



Regulation 14

Consultation Feedback Form

DRAFT NEIGHBOURHOOD PLAN - WE NEED YOUR VIEWS

The Marlborough Area Neighbourhood Plan Steering Group has prepared a Neighbourhood Plan for the period to 2036 (the Plan) for Marlborough, Manton, Mildenhall, and Savernake with the help of the local community.

The Plan sets out a vision for the future of these parish areas with planning policies which will be used to determine local planning proposals. The Steering Group is now inviting comments on the proposals in a Pre-Submission draft of the Plan before it is submitted to Wiltshire Council for formal consideration and wider consultation.

This consultation will be open for 7 weeks from 18 January – 8 March 2021.

This comments sheet, the draft Plan and supporting documents can be viewed and downloaded at:

www.marlborough-tc.gov.uk

You can send your comments via this form or by email to:

enquiries@marlborough-tc.gov.uk

If you need a hard copy of the Plan or would like to comment by letter or need more information, please contact the Town Council at: Marlborough Area Neighbourhood Plan (MANP), c/o Marlborough Town Council, Council Offices, 5 High Street, Marlborough, Wiltshire, SN8 1AA or via email at: enquiries@marlborough-tc.gov.uk or by telephone at 01672 512487 or 07593 584099

If you are completing this on a computer, you can add as many lines as you need to suit your comments. If you are writing on a printed copy, feel free to add additional sheets.

All comments must be received by midnight on 8 March 2021

Whether replying by email or via this form, your personal details will not be published or shared with anyone. However, if you prefer to comment without identifying yourself you can but your comments will not be taken into account unless your postcode (if you are an individual) or organisation name (if you are not an individual) are included. Please make clear which policy and or page number you are commenting on.

Name: **NAME REDACTED (Barton Willmore LLP) on behalf of Marlborough**

College Post code: **W1D 3QB**

Address: **7 Soho Square, London**

Are you responding as an

Organisation or Body	Yes / No
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If Yes - Name of organisation or body?

MARLBOROUGH COLLEGE

Individual	Yes / No
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Consultee Type - capacity in which you are commenting on the Plan - **Please answer this even if you do not wish to be identified.**

Resident of Marlborough, Manton, Mildenhall or Savernake	Yes / No (please delete as appropriate)
Neighbouring community resident	Yes / No (please delete as appropriate)
Local Business	Yes / No (please delete as appropriate)
Local Voluntary, Community or Faith Group	Yes / No (please delete as appropriate)
Other (please specify) School	Yes / No (please delete as appropriate)

PLEASE NOTE: Your personal details will not be published as part of the consultation response, but anonymous comments will not be actioned so please provide contact details to accompany your comments. Communication regarding progress of the Plan and amendments to be made will be publicised. No individual responses will be given. Both Marlborough Town Council (as the qualifying body for the Plan) and the Marlborough Area Neighbourhood Plan Steering Group have a duty to protect personal information and will process personal data in accordance the General Data Protection Regulation (GDPR). The personal data you provide on this form will only be used for the purpose of the Marlborough Area Neighbourhood Plan. The data will be stored on computer and/or manual files. This data will be passed on to Wiltshire Council for the Regulation 16 Consultation.

FEEDBACK/COMMENTS

Plan Page/ Policy Number	COMMENTS/FEEDBACK
	See attached.

MARLBOROUGH AREA NEIGHBOURHOOD PLAN

Pre-Submission Plan – Regulation 14 Consultation

1.0 INTRODUCTION & OVERVIEW

- 1.1 **These representations are submitted on behalf of Marlborough College ('The College').** The College welcomes the opportunity to engage with the preparation of the neighbourhood plan and has promoted some 16.21 ha of land at Barton Dene to provide for circa 130 new homes **together with land for a new doctors' surgery. With the withdrawal of Preshute from the** neighbourhood area, a revised proposal was submitted, reducing the site area to fall within the amended neighbourhood area boundary. This reduced scheme, providing for circa 40 **homes and land for a new doctors' surgery, is identified in the draft Marlborough Area** Neighbourhood Plan ('MANP') as MARL1.3: Land at Barton Dene.
- 1.2 The College supports this draft allocation and at the same time continues to promote the wider area and additional land to the rear of College Fields through the emerging local plan.
- 1.3 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 and the College supports these objectives and considers that the Barton Dene site will make a valuable contribution to meeting those needs.
- 1.4 The review of the local plan presents the opportunity for the neighbourhood plan to inform the local plan and can be prepared in tandem, ensuring consistency and that the neighbourhood plan remains up to date. The local plan is not spatially constrained in its remit by the withdrawal of Preshute and can therefore consider the allocation of the wider Barton Dene site to assist in meeting the needs of the community and the neighbouring parish of Preshute. Technical assessment has demonstrated that the site is suitable and deliverable.
- 1.5 The College will continue to engage with stakeholders and in the preparation of the neighbourhood plan.

