

Marlborough Town Council



31 May 2022

Dear Councillor

PLANNING COMMITTEE

You are summoned to a meeting of the **Planning Committee** which will be held on Monday, 6 June 2022 at 7pm in The Court Room, Marlborough Town Hall.

Yours sincerely

Richard Spencer-Williams

Mr Richard Spencer-Williams, PSLCC

Town Clerk

This meeting will be held in the Court Room at the Town Hall according to the latest Government Covid Safety Guidelines, and managed according to the Health and Safety at Work Act 1974(2)e.

There will be thirty places for members of the public to attend. If members of the public wish to attend they should notify the Town Clerk of this by noon on the Friday prior to the meeting. Places will be allocated on a first come first served basis. Organisations and interest groups are asked to send one delegate. Some members of the public may not be allowed to attend if all the allocated seats are taken.

If members of the public wish to attend and ask a question they should also notify the Town Clerk of this by noon on the Friday prior to the meeting and provide their question in writing at the same time. If members of the public wish to ask a question, but not attend, they can provide the question in writing to the Town Clerk by noon on the day of the meeting, and a written response will be provided.

PUBLIC QUESTION TIME

In accordance with Standing Order 3(f), members of the public may ask questions of the Planning Committee. The time allocated for this should not exceed 10 minutes and be limited to 1 question per person unless directed otherwise by the Chairman. A full response may not be possible without further research, and the Chair may direct that a written or oral response be given.

AGENDA

- 1. Apologies**
- 2. Declaration(s) of Interest**
To receive declarations of interest and consider any requests for dispensation
- 3. Chair's Announcements**
- 4. Minutes**
To confirm the minutes of the meeting held 16 May 2022
- 5. Action Log**
To note the updated action log and provide any verbal updates to actions in progress
- 6. Planning Decision Notices**
To note the Planning Decision Notices that have been issued by Wiltshire Council
- 7. Planning Application**
To consider applications received from Wiltshire Council
- 8. Work to Trees**
To consider applications received from Wiltshire Council
- 9. Licence Application**
To consider a New Premises Licence application received from Wiltshire Council
- 10. Wiltshire Council Demand Responsive Transport (On Demand Bus) Survey**
To note an ongoing survey and consider whether to make a corporate response
- 11. Speed Indicator Device**
To note the latest data downloaded from the SID
- 12. Marlborough Area Neighbourhood Plan**
To note an update report on the Marlborough Area Neighbourhood Plan
- 13. Temporary Road Closures**
To note Orders issued by Wiltshire Council



Marlborough Town Council



Planning Committee

Minutes of a meeting of the Planning Committee held Monday, 16 May 2022
in the Court Room, Marlborough Town Hall at 8.30pm

PRESENT	Councillor James Sheppard	Chair
	Councillor Lisa Farrell	Town Mayor (<i>ex officio</i>)
	Councillor Nicholas Fogg	
	Councillor Noel Barrett-Morton	
	Councillor Mark Cooper	
	Councillor Donald Heath	
	Councillor Jo Waltham	
	Councillor Richard Allen	
	Councillor Kymee Cleasby	
	Councillor Jane Davies	
	Councillor Caroline Thomas	
	Councillor Mark Luson	
	Councillor Kelvyn Shantry	

ALSO

PRESENT	Richard Spencer-Williams	Town Clerk
	Dawn Whitehall	Administrator
	Neil Goodwin	Marlborough.News
	Plus 3 members of the public	

PUBLIC QUESTION TIME

Three residents asked questions relating to the Marlborough Area Neighbourhood Plan in particular with reference to planning application PL/2021/04663 for a Change of Use from Agricultural to Equine Clinic with associated buildings, access and landscaping improvements at Poulton Mill:

Malcolm Exeter "A lot of peoples' money, time and effort had been put into the Neighbourhood Plan yet the Council were failing to get it over the finish line for the local people to benefit from, and instead seemingly allowing it to languish. Were the Councillors accepting of this state of apathy, and did they believe this was supporting the local residents to their best interests, particularly with some of the contrary planning decisions we are seeing?"



Stephanie Watson “Noted that there has been limited progress with the MANP to date with several references in recent MTC minutes regarding steering group concerns about ability to review comments and progress the plan. Can the MTC provide an update on how they propose to accelerate progress of this plan which includes key mandates that should be to the benefit of the local community. A number of elements of the current draft plan include statements that impact on planning decisions within the town including MARL16 which identifies valued community open spaces which should be protected and MARL17 which details the need to conserve the scenic beauty of the AONB. It would appear that recent planning decisions by MTC seem to disregard and wholly contradict the draft plan soon to be adopted. I reference the Planning Application for the major development of a commercial enterprise at a green site (Land at Tin Pit Poulton Hill) which is specifically referenced in the MARL16 maps. Can the MTC members provide an update on why such lengthy delays have been encountered with the MADP and explain why recent planning decision/s have contradicted the content of the draft plan.”

Martin Ephson asked “whether the council was concerned that its authority and the impact of the, soon to be adopted, neighbourhood plan was diminished as the council have approved planning application PL/2021/04663? The planning application entails the construction of a barn and associated access tracks on ‘a valued community green space (refer to submission plan inset MARL16) ‘ which is to be preserved’. Wilfully ignoring detailed proposed policy, prior to its adoption undermines the authority of the plan and therefore renders it obsolete even before its adoption.”

Members responded to all points:

- The draft Plan was in the final stage prior to a public referendum, and the Steering Group was currently awaiting a decision notice and recommendations for any amendments from Wiltshire Council. The timescale of this was not in the Town Council’s control
- It was hoped that a referendum could take place by the Autumn at the latest, but again this would be decided by Wiltshire Council rather than the Town Council
- An acknowledgement of, and sharing of, peoples’ frustrations that the Neighbourhood Planning process was a long one. The six years it had taken for Marlborough’s to reach this point was not unusual.
- Once the plan was “made” by referendum it would be used to guide the Town Council’s responses to planning applications. Any planning resolutions referring to protections or designations in the Neighbourhood Plan would only be valid after the plan is “made”: once it was made its framework, content and policies would guide the Town Council’s considerations of future planning applications and Wiltshire Council Planning Officers’ decisions
- The Town Council was a consultee for planning applications, not the decision maker. There were limited, set criteria (reasons) for how it could respond to applications especially if it was to object
- Although there had been no policy reasons to object to the planning application, Members had added a proviso in their comments about protecting



the setting and landscape in line with other consultee's responses at its meeting on 25 April 2022 where it had ***“resolved that Marlborough Town Council has no objection to this application subject to the Officer's satisfaction that heritage assets, the landscape and environment, and the historic setting will be protected as described in comments already raised by other consultees”***

- The entire parish of Marlborough and Manton sits within the AONB and all developments were considered against that setting
- The Town Council was a consultee on planning applications. It was within the power of the Planning Officer at Wiltshire Council to allow or turn down the proposed development. After this there was also an opportunity to appeal any decision

The **Chairman** thanked each resident for attending. He was sorry if they hadn't received the answers they wanted and acknowledged that planning decisions rarely made everyone happy. There would likely be a future opportunity to discuss the planning application as it moved through the planning process at Wiltshire Council.

31/22 APOLOGIES

Apologies for absence were received from **Councillors Ross, Hall and Loosmore**.

32/22 DECLARATIONS

There were no declarations.

33/22 MINUTES

RESOLVED: that the minutes of the meeting held 25 April 2022 were approved as a true record and signed by the Chairman

34/22 ACTION LOG

Members noted the updated action log.

35/22 PLANNING DECISION NOTICES

Members noted the planning decision notices that had been issued by Wiltshire Council.

36/22 PLANNING APPLICATIONS

a) **PL/2022/00814** – Ground investigation works followed by partial dismantling and reconstruction of existing curtilage Listed structural retaining and boundary wall at 1 Clarendon Court, Marlborough for the Directors of Kingsbury Hill Management Company Ltd

RESOLVED: that Marlborough Town Council has no objection to this application

b) **PL/2022/03446** – Ground investigation works followed by partial dismantling and reconstruction of existing curtilage Listed structural retaining and boundary wall at 1 Clarendon Court, Marlborough for the Directors of Kingsbury Hill Management Company Ltd



RESOLVED: that Marlborough Town Council has no objection to this application

- c) **PL/2022/03462** – Proposed timber frame garage and extended sloping driveway in the rear garden at Haven, Salisbury Road, Marlborough for Mrs Dianne Mackinder

RESOLVED: that Marlborough Town Council has no objection to this application

- d) **PL/2022/02293** – Single storey wooden bin and amenity store at 1 Old Ropeworks Court, Kennet Place, Marlborough for Mr Mike Fernley

RESOLVED: that Marlborough Town Council has no objection to this application

- e) **PL/2022/02451** – Single storey rear extension and loft conversion at 2 Reeds Ground, Marlborough for Miss Nicola Gannon

RESOLVED: that Marlborough Town Council has no objection to this application

- f) **PL/2022/03324** – 4 no. non illuminated hanging signs (resubmission of PL/2022/02003) at 121-122 High Street, Ground Floor and Basement, Marlborough for The White Company

RESOLVED: that Marlborough Town Council has no objection to this application

37/22

WILTSHIRE COUNCIL CONSULTATION ABOUT OFF STREET PARKING

Members noted the Town Clerk's report and considered proposed Traffic Regulation Orders affecting off-street parking.

Members were concerned about the proposed introduction of parking charges for blue badge holders:

- In a time of rising costs it was disappointing to see that blue badge holders, who were often vulnerable, would be subject to charges in all car parks
- The reasons stated for introducing charges for blue badge spaces seemed spurious as they could apply to any chargeable parking space
- The alternative for blue badge holders would be to walk or cycle to the town centre, which for many would be out of the question. Instead they may well choose to shop at Tesco, reducing business for town centre traders
- The topography of Marlborough, being very hilly, made it even more difficult for many people to walk to the town centre and/or carry shopping
- Very often all designated disabled parking bays were full, especially near Waitrose. Unless additional, level access provision was made, blue badge holders would likely be further disadvantaged
- It was a simple process for parking control officers to check that blue badges were valid

RESOLVED: to respond to the consultation to strongly object to the introduction of charges for blue badge holders

38/22

MARLBOROUGH AREA NEIGHBOURHOOD PLAN

The Steering Group was still awaiting a decision notice, which would also include recommendations for the content of the final plan. Once the plan was submitted to

the Town Council as the Qualifying Body, this would trigger a set, legal timeframe leading to a referendum.

39/22 SPEED INDICATOR DEVICE

Members noted that the SID rota had been extended to include Kingsbury Street. It was disappointing that the battery had only lasted 2-3 days and not been replaced for some time. The Town Clerk confirmed that Town Council staff should check the battery status.

40/22 TEMPORARY ROAD CLOSURES

Members noted that Wiltshire Council had issued an Order TR8096 for the temporary closure of:

Angel Yard (part), Marlborough; from outside property known as Pear Tree Cottage for a distance of approximately 40 metres in a northwest direction to enable Thames Water to repair a service pipe unmade in verge commencing 8 June 2022 for 3 days between 00:00 and 23:59

The meeting closed at 9.12pm



ITEM 5**ACTION LOG**

To note the most recent action log items and provide verbal updates as appropriate:

#	Description	Minute #	Source	Owner	Status	Meeting or Start Date	Notes
5	To ask the originator of the High Street crossing petition (Mrs Vera Hamblin) for views on the current CATG/(LHFIG) proposals, and to seek a meeting with a Highways Engineer to clarify the options available, to be reviewed at the next meeting		Planning Committee	Town Clerk	In progress	31 August 2021	"Town Clerk spoke to Mrs Hamblin on 25.10.21. Mrs Hamblin's view was that what was needed was a 'proper' crossing that suitably assisted those in particular with 'vulnerabilities' such as impaired vision or mobility to safely cross the large and busy High Street. A 'soft' crossing scheme as proposed she felt was inadequate for the needs of many of Marlborough residents. On 1.11.21 Cllrs Hall, Thomas, Sheppard, & Town Clerk met WC Highways engineer, Martin Cook to discuss ideas/options. MR undertook to see what scheme could be devised to cross High St near where Waitrose is located.
6	Manton Hollow: Town Clerk to arrange a meeting to discuss alternative signs (No Through Road) with a Highways Engineer and obtain costs		Planning Committee	Town Clerk	In progress	31 August 2021	10.01.22: Cllr Thomas submitted CATG(LHFIG) request to MTC on 14.3.22. MTC support - CATG(LHFIG) request forwarded to WC on 15.3.22."
7	To put the Manton 5-point traffic calming scheme forward for a Substantive Highways Grant		Planning Committee	Town Clerk	In progress	31 August 2021	"WC Highways emailed on 1.9.21 clarifying MTC's position, awaiting response. Raised with Highways engineer on the 1.11.21 who undertook to look at the options.



16	Councillor Sheppard to include pedestrian safety issues at Poulton Hill in his discussions with the Highways Engineer for suggested solutions	209/21	Planning Committee	Councillor Sheppard	In progress	4 October 2021	14.03.22: CATG(LHFIG) approved: WC to purchase, MTC pay 25%"
21	To investigate costs for portable/new SID options plus wider community involvement, and whether police permission would be required.		Planning Committee	Town Clerk	In progress		WC Highways emailed on 1.9.21 with proposal/application requesting advice on feasibility; awaiting response, CATG(LHFIG) acknowledge would suit substantive scheme, Scheme needs more work re; costing to prepare for next bid fund. CATG(LHFIG) agreed on 3.3.22 to proceed with some actions and retain crossing as larger part of scheme. Manton Residents Association contacted on 9.3.22 to invite to be part of project group. Confirmed wanted to be a part of group on 10.3.22. Confirmed with WC Highways on 10.3.22. Meeting date set for 20.5.22.
68	Handrail at Cherry Orchard: rejected by Wiltshire Council. Investigate options to pursue	PQT	Planning Committee	Town Clerk	In progress	7 February 2022	29.11.21 Atkins confirmed new posts would be needed at this location as the existing ones are not suitable; these could be installed as part of WC programme of work, but no clear date confirmed (the existing lampposts could have an 'extended life' granted if they are in good repair (3-5yrs). Traffic Survey request sent to Wiltshire Council on 25.3.22.
76	CATG(LHFIG): raise highways improvement request seeking safety measures at Frees Avenue	431/21	Planning Committee	Town Clerk	In progress	14 March 2022	Discussed at LHFIG on 26.5.22. RSW to arrange site meeting with relevant parties to explore options for consideration.



To note the Planning Decision Notices issued by Wiltshire Council for the period 9 to 29 May 2022:

a) PL/2021/11722 – 27A The Old Brew House, Kingsbury Street, Marlborough

Infill rear extension and erection of shed

Decision: Approve with conditions **MTC:** No objection, with comment that neighbours' concerns about overlooking, in particular the impact of light spill, be taken into account by the Planning Officer/subject to conditions to ensure the outer materials are in keeping with nearby properties and to take account of roof lights with respect to neighbouring amenity

Case Officer's Report: "...The design... has been amended during the application process, reducing the size of the rooflights and changing them to conservation style rooflights... appropriate to its setting. The extension will... be... of suitable materials (facing brick and slate roof tiles to match existing). ... the agent has amended the proposals throughout the planning process, omitting the conservatory, reducing the rooflights and changing them to conservation style rooflights. ... It is therefore considered on planning balance, that the proposed extension will not have such a harmful impact upon the setting of the nearby listed buildings or the significance of the host dwelling as to justify refusal... Furthermore, given the enclosed nature of the site... the proposed extension and shed will not be readily visible from the public realm and... will not harm the character and appearance of the conservation area. "

"Comments from occupiers of neighbouring properties have been duly noted with regard to loss of views, access across their private garden areas and the impact of the extension on their boundary wall. Officers assess proposals based on material planning considerations. Loss of a view and issues relating to private access arrangements are not material planning considerations. Issues relating to the boundary wall are also a private matter between the applicant and interested parties and as such an informative drawing the applicant's attention to the Party Wall Act will be included on the planning approval.... "

"In conclusion the proposals seem fitting with regards to scale, design and materials... acceptable in context of its surroundings and in accordance with... policies of the local development plan."

b) PL/2022/01891 – 3 Minal View, Chopping Knife Lane, Marlborough

Loft conversion with Velux windows. Re-model front entrance

Decision: Approve with conditions **MTC:** No objection

c) PL/2022/02256 – 18 River Park, Marlborough

Demolition of existing single storey garage and addition of double storey extension, with internal alterations

Decision: Approve with conditions **MTC:** No objection

d) PL/2022/02407 – 6 Old Lion Court, High Street, Marlborough

Beech tree – crown reduce 20% and crown thin

Decision: No objection **MTC:** No objection

e) PL/2022/02507 – 5 Morris Road, Marlborough

Single storey side extension, single storey front extension, conversion of garage loft to office with external stairs and front/rear dormers

Decision: Approve with conditions **MTC:** No objection

ITEM 7

PLANNING APPLICATIONS

Councillors and members of the public should contact the Town Clerk by midday on Monday, 6 June if they feel any of the following applications need full discussion at the meeting.

To consider the following Planning Applications received from Wiltshire Council:

- a) [PL/2022/03613](#) – Listed building consent (alt/ext)
Removal of timber post and beam and replacement with cased steel beam. Removal of first floor stud partitions and creation of bathroom at 4 Silverless Street for Johannah Beddall
- b) [PL/2022/03872](#) – Works to a listed building
4 no. non illuminated hanging signs at 121-122 Ground Floor and Basement, High Street, Marlborough for The White Company
- c) [PL/2022/03884](#) – Listed building discharge of condition
Discharge of condition 3(i) on [20/05287/LBC](#) at Marlborough College Science Block, Bath Road, Marlborough for Mr Phil Ely
- d) [PL/2022/03898](#) – Householder planning permission
Demolish existing front single storey porch and existing rear extension and build new 2 storey front and rear extension with slate siles and grey coloured windows and doors. Fully render whole dwelling. Replace existing roof tiles with slate tiles and replace all windows and doors with grey coloured units at 39 High Street, Manton for Mr Ben Hughes

ITEM 8

WORK TO TREES

To consider the following application received from Wiltshire Council:

[PL/2022/04118](#) – Consent under Tree Preservation Orders

Willow tree – reduce height by 6ft at Meadowlands, London Road, Marlborough for Mrs Painter

ITEM 9

LICENCE APPLICATION

To consider a New Premises Licence Application¹ for CANND Limited, The Laurels, Cold Harbour Lane, Marlborough SN8 1BJ for:

- OFF Sales for Supply of alcohol: Mon to Fri 09:00 hrs to 17:00 hrs

¹ See Appendix 1

To note a Wiltshire Council consultation about demand responsive transport and consider whether to make a corporate response.

Background

Press Release issued by Wiltshire Council on 25 May 2022

Wiltshire Council has been awarded £1.2m of Department for Transport (DfT) funding to launch an improved flexible, on-demand bus service in the Pewsey Vale area – and wants to hear from people on what the new service should look like.

Flexible, on-demand bus services do not run to a set timetable like usual buses. Instead, they enable people to phone or book a bus service via an app, to take them anywhere within the service area at a time to suit them. App users will be able to book their journey, see in real-time when the vehicle will arrive and make payment. For people who cannot or do not wish to use the app, telephone booking and on-bus payment will also be available.

In the case of this new service, the area it will cover takes in much of Pewsey Vale; from the eastern edge of Devizes, north to Beckhampton and Marlborough, and east to Collingbourne Ducis, Shalbourne and Froxfield, including Pewsey, Burbage, Great Bedwyn and Everleigh. This rural service would provide links to Devizes, Ludgershall and Tidworth, so people can take bus services to other towns.

Cllr Dr Mark McClelland, Cabinet Member for Transport, said: “This is a hugely exciting opportunity for people in the Vale of Pewsey, as the new service will help to improve connectivity across the towns and villages in the area.

“Unlike a conventional bus, which has a fixed route, timetable and stopping points, on demand buses allow people to book using an app and make journeys where they want, when they want; it’s a bit like an Uber-style service for buses.

“But it’s really important that this service is designed around the needs of passengers and our communities, and that’s why we’re asking people to take our survey to let us know what they’d like to see from the service.

“This new service supports our business plan aim to have vibrant, well-connected communities, particularly in rural areas, so I’d urge anyone in the area to take part in the survey so we can design a new service that meets the needs of the community.”

The funding for the scheme has been granted to the council through the DfT’s Rural Mobility Fund, which encourages local authorities to trial on-demand bus services in rural areas.”

Survey

The survey runs from Wednesday 25 May to Friday 15 July, and people can have their say and find out more, including a map of the service area, at www.wiltshire.gov.uk/transport-public-transport-bus.

This information has been shared on the Marlborough Town Council website and social media.

Recommendation

Members are asked to note this survey and consider whether to make a corporate response.

Town Clerk, 25.05.2022

ITEM 11

SPEED INDICATOR DEVICE DATA REPORT

To note the latest data downloaded from the Speed Indicator Device.

- 11 – 28th April in London Road
- 6 – 27th May in Kingsbury St

The SID will be in Bath Road from Monday 30 May.

