



## Action for the River Kennet

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Marlborough Town Council  
By email

Action for the River Kennet  
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Tele: 01672 512700  
8 March 2021

Dear Shelley

**Action for the River Kennet response to Marlborough Area Neighbourhood Plan**

Thank you and the neighbourhood planning team for all your work on this document, and thank you for inviting Action for the River Kennet to respond.

We attach our response and hope that it is helpful.

Sincerely

Charlotte Hitchmough  
Director

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*Patron*  
*Chairman*  
*Hon. Treasurer*  
*Water Resources Adviser*  
*Ecological Advisers*  
*Executive Committee*  
*Director*

Lord Kennet  
Richard Clarke (*Trustee*)  
Martin Gibson (*Trustee*)  
John Lawson  
Peter Marren, John Hounslow  
Kevin Light, Rob Starr, David Hill, John Lawson, Judy Pitts  
Charlotte Hitchmough

## 1 -Water Infrastructure

Improving the local foul and surface drainage infrastructure should be a 'Key Objective' and stated in the MANP (at para 5.2) as an additional bullet point.

The existing sewage network is not fit for purpose despite Marlborough STW being upgraded in 2012/13, the STW is still 'storming' currently. In 2019, this sewer storm overflow spilled 87 times for a total of 989 hours, discharging untreated sewage into the R. Kennet SSSI. There is not capacity for new development without significant investment in the sewerage network. All new development within the MANP should make substantial contributions to this infrastructure through the planning system using s106 Agreements, alongside significant investment from the Water Industry.

## 2 -Sustainable Urban Drainage Systems (SuD's)

Any form of development within the catchment of the R. Kennet has the potential to threaten the quality and biodiversity of the river itself and in turn, the landscape of the North Wessex Downs Area of Outstanding Natural Beauty (NWD AONB).

The use of a comprehensive SuDs scheme can mitigate or lessen impacts of development proposals SuDs can provide:

- flood risk management – reducing the risk of flooding from development
- water quality management – reducing the impact of diffuse pollution
- improved amenity and biodiversity – the integration of green infrastructure with SuDS solutions can help to create habitat, recreational and biodiversity areas
- improved water resources – SuDS can help to recharge groundwater supplies and capture rainwater for re-use purposes e.g. raingardens, attenuation ponds, green roofs etc.

However, standard engineering solutions do not go far enough e.g. underground detention tanks in areas of high ground water (i.e. the Kennet Valley) do not work. Innovative new solutions need to be applied.

Within the MANP Policy MARL 1- Sites 1-5 and at MARL 20 there should be a highlighted bullet point requiring a '*comprehensive SuDs scheme to be incorporated in all development proposals, addressing the 'four pillars of SuDS' as identified in the SuDS Manual.*

## 3 -Water efficiency and Climate Change

All new homes should be water efficient from the start. Building an inefficient home builds 100 years inefficiency into the system – its cost effective to include rainwater harvesting and greywater recycling (as part of a comprehensive SuDs scheme) from the start.

The independent water efficiency experts 'Waterwise' have drafted a new paper, with input from the UK Water Efficiency Strategy Steering Group, highlighting the role that water efficiency can play in reducing carbon emissions over the next two decades.

The Paper states that around 6% of the UK's total greenhouse gas emissions are from household water supply and use. This equates to over 2.6 kg CO<sub>2</sub>e per home per day. Approximately 90% of these water-related emissions are from how we use water in the home – the other 10% are operational emissions from water companies supplying water and removing and treating wastewater. The water sector has recently committed to reaching Net Zero by 2030 for its own emissions but this paper highlights

how modest reductions in household water use of 5-6% could deliver annual emissions savings of around 1.3 MtCO<sub>2</sub>e. This is a bigger saving than was actually achieved in the whole UK housing sector in 2017-18 or in 2018-19. A 10-12% reduction in household water use could reduce greenhouse gas emissions by a similar amount to the total operational emissions of the whole UK water sector (circa 2.4 MtCO<sub>2</sub>e).

A water audit/assessment, (similar to an energy audit), is the method of quantifying all the flows of water in a system to understand its usage, reduce losses and improve water conservation. This should be provided with any development proposal.

Within the MANP Policies MARL 1,3 & 5 there should be a highlighted bullet point requiring a *'comprehensive SuDS scheme together with a Water Audit/Assessment to be incorporated in all development proposal.'* This should be cross referenced to policy MARL 20.

## DRAFT MANP RESPONSE - SPECIFIC

### Page 10. para 2.3

Insert bold italics as below:

The River Kennet rises north of Avebury and flows through part of the North Wessex Downs AONB and Marlborough. ***The Kennet is a globally important chalk stream, designated as a Site of Special Scientific Interest (SSSI)***, that runs through the centre of Marlborough, which is built in the river valley and on the slopes of the Marlborough Downs to the north with Savernake Forest as its southerly boundary.