2.0 LOCAL NEEDS

- 2.1 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.
- 2.2 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 social and community needs. One of which is the need to expand the existing GP surgery.
- 2.3 Based on meetings with Kennet & Avon Medical Partnership in the period August 2017 to date, the College's understanding of the position regarding the surgery is:
- Kennet & Avon Medical Partnership currently has circa 17,000 patients across two sites, one in Marlborough and one in Pewsey.
 - The Marlborough site in George Lane and was initially constructed in 1990 and is just under 530 sq.m.
 - A survey was conducted in September 2015, and it noted that 60% of rooms were **"Fully-used" with the other 40% of rooms being "Overcrowded"**. The recommendation then was that an additional 2-3 consulting rooms were required, as well as additional administration space and more staff welfare facilities.
 - Over the years the population has grown to such an extent that the current premises are too cramped and no longer fit for purpose.
- 2.4 The College's understanding of the need is therefore for a site approximately twice the size of the existing one with improved parking facilities.
- 2.5 It is important to recognise, as 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.

- 2.6 Failure to do so, and to constrain further the supply of homes (of all tenures and affordability) will result in an increase in the cost of housing, both for rent and sale, exacerbating current affordability issues without any mechanism for the community to respond.
- 2.7 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.

Affordable Housing Need

- 2.8 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.
- 2.9 Whilst every household in the neighbourhood area was sent a questionnaire, only 24% were completed. The identification of affordable housing needs was 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 therefore the full affordable needs for the neighbourhood area may well be greater. The need for 35 affordable homes per annum ought therefore be taken as a minimum.
- 2.10 Wiltshire Council has 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.
- 2.11 The sensitivity tests consider demographic and affordability evidence alongside the apportionment of county-wide affordable need. This identifies 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).

- 2.12 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.**
- 2.13 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 through the MANP, upon which the residents of Preshute Parish rely and contribute to. 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

- 2.14 **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).**
- 2.15 The current position in respect of healthcare facilities in Marlborough has not been published in an update to the IDP to support the local plan review consultation. However, it is **understood from the emerging MANP, draft policies therein and the College's on-going**

engagement with the GP Practice that there is a pressing need to relocate and expand the Marlborough Surgery.

- 2.16 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. The College will continue to work with the Steering Group and stakeholders to explore the requirements further.

3.0 DRAFT LOCAL PLAN

- 3.1 The MANP must be consistent with the local plan and Wiltshire Council is now progressing a review of its local plan. This 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 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.
- 3.2 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 on the local plan review 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 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.
- 3.3 The issue is the spatial distribution of that requirement in a manner that would contribute to sustainable development (as per paragraph 7 of the NPPF). The local plan will be informed by a range of technical assessments and studies. This includes settlement hierarchy and local housing needs. Providing new homes at Barton Dene will contribute to local plan requirement in a manner that is targeted at meeting local needs.

- 3.4 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).
- 3.5 Given the location of Marlborough within the AONB and having regard to the high level of affordable need and aspirations of the MANP, 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).
- 3.6 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.**
- 3.7 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 consider the contribution that the Marlborough area can make to meeting the wider requirements of the Council in a manner that is commensurate with the identified local needs as evidenced.
- 3.8 Preshute Parish is a rural parish, reliant upon the town of Marlborough for local services and facilities. Given the late withdrawal of the parish from the neighbourhood area, Preshute is reliant upon participating in the emerging local plan to provide the spatial framework to meet those needs or the neighbourhood plan (which it has chosen not to participate in) in the absence of any allocations in the proposed Preshute neighbourhood 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 (see MANP Informal Consultation, July/ August 2019) but was discounted due to the withdrawal of Preshute.