Please see Appendix 2 for the data report.

Assistant Town Clerk, 27 May 2022

ITEM 12

MARLBOROUGH AREA NEIGHBOURHOOD PLAN

To receive an update on the Marlborough Area Neighbourhood Plan (MANP).

The final Examiners report has been sent to Wiltshire Council. Consequently a 'Decision Notice' has been issued by Wiltshire Council, received on 26th May, and with this a set of required amendments to the MANP.

- The most significant material amendment is the removal of the Salisbury Road site from the plan.
- The 'Decision Notice', subject to these amendments, recommends for the MANP to move to referendum. Wiltshire Council has also issued notification of the referendum date as 11th August.
- The MANP amendments will be made in house where possible week beginning 6th June, and if needed will commission in external consultants for some technical changes.

- The amended MANP has to be returned to Wiltshire Council by 22nd June.
- The MANP Steering Group is meeting on 7th June to plan for how best to promote the plan and the referendum date.

Please see Appendix 3 for the Examiner's Decision Statement and the Examiner's final report.

Town Clerk, 30.05.2022

ITEM 13

TEMPORARY ROAD CLOSURE

To note that, under Section 14 of the Road Traffic Regulation Act 1984, Wiltshire Council has issued Orders as follows:

TTRO 8127 – Temporary Closure of Kingsbury Street (Part), Marlborough

Notice is hereby given that Wiltshire Council has made an Order to close temporarily to all traffic:

Kingsbury Street (Part), Marlborough;
from its junction with High Street for
approximately 60m in a north easterly
direction.

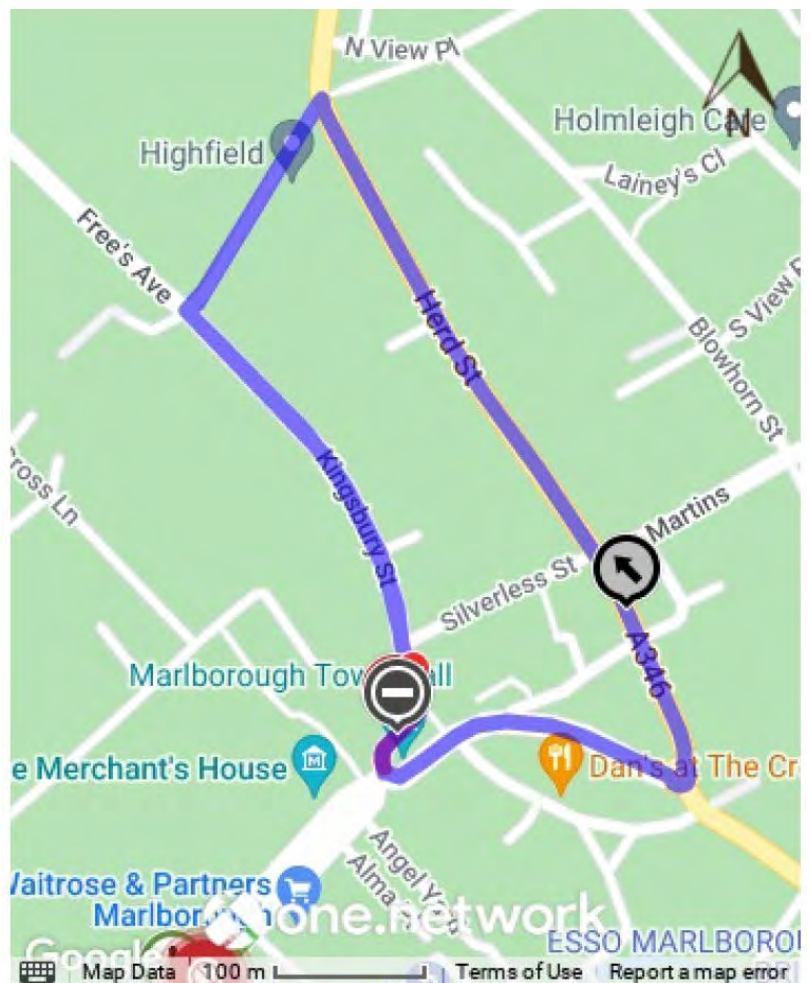
To enable: Wiltshire Council to mount a
cherry picker in the road to install
lightening conductor on top of Town Hall
and associated works.

Alternative route: via Kingsbury Street
(unaffected length), The Common, A346,
New Road and vice versa.

This Order will come into operation on 04
July 2022 and the closure will be required
between the hours of 08:00 and 16:00 for
3 days.

The closure can also be found on
one.network here:

<https://one.network/?tm=128334157>



23 MAY 2022



Application for a premises licence to be granted under the Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You may wish to keep a copy of the completed form for your records.

I/We CANND LIMITED

(Insert name(s) of applicant)

apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in Part 1 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003

Part 1 – Premises details

Postal address of premises or, if none, ordnance survey map reference or description <u>THE LAURELS</u> <u>COLD HARBOUR LANE</u>			
Post town	<u>MARLBOROUGH</u>	Postcode	<u>SN8 1BJ</u>
Telephone number at premises (if any)		<u>0044 7876 394266</u>	
Non-domestic rateable value of premises		£	

Part 2 - Applicant details

Please state whether you are applying for a premises licence as

Please tick as appropriate

- | | |
|--|---|
| a) an individual or individuals * | <input type="checkbox"/> please complete section (A) |
| b) a person other than an individual * | |
| i as a limited company/limited liability partnership | <input checked="" type="checkbox"/> please complete section (B) |
| ii as a partnership (other than limited liability) | <input type="checkbox"/> please complete section (B) |
| iii as an unincorporated association or | <input type="checkbox"/> please complete section (B) |
| iv other (for example a statutory corporation) | <input type="checkbox"/> please complete section (B) |
| c) a recognised club | <input type="checkbox"/> please complete section (B) |

- d) a charity ☐ please complete section (B)
- e) the proprietor of an educational establishment ☐ please complete section (B)
- f) a health service body ☐ please complete section (B)
- g) a person who is registered under Part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales ☐ please complete section (B)
- ga) a person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 (within the meaning of that Part) in an independent hospital in England ☐ please complete section (B)
- h) the chief officer of police of a police force in England and Wales ☐ please complete section (B)

* If you are applying as a person described in (a) or (b) please confirm (by ticking yes to one box below):

- I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities; or ☐
- I am making the application pursuant to a
- statutory function or ☐
- a function discharged by virtue of Her Majesty's prerogative ☐

(A) INDIVIDUAL APPLICANTS (fill in as applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
Date of birth			I am 18 years old or over <input type="checkbox"/>		Please tick yes
Nationality					
Current residential address if different from premises address					
Post town				Postcode	
Daytime contact telephone number					
E-mail address (optional)					
Where applicable (if demonstrating a right to work via the Home Office online right to work checking service), the 9-digit 'share code' provided to the applicant by that service (please see note 15 for information)					

SECOND INDIVIDUAL APPLICANT (if applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
Date of birth		I am 18 years old or over		<input type="checkbox"/> Please tick yes	
Nationality					
Where applicable (if demonstrating a right to work via the Home Office online right to work checking service), the 9-digit 'share code' provided to the applicant by that service: (please see note 15 for information)					
Current residential address if different from premises address					
Post town				Postcode	
Daytime contact telephone number					
E-mail address (optional)					

(B) OTHER APPLICANTS

Please provide name and registered address of applicant in full. Where appropriate please give any registered number. In the case of a partnership or other joint venture (other than a body corporate), please give the name and address of each party concerned.

Name	JOHN DORE	CANNO LIMITED
Address	THE LAURELS COLD HARBOUR LANE MALLBOROUGH SN8 1BJ	
Registered number (where applicable)	12185268	

Description of applicant (for example, partnership, company, unincorporated association etc.)	
PRIVATE LIMITED COMPANY	FOUNDER + CEO.
Telephone number (if any)	07876394266
E-mail address (optional)	JOHNDORE@CANND.CO.UK

Part 3 Operating Schedule

When do you want the premises licence to start?

DD	MM	YYYY
01	06	2022

If you wish the licence to be valid only for a limited period, when do you want it to end?

DD	MM	YYYY

Please give a general description of the premises (please read guidance note 1)

REGISTERED OFFICE FOR
CANND LIMITED
RESIDENTIAL HOUSE FOR
FOUNDER & CEO JOHN DORE

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend.

What licensable activities do you intend to carry on from the premises?

N/A

(please see sections 1 and 14 and Schedules 1 and 2 to the Licensing Act 2003)

Provision of regulated entertainment (please read guidance note 2)

Please tick all that apply

- a) plays (if ticking yes, fill in box A) ☐
- b) films (if ticking yes, fill in box B) ☐
- c) indoor sporting events (if ticking yes, fill in box C) ☐
- d) boxing or wrestling entertainment (if ticking yes, fill in box D) ☐
- e) live music (if ticking yes, fill in box E) ☐

N/A

f) recorded music (if ticking yes, fill in box F)

☐

g) performances of dance (if ticking yes, fill in box G)

☐

h) anything of a similar description to that falling within (e), (f) or (g)
(if ticking yes, fill in box H)

☐

N/A

Provision of late night refreshment (if ticking yes, fill in box I)

☐

Supply of alcohol (if ticking yes, fill in box J)

☒

In all cases complete boxes K, L and M

A

Plays Standard days and timings (please read guidance note 7)			<u>Will the performance of a play take place indoors or outdoors or both – please tick</u> (please read guidance note 3)		Indoors	<input type="checkbox"/>
					Outdoors	<input type="checkbox"/>
					Both	<input type="checkbox"/>
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)			
Mon						
Tue						
			<u>State any seasonal variations for performing plays</u> (please read guidance note 5)			
Wed						
Thur						
			<u>Non standard timings. Where you intend to use the premises for the performance of plays at different times to those listed in the column on the left, please list</u> (please read guidance note 6)			
Fri						
Sat						
Sun						

B

Films Standard days and timings (please read guidance note 7)			Will the exhibition of films take place indoors or outdoors or both – please tick (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	Please give further details here (please read guidance note 4)		
Mon					
Tue					
Wed					
Thur			State any seasonal variations for the exhibition of films (please read guidance note 5)		
Fri			Non standard timings. Where you intend to use the premises for the exhibition of films at different times to those listed in the column on the left, please list (please read guidance note 6)		
Sat					
Sun					

C

Indoor sporting events Standard days and timings (please read guidance note 7)			<u>Please give further details</u> (please read guidance note 4) <div style="text-align: center; font-size: 2em;">N/A</div>
Day	Start	Finish	
Mon			
Tue			<u>State any seasonal variations for indoor sporting events</u> (please read guidance note 5)
Wed			
			<u>Non standard timings. Where you intend to use the premises for indoor sporting events at different times to those listed in the column on the left, please list</u> (please read guidance note 6)
Thur			
Fri			
Sat			
Sun			

D

Boxing or wrestling entertainments Standard days and timings (please read guidance note 7)			Will the boxing or wrestling entertainment take place indoors or outdoors or both – please tick (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	Please give further details here (please read guidance note 4) <div style="text-align: center; font-size: 2em;">NA</div>		
Mon					
Tue					
Wed					
Thur			State any seasonal variations for boxing or wrestling entertainment (please read guidance note 5)		
Fri					
Sat			Non standard timings. Where you intend to use the premises for boxing or wrestling entertainment at different times to those listed in the column on the left, please list (please read guidance note 6)		
Sun					

E

Live music Standard days and timings (please read guidance note 7)			Will the performance of live music take place indoors or outdoors or both – please tick (please read guidance note 3)		Indoors <input type="checkbox"/>
					Outdoors <input type="checkbox"/>
Day	Start	Finish			Both <input type="checkbox"/>
Mon			Please give further details here (please read guidance note 4) <div style="text-align: center; font-size: 2em;">N/A</div>		
Tue					
Wed			State any seasonal variations for the performance of live music (please read guidance note 5)		
Thur					
Fri			Non standard timings. Where you intend to use the premises for the performance of live music at different times to those listed in the column on the left, please list (please read guidance note 6)		
Sat					
Sun					

F

Recorded music Standard days and timings (please read guidance note 7)			Will the playing of recorded music take place indoors or outdoors or both – please tick (please read guidance note 3)		Indoors	<input type="checkbox"/>
					Outdoors	<input type="checkbox"/>
					Both	<input type="checkbox"/>
Day	Start	Finish	Please give further details here (please read guidance note 4) <div style="text-align: center; font-size: 2em;">N/A</div>			
Mon						
Tue						
			State any seasonal variations for the playing of recorded music (please read guidance note 5)			
Wed						
Thur						
			Non standard timings. Where you intend to use the premises for the playing of recorded music at different times to those listed in the column on the left, please list (please read guidance note 6)			
Fri						
Sat						
Sun						

G

Performances of dance Standard days and timings (please read guidance note 7)			<u>Will the performance of dance take place indoors or outdoors or both – please tick</u> (please read guidance note 3)		Indoors	<input type="checkbox"/>
					Outdoors	<input type="checkbox"/>
					Both	<input type="checkbox"/>
Day	Start	Finish				
Mon			<u>Please give further details here</u> (please read guidance note 4) <div style="text-align: center; font-size: 2em;">N/A</div>			
Tue						
Wed			<u>State any seasonal variations for the performance of dance</u> (please read guidance note 5)			
Thur						
Fri			<u>Non standard timings. Where you intend to use the premises for the performance of dance at different times to those listed in the column on the left, please list</u> (please read guidance note 6)			
Sat						
Sun						

H

Anything of a similar description to that falling within (e), (f) or (g) Standard days and timings (please read guidance note 7)			Please give a description of the type of entertainment you will be providing <div style="text-align: center; font-size: 2em;">N/A</div>		
Day	Start	Finish	<u>Will this entertainment take place indoors or outdoors or both – please tick</u> (please read guidance note 3)	Indoors	<input type="checkbox"/>
Mon				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Tue			<u>Please give further details here</u> (please read guidance note 4)		
Wed					
Thur			<u>State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g)</u> (please read guidance note 5)		
Fri					
Sat			<u>Non standard timings. Where you intend to use the premises for the entertainment of a similar description to that falling within (e), (f) or (g) at different times to those listed in the column on the left, please list</u> (please read guidance note 6)		
Sun					

I

Late night refreshment Standard days and timings (please read guidance note 7)			Will the provision of late night refreshment take place indoors or outdoors or both – please tick (please read guidance note 3)		Indoors	<input type="checkbox"/>
			N/A		Outdoors	<input type="checkbox"/>
					Both	<input type="checkbox"/>
Day	Start	Finish				
Mon			<u>Please give further details here</u> (please read guidance note 4)			
Tue						
Wed			<u>State any seasonal variations for the provision of late night refreshment</u> (please read guidance note 5)			
Thur						
Fri			<u>Non standard timings. Where you intend to use the premises for the provision of late night refreshment at different times, to those listed in the column on the left, please list</u> (please read guidance note 6)			
Sat						
Sun						

J

Supply of alcohol Standard days and timings (please read guidance note 7)			Will the supply of alcohol be for consumption – please tick (please read guidance note 8) IT WILL BE SUPPLIED TO AMAZON FOR SALE ON THEIR PLATFORM		On the premises <input type="checkbox"/>
					Off the premises <input checked="" type="checkbox"/>
					Both <input type="checkbox"/>
Day	Start	Finish	State any seasonal variations for the supply of alcohol (please read guidance note 5) AMAZON SALES HIGHER JUL - AUG. SUMMER NOV - DEC. CHRISTMAS		
Mon	900	1700	Non standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list (please read guidance note 6) N/A		
Tue	900	1700			
Wed	900	1700			
Thur	900	1700			
Fri	0900	1700			
Sat	N/A				
Sun	N/A				

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor (Please see declaration about the entitlement to work in the checklist at the end of the form):

Name		JOHN DORE
Date of birth		7-12-66
Address		THE LAURELS COLD HARBOUR LANE MAREBOURGH.
Postcode	SN8 1BJ	
Personal licence number (if known)		LN/0018738
Issuing licensing authority (if known)		WILTSHIRE COUNCIL

K

Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children (please read guidance note 9).

N/A

L

Hours premises are open to the public
Standard days and timings
(please read guidance note 7)

Day	Start	Finish
Mon		
Tue		
Wed		
Thur		
Fri		
Sat		
Sun		

State any seasonal variations (please read guidance note 5)

N/A

Non standard timings. Where you intend the premises to be open to the public at different times from those listed in the column on the left, please list (please read guidance note 6)

N/A

M

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b, c, d and e) (please read guidance note 10)

I WILL ONLY BE STORING THE WINE ON MY PREMISES - IT WILL BE SHIPPED DIRECTLY TO AMAZON FOR SALE. I REQUIRE A PREMISES LICENCE TO SELL ON AMAZON. ANY WEBSITE ORDERS + SELLAR PLATFORM (FOR TRADE SALE) SALES WILL BE SENT DIRECTLY FROM MY PREMISES.

b) The prevention of crime and disorder

WINE STOCK WILL BE SMALL + SECURE ON PREMISES WITH DEAD LOCKS.

c) Public safety

NO ALCOHOL WILL BE SOLD FROM PREMISES TO THE GENERAL PUBLIC - JUST SENT TO AMAZON + TRADE/WEB CUSTOMERS. I HAVE A DRIVEWAY + ORDERS WILL BE SMALL (10-20 CASES A MONTH)

d) The prevention of public nuisance

NO ALCOHOL SOLD DIRECTLY ON PREMISES TO GENERAL PUBLIC, ONLY PACKED & DELIVERED IN CAR DURING WORK HOURS ONE VAN DELIVERY PER QUARTER TO AMAZON,

e) The protection of children from harm

NO ALCOHOL ON SIGHT - ALL PACKED IN BOXES + NOT SOLD DIRECT TO ANY GENERAL PUBLIC, WEBSITE HAS AGE LIMITS ADDED TO HOME PAGE

Checklist:**Please tick to indicate agreement**

- I have made or enclosed payment of the fee. ☐
- I have enclosed the plan of the premises. ☒
- I have sent copies of this application and the plan to responsible authorities and others where applicable. ☐ N/A
- I have enclosed the consent form completed by the individual I wish to be designated premises supervisor, if applicable. ☒
- I understand that I must now advertise my application. ☒
- I understand that if I do not comply with the above requirements my application will be rejected. ☒
- [Applicable to all individual applicants, including those in a partnership which is not a limited liability partnership, but not companies or limited liability partnerships] I have included documents demonstrating my entitlement to work in the United Kingdom or my share code issued by the Home Office online right to work checking service (please read note 15). ☐

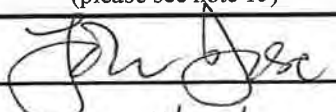
IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

IT IS AN OFFENCE UNDER SECTION 24B OF THE IMMIGRATION ACT 1971 FOR A PERSON TO WORK WHEN THEY KNOW, OR HAVE REASONABLE CAUSE TO BELIEVE, THAT THEY ARE DISQUALIFIED FROM DOING SO BY REASON OF THEIR IMMIGRATION STATUS. THOSE WHO EMPLOY AN ADULT WITHOUT LEAVE OR WHO IS SUBJECT TO CONDITIONS AS TO EMPLOYMENT WILL BE LIABLE TO A CIVIL PENALTY UNDER SECTION 15 OF THE IMMIGRATION, ASYLUM AND NATIONALITY ACT 2006 AND PURSUANT TO SECTION 21 OF THE SAME ACT, WILL BE COMMITTING AN OFFENCE WHERE THEY DO SO IN THE KNOWLEDGE, OR WITH REASONABLE CAUSE TO BELIEVE, THAT THE EMPLOYEE IS DISQUALIFIED.

Part 4 – Signatures (please read guidance note 11)

Signature of applicant or applicant's solicitor or other duly authorised agent (see guidance note 12).
If signing on behalf of the applicant, please state in what capacity.

Declaration	<ul style="list-style-type: none">• [Applicable to individual applicants only, including those in a partnership which is not a limited liability partnership] I understand I am not entitled to be issued with a licence if I do not have the entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15).• The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, or have conducted an online right to work check using the Home Office
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	online right to work checking service which confirmed their right to work (please see note 15)
Signature	
Date	18/4/22.
Capacity	APPLICANT (PERSONAL LICENCE) DPS.

For joint applications, signature of 2nd applicant or 2nd applicant's solicitor or other authorised agent (please read guidance note 13). If signing on behalf of the applicant, please state in what capacity.