### Page 11 para 2.10

We would prefer the following wording below to be substituted:

***'On the eastern side of Marlborough the public have access to 15 acres of water meadows and the River Kennet at Stonebridge Wild River Reserve. The site provides nature walks with some access for the disabled. The water meadow is co-owned and managed by ARK and MTC; and is maintained in accordance with best conservation and environmental principles, the stretch of river and the associated land is an exemplar for the River Kennet as a whole. The projects are undertaken or overseen by local river trust Action for the River Kennet (ARK) and their volunteers. The site is used for scientific research, educational outreach and is a well-used local amenity.'***

## THE SUSUSTAINABILITY APPRAISAL (SA)

Page 9 (NTS iii)

**Table NTS.2 Site 1- Land off Elcot.** The findings regarding Land, soil and water resources are 'uncertain effects', along with Biodiversity and Climate change. Likely adverse effect (without mitigation measures) at Site 1 for Air Quality, Health and wellbeing, Landscape and Historic Environment.

If development expanded onto Site 2 the same table includes the same **negative** effects, but with the exception of Climate change effects being **likely** rather than uncertain.

Sites 1 and 2 perform **negatively** against the Landscape SA theme due to potential adverse effects on the character, setting and intrinsic qualities of the North Wessex Downs AONB.

**Site 8 -Land at Kelham Gardens.** This site is partially within a high flood risk area. The Plan refers to managing surface water flooding within the site.

**We would expect to see sensitive green SuDS features, adding to the site's amenity and biodiversity value and improvements to the river and banks, to address the reasons for the river failing to achieve good ecological status.**

Page 14 (NTS page viii)

'Assessment of the Neighbourhood Plan. In March 2020 AECOM assessed an initial draft of the Pre-Submission Regulation 14 Neighbourhood Plan, providing the following four recommendations:

- *That Policy MARL1 support biodiversity enhancements/ net gain at Land off Elcot Road. New development could promote ecological connectivity between the site and the River Kennett SSSI; extending the Neighbourhood Plan area's valued green infrastructure network.*
- *Encourage positive measures in new housing development to address climate change. This may include the addition of a new policy, which places an emphasis on high quality design within new development. A design led policy could ensure development proposals, where possible, **realise opportunities for integrated renewable energy technologies, rainwater harvesting, water efficiency measures, and integrated vehicle electric charging points.** Specifically, the Draft MANP could seek to incentivise a shift away from petrol/diesel vehicles, in order to support sustainable travel in the MANP area in line with national and local climate change commitments.*
- *Provide recognition to the presence of the Stonehenge, Avebury and Associated Sites WHS within the Neighbourhood Plan area, identifying potential indirect effects that may occur through the delivery of the MANP.*
- *Policy provisions are extended to capture the need for archaeological investigation where appropriate.*

*The Steering Group subsequently updated the draft Neighbourhood Plan in response to the recommendations proposed through the SA Report.*

*In June 2020 AECOM assessed a second draft of the Pre-Submission Regulation 14 Neighbourhood Plan, providing the following single recommendation:*

- *Encourage a shift away from petrol/diesel vehicles to increase sustainable travel in the MANP area, in line with national and local climate change commitments. For example, the inclusion of a policy criteria that requires new development to deliver or contribute to electric vehicle charging points would strengthen the MANP's approach to climate change mitigation.*

**Originally in Bullet Point 2, why has 'rainwater harvesting, water efficiency measures' been removed from the second draft. Can this be reinstated.**

## KEY SUSUSTAINABILITY ISSUES

Page 25 (SA page 9)

We note that:

*The SA Report includes consultation response from the EA :*

*'Environment Agency Richard Jenkins, Planning Adviser We are in overall agreement with the objectives set and criteria that has been outlined in the report. We advise that Section 7, Page 52, SA Objective: Use and Manage water in a sustainable way, **should***

*also include groundwater as well as surface water.'*

On page 51 (SA page 35)

We note in Table 4.6 . Theme: Land, soil and water resources - Significant effect appraised as 'Yes - *negative*' for all Options D, E & F.

Page 26 (SA page 10)

Fourth Bullet Point

*Land, soil and water resources,*

- *The Neighbourhood Plan area is located within the 'Kennet' catchment area which contains 33 waterbodies, all of which have 'good' chemical status and 29 of which have either 'moderate' or 'good' ecological status.*

The latest Environment Agency data confirms **that 0%** of rivers met good chemical status.

Therefore, there is a need for greater investment in water treatment, creating SuDS systems and minimising water consumption within policies that can be delivered in the MANP.

See also Water Quality, para 2, page 92/93 (SA page 76/77) which is therefore also incorrect. However, the '*reasons for not achieving good status*' (RNAGs) are listed in the paragraph.

Action for the River Kennet

8 March 2021