4.0 DRAFT MANP

- 4.1 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. Preshute is a small parish, with circa 193 residents (as per Census 2011). Whilst Preshute Parish has decided to withdraw from the neighbourhood area, its residents will remain dependant and reliant upon Marlborough Town for local services and facilities as well as new homes.
- 4.2 The preparation of the MANP was commenced in advance of the local plan. However, the local plan is now progressing with Regulation 18 consultation running until 9 March 2021. It is open to the neighbourhood plan to defer to the local plan to meet some or all the identified needs; there is no need for the MANP to allocate a sub-optimal solution when the local plan can bring forward a wider, more suitable response.
- 4.3 Both the MANP and the local plan can be progressed in tandem, whereby the most suitable and appropriate strategy can be adopted. This could include through the allocation of additional land, for example at Barton Dene and/ or College Fields, to deliver additional housing to 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) **as well as to support the provision of local facilities, such as a new doctors' surgery.**

5.0 DRAFT MANP ALLOCATION

- 5.1 The College supports the principle of the draft allocation for the Land at Barton Dene and makes no comment at this stage on the draft wording.
- 5.2 It is noted that paragraph 5.6 of the Pre-Submission Plan that supports the draft allocations advises a total of 170 homes from the five proposed allocations of which approximately 80 homes would be affordable. The proposed allocations (MARL1.1-5) provide for the following:
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|----|-----------------------------|---|----------|
| 1. | Land off Elcot Lane | = | 50 homes |
| 2. | Land rear of Salisbury Road | = | 50 homes |
| 3. | Land at Barton Dene | = | 40 homes |

- | | | | |
|----|-------------------------|---|----------|
| 4. | Land off Cherry Orchard | = | 30 homes |
| 5. | Land at Kelham Gardens | = | 10 homes |

5.3 This amounts to 180 homes of which 86 would be affordable (or equivalent affordable). It is assumed that this apparent inconsistency will be addressed in the next iteration of the MANP.

5.4 Whilst the draft allocation for Land at Barton Dene within the Pre-Submission Plan (MARL1.3) will make a meaningful contribution to the provision of housing, including affordable housing, there is scope for the local plan to allocate sites outside of the neighbourhood area to meet additional housing needs as identified. The wider site at Barton Dene (identified as Site 3 on Figure 1 of the Local Plan: Planning for Marlborough report, January 2021 but Site 4 in the corresponding text (see page 8)) could accommodate a further 90 homes (130 in total) which would make a further notable contribution to the provision of affordable homes for the local community. If the wider site were to be allocated, this could reduce the need for a 'replacement' or additional allocation(s) and provide further flexibility as to the location of the new medical centre and terms for its delivery.

5.5 Whilst we appreciate that Marlborough wishes to move forward with the MANP, we suggest that it is open to the MANP to propose a reserve site or allocation, to be released if the local plan does not make sufficient provision out with the now reduced neighbourhood area in a manner that is consistent with the MANP.

6.0 CONCLUSION

6.1 The College supports the aspirations of the MANP and the draft allocation for Land at Barton Dene (MARL1.3). The College wishes to participate in the future examination of the MANP and, as such, the comments within this representation should be taken as a technical objection.

6.2 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.
- The need for a new site for the Marlborough GP surgery is supported.

- There is a clear and pressing need for affordable homes in the Marlborough area that justifies the scale of allocations proposed through the MANP as a minimum and could go further.
- **The College's Land at Barton Dene can make a valuable contribution** to the provision of new homes including affordable homes in addition to land for a new (expanded) GP surgery within the neighbourhood area.
- The wider site at Barton Dene (falling within Preshute Parish) can make a greater contribution to meeting market and affordable housing needs for Marlborough and the surrounding area including Preshute whilst continuing to provide land for the GP surgery.
- The MANP should consider the merit of supporting the allocation of the wider Barton Dene site through the Wiltshire local plan as an appropriate solution to delivering additional homes, including affordable homes, for the Marlborough area.
- This would lessen dependency on other sites within the neighbourhood area and could allow the MANP to consider whether such other sites would be better identified **as 'reserve' sites in the event of delays/ failure to deliver sufficient homes on** preferred site allocations.
- **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, nor the role that Barton Dene can play in meeting identified needs.

BARTON WILLMORE

8 March 2021