Signature	
Date	
Capacity	

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 14)

THE LAURELS COLD HARBOUR LANE
MARLBOROUGH,

Post town	MARLBOROUGH	Postcode	SN8 1BJ
Telephone number (if any)	07876 394266		
If you would prefer us to correspond with you by e-mail, your e-mail address (optional)			

ÉlanCité

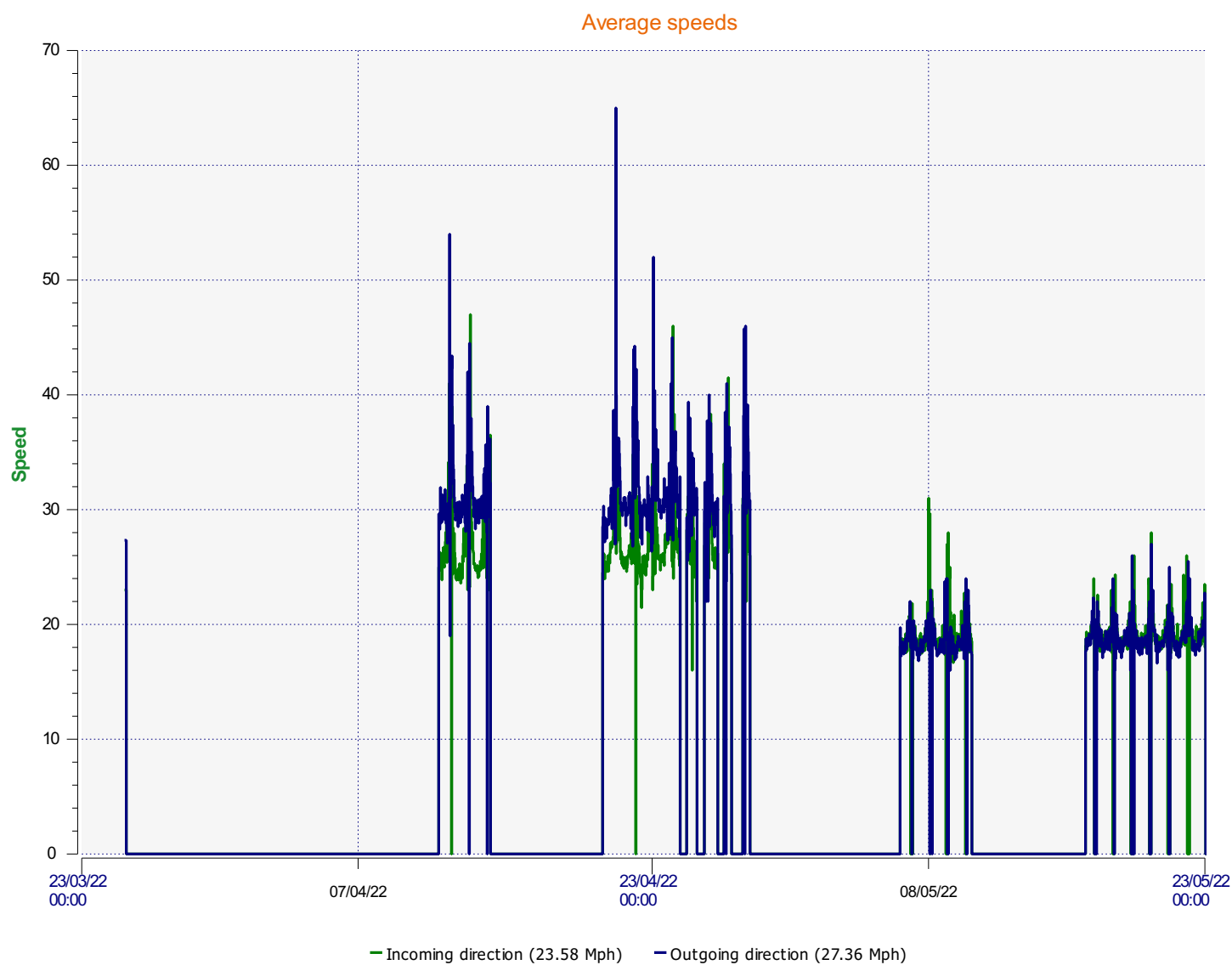
DÉTECTER • INFORMER • SÉCURISER



Start date: Friday, March 25, 2022 9:30 AM
End date: Friday, May 27, 2022 10:00 AM

Location:

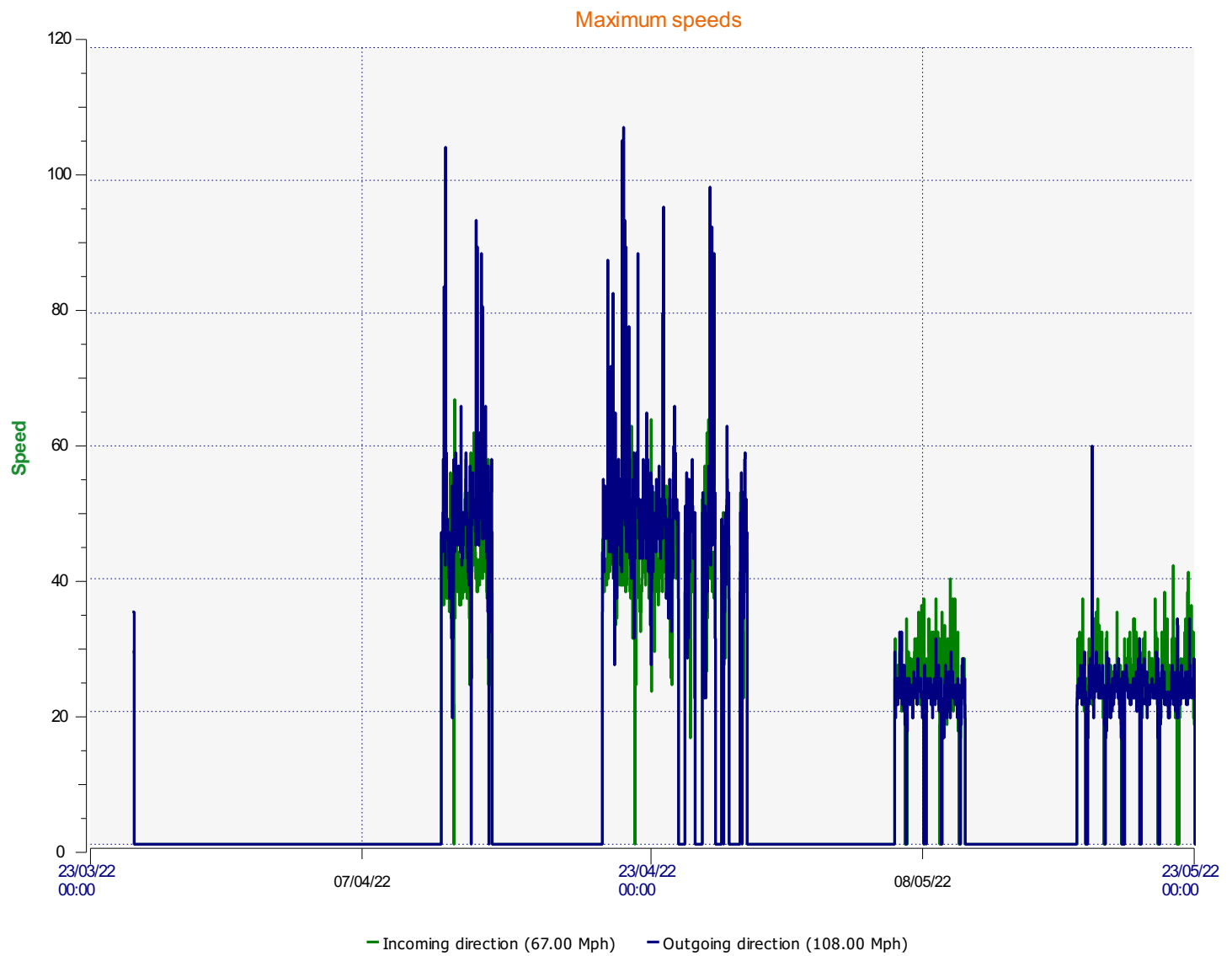
Comments:



Start date: Friday, March 25, 2022 9:30 AM
End date: Friday, May 27, 2022 10:00 AM

Location:

Comments:

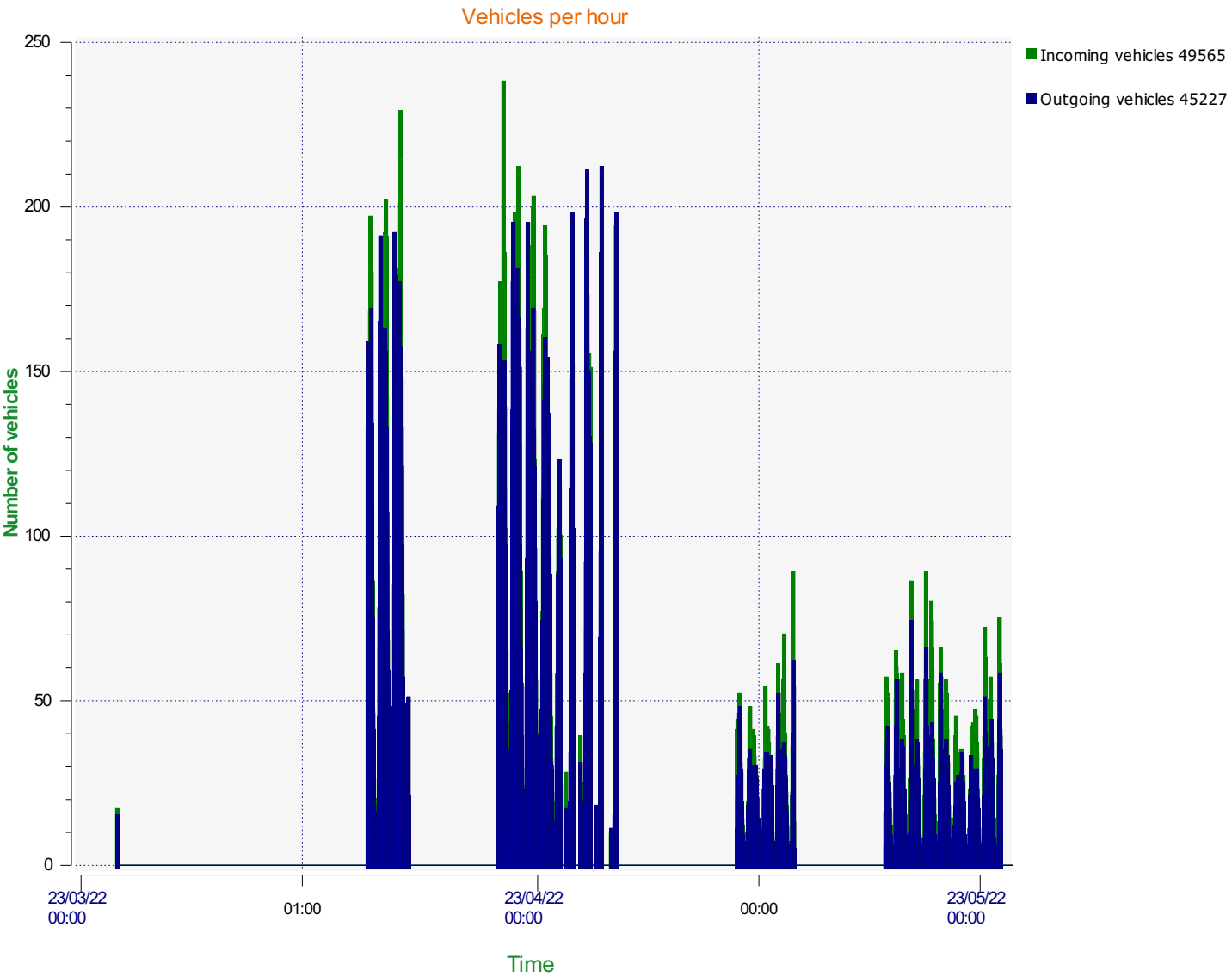


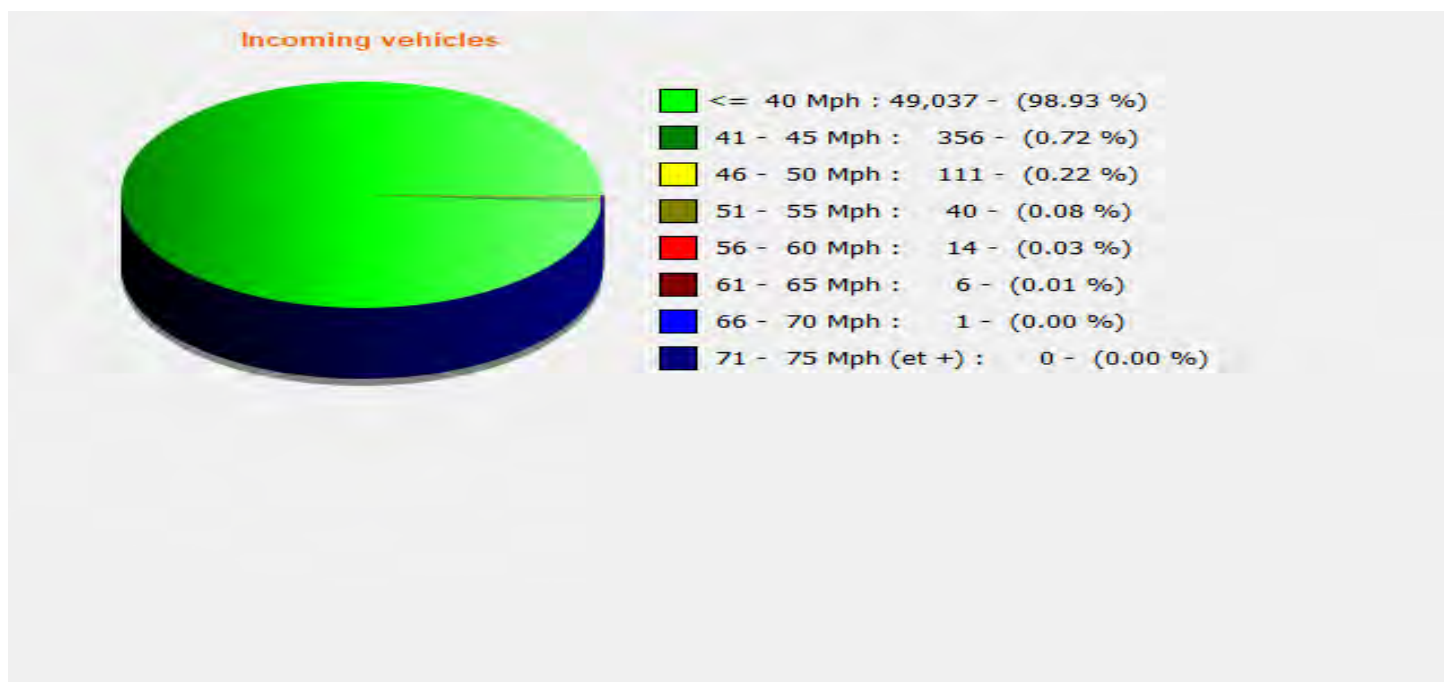
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End date: Friday, May 27, 2022 10:00 AM

Location:

Comments:

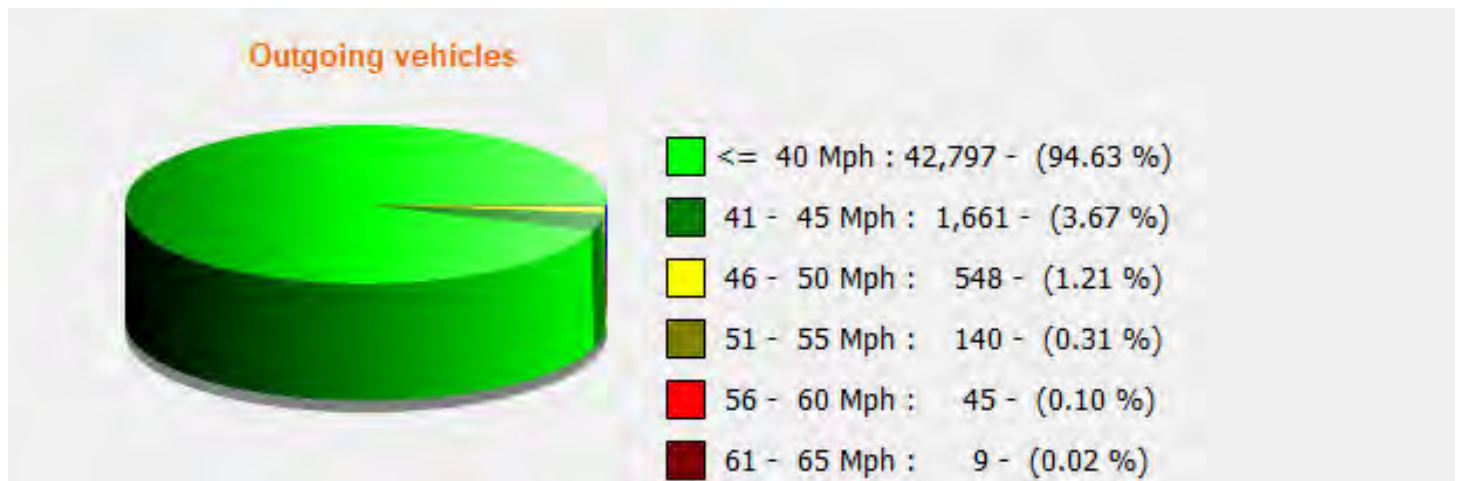




Start date: Friday, March 25, 2022 9:30 AM
End date: Friday, May 27, 2022 10:00 AM

Location:

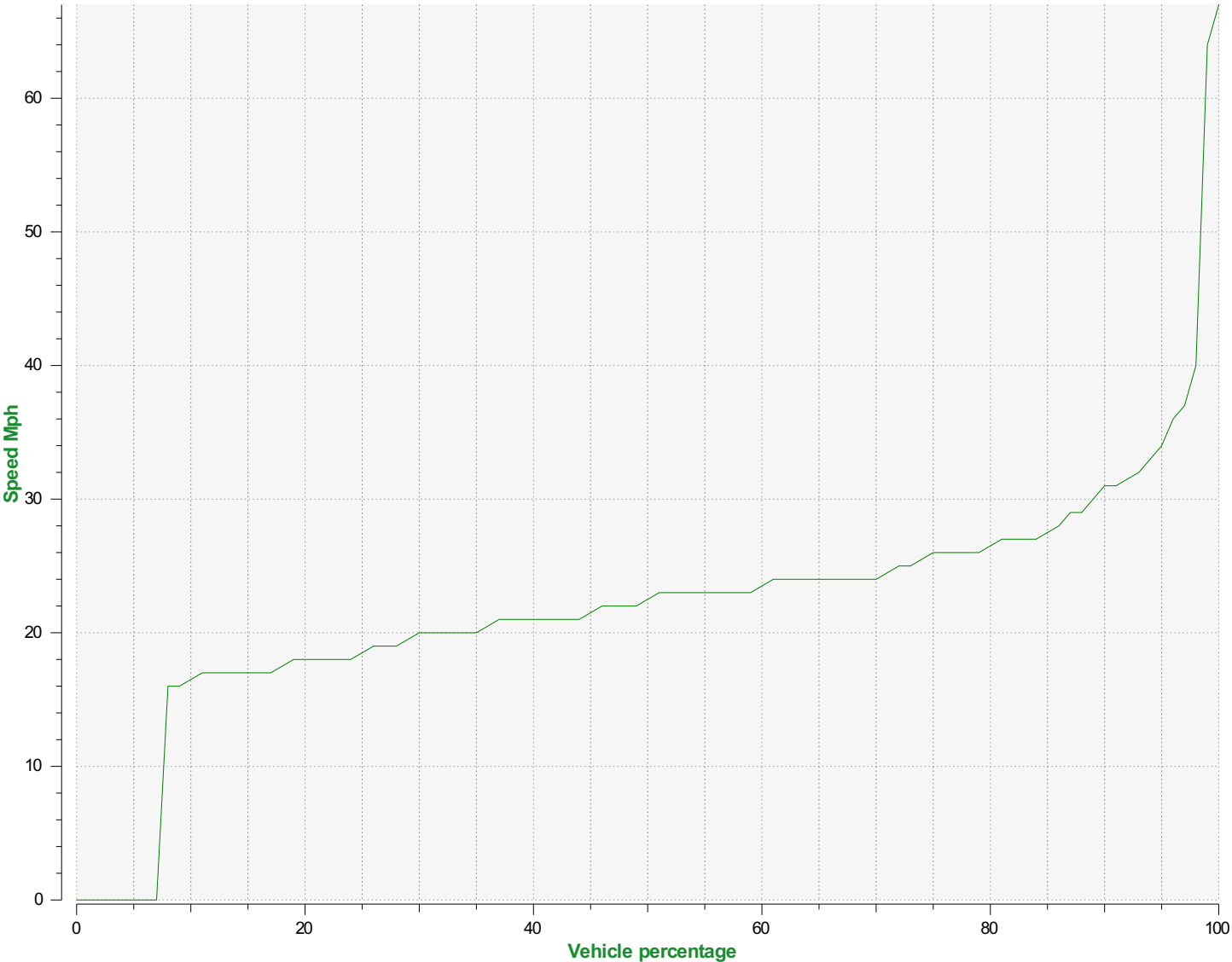
Comments:



Start date: Friday, March 25, 2022 9:30 AM
End date: Friday, May 27, 2022 10:00 AM

Location:

Comments:



