transport provision would be a more preferable approach with smaller windfall sites only being accommodated in Marlborough.

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> MARL058	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Wiltshire Ramblers
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> yes	<b>If this representation refers to attachment(s), these are listed below:</b> MARL58a, 58b
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MB3. Is this the right pool of potential development sites?</b>	

Planning for Marlborough

Site 1. No objection.

Site 2. No objection provided the higher ground is retained as open space, as is the case with the existing Salisbury Road development which it adjoins.

Sites 3 & 4. With the exception of that part of Site 3 which is included in the Marlborough Neighbourhood Plan we do not consider these sites suitable for development and therefore object to their inclusion. There would be an adverse impact on the whole of bridleway PRES32 as well as parts of MARL1 and PRES27 (the White Horse Trail). PRES32 affords good views across the valley to Granham Hill. The sites' elevation means that housing development would be a prominent and unattractive feature in views from south of the A4, looking north towards the downs.

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

<b>Rep ID:</b> MARL059	
<b>Consultee code:</b> Other	<b>Consultee Organisation (if applicable):</b> Manton Residents Association Committe
<b>Is this response on behalf of someone else/another organisation?</b> No	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b> MARL59
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MB3. Is this the right pool of potential development sites?</b>	



**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

Manton Residents' Association Consultation February/March 2021

Wiltshire Local Plan consultation

Following consultation in the Manton Village via leaflet and email, the Manton Residents Association have combined the views of contributors into the following document.

Importantly there are key issues/omissions in the main document of the Marlborough Neighbour hood Plan which we feel should be amended to protect future planning development (see second section below)

New Medical Centre: there is some support for this on basis that the existing medical centre should be updated and, importantly, have enough parking so that groups can meet for special clinics, vulnerable and carers can access care easily, prescriptions collected and so on. But there is also some strong opposition to moving from the existing central site with its adjacent parking

provision. Updating could be arguably achieved on the existing site as capacity concerns appear to be mainly around staffing resources.

Sustainability : many wish to see this as an important part of all future development and would be interested in more detail  
Transparency please!

General infrastructure, especially schools, roads: leisure centre: traffic jams, and even gridlock, occur around the town with increasing frequency. No recent building has been accompanied by any traffic measures of any significance at all. Even if working from home continues some commuting impact will be felt. The proposed land off Elcot Lane development (MARL1) with exit to main highways through White Horse Road /Chopping Knife lane development already has its own issues of parking and passing parked vehicles, which are potentially hazardous. Again specific details would be welcomed. Primary schools have space but there is concern about the capacity of St John's to cope without becoming too big for comfort. The leisure centre is small and in poor repair and needing update to meet the needs of the community. The provision of more bike racks to encourage biking is called for. One person mentioned increasing Business park. We favour the proposed new car park near the Rugby Club on the Common.

New Housing : there is a lack of comparatively low cost freehold housing in the town. It is agreed that the town does not need any future retirement developments as currently they are significant but underused. It is a concern that an increase of a further 245 houses (2019-2036) intrudes on current greenfield sites with a whole range of implications. There does not appear to be any increase in availability of local employment therefore increasing traffic congestion at key times of day. Although this can be mornings, midday and evenings. The town is frequently gridlocked without any issues causing the gridlock other than the significant number of vehicles. There appears to be a promise that traffic issues will be reviewed but there are not recognised solutions.

Skyline and views: even if a clear skyline is technically maintained that does not necessarily mean that from eg centre of town a skyline is in fact uncluttered and spoiled

AONB and Conservation areas: we all cherish our beautiful surroundings and want these respected as far as possible.

Marlborough is naturally constrained by the Kennet and other valleys and by water meadows and flooding. More tree-planting as part of development is favoured. The identified sites for housing will have a significant impact on an ANOB especially sites 3 and 4 identified in the plan.

What we like about the present proposed plan: A number of small sites around the town are clearly better than one large new development e.g Sites 3 and 4 will have too great an impact on Skyline/ANOB, environment etc.. Most respondents recognise the need for more housing, especially social and low cost housing. But many are against any more housing for the elderly!

Marlborough Neighbourhood Plan Omissions/amendments (see page 40).

Bullet point 4. Manton Road We believe this should read Manton High Street onto Manton Road

Section B ( to protect us from issues with planning and protecting the Conservation Area) The following two points should be added after bullet point 3

Downs Lane, cut into the rising downland landscape to the north of mature housing on Bath Road and adjacent to Bridge St, was constructed in the late 19th century to serve the Manton Estate. At its south end there is a mature enclave of 1940s/50s housing including Manton Hollow with many mature trees and hedges that complement the older village setting.

West Manton, to the south-west of Manton High Street, is a small 1960s housing development with mature gardens and trees and a complementary mature setting forming the western extent of the modern village.

There should be no permitted development above the 150m contour on the fringes of the village. Development above this limit, even if it were practical, would have a severe impact on visual amenity, the character of the AONB and would compromise the setting and character of the village by introducing prominent development on the skylines

<b>Rep ID:</b> MARL060	
<b>Consultee code:</b> Statutory Body	<b>Consultee Organisation (if applicable):</b> Savills
<b>Is this response on behalf of someone else/another organisation?</b> Yes	
<b>Organisation being represented (if applicable):</b>	
<b>Does this representation refer to attachment(s):</b> no	<b>If this representation refers to attachment(s), these are listed below:</b> MARL60
<b>MB1. What do you think to the scale of growth? Should there be a brownfield target?</b>	
<b>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</b>	
<b>MB3. Is this the right pool of potential development sites?</b>	

**MB4. What land do you think is the most appropriate upon which to build?**

**MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?**

**MB6. Are there any issues or infrastructure requirements that should be identified?**

**Further comments**

**Waste Comment**

The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.

**Water Comments**

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.