



**Marlborough**  
Area Neighbourhood Plan

## **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](http://www.marlborough-tc.gov.uk)

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

[enquiries@marlborough-tc.gov.uk](mailto: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](mailto: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Whether replying by email or via this form, your personal details will not be published or shared with anyone.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.

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Are you responding as an

|                             |       |
|-----------------------------|-------|
| <b>Organisation or Body</b> | Yes / |
|-----------------------------|-------|

If Yes - Name of organisation or body?

|                             |
|-----------------------------|
| The North Wessex Downs AONB |
|-----------------------------|

|                   |          |
|-------------------|----------|
| <b>Individual</b> | Yes / No |
|-------------------|----------|

**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 | / No (please delete as appropriate) |
| Neighbouring community resident                          | / No (please delete as appropriate) |
| Local Business   | / No (please delete as appropriate) |
| Local Voluntary, Community or Faith Group                | / No (please delete as appropriate) |
| Other (please specify)                                   | Yes /)                              |

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/<br>Policy<br>Number               | COMMENTS/FEEDBACK  |
|--|--|
| MARL1 and all proposed allocations and MARL3 | <p>We previously commented on this, but the language used is very important and therefore we would discourage the use of the word approximately when identifying the number of dwellings on sites and that you change this to, <i>up to x number of dwellings</i>. This ensures developers do not push the numbers beyond what is acceptable, which they all do but it is harder to defend at application when the policy is so flexibly worded with approx.</p> <p>Recommend that reference be made to using the North Wessex Downs Colour Study and guidance to inform the type of material and colour best suited the landscape character area.</p> <p>The SAs initial assessment was that sites A-E including Elcot Lane, Rear of Salisbury Road and Barton Dean would have a likely adverse effect. This alone should have pushed the MANP to consider other sites.</p> <p>Housing Needs Assessment appears out of date yet in areas in mentions an update but this does not come across clearly, the original document assessed need up to the original plan date of 2026 but the revised MANP is to follow that of the Wiltshire Local Plan and extend to 2036.</p> <p>Commend the MANP striving to achieve 50% affordable but it is an unrealistic target, developers struggle to provide 40%.</p> |
| MARL1 Site 1                                 | <p>40% a more realistic target for obtaining affordable housing.</p> <p>Need to edge of development to follow the line of White horse Road rather than the step out that is currently detailed. Landscaped edge does not need to be a line of trees, this was an open landscape, a well-designed development should be landscape led and sit sympathetically into the landscape whereby the soft boundary treatment enhances this rural edge.</p>  |

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| MARL1 Site 2 | <p>AONB unit would oppose this allocation to land rear of Salisbury lane.</p> <p>Plan is of poor quality and therefore legend is not legible.</p> <p>Appears planting is being used to try and hide the site. Planting should not be used to screen a development; development should be acceptable in its own right and planting used to enhance the site.</p> <p>The site does not relate well to the existing Salisbury Road development, due to the orientation of site and the physical divide created by the tunnel. The site would appear out on a limb and detached from the town due to the topography of this shallow valley. The site forms part of the open countryside beyond the settlement boundary of Marlborough.</p> <p>Visible from the A345 which is an important approach into Marlborough.</p> <p>Significant numbers of records exist for bats hibernating in the disused Marlborough Railway Tunnel adjacent to the site which is also known as an important swarming site for myotis bat species (for which there are few swarming site identified in England), having been recorded for the last 20 years by Wiltshire Bat Group. The number of bats recorded using the tunnel over winter meets the criteria for designation as SSSI (Site of Special Scientific Interest), therefore the tunnel must be treated as if it were an SSSI. The Tunnel according to Natural England has one of the largest Natterer's bat hibernation roosts in England. The ecological importance of this site has already been affected by the Salisbury Road development, additional pressure on the Tunnel would have a significant impact upon the protected species within this locality.</p> |
| MARL1 Site 3 | <p>None of the Barton Dene site sits within the 155m contour therefore that line is irrelevant in the policy. If the MANP continue to endorse this site, then a restriction on building heights should be included such as building ridge lines should not extend above the 150m contour.</p> <p>There is scope for some development on site as part of redevelopment of brownfield land. The green open space to the north of the leisure centre is an open green space and community asset.</p>  |

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| MARL1 Site 4 | Use of brownfield land acceptable, however consideration needs to be given to the proximity of the former Railway tunnel which is an important Bat habitat as previously detailed, therefore the site area may need to be reduced and the housing numbers amended, realistically 20-25 dwellings may be more appropriate.   |
| MARL1 Site 5 | Still concerned over the inclusion of Kelham Gardens due to proximity of River Kennet and water meadows.  |
| MARL15       | The MANP should set a percentage for biodiversity net gain for example a minimum of 10%.  |
| MARL 17      | The open space of Barton Dene is a valued community green space.  |
| MARL18       | <p>The policy needs to be conserving and enhancing the landscape and scenic beauty of the AONB rather than conserving the scenic beauty, this will bring it in line with national guidance (NPPF).</p> <p>The wording of paragraph A appears supportive of development in the AONB outside of a settlement boundary. Unfortunately the AONB does not support this approach, the policy should be in line with the NPPF which states that development outside defined settlement boundaries in open countryside should be refused unless it involves conversion of a redundant building, re-use of a brownfield site, development for agricultural workers dwelling, a rural exception site or a development that is unique and exceptional in design (ie. One of a kind).</p> |

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|        | <p>Paras A and B contradict each other. A development of 5 dwellings is more than likely to have a greater impact than a single modest dwelling.</p> <p>Policy needs to be reworded.</p>   |
| MARL19 | <p>A welcome addition to the MANP and endorsed by the AONB.</p> <p>Remove the word otherwise from first line.</p> <p>Not just external lighting that can affect dark skies but internal lighting from large window openings or rooflights.</p> <p>Possible re wording; ...<i>special attention should be given to minimising any potential light spill from internal and external light sources in order to protect dark skies, a special quality of the AONB.</i></p> <p>Amend para 5.59 to state that any development in the MANP should have consideration of the North Wessex Downs good lighting guide and position statement.</p> <p>We have included some policy wording examples in the lighting guide appendix which may be of benefit. The guide is due to published in April.</p> |