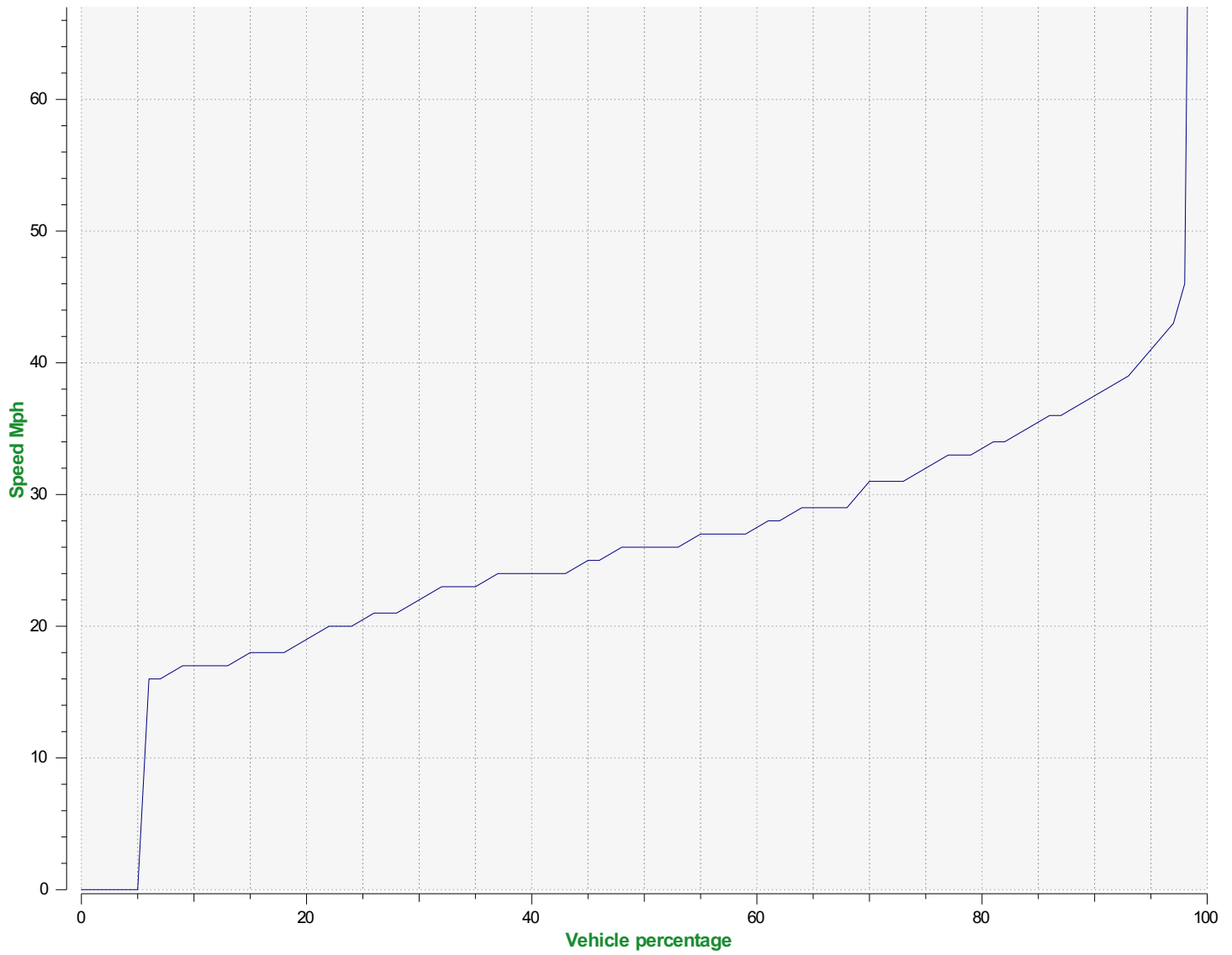
Speed percentiles (incoming)

V30: 20.00Mph **V50:** 22.00Mph **V85:** 27.00Mph

Start date: Friday, March 25, 2022 9:30 AM
End date: Friday, May 27, 2022 10:00 AM

Location:

Comments:



Speed percentile(outgoing)

V30: 22.00Mph **V50:** 26.00Mph **V85:** 35.00Mph

Start date: Friday, March 25, 2022 9:30 AM
End date: Friday, May 27, 2022 10:00 AM

Location:

Comments:

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
27/05/2022 10:00	9	9	20.33	26.00	Incoming
27/05/2022 10:00	6	6	18.50	21.00	Outgoing
27/05/2022 09:30	39	39	18.26	25.00	Incoming
27/05/2022 09:30	26	26	18.38	28.00	Outgoing
27/05/2022 09:00	34	34	17.35	21.00	Incoming
27/05/2022 09:00	16	16	18.44	24.00	Outgoing
27/05/2022 08:30	37	37	18.51	24.00	Incoming
27/05/2022 08:30	25	25	18.32	23.00	Outgoing
27/05/2022 08:00	43	43	18.21	24.00	Incoming
27/05/2022 08:00	13	13	18.38	21.00	Outgoing
27/05/2022 07:30	39	39	18.36	24.00	Incoming
27/05/2022 07:30	41	41	18.49	23.00	Outgoing
27/05/2022 07:00	53	53	18.49	27.00	Incoming
27/05/2022 07:00	46	46	18.35	24.00	Outgoing
27/05/2022 06:30	82	82	19.41	32.00	Incoming
27/05/2022 06:30	54	54	19.22	28.00	Outgoing
27/05/2022 06:00	49	49	19.94	32.00	Incoming
27/05/2022 06:00	48	48	19.50	25.00	Outgoing
27/05/2022 05:30	37	37	19.00	24.00	Incoming
27/05/2022 05:30	32	32	19.62	25.00	Outgoing
27/05/2022 05:00	23	23	20.22	26.00	Incoming
27/05/2022 05:00	16	16	20.25	26.00	Outgoing
27/05/2022 04:30	14	14	20.93	25.00	Incoming
27/05/2022 04:30	7	7	19.00	25.00	Outgoing
27/05/2022 04:00	10	10	19.70	25.00	Incoming
27/05/2022 04:00	3	3	18.33	21.00	Outgoing
27/05/2022 03:30	2	2	22.00	28.00	Incoming
27/05/2022 03:30	1	1	19.00	19.00	Outgoing
27/05/2022 03:00	1	1	21.00	21.00	Incoming
27/05/2022 02:30	1	1	16.00	16.00	Outgoing
27/05/2022 02:30	3	3	19.67	24.00	Incoming
27/05/2022 02:00	1	1	20.00	20.00	Outgoing
27/05/2022 01:00	1	1	19.00	19.00	Incoming
27/05/2022 01:00	1	1	20.00	20.00	Outgoing
27/05/2022 00:30	1	1	18.00	18.00	Incoming
27/05/2022 00:00	1	1	22.00	22.00	Outgoing
26/05/2022 23:30	1	1	19.00	19.00	Incoming
26/05/2022 23:30	3	3	21.67	26.00	Outgoing
26/05/2022 23:00	1	1	23.00	23.00	Incoming
26/05/2022 23:00	2	2	20.50	21.00	Outgoing
26/05/2022 22:30	4	4	17.00	19.00	Incoming
26/05/2022 22:30	7	7	19.71	25.00	Outgoing
26/05/2022 22:00	6	6	23.17	27.00	Incoming
26/05/2022 22:00	4	4	20.50	22.00	Outgoing
26/05/2022 21:30	7	7	20.57	24.00	Incoming
26/05/2022 21:30	4	4	19.50	21.00	Outgoing
26/05/2022 21:00	13	13	19.77	25.00	Incoming
26/05/2022 21:00	16	16	19.69	25.00	Outgoing
26/05/2022 20:30	6	6	17.33	19.00	Incoming
26/05/2022 20:30	19	19	18.68	27.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
26/05/2022 20:00	26	26	20.27	33.00	Incoming
26/05/2022 20:00	11	11	18.64	24.00	Outgoing
26/05/2022 19:30	17	17	19.94	28.00	Incoming
26/05/2022 19:30	8	8	19.12	21.00	Outgoing
26/05/2022 19:00	23	23	19.91	35.00	Incoming
26/05/2022 19:00	15	15	18.40	25.00	Outgoing
26/05/2022 18:30	23	23	18.57	23.00	Incoming
26/05/2022 18:30	17	17	20.00	27.00	Outgoing
26/05/2022 18:00	32	32	19.66	44.00	Incoming
26/05/2022 18:00	22	22	18.55	23.00	Outgoing
26/05/2022 17:30	40	40	18.93	25.00	Incoming
26/05/2022 17:30	21	21	18.76	34.00	Outgoing
26/05/2022 17:00	42	42	18.57	27.00	Incoming
26/05/2022 17:00	35	35	18.80	23.00	Outgoing
26/05/2022 16:30	57	57	19.21	25.00	Incoming
26/05/2022 16:30	39	39	17.87	23.00	Outgoing
26/05/2022 16:00	39	39	18.64	25.00	Incoming
26/05/2022 16:00	29	29	18.76	24.00	Outgoing
26/05/2022 15:30	49	49	18.55	24.00	Incoming
26/05/2022 15:30	36	36	17.92	23.00	Outgoing
26/05/2022 15:00	46	46	18.48	25.00	Incoming
26/05/2022 15:00	21	21	18.67	22.00	Outgoing
26/05/2022 14:30	52	52	18.92	26.00	Incoming
26/05/2022 14:30	30	30	18.57	22.00	Outgoing
26/05/2022 14:00	58	58	18.33	25.00	Incoming
26/05/2022 14:00	23	23	18.57	27.00	Outgoing
26/05/2022 13:30	37	37	18.76	26.00	Incoming
26/05/2022 13:30	31	31	17.81	24.00	Outgoing
26/05/2022 13:00	25	25	17.48	21.00	Incoming
26/05/2022 13:00	27	27	17.26	22.00	Outgoing
26/05/2022 12:30	50	50	18.86	27.00	Incoming
26/05/2022 12:30	20	20	18.50	23.00	Outgoing
26/05/2022 12:00	39	39	17.64	23.00	Incoming
26/05/2022 12:00	27	27	18.26	22.00	Outgoing
26/05/2022 11:30	44	44	18.32	25.00	Incoming
26/05/2022 11:30	28	28	20.36	55.00	Outgoing
26/05/2022 11:00	13	13	18.85	22.00	Incoming
26/05/2022 11:00	27	27	18.04	22.00	Outgoing
26/05/2022 10:30	24	24	17.67	25.00	Incoming
26/05/2022 10:30	16	16	18.62	26.00	Outgoing
26/05/2022 10:00	38	38	18.95	25.00	Incoming
26/05/2022 10:00	17	17	17.94	21.00	Outgoing
26/05/2022 09:30	30	30	17.97	22.00	Incoming
26/05/2022 09:30	26	26	18.50	24.00	Outgoing
26/05/2022 09:00	41	41	17.90	25.00	Incoming
26/05/2022 09:00	23	23	18.65	25.00	Outgoing
26/05/2022 08:30	36	36	18.39	23.00	Incoming
26/05/2022 08:30	21	21	18.29	22.00	Outgoing
26/05/2022 08:00	41	41	19.39	27.00	Incoming
26/05/2022 08:00	34	34	18.65	25.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
26/05/2022 07:30	58	58	18.34	25.00	Incoming
26/05/2022 07:30	48	48	18.06	22.00	Outgoing
26/05/2022 07:00	55	55	18.65	25.00	Incoming
26/05/2022 07:00	37	37	18.00	23.00	Outgoing
26/05/2022 06:30	92	92	19.16	28.00	Incoming
26/05/2022 06:30	59	59	18.88	25.00	Outgoing
26/05/2022 06:00	67	67	19.72	29.00	Incoming
26/05/2022 06:00	37	37	19.11	25.00	Outgoing
26/05/2022 05:30	40	40	20.30	25.00	Incoming
26/05/2022 05:30	34	34	20.32	25.00	Outgoing
26/05/2022 05:00	26	26	21.38	28.00	Incoming
26/05/2022 05:00	23	23	20.74	25.00	Outgoing
26/05/2022 04:30	14	14	21.57	28.00	Incoming
26/05/2022 04:30	9	9	20.67	27.00	Outgoing
26/05/2022 04:00	7	7	18.57	22.00	Incoming
26/05/2022 04:00	4	4	19.75	24.00	Outgoing
26/05/2022 03:30	3	3	20.33	23.00	Incoming
26/05/2022 03:30	1	1	16.00	16.00	Outgoing
26/05/2022 03:00	1	1	22.00	22.00	Incoming
26/05/2022 02:30	2	2	20.00	21.00	Incoming
26/05/2022 02:00	1	1	23.00	23.00	Incoming
26/05/2022 01:00	1	1	24.00	24.00	Outgoing
26/05/2022 01:00	2	2	21.50	25.00	Incoming
26/05/2022 00:30	1	1	24.00	24.00	Incoming
26/05/2022 00:30	3	3	20.33	24.00	Outgoing
26/05/2022 00:00	2	2	20.00	22.00	Incoming
26/05/2022 00:00	4	4	21.25	26.00	Outgoing
25/05/2022 23:30	5	5	24.00	33.00	Incoming
25/05/2022 23:30	3	3	19.00	22.00	Outgoing
25/05/2022 23:00	2	2	23.50	25.00	Incoming
25/05/2022 23:00	4	4	22.25	23.00	Outgoing
25/05/2022 22:30	6	6	22.50	32.00	Incoming
25/05/2022 22:30	4	4	17.75	20.00	Outgoing
25/05/2022 22:00	4	4	18.75	20.00	Incoming
25/05/2022 22:00	2	2	17.00	18.00	Outgoing
25/05/2022 21:30	7	7	19.00	22.00	Incoming
25/05/2022 21:30	2	2	19.00	20.00	Outgoing
25/05/2022 21:00	8	8	19.75	28.00	Incoming
25/05/2022 21:00	8	8	19.00	21.00	Outgoing
25/05/2022 20:30	21	21	18.52	24.00	Incoming
25/05/2022 20:30	3	3	18.00	19.00	Outgoing
25/05/2022 20:00	16	16	18.56	24.00	Incoming
25/05/2022 20:00	9	9	18.56	20.00	Outgoing
25/05/2022 19:30	28	28	19.57	31.00	Incoming
25/05/2022 19:30	12	12	17.50	21.00	Outgoing
25/05/2022 19:00	23	23	18.87	23.00	Incoming
25/05/2022 19:00	17	17	18.82	23.00	Outgoing
25/05/2022 18:30	21	21	19.19	24.00	Incoming
25/05/2022 18:30	27	27	18.19	25.00	Outgoing
25/05/2022 18:00	35	35	18.91	27.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
25/05/2022 18:00	24	24	19.00	27.00	Outgoing
25/05/2022 17:30	39	39	19.85	34.00	Incoming
25/05/2022 17:30	26	26	19.08	23.00	Outgoing
25/05/2022 17:00	36	36	18.69	31.00	Incoming
25/05/2022 17:00	40	40	18.30	25.00	Outgoing
25/05/2022 16:30	58	58	18.53	25.00	Incoming
25/05/2022 16:30	38	38	18.97	25.00	Outgoing
25/05/2022 16:00	58	58	19.28	28.00	Incoming
25/05/2022 16:00	36	36	18.33	24.00	Outgoing
25/05/2022 15:30	53	53	18.15	24.00	Incoming
25/05/2022 15:30	37	37	18.59	25.00	Outgoing
25/05/2022 15:00	65	65	18.69	25.00	Incoming
25/05/2022 15:00	34	34	18.56	23.00	Outgoing
25/05/2022 14:30	72	72	18.39	25.00	Incoming
25/05/2022 14:30	31	31	18.94	26.00	Outgoing
25/05/2022 14:00	47	47	18.70	33.00	Incoming
25/05/2022 14:00	29	29	17.45	21.00	Outgoing
25/05/2022 13:30	47	47	18.94	24.00	Incoming
25/05/2022 13:30	28	28	17.71	22.00	Outgoing
25/05/2022 13:00	39	39	18.59	24.00	Incoming
25/05/2022 13:00	30	30	18.20	22.00	Outgoing
25/05/2022 12:30	40	40	19.07	24.00	Incoming
25/05/2022 12:30	25	25	18.16	24.00	Outgoing
25/05/2022 12:00	38	38	18.29	23.00	Incoming
25/05/2022 12:00	23	23	17.96	24.00	Outgoing
25/05/2022 11:30	19	19	19.16	26.00	Incoming
25/05/2022 11:30	15	15	17.87	23.00	Outgoing
25/05/2022 11:00	32	32	18.44	23.00	Incoming
25/05/2022 11:00	20	20	18.20	23.00	Outgoing
25/05/2022 10:30	25	25	18.80	27.00	Incoming
25/05/2022 10:30	16	16	18.25	22.00	Outgoing
25/05/2022 10:00	1	1	16.00	16.00	Incoming
25/05/2022 10:00	6	6	16.83	18.00	Outgoing
24/05/2022 08:30	23	23	19.04	25.00	Incoming
24/05/2022 08:30	10	10	17.40	20.00	Outgoing
24/05/2022 08:00	39	39	18.23	22.00	Incoming
24/05/2022 08:00	35	35	18.74	24.00	Outgoing
24/05/2022 07:30	35	35	17.91	28.00	Incoming
24/05/2022 07:30	41	41	18.22	22.00	Outgoing
24/05/2022 07:00	61	61	18.46	25.00	Incoming
24/05/2022 07:00	33	33	17.91	22.00	Outgoing
24/05/2022 06:30	75	75	18.48	25.00	Incoming
24/05/2022 06:30	58	58	18.69	31.00	Outgoing
24/05/2022 06:00	39	39	19.46	25.00	Incoming
24/05/2022 06:00	44	44	19.30	25.00	Outgoing
24/05/2022 05:30	37	37	20.70	32.00	Incoming
24/05/2022 05:30	37	37	20.51	29.00	Outgoing
24/05/2022 05:00	27	27	21.44	32.00	Incoming
24/05/2022 05:00	24	24	21.04	26.00	Outgoing
24/05/2022 04:30	17	17	20.29	27.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
24/05/2022 04:30	6	6	21.00	23.00	Outgoing
24/05/2022 04:00	10	10	21.90	27.00	Incoming
24/05/2022 03:30	1	1	18.00	18.00	Outgoing
24/05/2022 03:30	2	2	16.50	17.00	Incoming
24/05/2022 03:00	3	3	21.67	22.00	Incoming
24/05/2022 03:00	1	1	16.00	16.00	Outgoing
24/05/2022 02:30	1	1	19.00	19.00	Incoming
24/05/2022 02:30	2	2	18.50	21.00	Outgoing
24/05/2022 02:00	2	2	24.50	27.00	Incoming
24/05/2022 01:30	1	1	18.00	18.00	Incoming
24/05/2022 01:00	1	1	27.00	27.00	Incoming
24/05/2022 00:30	1	1	23.00	23.00	Outgoing
24/05/2022 00:30	2	2	20.50	25.00	Incoming
24/05/2022 00:00	2	2	19.50	23.00	Outgoing
23/05/2022 23:30	2	2	19.50	22.00	Incoming
23/05/2022 23:00	1	1	21.00	21.00	Outgoing
23/05/2022 23:00	3	3	18.00	19.00	Incoming
23/05/2022 22:30	2	2	19.00	21.00	Incoming
23/05/2022 22:30	2	2	21.50	24.00	Outgoing
23/05/2022 22:00	2	2	24.50	28.00	Incoming
23/05/2022 22:00	1	1	22.00	22.00	Outgoing
23/05/2022 21:30	5	5	19.20	21.00	Incoming
23/05/2022 21:30	7	7	18.57	21.00	Outgoing
23/05/2022 21:00	14	14	20.43	25.00	Incoming
23/05/2022 21:00	8	8	21.00	24.00	Outgoing
23/05/2022 20:30	12	12	18.92	22.00	Incoming
23/05/2022 20:30	5	5	19.80	23.00	Outgoing
23/05/2022 20:00	18	18	18.78	24.00	Incoming
23/05/2022 20:00	10	10	18.50	21.00	Outgoing
23/05/2022 19:30	22	22	19.05	26.00	Incoming
23/05/2022 19:30	14	14	19.21	25.00	Outgoing
23/05/2022 19:00	17	17	18.41	23.00	Incoming
23/05/2022 19:00	22	22	19.41	26.00	Outgoing
23/05/2022 18:30	28	28	19.54	37.00	Incoming
23/05/2022 18:30	21	21	19.00	25.00	Outgoing
23/05/2022 18:00	22	22	17.64	21.00	Incoming
23/05/2022 18:00	32	32	18.84	22.00	Outgoing
23/05/2022 17:30	39	39	18.59	25.00	Incoming
23/05/2022 17:30	37	37	18.32	25.00	Outgoing
23/05/2022 17:00	43	43	19.14	31.00	Incoming
23/05/2022 17:00	44	44	19.30	24.00	Outgoing
23/05/2022 16:30	40	40	18.32	25.00	Incoming
23/05/2022 16:30	35	35	18.43	24.00	Outgoing
23/05/2022 16:00	53	53	18.57	25.00	Incoming
23/05/2022 16:00	41	41	17.88	22.00	Outgoing
23/05/2022 15:30	57	57	18.32	31.00	Incoming
23/05/2022 15:30	21	21	18.95	25.00	Outgoing
23/05/2022 15:00	50	50	18.92	26.00	Incoming
23/05/2022 15:00	30	30	19.07	25.00	Outgoing
23/05/2022 14:30	38	38	18.50	35.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
23/05/2022 14:30	23	23	18.52	21.00	Outgoing
23/05/2022 14:00	43	43	19.05	26.00	Incoming
23/05/2022 14:00	24	24	18.33	22.00	Outgoing
23/05/2022 13:30	36	36	18.33	25.00	Incoming
23/05/2022 13:30	21	21	18.33	25.00	Outgoing
23/05/2022 13:00	36	36	18.53	27.00	Incoming
23/05/2022 13:00	28	28	17.96	27.00	Outgoing
23/05/2022 12:30	30	30	18.20	25.00	Incoming
23/05/2022 12:30	18	18	17.11	21.00	Outgoing
23/05/2022 12:00	34	34	18.18	31.00	Incoming
23/05/2022 12:00	15	15	18.53	25.00	Outgoing
23/05/2022 11:30	34	34	18.62	23.00	Incoming
23/05/2022 11:30	31	31	17.97	24.00	Outgoing
23/05/2022 11:00	32	32	18.88	25.00	Incoming
23/05/2022 11:00	27	27	17.67	21.00	Outgoing
23/05/2022 10:30	31	31	18.10	26.00	Incoming
23/05/2022 10:30	20	20	17.35	23.00	Outgoing
23/05/2022 10:00	35	35	17.94	23.00	Incoming
23/05/2022 10:00	13	13	18.31	27.00	Outgoing
23/05/2022 09:30	31	31	18.00	22.00	Incoming
23/05/2022 09:30	24	24	17.88	22.00	Outgoing
23/05/2022 09:00	22	22	18.00	22.00	Incoming
23/05/2022 09:00	28	28	17.86	23.00	Outgoing
23/05/2022 08:30	44	44	18.36	24.00	Incoming
23/05/2022 08:30	19	19	17.63	24.00	Outgoing
23/05/2022 08:00	31	31	18.52	25.00	Incoming
23/05/2022 08:00	36	36	18.08	26.00	Outgoing
23/05/2022 07:30	63	63	18.90	31.00	Incoming
23/05/2022 07:30	40	40	17.93	22.00	Outgoing
23/05/2022 07:00	52	52	18.23	25.00	Incoming
23/05/2022 07:00	28	28	17.79	25.00	Outgoing
23/05/2022 06:30	72	72	18.33	24.00	Incoming
23/05/2022 06:30	44	44	18.34	24.00	Outgoing
23/05/2022 06:00	67	67	19.22	27.00	Incoming
23/05/2022 06:00	51	51	18.69	27.00	Outgoing
23/05/2022 05:30	39	39	19.03	25.00	Incoming
23/05/2022 05:30	30	30	19.80	25.00	Outgoing
23/05/2022 05:00	32	32	19.50	27.00	Incoming
23/05/2022 05:00	21	21	19.81	24.00	Outgoing
23/05/2022 04:30	14	14	22.14	31.00	Incoming
23/05/2022 04:30	5	5	19.00	24.00	Outgoing
23/05/2022 04:00	7	7	19.71	21.00	Incoming
23/05/2022 04:00	3	3	22.00	24.00	Outgoing
23/05/2022 03:30	3	3	21.33	28.00	Incoming
23/05/2022 03:30	2	2	19.00	21.00	Outgoing
23/05/2022 03:00	4	4	21.00	22.00	Incoming
23/05/2022 03:00	1	1	17.00	17.00	Outgoing
23/05/2022 02:30	2	2	19.50	21.00	Incoming
23/05/2022 02:30	1	1	21.00	21.00	Outgoing
23/05/2022 02:00	1	1	22.00	22.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
23/05/2022 02:00	1	1	21.00	21.00	Outgoing
23/05/2022 00:30	1	1	19.00	19.00	Incoming
23/05/2022 00:30	1	1	19.00	19.00	Outgoing
23/05/2022 00:00	1	1	18.00	18.00	Incoming
23/05/2022 00:00	3	3	20.67	23.00	Outgoing
22/05/2022 23:30	2	2	23.50	27.00	Incoming
22/05/2022 23:30	4	4	22.75	28.00	Outgoing
22/05/2022 23:00	2	2	18.50	19.00	Incoming
22/05/2022 23:00	4	4	19.50	22.00	Outgoing
22/05/2022 22:30	4	4	21.50	32.00	Incoming
22/05/2022 22:30	6	6	19.67	24.00	Outgoing
22/05/2022 22:00	6	6	21.83	25.00	Incoming
22/05/2022 22:00	4	4	19.25	25.00	Outgoing
22/05/2022 21:30	6	6	20.67	26.00	Incoming
22/05/2022 21:30	6	6	19.83	24.00	Outgoing
22/05/2022 21:00	11	11	21.91	32.00	Incoming
22/05/2022 21:00	6	6	20.33	24.00	Outgoing
22/05/2022 20:30	7	7	20.43	28.00	Incoming
22/05/2022 20:30	8	8	19.00	22.00	Outgoing
22/05/2022 20:00	14	14	20.64	36.00	Incoming
22/05/2022 20:00	14	14	19.64	23.00	Outgoing
22/05/2022 19:30	12	12	20.08	25.00	Incoming
22/05/2022 19:30	17	17	19.53	24.00	Outgoing
22/05/2022 19:00	22	22	18.23	24.00	Incoming
22/05/2022 19:00	20	20	18.80	24.00	Outgoing
22/05/2022 18:30	23	23	19.00	23.00	Incoming
22/05/2022 18:30	18	18	19.61	27.00	Outgoing
22/05/2022 18:00	34	34	18.76	27.00	Incoming
22/05/2022 18:00	19	19	19.21	23.00	Outgoing
22/05/2022 17:30	27	27	18.48	22.00	Incoming
22/05/2022 17:30	29	29	18.10	34.00	Outgoing
22/05/2022 17:00	37	37	18.51	27.00	Incoming
22/05/2022 17:00	25	25	19.00	24.00	Outgoing
22/05/2022 16:30	45	45	18.18	27.00	Incoming
22/05/2022 16:30	29	29	17.69	22.00	Outgoing
22/05/2022 16:00	35	35	19.60	41.00	Incoming
22/05/2022 16:00	21	21	17.71	22.00	Outgoing
22/05/2022 15:30	30	30	18.63	23.00	Incoming
22/05/2022 15:30	26	26	19.38	26.00	Outgoing
22/05/2022 15:00	47	47	18.81	38.00	Incoming
22/05/2022 15:00	21	21	18.05	21.00	Outgoing
22/05/2022 14:30	35	35	18.06	24.00	Incoming
22/05/2022 14:30	26	26	17.88	22.00	Outgoing
22/05/2022 14:00	39	39	18.18	24.00	Incoming
22/05/2022 14:00	27	27	18.22	25.00	Outgoing
22/05/2022 13:30	36	36	19.03	27.00	Incoming
22/05/2022 13:30	22	22	18.27	21.00	Outgoing
22/05/2022 13:00	33	33	18.79	25.00	Incoming
22/05/2022 13:00	21	21	18.10	23.00	Outgoing
22/05/2022 12:30	30	30	19.87	34.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
22/05/2022 12:30	25	25	18.20	26.00	Outgoing
22/05/2022 12:00	38	38	19.53	28.00	Incoming
22/05/2022 12:00	21	21	17.95	23.00	Outgoing
22/05/2022 11:30	43	43	18.95	32.00	Incoming
22/05/2022 11:30	23	23	17.30	25.00	Outgoing
22/05/2022 11:00	31	31	18.61	27.00	Incoming
22/05/2022 11:00	29	29	18.28	25.00	Outgoing
22/05/2022 10:30	42	42	18.76	26.00	Incoming
22/05/2022 10:30	25	25	17.60	23.00	Outgoing
22/05/2022 10:00	41	41	18.61	25.00	Incoming
22/05/2022 10:00	24	24	18.58	22.00	Outgoing
22/05/2022 09:30	33	33	18.42	28.00	Incoming
22/05/2022 09:30	26	26	18.08	25.00	Outgoing
22/05/2022 09:00	39	39	18.18	25.00	Incoming
22/05/2022 09:00	26	26	18.46	25.00	Outgoing
22/05/2022 08:30	31	31	18.16	24.00	Incoming
22/05/2022 08:30	27	27	18.63	24.00	Outgoing
22/05/2022 08:00	28	28	18.29	25.00	Incoming
22/05/2022 08:00	33	33	18.39	22.00	Outgoing
22/05/2022 07:30	23	23	19.48	26.00	Incoming
22/05/2022 07:30	23	23	17.74	22.00	Outgoing
22/05/2022 07:00	18	18	19.22	24.00	Incoming
22/05/2022 07:00	19	19	19.63	27.00	Outgoing
22/05/2022 06:30	23	23	19.61	25.00	Incoming
22/05/2022 06:30	21	21	19.19	25.00	Outgoing
22/05/2022 06:00	15	15	20.13	28.00	Incoming
22/05/2022 06:00	8	8	20.62	26.00	Outgoing
22/05/2022 05:30	11	11	19.27	24.00	Incoming
22/05/2022 05:30	3	3	19.33	21.00	Outgoing
22/05/2022 05:00	8	8	18.88	22.00	Incoming
22/05/2022 05:00	2	2	20.50	23.00	Outgoing
22/05/2022 04:30	3	3	18.00	19.00	Incoming
22/05/2022 04:30	5	5	20.60	24.00	Outgoing
22/05/2022 04:00	3	3	20.00	21.00	Incoming
22/05/2022 04:00	1	1	24.00	24.00	Outgoing
22/05/2022 03:30	3	3	19.00	21.00	Outgoing
22/05/2022 03:00	6	6	21.00	25.00	Incoming
22/05/2022 03:00	3	3	20.00	23.00	Outgoing
22/05/2022 02:30	1	1	19.00	19.00	Outgoing
22/05/2022 02:00	1	1	17.00	17.00	Incoming
22/05/2022 02:00	2	2	25.50	33.00	Outgoing
22/05/2022 01:30	1	1	21.00	21.00	Incoming
22/05/2022 01:30	6	6	22.17	34.00	Outgoing
22/05/2022 01:00	1	1	19.00	19.00	Outgoing
22/05/2022 00:30	3	3	20.67	22.00	Incoming
22/05/2022 00:30	1	1	22.00	22.00	Outgoing
22/05/2022 00:00	2	2	26.00	28.00	Incoming
22/05/2022 00:00	3	3	21.67	26.00	Outgoing
21/05/2022 23:30	2	2	19.00	20.00	Incoming
21/05/2022 23:30	3	3	21.00	25.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
21/05/2022 23:00	2	2	18.50	19.00	Incoming
21/05/2022 23:00	5	5	18.40	20.00	Outgoing
21/05/2022 22:30	6	6	21.00	31.00	Incoming
21/05/2022 22:30	5	5	19.40	22.00	Outgoing
21/05/2022 22:00	6	6	18.17	25.00	Incoming
21/05/2022 22:00	7	7	18.43	22.00	Outgoing
21/05/2022 21:30	5	5	19.40	24.00	Incoming
21/05/2022 21:30	9	9	19.11	23.00	Outgoing
21/05/2022 21:00	5	5	18.80	21.00	Incoming
21/05/2022 21:00	9	9	19.89	25.00	Outgoing
21/05/2022 20:30	12	12	18.25	29.00	Incoming
21/05/2022 20:30	6	6	18.83	21.00	Outgoing
21/05/2022 20:00	16	16	24.31	42.00	Incoming
21/05/2022 20:00	19	19	19.16	26.00	Outgoing
21/05/2022 19:30	27	27	19.85	31.00	Incoming
21/05/2022 19:30	12	12	18.83	25.00	Outgoing
21/05/2022 19:00	25	25	18.92	29.00	Incoming
21/05/2022 19:00	21	21	18.67	24.00	Outgoing
21/05/2022 18:30	18	18	19.33	31.00	Incoming
21/05/2022 18:30	25	25	19.40	27.00	Outgoing
21/05/2022 18:00	32	32	18.44	25.00	Incoming
21/05/2022 18:00	18	18	19.17	26.00	Outgoing
21/05/2022 17:30	23	23	19.48	27.00	Incoming
21/05/2022 17:30	17	17	18.88	22.00	Outgoing
21/05/2022 17:00	24	24	18.71	25.00	Incoming
21/05/2022 17:00	34	34	18.47	23.00	Outgoing
21/05/2022 16:30	35	35	18.00	25.00	Incoming
21/05/2022 16:30	27	27	18.89	23.00	Outgoing
21/05/2022 16:00	32	32	18.28	22.00	Incoming
21/05/2022 16:00	28	28	18.04	21.00	Outgoing
21/05/2022 15:30	27	27	18.63	25.00	Incoming
21/05/2022 15:30	19	19	18.16	22.00	Outgoing
21/05/2022 15:00	31	31	18.52	27.00	Incoming
21/05/2022 15:00	12	12	17.17	19.00	Outgoing
21/05/2022 14:30	24	24	18.71	27.00	Incoming
21/05/2022 14:30	17	17	17.29	20.00	Outgoing
21/05/2022 14:00	33	33	18.58	25.00	Incoming
21/05/2022 14:00	15	15	18.33	22.00	Outgoing
21/05/2022 13:30	17	17	17.94	22.00	Incoming
21/05/2022 13:30	9	9	17.11	19.00	Outgoing
21/05/2022 13:00	31	31	17.84	21.00	Incoming
21/05/2022 13:00	16	16	17.69	23.00	Outgoing
21/05/2022 12:30	31	31	18.03	24.00	Incoming
21/05/2022 12:30	24	24	18.46	22.00	Outgoing
21/05/2022 12:00	23	23	20.04	34.00	Incoming
21/05/2022 12:00	11	11	17.45	21.00	Outgoing
21/05/2022 11:30	28	28	18.82	24.00	Incoming
21/05/2022 11:30	24	24	17.79	22.00	Outgoing
21/05/2022 11:00	22	22	18.05	24.00	Incoming
21/05/2022 11:00	23	23	17.30	21.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
21/05/2022 10:30	23	23	18.78	23.00	Incoming
21/05/2022 10:30	19	19	18.58	22.00	Outgoing
21/05/2022 10:00	22	22	18.09	23.00	Incoming
21/05/2022 10:00	27	27	17.93	21.00	Outgoing
21/05/2022 09:30	30	30	18.40	25.00	Incoming
21/05/2022 09:30	22	22	17.95	23.00	Outgoing
21/05/2022 09:00	34	34	18.18	24.00	Incoming
21/05/2022 09:00	23	23	18.04	22.00	Outgoing
21/05/2022 08:30	35	35	19.00	38.00	Incoming
21/05/2022 08:30	19	19	17.74	21.00	Outgoing
21/05/2022 08:00	43	43	18.58	26.00	Incoming
21/05/2022 08:00	25	25	17.88	26.00	Outgoing
21/05/2022 07:30	45	45	18.33	24.00	Incoming
21/05/2022 07:30	17	17	18.06	22.00	Outgoing
21/05/2022 07:00	39	39	18.46	22.00	Incoming
21/05/2022 07:00	16	16	19.31	22.00	Outgoing
21/05/2022 06:30	31	31	19.90	28.00	Incoming
21/05/2022 06:30	18	18	18.89	24.00	Outgoing
21/05/2022 06:00	16	16	19.56	31.00	Incoming
21/05/2022 06:00	10	10	20.70	26.00	Outgoing
21/05/2022 05:30	13	13	19.15	25.00	Incoming
21/05/2022 05:30	12	12	20.42	27.00	Outgoing
21/05/2022 05:00	14	14	21.43	32.00	Incoming
21/05/2022 05:00	6	6	20.83	24.00	Outgoing
21/05/2022 04:30	10	10	19.60	25.00	Incoming
21/05/2022 04:30	2	2	21.00	26.00	Outgoing
21/05/2022 04:00	2	2	23.50	24.00	Incoming
21/05/2022 04:00	3	3	19.00	22.00	Outgoing
21/05/2022 03:30	2	2	17.50	19.00	Incoming
21/05/2022 03:30	2	2	18.50	19.00	Outgoing
21/05/2022 03:00	3	3	20.00	24.00	Incoming
21/05/2022 03:00	2	2	17.00	18.00	Outgoing
21/05/2022 02:30	3	3	19.67	21.00	Incoming
21/05/2022 02:30	1	1	20.00	20.00	Outgoing
21/05/2022 01:30	2	2	18.50	21.00	Incoming
21/05/2022 01:30	1	1	25.00	25.00	Outgoing
21/05/2022 00:30	3	3	19.00	22.00	Incoming
21/05/2022 00:30	7	7	19.57	23.00	Outgoing
21/05/2022 00:00	2	2	20.00	24.00	Incoming
21/05/2022 00:00	3	3	21.67	28.00	Outgoing
20/05/2022 23:30	1	1	16.00	16.00	Outgoing
20/05/2022 23:00	7	7	21.71	31.00	Incoming
20/05/2022 23:00	6	6	18.00	21.00	Outgoing
20/05/2022 22:30	6	6	18.17	24.00	Incoming
20/05/2022 22:30	8	8	20.25	25.00	Outgoing
20/05/2022 22:00	14	14	19.71	31.00	Incoming
20/05/2022 22:00	6	6	19.00	22.00	Outgoing
20/05/2022 21:30	11	11	19.82	27.00	Incoming
20/05/2022 21:30	4	4	19.25	29.00	Outgoing
20/05/2022 21:00	14	14	19.71	32.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
20/05/2022 21:00	7	7	19.43	24.00	Outgoing
20/05/2022 20:30	13	13	18.46	25.00	Incoming
20/05/2022 20:30	8	8	19.75	22.00	Outgoing
20/05/2022 20:00	18	18	20.39	37.00	Incoming
20/05/2022 20:00	7	7	18.86	24.00	Outgoing
20/05/2022 19:30	10	10	19.20	25.00	Incoming
20/05/2022 19:30	11	11	19.00	22.00	Outgoing
20/05/2022 19:00	21	21	19.29	25.00	Incoming
20/05/2022 19:00	21	21	19.14	24.00	Outgoing
20/05/2022 18:30	31	31	18.84	24.00	Incoming
20/05/2022 18:30	24	24	18.42	22.00	Outgoing
20/05/2022 18:00	33	33	18.88	27.00	Incoming
20/05/2022 18:00	23	23	18.04	24.00	Outgoing
20/05/2022 17:30	18	18	18.22	23.00	Incoming
20/05/2022 17:30	33	33	18.21	22.00	Outgoing
20/05/2022 17:00	41	41	19.49	27.00	Incoming
20/05/2022 17:00	33	33	18.55	23.00	Outgoing
20/05/2022 16:30	46	46	18.46	28.00	Incoming
20/05/2022 16:30	30	30	18.40	24.00	Outgoing
20/05/2022 16:00	52	52	18.92	27.00	Incoming
20/05/2022 16:00	33	33	18.61	25.00	Outgoing
20/05/2022 15:30	47	47	17.85	22.00	Incoming
20/05/2022 15:30	38	38	18.34	24.00	Outgoing
20/05/2022 15:00	56	56	18.86	26.00	Incoming
20/05/2022 15:00	38	38	18.24	23.00	Outgoing
20/05/2022 14:30	52	52	18.17	28.00	Incoming
20/05/2022 14:30	32	32	18.09	24.00	Outgoing
20/05/2022 14:00	44	44	18.18	22.00	Incoming
20/05/2022 14:00	19	19	18.37	24.00	Outgoing
20/05/2022 13:30	38	38	17.89	26.00	Incoming
20/05/2022 13:30	33	33	17.79	23.00	Outgoing
20/05/2022 13:00	45	45	18.53	25.00	Incoming
20/05/2022 13:00	29	29	18.45	22.00	Outgoing
20/05/2022 12:30	44	44	18.11	24.00	Incoming
20/05/2022 12:30	19	19	17.63	21.00	Outgoing
20/05/2022 12:00	47	47	18.60	29.00	Incoming
20/05/2022 12:00	29	29	18.45	23.00	Outgoing
20/05/2022 11:30	29	29	18.97	22.00	Incoming
20/05/2022 11:30	30	30	18.23	24.00	Outgoing
20/05/2022 11:00	42	42	18.69	23.00	Incoming
20/05/2022 11:00	18	18	18.33	22.00	Outgoing
20/05/2022 10:30	39	39	19.03	25.00	Incoming
20/05/2022 10:30	23	23	17.57	21.00	Outgoing
20/05/2022 10:00	33	33	17.97	21.00	Incoming
20/05/2022 10:00	23	23	17.91	24.00	Outgoing
20/05/2022 09:30	25	25	18.80	24.00	Incoming
20/05/2022 09:30	13	13	16.62	19.00	Outgoing
20/05/2022 09:00	39	39	18.51	25.00	Incoming
20/05/2022 09:00	25	25	19.12	26.00	Outgoing
20/05/2022 08:30	45	45	18.60	23.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
20/05/2022 08:30	19	19	18.47	25.00	Outgoing
20/05/2022 08:00	43	43	18.65	24.00	Incoming
20/05/2022 08:00	31	31	17.65	21.00	Outgoing
20/05/2022 07:30	37	37	18.24	25.00	Incoming
20/05/2022 07:30	35	35	18.46	25.00	Outgoing
20/05/2022 07:00	56	56	18.54	24.00	Incoming
20/05/2022 07:00	57	57	18.49	25.00	Outgoing
20/05/2022 06:30	66	66	18.94	32.00	Incoming
20/05/2022 06:30	58	58	19.57	26.00	Outgoing
20/05/2022 06:00	55	55	19.33	29.00	Incoming
20/05/2022 06:00	47	47	19.49	24.00	Outgoing
20/05/2022 05:30	31	31	20.00	27.00	Incoming
20/05/2022 05:30	25	25	19.72	28.00	Outgoing
20/05/2022 05:00	32	32	19.47	26.00	Incoming
20/05/2022 05:00	18	18	19.39	25.00	Outgoing
20/05/2022 04:30	13	13	21.00	31.00	Incoming
20/05/2022 04:30	9	9	19.89	27.00	Outgoing
20/05/2022 04:00	9	9	19.44	24.00	Incoming
20/05/2022 04:00	5	5	23.00	26.00	Outgoing
20/05/2022 03:30	3	3	22.67	29.00	Incoming
20/05/2022 03:30	1	1	21.00	21.00	Outgoing
20/05/2022 03:00	1	1	19.00	19.00	Incoming
20/05/2022 03:00	1	1	22.00	22.00	Outgoing
20/05/2022 02:30	2	2	18.50	20.00	Incoming
20/05/2022 02:30	2	2	19.50	23.00	Outgoing
20/05/2022 02:00	1	1	28.00	28.00	Incoming
20/05/2022 02:00	1	1	27.00	27.00	Outgoing
20/05/2022 01:00	2	2	17.00	18.00	Incoming
20/05/2022 00:30	2	2	21.00	23.00	Outgoing
20/05/2022 00:30	3	3	18.00	21.00	Incoming
19/05/2022 23:30	3	3	22.00	31.00	Outgoing
19/05/2022 23:00	2	2	23.50	24.00	Incoming
19/05/2022 23:00	2	2	21.50	22.00	Outgoing
19/05/2022 22:30	5	5	24.00	31.00	Incoming
19/05/2022 22:30	4	4	20.50	24.00	Outgoing
19/05/2022 22:00	9	9	20.11	27.00	Incoming
19/05/2022 22:00	7	7	20.00	28.00	Outgoing
19/05/2022 21:30	9	9	19.11	22.00	Incoming
19/05/2022 21:30	5	5	18.80	22.00	Outgoing
19/05/2022 21:00	15	15	18.47	24.00	Incoming
19/05/2022 21:00	9	9	19.11	22.00	Outgoing
19/05/2022 20:30	10	10	18.90	24.00	Incoming
19/05/2022 20:30	9	9	17.44	20.00	Outgoing
19/05/2022 20:00	20	20	18.95	24.00	Incoming
19/05/2022 20:00	8	8	18.12	20.00	Outgoing
19/05/2022 19:30	20	20	19.60	26.00	Incoming
19/05/2022 19:30	13	13	18.69	20.00	Outgoing
19/05/2022 19:00	22	22	19.14	32.00	Incoming
19/05/2022 19:00	26	26	18.92	26.00	Outgoing
19/05/2022 18:30	24	24	19.92	31.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
19/05/2022 18:30	20	20	19.00	23.00	Outgoing
19/05/2022 18:00	27	27	18.30	23.00	Incoming
19/05/2022 18:00	14	14	18.93	23.00	Outgoing
19/05/2022 17:30	38	38	18.00	27.00	Incoming
19/05/2022 17:30	32	32	18.19	22.00	Outgoing
19/05/2022 17:00	59	59	18.86	31.00	Incoming
19/05/2022 17:00	35	35	18.20	24.00	Outgoing
19/05/2022 16:30	66	66	19.17	34.00	Incoming
19/05/2022 16:30	43	43	18.26	23.00	Outgoing
19/05/2022 16:00	74	74	18.66	32.00	Incoming
19/05/2022 16:00	34	34	18.09	22.00	Outgoing
19/05/2022 15:30	80	80	19.12	34.00	Incoming
19/05/2022 15:30	35	35	18.31	25.00	Outgoing
19/05/2022 15:00	47	47	18.77	26.00	Incoming
19/05/2022 15:00	32	32	18.69	25.00	Outgoing
19/05/2022 14:30	53	53	18.68	27.00	Incoming
19/05/2022 14:30	39	39	17.85	22.00	Outgoing
19/05/2022 14:00	56	56	18.27	24.00	Incoming
19/05/2022 14:00	19	19	17.42	24.00	Outgoing
19/05/2022 13:30	38	38	18.84	27.00	Incoming
19/05/2022 13:30	26	26	18.88	23.00	Outgoing
19/05/2022 13:00	37	37	19.27	25.00	Incoming
19/05/2022 13:00	23	23	18.35	22.00	Outgoing
19/05/2022 12:30	25	25	18.28	25.00	Incoming
19/05/2022 12:30	28	28	18.14	24.00	Outgoing
19/05/2022 12:00	33	33	18.24	22.00	Incoming
19/05/2022 12:00	19	19	17.84	21.00	Outgoing
19/05/2022 11:30	27	27	18.19	25.00	Incoming
19/05/2022 11:30	18	18	17.83	22.00	Outgoing
19/05/2022 11:00	34	34	17.82	28.00	Incoming
19/05/2022 11:00	18	18	17.33	21.00	Outgoing
19/05/2022 10:30	29	29	18.45	32.00	Incoming
19/05/2022 10:30	36	36	17.94	24.00	Outgoing
19/05/2022 10:00	40	40	18.73	25.00	Incoming
19/05/2022 10:00	27	27	18.81	24.00	Outgoing
19/05/2022 09:30	31	31	18.42	24.00	Incoming
19/05/2022 09:30	24	24	17.50	22.00	Outgoing
19/05/2022 09:00	28	28	17.61	22.00	Incoming
19/05/2022 09:00	19	19	18.53	24.00	Outgoing
19/05/2022 08:30	38	38	18.58	31.00	Incoming
19/05/2022 08:30	27	27	17.81	22.00	Outgoing
19/05/2022 08:00	39	39	19.03	25.00	Incoming
19/05/2022 08:00	31	31	17.90	23.00	Outgoing
19/05/2022 07:30	45	45	19.44	25.00	Incoming
19/05/2022 07:30	42	42	17.88	23.00	Outgoing
19/05/2022 07:00	61	61	18.67	24.00	Incoming
19/05/2022 07:00	66	66	18.80	25.00	Outgoing
19/05/2022 06:30	89	89	19.04	28.00	Incoming
19/05/2022 06:30	65	65	19.08	25.00	Outgoing
19/05/2022 06:00	56	56	18.91	25.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
19/05/2022 06:00	41	41	19.51	26.00	Outgoing
19/05/2022 05:30	29	29	19.93	25.00	Incoming
19/05/2022 05:30	28	28	19.25	27.00	Outgoing
19/05/2022 05:00	34	34	20.03	24.00	Incoming
19/05/2022 05:00	29	29	19.34	27.00	Outgoing
19/05/2022 04:30	21	21	21.67	28.00	Incoming
19/05/2022 04:30	8	8	19.62	24.00	Outgoing
19/05/2022 04:00	10	10	20.10	25.00	Incoming
19/05/2022 04:00	8	8	20.12	24.00	Outgoing
19/05/2022 03:30	3	3	26.00	31.00	Incoming
19/05/2022 03:00	1	1	16.00	16.00	Outgoing
19/05/2022 03:00	1	1	19.00	19.00	Incoming
19/05/2022 02:30	2	2	24.50	25.00	Incoming
19/05/2022 02:30	1	1	23.00	23.00	Outgoing
19/05/2022 01:00	4	4	21.00	23.00	Incoming
19/05/2022 01:00	1	1	26.00	26.00	Outgoing
19/05/2022 00:00	6	6	20.83	23.00	Incoming
18/05/2022 23:30	3	3	19.33	25.00	Outgoing
18/05/2022 23:00	1	1	18.00	18.00	Incoming
18/05/2022 23:00	2	2	16.00	16.00	Outgoing
18/05/2022 22:30	3	3	22.00	25.00	Incoming
18/05/2022 22:30	2	2	21.00	22.00	Outgoing
18/05/2022 22:00	5	5	20.20	27.00	Incoming
18/05/2022 22:00	2	2	19.00	19.00	Outgoing
18/05/2022 21:30	2	2	21.00	22.00	Incoming
18/05/2022 21:30	1	1	21.00	21.00	Outgoing
18/05/2022 21:00	8	8	18.38	22.00	Incoming
18/05/2022 21:00	5	5	18.20	19.00	Outgoing
18/05/2022 20:30	5	5	20.40	27.00	Incoming
18/05/2022 20:30	6	6	18.33	21.00	Outgoing
18/05/2022 20:00	20	20	20.35	25.00	Incoming
18/05/2022 20:00	9	9	18.11	22.00	Outgoing
18/05/2022 19:30	25	25	18.80	28.00	Incoming
18/05/2022 19:30	10	10	19.60	28.00	Outgoing
18/05/2022 19:00	11	11	17.82	22.00	Incoming
18/05/2022 19:00	19	19	18.63	22.00	Outgoing
18/05/2022 18:30	16	16	18.81	25.00	Incoming
18/05/2022 18:30	26	26	19.73	26.00	Outgoing
18/05/2022 18:00	23	23	19.52	24.00	Incoming
18/05/2022 18:00	26	26	18.46	24.00	Outgoing
18/05/2022 17:30	30	30	19.07	35.00	Incoming
18/05/2022 17:30	26	26	18.54	25.00	Outgoing
18/05/2022 17:00	36	36	19.03	27.00	Incoming
18/05/2022 17:00	32	32	19.06	25.00	Outgoing
18/05/2022 16:30	35	35	18.17	26.00	Incoming
18/05/2022 16:30	37	37	18.24	23.00	Outgoing
18/05/2022 16:00	56	56	18.64	27.00	Incoming
18/05/2022 16:00	36	36	18.67	25.00	Outgoing
18/05/2022 15:30	45	45	18.36	25.00	Incoming
18/05/2022 15:30	37	37	18.30	25.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
18/05/2022 15:00	41	41	18.51	25.00	Incoming
18/05/2022 15:00	38	38	19.50	24.00	Outgoing
18/05/2022 14:30	44	44	18.68	25.00	Incoming
18/05/2022 14:30	26	26	18.85	27.00	Outgoing
18/05/2022 14:00	37	37	18.24	23.00	Incoming
18/05/2022 14:00	25	25	18.08	22.00	Outgoing
18/05/2022 13:30	42	42	18.98	26.00	Incoming
18/05/2022 13:30	30	30	18.17	24.00	Outgoing
18/05/2022 13:00	31	31	18.32	26.00	Incoming
18/05/2022 13:00	21	21	17.76	21.00	Outgoing
18/05/2022 12:30	38	38	18.68	25.00	Incoming
18/05/2022 12:30	20	20	17.60	22.00	Outgoing
18/05/2022 12:00	30	30	18.50	24.00	Incoming
18/05/2022 12:00	24	24	18.54	24.00	Outgoing
18/05/2022 11:30	47	47	18.30	24.00	Incoming
18/05/2022 11:30	20	20	18.15	25.00	Outgoing
18/05/2022 11:00	29	29	18.86	26.00	Incoming
18/05/2022 11:00	12	12	17.08	20.00	Outgoing
18/05/2022 10:30	29	29	18.28	24.00	Incoming
18/05/2022 10:30	25	25	17.64	22.00	Outgoing
18/05/2022 10:00	34	34	18.38	24.00	Incoming
18/05/2022 10:00	22	22	18.36	21.00	Outgoing
18/05/2022 09:30	24	24	17.75	24.00	Incoming
18/05/2022 09:30	22	22	18.82	24.00	Outgoing
18/05/2022 09:00	30	30	18.73	27.00	Incoming
18/05/2022 09:00	14	14	17.57	19.00	Outgoing
18/05/2022 08:30	39	39	18.44	25.00	Incoming
18/05/2022 08:30	24	24	17.96	22.00	Outgoing
18/05/2022 08:00	39	39	18.18	22.00	Incoming
18/05/2022 08:00	23	23	18.09	22.00	Outgoing
18/05/2022 07:30	53	53	17.85	25.00	Incoming
18/05/2022 07:30	53	53	17.96	24.00	Outgoing
18/05/2022 07:00	56	56	18.86	26.00	Incoming
18/05/2022 07:00	59	59	18.31	24.00	Outgoing
18/05/2022 06:30	86	86	18.65	25.00	Incoming
18/05/2022 06:30	74	74	18.38	28.00	Outgoing
18/05/2022 06:00	66	66	19.09	26.00	Incoming
18/05/2022 06:00	44	44	19.11	27.00	Outgoing
18/05/2022 05:30	42	42	19.67	28.00	Incoming
18/05/2022 05:30	34	34	19.35	24.00	Outgoing
18/05/2022 05:00	26	26	19.81	26.00	Incoming
18/05/2022 05:00	19	19	20.84	28.00	Outgoing
18/05/2022 04:30	21	21	20.86	25.00	Incoming
18/05/2022 04:30	10	10	17.80	19.00	Outgoing
18/05/2022 04:00	10	10	20.40	32.00	Incoming
18/05/2022 04:00	7	7	20.86	29.00	Outgoing
18/05/2022 03:30	5	5	19.40	23.00	Incoming
18/05/2022 03:30	2	2	17.00	17.00	Outgoing
18/05/2022 03:00	3	3	24.33	31.00	Incoming
18/05/2022 03:00	1	1	21.00	21.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
18/05/2022 02:30	5	5	18.00	21.00	Incoming
18/05/2022 02:30	1	1	16.00	16.00	Outgoing
18/05/2022 02:00	1	1	17.00	17.00	Incoming
18/05/2022 01:00	1	1	18.00	18.00	Outgoing
18/05/2022 01:00	1	1	22.00	22.00	Incoming
18/05/2022 00:30	1	1	16.00	16.00	Incoming
18/05/2022 00:30	1	1	22.00	22.00	Outgoing
18/05/2022 00:00	1	1	24.00	24.00	Outgoing
17/05/2022 23:30	1	1	19.00	19.00	Incoming
17/05/2022 23:30	2	2	21.00	22.00	Outgoing
17/05/2022 23:00	2	2	17.50	19.00	Incoming
17/05/2022 23:00	4	4	19.00	23.00	Outgoing
17/05/2022 22:30	3	3	18.67	22.00	Incoming
17/05/2022 22:30	2	2	21.50	27.00	Outgoing
17/05/2022 22:00	2	2	23.00	25.00	Incoming
17/05/2022 22:00	5	5	19.00	24.00	Outgoing
17/05/2022 21:30	10	10	19.90	32.00	Incoming
17/05/2022 21:30	7	7	18.43	22.00	Outgoing
17/05/2022 21:00	15	15	19.20	23.00	Incoming
17/05/2022 21:00	9	9	19.00	24.00	Outgoing
17/05/2022 20:30	9	9	19.56	25.00	Incoming
17/05/2022 20:30	9	9	19.67	24.00	Outgoing
17/05/2022 20:00	18	18	19.22	24.00	Incoming
17/05/2022 20:00	7	7	17.71	22.00	Outgoing
17/05/2022 19:30	23	23	19.78	31.00	Incoming
17/05/2022 19:30	14	14	19.29	24.00	Outgoing
17/05/2022 19:00	16	16	19.31	32.00	Incoming
17/05/2022 19:00	23	23	18.43	22.00	Outgoing
17/05/2022 18:30	32	32	18.66	22.00	Incoming
17/05/2022 18:30	22	22	19.45	26.00	Outgoing
17/05/2022 18:00	39	39	19.54	33.00	Incoming
17/05/2022 18:00	21	21	18.86	27.00	Outgoing
17/05/2022 17:30	35	35	19.51	29.00	Incoming
17/05/2022 17:30	23	23	18.61	24.00	Outgoing
17/05/2022 17:00	41	41	18.90	32.00	Incoming
17/05/2022 17:00	36	36	17.81	22.00	Outgoing
17/05/2022 16:30	44	44	18.66	24.00	Incoming
17/05/2022 16:30	34	34	18.91	24.00	Outgoing
17/05/2022 16:00	58	58	18.71	37.00	Incoming
17/05/2022 16:00	33	33	18.12	23.00	Outgoing
17/05/2022 15:30	45	45	19.13	25.00	Incoming
17/05/2022 15:30	37	37	18.51	24.00	Outgoing
17/05/2022 15:00	56	56	18.62	28.00	Incoming
17/05/2022 15:00	38	38	18.61	24.00	Outgoing
17/05/2022 14:30	43	43	18.49	25.00	Incoming
17/05/2022 14:30	26	26	19.42	24.00	Outgoing
17/05/2022 14:00	47	47	19.15	35.00	Incoming
17/05/2022 14:00	17	17	18.76	29.00	Outgoing
17/05/2022 13:30	41	41	19.41	25.00	Incoming
17/05/2022 13:30	28	28	18.43	24.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
17/05/2022 13:00	34	34	18.06	23.00	Incoming
17/05/2022 13:00	23	23	17.74	23.00	Outgoing
17/05/2022 12:30	31	31	18.81	23.00	Incoming
17/05/2022 12:30	29	29	17.59	24.00	Outgoing
17/05/2022 12:00	36	36	18.53	24.00	Incoming
17/05/2022 12:00	26	26	18.08	24.00	Outgoing
17/05/2022 11:30	48	48	19.06	32.00	Incoming
17/05/2022 11:30	26	26	18.35	22.00	Outgoing
17/05/2022 11:00	29	29	19.00	34.00	Incoming
17/05/2022 11:00	21	21	17.90	22.00	Outgoing
17/05/2022 10:30	31	31	18.00	23.00	Incoming
17/05/2022 10:30	22	22	17.09	19.00	Outgoing
17/05/2022 10:00	25	25	18.16	24.00	Incoming
17/05/2022 10:00	19	19	18.42	27.00	Outgoing
17/05/2022 09:30	33	33	18.52	24.00	Incoming
17/05/2022 09:30	15	15	18.87	23.00	Outgoing
17/05/2022 09:00	29	29	18.28	25.00	Incoming
17/05/2022 09:00	24	24	18.79	25.00	Outgoing
17/05/2022 08:30	31	31	17.71	21.00	Incoming
17/05/2022 08:30	27	27	19.56	60.00	Outgoing
17/05/2022 08:00	54	54	18.11	25.00	Incoming
17/05/2022 08:00	29	29	18.07	22.00	Outgoing
17/05/2022 07:30	40	40	17.65	24.00	Incoming
17/05/2022 07:30	42	42	18.31	24.00	Outgoing
17/05/2022 07:00	58	58	17.64	22.00	Incoming
17/05/2022 07:00	44	44	18.14	25.00	Outgoing
17/05/2022 06:30	60	60	18.38	25.00	Incoming
17/05/2022 06:30	56	56	18.70	26.00	Outgoing
17/05/2022 06:00	65	65	19.98	28.00	Incoming
17/05/2022 06:00	42	42	19.76	28.00	Outgoing
17/05/2022 05:30	50	50	20.06	26.00	Incoming
17/05/2022 05:30	34	34	19.65	25.00	Outgoing
17/05/2022 05:00	25	25	19.36	28.00	Incoming
17/05/2022 05:00	26	26	21.19	27.00	Outgoing
17/05/2022 04:30	27	27	21.19	31.00	Incoming
17/05/2022 04:30	6	6	20.67	24.00	Outgoing
17/05/2022 04:00	7	7	22.57	29.00	Incoming
17/05/2022 04:00	5	5	18.00	21.00	Outgoing
17/05/2022 03:30	3	3	20.00	25.00	Incoming
17/05/2022 03:30	1	1	22.00	22.00	Outgoing
17/05/2022 03:00	2	2	20.00	24.00	Incoming
17/05/2022 03:00	1	1	16.00	16.00	Outgoing
17/05/2022 02:30	3	3	19.67	22.00	Incoming
17/05/2022 02:00	2	2	18.50	21.00	Outgoing
17/05/2022 01:30	3	3	20.33	25.00	Incoming
17/05/2022 01:30	1	1	20.00	20.00	Outgoing
17/05/2022 01:00	1	1	16.00	16.00	Incoming
17/05/2022 00:30	2	2	19.00	21.00	Incoming
16/05/2022 23:30	2	2	20.50	23.00	Outgoing
16/05/2022 23:30	1	1	20.00	20.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
16/05/2022 23:00	1	1	24.00	24.00	Incoming
16/05/2022 23:00	2	2	19.00	22.00	Outgoing
16/05/2022 22:30	2	2	20.50	21.00	Incoming
16/05/2022 22:30	3	3	22.33	29.00	Outgoing
16/05/2022 22:00	4	4	19.00	20.00	Incoming
16/05/2022 22:00	6	6	20.83	27.00	Outgoing
16/05/2022 21:30	7	7	19.86	28.00	Incoming
16/05/2022 21:30	9	9	19.78	25.00	Outgoing
16/05/2022 21:00	12	12	19.17	26.00	Incoming
16/05/2022 21:00	5	5	21.20	24.00	Outgoing
16/05/2022 20:30	16	16	19.88	27.00	Incoming
16/05/2022 20:30	8	8	20.25	27.00	Outgoing
16/05/2022 20:00	17	17	19.06	37.00	Incoming
16/05/2022 20:00	8	8	18.75	21.00	Outgoing
16/05/2022 19:30	11	11	19.91	22.00	Incoming
16/05/2022 19:30	12	12	18.92	24.00	Outgoing
16/05/2022 19:00	22	22	19.41	27.00	Incoming
16/05/2022 19:00	22	22	18.27	21.00	Outgoing
16/05/2022 18:30	24	24	19.17	25.00	Incoming
16/05/2022 18:30	15	15	18.20	23.00	Outgoing
16/05/2022 18:00	27	27	18.56	22.00	Incoming
16/05/2022 18:00	25	25	18.84	24.00	Outgoing
16/05/2022 17:30	26	26	19.00	25.00	Incoming
16/05/2022 17:30	22	22	18.45	23.00	Outgoing
16/05/2022 17:00	34	34	19.21	27.00	Incoming
16/05/2022 17:00	35	35	19.17	27.00	Outgoing
16/05/2022 16:30	51	51	19.20	29.00	Incoming
16/05/2022 16:30	31	31	18.55	24.00	Outgoing
16/05/2022 16:00	52	52	18.60	32.00	Incoming
16/05/2022 16:00	42	42	18.12	25.00	Outgoing
16/05/2022 15:30	51	51	18.94	29.00	Incoming
16/05/2022 15:30	30	30	18.23	22.00	Outgoing
16/05/2022 15:00	49	49	18.10	23.00	Incoming
16/05/2022 15:00	37	37	18.38	25.00	Outgoing
16/05/2022 14:30	45	45	18.42	25.00	Incoming
16/05/2022 14:30	27	27	18.81	24.00	Outgoing
16/05/2022 14:00	57	57	18.30	27.00	Incoming
16/05/2022 14:00	30	30	17.80	22.00	Outgoing
16/05/2022 13:30	37	37	19.35	31.00	Incoming
16/05/2022 13:30	28	28	18.07	23.00	Outgoing
16/05/2022 13:00	33	33	18.79	23.00	Incoming
16/05/2022 13:00	21	21	18.76	24.00	Outgoing
16/05/2022 12:30	16	16	18.12	22.00	Incoming
16/05/2022 12:30	6	6	17.67	21.00	Outgoing
10/05/2022 08:00	13	13	18.54	21.00	Incoming
10/05/2022 08:00	5	5	17.40	19.00	Outgoing
10/05/2022 07:30	48	48	18.81	25.00	Incoming
10/05/2022 07:30	54	54	17.61	25.00	Outgoing
10/05/2022 07:00	45	45	18.64	28.00	Incoming
10/05/2022 07:00	49	49	17.55	24.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
10/05/2022 06:30	89	89	19.19	28.00	Incoming
10/05/2022 06:30	62	62	18.27	24.00	Outgoing
10/05/2022 06:00	65	65	19.11	25.00	Incoming
10/05/2022 06:00	40	40	18.60	25.00	Outgoing
10/05/2022 05:30	36	36	20.08	27.00	Incoming
10/05/2022 05:30	38	38	19.11	28.00	Outgoing
10/05/2022 05:00	21	21	19.86	25.00	Incoming
10/05/2022 05:00	22	22	19.77	24.00	Outgoing
10/05/2022 04:30	16	16	19.31	28.00	Incoming
10/05/2022 04:30	7	7	19.14	22.00	Outgoing
10/05/2022 04:00	11	11	21.09	25.00	Incoming
10/05/2022 04:00	3	3	21.67	27.00	Outgoing
10/05/2022 03:30	3	3	19.33	21.00	Incoming
10/05/2022 03:30	1	1	23.00	23.00	Outgoing
10/05/2022 03:00	2	2	17.50	19.00	Incoming
10/05/2022 03:00	3	3	17.67	18.00	Outgoing
10/05/2022 02:30	2	2	17.50	19.00	Incoming
10/05/2022 02:30	1	1	21.00	21.00	Outgoing
10/05/2022 02:00	2	2	16.00	16.00	Incoming
10/05/2022 01:30	1	1	17.00	17.00	Incoming
10/05/2022 01:00	1	1	21.00	21.00	Outgoing
10/05/2022 00:30	1	1	24.00	24.00	Outgoing
10/05/2022 00:00	1	1	17.00	17.00	Outgoing
09/05/2022 23:30	3	3	20.00	22.00	Incoming
09/05/2022 23:30	1	1	19.00	19.00	Outgoing
09/05/2022 23:00	1	1	17.00	17.00	Incoming
09/05/2022 23:00	1	1	22.00	22.00	Outgoing
09/05/2022 22:30	4	4	22.75	32.00	Incoming
09/05/2022 22:30	4	4	19.75	25.00	Outgoing
09/05/2022 22:00	7	7	19.29	22.00	Incoming
09/05/2022 22:00	3	3	17.00	19.00	Outgoing
09/05/2022 21:30	6	6	19.00	21.00	Incoming
09/05/2022 21:30	6	6	18.67	21.00	Outgoing
09/05/2022 21:00	6	6	18.67	23.00	Incoming
09/05/2022 21:00	6	6	18.17	21.00	Outgoing
09/05/2022 20:30	9	9	20.67	27.00	Incoming
09/05/2022 20:30	12	12	18.50	24.00	Outgoing
09/05/2022 20:00	15	15	18.33	21.00	Incoming
09/05/2022 20:00	16	16	19.94	23.00	Outgoing
09/05/2022 19:30	18	18	19.83	27.00	Incoming
09/05/2022 19:30	15	15	18.07	24.00	Outgoing
09/05/2022 19:00	16	16	18.62	24.00	Incoming
09/05/2022 19:00	22	22	17.77	21.00	Outgoing
09/05/2022 18:30	27	27	21.19	37.00	Incoming
09/05/2022 18:30	26	26	18.54	24.00	Outgoing
09/05/2022 18:00	24	24	18.67	31.00	Incoming
09/05/2022 18:00	23	23	18.30	22.00	Outgoing
09/05/2022 17:30	33	33	18.24	24.00	Incoming
09/05/2022 17:30	32	32	18.72	22.00	Outgoing
09/05/2022 17:00	40	40	18.02	23.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
09/05/2022 17:00	30	30	18.23	23.00	Outgoing
09/05/2022 16:30	25	25	17.72	20.00	Incoming
09/05/2022 16:30	33	33	18.03	22.00	Outgoing
09/05/2022 16:00	70	70	18.26	37.00	Incoming
09/05/2022 16:00	34	34	18.38	23.00	Outgoing
09/05/2022 15:30	52	52	19.15	28.00	Incoming
09/05/2022 15:30	37	37	18.59	26.00	Outgoing
09/05/2022 15:00	56	56	18.16	28.00	Incoming
09/05/2022 15:00	37	37	18.35	24.00	Outgoing
09/05/2022 14:30	34	34	17.76	24.00	Incoming
09/05/2022 14:30	26	26	19.00	24.00	Outgoing
09/05/2022 14:00	43	43	18.14	23.00	Incoming
09/05/2022 14:00	26	26	18.00	24.00	Outgoing
09/05/2022 13:30	27	27	18.11	27.00	Incoming
09/05/2022 13:30	35	35	18.54	29.00	Outgoing
09/05/2022 13:00	28	28	18.18	23.00	Incoming
09/05/2022 13:00	29	29	17.69	25.00	Outgoing
09/05/2022 12:30	20	20	19.25	40.00	Incoming
09/05/2022 12:30	21	21	17.48	19.00	Outgoing
09/05/2022 12:00	29	29	18.45	26.00	Incoming
09/05/2022 12:00	25	25	17.08	21.00	Outgoing
09/05/2022 11:30	33	33	18.30	22.00	Incoming
09/05/2022 11:30	18	18	18.00	21.00	Outgoing
09/05/2022 11:00	20	20	17.75	24.00	Incoming
09/05/2022 11:00	15	15	17.93	25.00	Outgoing
09/05/2022 10:30	22	22	17.36	23.00	Incoming
09/05/2022 10:30	21	21	17.86	26.00	Outgoing
09/05/2022 10:00	8	8	18.50	24.00	Incoming
09/05/2022 10:00	10	10	16.90	20.00	Outgoing
09/05/2022 09:30	20	20	18.35	23.00	Incoming
09/05/2022 09:30	21	21	18.24	22.00	Outgoing
09/05/2022 09:00	12	12	20.83	31.00	Incoming
09/05/2022 09:00	13	13	17.54	21.00	Outgoing
09/05/2022 08:30	12	12	18.50	24.00	Incoming
09/05/2022 08:30	7	7	17.57	21.00	Outgoing
09/05/2022 08:00	6	6	16.67	18.00	Incoming
09/05/2022 08:00	6	6	18.17	19.00	Outgoing
09/05/2022 07:30	16	16	17.75	24.00	Incoming
09/05/2022 07:30	26	26	19.00	25.00	Outgoing
09/05/2022 07:00	46	46	18.30	28.00	Incoming
09/05/2022 07:00	35	35	17.46	22.00	Outgoing
09/05/2022 06:30	52	52	18.90	24.00	Incoming
09/05/2022 06:30	52	52	18.27	26.00	Outgoing
09/05/2022 06:00	61	61	19.25	25.00	Incoming
09/05/2022 06:00	46	46	18.87	27.00	Outgoing
09/05/2022 05:30	39	39	20.36	29.00	Incoming
09/05/2022 05:30	34	34	19.56	25.00	Outgoing
09/05/2022 05:00	29	29	20.28	33.00	Incoming
09/05/2022 05:00	24	24	19.62	24.00	Outgoing
09/05/2022 04:30	14	14	21.07	26.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
09/05/2022 04:30	5	5	19.80	22.00	Outgoing
09/05/2022 04:00	7	7	20.57	26.00	Incoming
09/05/2022 04:00	1	1	16.00	16.00	Outgoing
09/05/2022 03:30	1	1	25.00	25.00	Incoming
09/05/2022 03:30	3	3	19.33	22.00	Outgoing
09/05/2022 03:00	1	1	24.00	24.00	Incoming
09/05/2022 03:00	1	1	16.00	16.00	Outgoing
09/05/2022 02:30	5	5	19.60	21.00	Incoming
09/05/2022 02:30	1	1	18.00	18.00	Outgoing
09/05/2022 02:00	1	1	17.00	17.00	Incoming
09/05/2022 02:00	1	1	16.00	16.00	Outgoing
09/05/2022 01:30	2	2	28.00	35.00	Incoming
09/05/2022 01:00	2	2	18.50	19.00	Outgoing
09/05/2022 01:00	2	2	21.50	25.00	Incoming
09/05/2022 00:00	1	1	27.00	27.00	Incoming
09/05/2022 00:00	2	2	24.00	25.00	Outgoing
08/05/2022 23:30	1	1	20.00	20.00	Outgoing
08/05/2022 23:00	1	1	18.00	18.00	Incoming
08/05/2022 23:00	1	1	24.00	24.00	Outgoing
08/05/2022 22:30	2	2	20.00	23.00	Outgoing
08/05/2022 22:00	7	7	20.43	31.00	Incoming
08/05/2022 22:00	3	3	18.67	20.00	Outgoing
08/05/2022 21:30	3	3	17.33	20.00	Incoming
08/05/2022 21:30	7	7	18.86	21.00	Outgoing
08/05/2022 21:00	8	8	18.38	22.00	Incoming
08/05/2022 21:00	4	4	23.75	27.00	Outgoing
08/05/2022 20:30	12	12	20.00	25.00	Incoming
08/05/2022 20:30	10	10	19.10	24.00	Outgoing
08/05/2022 20:00	21	21	19.86	32.00	Incoming
08/05/2022 20:00	18	18	17.44	22.00	Outgoing
08/05/2022 19:30	17	17	18.82	25.00	Incoming
08/05/2022 19:30	24	24	18.17	22.00	Outgoing
08/05/2022 19:00	24	24	18.46	26.00	Incoming
08/05/2022 19:00	29	29	17.97	22.00	Outgoing
08/05/2022 18:30	28	28	19.29	29.00	Incoming
08/05/2022 18:30	27	27	18.70	22.00	Outgoing
08/05/2022 18:00	25	25	19.92	28.00	Incoming
08/05/2022 18:00	15	15	18.20	24.00	Outgoing
08/05/2022 17:30	24	24	18.92	37.00	Incoming
08/05/2022 17:30	23	23	18.35	31.00	Outgoing
08/05/2022 17:00	22	22	18.27	23.00	Incoming
08/05/2022 17:00	33	33	18.03	25.00	Outgoing
08/05/2022 16:30	27	27	18.19	25.00	Incoming
08/05/2022 16:30	26	26	17.58	21.00	Outgoing
08/05/2022 16:00	23	23	18.09	25.00	Incoming
08/05/2022 16:00	26	26	18.46	22.00	Outgoing
08/05/2022 15:30	32	32	18.31	29.00	Incoming
08/05/2022 15:30	25	25	18.76	25.00	Outgoing
08/05/2022 15:00	37	37	17.89	25.00	Incoming
08/05/2022 15:00	29	29	18.34	23.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
08/05/2022 14:30	36	36	18.36	29.00	Incoming
08/05/2022 14:30	25	25	18.32	23.00	Outgoing
08/05/2022 14:00	41	41	18.85	32.00	Incoming
08/05/2022 14:00	25	25	18.04	23.00	Outgoing
08/05/2022 13:30	36	36	17.97	24.00	Incoming
08/05/2022 13:30	29	29	17.79	24.00	Outgoing
08/05/2022 13:00	35	35	17.89	24.00	Incoming
08/05/2022 13:00	15	15	17.40	19.00	Outgoing
08/05/2022 12:30	42	42	18.10	23.00	Incoming
08/05/2022 12:30	19	19	17.58	21.00	Outgoing
08/05/2022 12:00	35	35	18.74	26.00	Incoming
08/05/2022 12:00	24	24	17.75	24.00	Outgoing
08/05/2022 11:30	41	41	18.34	32.00	Incoming
08/05/2022 11:30	19	19	17.63	21.00	Outgoing
08/05/2022 11:00	29	29	18.52	25.00	Incoming
08/05/2022 11:00	34	34	17.24	21.00	Outgoing
08/05/2022 10:30	41	41	18.59	28.00	Incoming
08/05/2022 10:30	34	34	17.74	23.00	Outgoing
08/05/2022 10:00	37	37	18.22	28.00	Incoming
08/05/2022 10:00	30	30	17.83	25.00	Outgoing
08/05/2022 09:30	54	54	18.04	23.00	Incoming
08/05/2022 09:30	24	24	17.92	22.00	Outgoing
08/05/2022 09:00	32	32	18.47	24.00	Incoming
08/05/2022 09:00	24	24	18.54	25.00	Outgoing
08/05/2022 08:30	32	32	18.81	29.00	Incoming
08/05/2022 08:30	27	27	18.19	24.00	Outgoing
08/05/2022 08:00	28	28	19.29	34.00	Incoming
08/05/2022 08:00	16	16	19.69	24.00	Outgoing
08/05/2022 07:30	25	25	20.08	28.00	Incoming
08/05/2022 07:30	29	29	18.21	24.00	Outgoing
08/05/2022 07:00	21	21	19.71	28.00	Incoming
08/05/2022 07:00	17	17	18.71	22.00	Outgoing
08/05/2022 06:30	23	23	19.57	24.00	Incoming
08/05/2022 06:30	11	11	20.18	23.00	Outgoing
08/05/2022 06:00	21	21	19.71	28.00	Incoming
08/05/2022 06:00	8	8	20.50	25.00	Outgoing
08/05/2022 05:30	7	7	19.86	24.00	Incoming
08/05/2022 05:30	5	5	19.20	22.00	Outgoing
08/05/2022 05:00	8	8	21.50	27.00	Incoming
08/05/2022 05:00	3	3	19.33	20.00	Outgoing
08/05/2022 04:30	4	4	22.25	24.00	Incoming
08/05/2022 04:00	1	1	22.00	22.00	Outgoing
08/05/2022 04:00	4	4	23.00	27.00	Incoming
08/05/2022 03:30	2	2	23.00	28.00	Incoming
08/05/2022 03:30	3	3	19.00	22.00	Outgoing
08/05/2022 03:00	2	2	20.00	22.00	Incoming
08/05/2022 03:00	2	2	17.50	19.00	Outgoing
08/05/2022 02:30	2	2	21.00	24.00	Incoming
08/05/2022 02:30	2	2	23.00	27.00	Outgoing
08/05/2022 02:00	3	3	20.33	21.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
08/05/2022 01:30	3	3	29.67	37.00	Incoming
08/05/2022 01:00	4	4	17.75	19.00	Outgoing
08/05/2022 01:00	1	1	20.00	20.00	Incoming
08/05/2022 00:30	3	3	21.67	27.00	Incoming
08/05/2022 00:30	1	1	19.00	19.00	Outgoing
08/05/2022 00:00	1	1	31.00	31.00	Incoming
08/05/2022 00:00	1	1	21.00	21.00	Outgoing
07/05/2022 23:30	9	9	19.00	22.00	Incoming
07/05/2022 23:30	4	4	17.75	19.00	Outgoing
07/05/2022 23:00	7	7	18.86	24.00	Incoming
07/05/2022 23:00	5	5	20.20	23.00	Outgoing
07/05/2022 22:30	11	11	22.00	36.00	Incoming
07/05/2022 22:30	8	8	20.00	22.00	Outgoing
07/05/2022 22:00	6	6	19.17	22.00	Incoming
07/05/2022 22:00	2	2	20.00	22.00	Outgoing
07/05/2022 21:30	7	7	19.43	24.00	Incoming
07/05/2022 21:30	9	9	18.67	25.00	Outgoing
07/05/2022 21:00	13	13	18.15	21.00	Incoming
07/05/2022 21:00	14	14	19.71	24.00	Outgoing
07/05/2022 20:30	20	20	20.05	32.00	Incoming
07/05/2022 20:30	6	6	20.33	25.00	Outgoing
07/05/2022 20:00	15	15	19.07	25.00	Incoming
07/05/2022 20:00	9	9	19.67	25.00	Outgoing
07/05/2022 19:30	11	11	19.73	24.00	Incoming
07/05/2022 19:30	20	20	18.50	23.00	Outgoing
07/05/2022 19:00	11	11	17.73	24.00	Incoming
07/05/2022 19:00	11	11	18.45	23.00	Outgoing
07/05/2022 18:30	27	27	18.70	35.00	Incoming
07/05/2022 18:30	26	26	19.04	25.00	Outgoing
07/05/2022 18:00	25	25	18.28	25.00	Incoming
07/05/2022 18:00	14	14	18.79	23.00	Outgoing
07/05/2022 17:30	15	15	18.80	22.00	Incoming
07/05/2022 17:30	23	23	18.48	28.00	Outgoing
07/05/2022 17:00	20	20	17.90	25.00	Incoming
07/05/2022 17:00	30	30	17.93	24.00	Outgoing
07/05/2022 16:30	24	24	18.21	25.00	Incoming
07/05/2022 16:30	24	24	17.67	21.00	Outgoing
07/05/2022 16:00	29	29	18.90	31.00	Incoming
07/05/2022 16:00	23	23	17.61	24.00	Outgoing
07/05/2022 15:30	33	33	18.42	25.00	Incoming
07/05/2022 15:30	29	29	18.66	22.00	Outgoing
07/05/2022 15:00	25	25	17.48	26.00	Incoming
07/05/2022 15:00	25	25	18.48	24.00	Outgoing
07/05/2022 14:30	39	39	18.44	23.00	Incoming
07/05/2022 14:30	24	24	17.83	22.00	Outgoing
07/05/2022 14:00	29	29	18.48	25.00	Incoming
07/05/2022 14:00	22	22	18.59	25.00	Outgoing
07/05/2022 13:30	25	25	19.24	31.00	Incoming
07/05/2022 13:30	27	27	18.70	25.00	Outgoing
07/05/2022 13:00	41	41	18.39	29.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
07/05/2022 13:00	22	22	18.41	23.00	Outgoing
07/05/2022 12:30	28	28	19.04	25.00	Incoming
07/05/2022 12:30	27	27	17.33	22.00	Outgoing
07/05/2022 12:00	30	30	18.07	28.00	Incoming
07/05/2022 12:00	25	25	17.88	26.00	Outgoing
07/05/2022 11:30	30	30	17.90	27.00	Incoming
07/05/2022 11:30	17	17	17.41	22.00	Outgoing
07/05/2022 11:00	12	12	17.92	22.00	Incoming
07/05/2022 11:00	6	6	16.83	19.00	Outgoing
07/05/2022 10:30	20	20	17.85	21.00	Incoming
07/05/2022 10:30	7	7	16.86	19.00	Outgoing
07/05/2022 10:00	26	26	18.23	24.00	Incoming
07/05/2022 10:00	30	30	17.73	21.00	Outgoing
07/05/2022 09:30	22	22	18.45	25.00	Incoming
07/05/2022 09:30	26	26	17.88	24.00	Outgoing
07/05/2022 09:00	22	22	18.73	24.00	Incoming
07/05/2022 09:00	10	10	17.30	21.00	Outgoing
07/05/2022 08:30	48	48	18.35	27.00	Incoming
07/05/2022 08:30	22	22	18.00	23.00	Outgoing
07/05/2022 08:00	29	29	18.59	28.00	Incoming
07/05/2022 08:00	35	35	18.63	24.00	Outgoing
07/05/2022 07:30	46	46	18.67	27.00	Incoming
07/05/2022 07:30	27	27	17.85	22.00	Outgoing
07/05/2022 07:00	31	31	18.87	28.00	Incoming
07/05/2022 07:00	24	24	17.79	21.00	Outgoing
07/05/2022 06:30	32	32	19.06	27.00	Incoming
07/05/2022 06:30	29	29	18.90	23.00	Outgoing
07/05/2022 06:00	19	19	19.89	27.00	Incoming
07/05/2022 06:00	15	15	18.67	25.00	Outgoing
07/05/2022 05:30	19	19	19.05	25.00	Incoming
07/05/2022 05:30	18	18	19.72	25.00	Outgoing
07/05/2022 05:00	19	19	19.79	29.00	Incoming
07/05/2022 05:00	5	5	19.40	25.00	Outgoing
07/05/2022 04:30	8	8	19.12	22.00	Incoming
07/05/2022 04:30	6	6	20.33	23.00	Outgoing
07/05/2022 04:00	7	7	19.43	25.00	Incoming
07/05/2022 04:00	2	2	19.50	22.00	Outgoing
07/05/2022 03:30	3	3	18.33	21.00	Incoming
07/05/2022 03:30	1	1	17.00	17.00	Outgoing
07/05/2022 03:00	4	4	20.25	25.00	Outgoing
07/05/2022 02:30	6	6	21.83	34.00	Incoming
07/05/2022 02:00	1	1	18.00	18.00	Incoming
07/05/2022 01:30	1	1	18.00	18.00	Outgoing
07/05/2022 01:00	1	1	17.00	17.00	Incoming
07/05/2022 01:00	1	1	19.00	19.00	Outgoing
07/05/2022 00:30	1	1	18.00	18.00	Outgoing
07/05/2022 00:00	3	3	21.00	23.00	Incoming
07/05/2022 00:00	1	1	22.00	22.00	Outgoing
06/05/2022 23:30	3	3	21.67	25.00	Incoming
06/05/2022 23:30	3	3	22.00	27.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
06/05/2022 23:00	3	3	20.67	22.00	Incoming
06/05/2022 23:00	4	4	18.50	20.00	Outgoing
06/05/2022 22:30	4	4	20.75	27.00	Incoming
06/05/2022 22:30	7	7	20.14	26.00	Outgoing
06/05/2022 22:00	8	8	19.25	24.00	Incoming
06/05/2022 22:00	5	5	19.00	23.00	Outgoing
06/05/2022 21:30	10	10	19.80	27.00	Incoming
06/05/2022 21:30	4	4	19.75	22.00	Outgoing
06/05/2022 21:00	8	8	19.50	24.00	Incoming
06/05/2022 21:00	6	6	18.67	21.00	Outgoing
06/05/2022 20:30	12	12	20.17	27.00	Incoming
06/05/2022 20:30	9	9	20.33	25.00	Outgoing
06/05/2022 20:00	9	9	17.67	20.00	Incoming
06/05/2022 20:00	9	9	19.33	32.00	Outgoing
06/05/2022 19:30	18	18	18.50	27.00	Incoming
06/05/2022 19:30	14	14	19.07	29.00	Outgoing
06/05/2022 19:00	19	19	18.47	27.00	Incoming
06/05/2022 19:00	15	15	17.87	22.00	Outgoing
06/05/2022 18:30	15	15	17.53	23.00	Incoming
06/05/2022 18:30	19	19	17.79	22.00	Outgoing
06/05/2022 18:00	15	15	19.20	25.00	Incoming
06/05/2022 18:00	28	28	17.75	24.00	Outgoing
06/05/2022 17:30	21	21	18.71	29.00	Incoming
06/05/2022 17:30	25	25	18.76	32.00	Outgoing
06/05/2022 17:00	31	31	17.87	27.00	Incoming
06/05/2022 17:00	29	29	17.52	24.00	Outgoing
06/05/2022 16:30	34	34	18.00	25.00	Incoming
06/05/2022 16:30	40	40	18.27	23.00	Outgoing
06/05/2022 16:00	36	36	18.69	27.00	Incoming
06/05/2022 16:00	48	48	18.27	25.00	Outgoing
06/05/2022 15:30	39	39	18.49	25.00	Incoming
06/05/2022 15:30	26	26	17.42	22.00	Outgoing
06/05/2022 15:00	52	52	18.31	25.00	Incoming
06/05/2022 15:00	24	24	17.54	21.00	Outgoing
06/05/2022 14:30	39	39	17.95	23.00	Incoming
06/05/2022 14:30	46	46	18.07	22.00	Outgoing
06/05/2022 14:00	40	40	17.65	24.00	Incoming
06/05/2022 14:00	27	27	18.48	25.00	Outgoing
06/05/2022 13:30	40	40	18.77	27.00	Incoming
06/05/2022 13:30	23	23	17.61	21.00	Outgoing
06/05/2022 13:00	32	32	18.06	24.00	Incoming
06/05/2022 13:00	27	27	18.37	25.00	Outgoing
06/05/2022 12:30	42	42	18.60	24.00	Incoming
06/05/2022 12:30	21	21	18.05	24.00	Outgoing
06/05/2022 12:00	44	44	18.55	24.00	Incoming
06/05/2022 12:00	22	22	17.23	19.00	Outgoing
06/05/2022 11:30	41	41	18.17	31.00	Incoming
06/05/2022 11:30	20	20	18.00	24.00	Outgoing
06/05/2022 11:00	18	18	18.11	25.00	Incoming
06/05/2022 11:00	11	11	19.73	29.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
28/04/2022 07:00	61	61	26.02	43.00	Incoming
28/04/2022 07:00	65	65	30.82	47.00	Outgoing
28/04/2022 06:30	156	156	26.27	44.00	Incoming
28/04/2022 06:30	198	198	30.08	46.00	Outgoing
28/04/2022 06:00	109	109	26.49	47.00	Incoming
28/04/2022 06:00	194	194	31.49	52.00	Outgoing
28/04/2022 05:30	76	76	27.91	44.00	Incoming
28/04/2022 05:30	156	156	32.96	49.00	Outgoing
28/04/2022 05:00	41	41	29.51	48.00	Incoming
28/04/2022 05:00	87	87	35.03	48.00	Outgoing
28/04/2022 04:30	19	19	28.79	38.00	Incoming
28/04/2022 04:30	57	57	36.19	59.00	Outgoing
28/04/2022 04:00	7	7	36.43	52.00	Incoming
28/04/2022 04:00	21	21	39.14	58.00	Outgoing
28/04/2022 03:30	5	5	32.40	52.00	Incoming
28/04/2022 03:30	15	15	33.13	41.00	Outgoing
28/04/2022 03:00	6	6	32.33	49.00	Incoming
28/04/2022 03:00	7	7	38.71	45.00	Outgoing
28/04/2022 02:30	1	1	22.00	22.00	Incoming
28/04/2022 02:30	3	3	29.67	34.00	Outgoing
28/04/2022 02:00	6	6	24.83	32.00	Incoming
28/04/2022 02:00	4	4	38.50	53.00	Outgoing
28/04/2022 01:30	6	6	28.17	40.00	Incoming
28/04/2022 01:30	1	1	46.00	46.00	Outgoing
28/04/2022 01:00	2	2	29.50	33.00	Incoming
28/04/2022 01:00	2	2	31.50	38.00	Outgoing
28/04/2022 00:30	3	3	36.33	38.00	Incoming
28/04/2022 00:00	3	3	26.33	31.00	Outgoing
28/04/2022 00:00	5	5	29.00	34.00	Incoming
27/04/2022 23:30	10	10	32.00	51.00	Incoming
27/04/2022 23:30	4	4	45.75	56.00	Outgoing
27/04/2022 23:00	10	10	30.60	40.00	Incoming
27/04/2022 23:00	5	5	38.20	47.00	Outgoing
27/04/2022 22:30	11	11	30.82	53.00	Incoming
27/04/2022 22:30	11	11	33.27	50.00	Outgoing
27/04/2022 22:00	10	10	31.00	41.00	Incoming
27/04/2022 22:00	9	9	30.44	38.00	Outgoing
27/04/2022 07:00	144	144	24.45	37.00	Incoming
27/04/2022 07:00	210	210	27.79	45.00	Outgoing
27/04/2022 06:30	154	154	26.62	48.00	Incoming
27/04/2022 06:30	212	212	29.87	53.00	Outgoing
27/04/2022 06:00	90	90	27.33	45.00	Incoming
27/04/2022 06:00	186	186	30.47	50.00	Outgoing
27/04/2022 05:30	78	78	27.35	45.00	Incoming
27/04/2022 05:30	168	168	33.13	52.00	Outgoing
27/04/2022 05:00	38	38	29.55	43.00	Incoming
27/04/2022 05:00	95	95	35.47	55.00	Outgoing
27/04/2022 04:30	18	18	29.11	52.00	Incoming
27/04/2022 04:30	69	69	34.55	63.00	Outgoing
27/04/2022 04:00	6	6	33.83	43.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
27/04/2022 04:00	19	19	37.21	51.00	Outgoing
27/04/2022 03:30	9	9	28.89	46.00	Incoming
27/04/2022 03:30	13	13	34.38	46.00	Outgoing
27/04/2022 03:00	2	2	41.50	49.00	Incoming
27/04/2022 03:00	5	5	37.20	39.00	Outgoing
27/04/2022 02:30	4	4	26.25	28.00	Incoming
27/04/2022 02:30	7	7	30.57	50.00	Outgoing
27/04/2022 02:00	4	4	26.75	38.00	Incoming
27/04/2022 02:00	3	3	32.33	40.00	Outgoing
27/04/2022 01:30	2	2	33.00	44.00	Incoming
27/04/2022 01:30	3	3	29.67	35.00	Outgoing
27/04/2022 01:00	6	6	32.00	46.00	Incoming
27/04/2022 01:00	1	1	41.00	41.00	Outgoing
27/04/2022 00:30	1	1	31.00	31.00	Incoming
27/04/2022 00:30	4	4	23.75	27.00	Outgoing
27/04/2022 00:00	8	8	24.75	37.00	Incoming
26/04/2022 23:30	3	3	33.33	44.00	Outgoing
26/04/2022 23:30	7	7	37.14	50.00	Incoming
26/04/2022 23:00	6	6	34.17	46.00	Incoming
26/04/2022 23:00	4	4	38.50	48.00	Outgoing
26/04/2022 22:30	6	6	31.67	37.00	Incoming
26/04/2022 22:30	8	8	26.00	32.00	Outgoing
26/04/2022 22:00	18	18	27.89	42.00	Incoming
26/04/2022 22:00	18	18	29.00	41.00	Outgoing
26/04/2022 21:30	7	7	34.00	44.00	Incoming
26/04/2022 21:30	10	10	31.20	49.00	Outgoing
26/04/2022 13:00	5	5	26.20	31.00	Incoming
26/04/2022 13:00	1	1	31.00	31.00	Outgoing
26/04/2022 12:30	151	151	24.76	37.00	Incoming
26/04/2022 12:30	128	128	29.68	53.00	Outgoing
26/04/2022 12:00	142	142	25.29	40.00	Incoming
26/04/2022 12:00	116	116	28.71	46.00	Outgoing
26/04/2022 11:30	135	135	24.97	37.00	Incoming
26/04/2022 11:30	130	130	29.95	89.00	Outgoing
26/04/2022 11:00	125	125	26.50	44.00	Incoming
26/04/2022 11:00	127	127	30.68	54.00	Outgoing
26/04/2022 10:30	155	155	26.05	40.00	Incoming
26/04/2022 10:30	117	117	30.67	49.00	Outgoing
26/04/2022 10:00	136	136	26.71	44.00	Incoming
26/04/2022 10:00	123	123	30.48	52.00	Outgoing
26/04/2022 09:30	136	136	26.40	44.00	Incoming
26/04/2022 09:30	150	150	29.48	47.00	Outgoing
26/04/2022 09:00	135	135	24.89	38.00	Incoming
26/04/2022 09:00	145	145	27.61	45.00	Outgoing
26/04/2022 08:30	129	129	25.95	43.00	Incoming
26/04/2022 08:30	132	132	30.56	93.00	Outgoing
26/04/2022 08:00	125	125	26.39	44.00	Incoming
26/04/2022 08:00	150	150	29.40	46.00	Outgoing
26/04/2022 07:30	158	158	25.93	42.00	Incoming
26/04/2022 07:30	173	173	28.64	91.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
26/04/2022 07:00	142	142	25.55	54.00	Incoming
26/04/2022 07:00	211	211	29.57	42.00	Outgoing
26/04/2022 06:30	123	123	26.04	40.00	Incoming
26/04/2022 06:30	185	185	29.83	46.00	Outgoing
26/04/2022 06:00	100	100	27.01	54.00	Incoming
26/04/2022 06:00	196	196	31.29	99.00	Outgoing
26/04/2022 05:30	71	71	28.27	58.00	Incoming
26/04/2022 05:30	149	149	33.13	57.00	Outgoing
26/04/2022 05:00	30	30	28.63	63.00	Incoming
26/04/2022 05:00	92	92	34.88	57.00	Outgoing
26/04/2022 04:30	12	12	28.42	43.00	Incoming
26/04/2022 04:30	58	58	33.84	54.00	Outgoing
26/04/2022 04:00	3	3	38.33	64.00	Incoming
26/04/2022 04:00	18	18	37.56	57.00	Outgoing
26/04/2022 03:30	5	5	30.80	43.00	Incoming
26/04/2022 03:30	14	14	35.71	50.00	Outgoing
26/04/2022 03:00	4	4	38.25	47.00	Incoming
26/04/2022 03:00	5	5	36.60	43.00	Outgoing
26/04/2022 02:30	2	2	29.00	34.00	Incoming
26/04/2022 02:30	6	6	28.50	38.00	Outgoing
26/04/2022 02:00	9	9	35.22	62.00	Incoming
26/04/2022 02:00	1	1	40.00	40.00	Outgoing
26/04/2022 01:30	5	5	24.00	26.00	Incoming
26/04/2022 01:30	5	5	30.20	47.00	Outgoing
26/04/2022 01:00	3	3	26.67	31.00	Incoming
26/04/2022 01:00	2	2	32.00	35.00	Outgoing
26/04/2022 00:30	4	4	26.75	29.00	Incoming
26/04/2022 00:30	1	1	22.00	22.00	Outgoing
26/04/2022 00:00	12	12	26.83	38.00	Incoming
26/04/2022 00:00	3	3	27.00	32.00	Outgoing
25/04/2022 23:30	4	4	23.75	26.00	Incoming
25/04/2022 23:30	4	4	37.75	51.00	Outgoing
25/04/2022 23:00	5	5	32.00	57.00	Incoming
25/04/2022 23:00	4	4	27.25	32.00	Outgoing
25/04/2022 22:30	9	9	30.33	46.00	Incoming
25/04/2022 22:30	1	1	22.00	22.00	Outgoing
25/04/2022 22:00	13	13	24.46	29.00	Incoming
25/04/2022 22:00	11	11	28.91	34.00	Outgoing
25/04/2022 21:30	22	22	28.77	39.00	Incoming
25/04/2022 21:30	14	14	27.64	39.00	Outgoing
25/04/2022 21:00	25	25	27.52	40.00	Incoming
25/04/2022 21:00	19	19	29.63	46.00	Outgoing
25/04/2022 20:30	39	39	28.87	46.00	Incoming
25/04/2022 20:30	31	31	32.39	53.00	Outgoing
25/04/2022 20:00	36	36	26.89	52.00	Incoming
25/04/2022 20:00	27	27	29.89	50.00	Outgoing
25/04/2022 10:00	15	15	25.53	39.00	Incoming
25/04/2022 10:00	16	16	31.06	50.00	Outgoing
25/04/2022 09:30	1	1	22.00	22.00	Incoming
25/04/2022 09:30	8	8	31.88	43.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
25/04/2022 09:00	36	36	27.28	46.00	Incoming
25/04/2022 09:00	68	68	30.66	46.00	Outgoing
25/04/2022 08:30	41	41	25.51	43.00	Incoming
25/04/2022 08:30	43	43	30.00	43.00	Outgoing
25/04/2022 08:00	82	82	25.72	43.00	Incoming
25/04/2022 08:00	102	102	29.88	43.00	Outgoing
25/04/2022 07:30	138	138	25.33	38.00	Incoming
25/04/2022 07:30	152	152	29.87	48.00	Outgoing
25/04/2022 07:00	152	152	24.11	39.00	Incoming
25/04/2022 07:00	198	198	29.50	51.00	Outgoing
25/04/2022 06:30	109	109	25.43	38.00	Incoming
25/04/2022 06:30	182	182	29.77	58.00	Outgoing
25/04/2022 06:00	113	113	27.28	47.00	Incoming
25/04/2022 06:00	185	185	32.38	52.00	Outgoing
25/04/2022 05:30	69	69	28.41	53.00	Incoming
25/04/2022 05:30	148	148	34.49	55.00	Outgoing
25/04/2022 05:00	28	28	31.61	53.00	Incoming
25/04/2022 05:00	114	114	33.62	52.00	Outgoing
25/04/2022 04:30	15	15	30.53	45.00	Incoming
25/04/2022 04:30	68	68	31.21	47.00	Outgoing
25/04/2022 04:00	1	1	16.00	16.00	Incoming
25/04/2022 04:00	34	34	33.24	48.00	Outgoing
25/04/2022 03:30	6	6	31.33	54.00	Incoming
25/04/2022 03:30	19	19	34.95	50.00	Outgoing
25/04/2022 03:00	6	6	32.83	44.00	Incoming
25/04/2022 03:00	11	11	27.73	41.00	Outgoing
25/04/2022 02:30	2	2	31.00	39.00	Incoming
25/04/2022 02:30	6	6	31.83	41.00	Outgoing
25/04/2022 02:00	4	4	28.00	34.00	Incoming
25/04/2022 02:00	6	6	34.50	55.00	Outgoing
25/04/2022 01:30	8	8	25.25	33.00	Incoming
25/04/2022 01:30	2	2	29.50	31.00	Outgoing
25/04/2022 01:00	4	4	27.75	32.00	Incoming
25/04/2022 01:00	3	3	38.00	44.00	Outgoing
25/04/2022 00:30	3	3	32.67	52.00	Incoming
25/04/2022 00:30	4	4	29.25	42.00	Outgoing
25/04/2022 00:00	6	6	28.17	38.00	Incoming
25/04/2022 00:00	3	3	26.33	28.00	Outgoing
24/04/2022 23:30	2	2	38.00	52.00	Incoming
24/04/2022 23:30	3	3	29.67	34.00	Outgoing
24/04/2022 23:00	5	5	26.80	38.00	Incoming
24/04/2022 23:00	8	8	39.38	56.00	Outgoing
24/04/2022 22:30	13	13	31.15	42.00	Incoming
24/04/2022 22:30	10	10	28.30	47.00	Outgoing
24/04/2022 22:00	13	13	25.54	29.00	Incoming
24/04/2022 22:00	17	17	25.59	32.00	Outgoing
24/04/2022 21:30	14	14	29.64	42.00	Incoming
24/04/2022 21:30	12	12	28.67	51.00	Outgoing
24/04/2022 21:00	28	28	28.25	47.00	Incoming
24/04/2022 21:00	12	12	29.33	38.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
24/04/2022 12:00	38	38	26.42	37.00	Incoming
24/04/2022 12:00	24	24	32.88	50.00	Outgoing
24/04/2022 11:30	100	100	25.10	40.00	Incoming
24/04/2022 11:30	93	93	27.59	40.00	Outgoing
24/04/2022 11:00	78	78	25.65	42.00	Incoming
24/04/2022 11:00	78	78	30.50	45.00	Outgoing
24/04/2022 10:30	119	119	26.32	45.00	Incoming
24/04/2022 10:30	116	116	31.26	50.00	Outgoing
24/04/2022 10:00	100	100	26.32	43.00	Incoming
24/04/2022 10:00	123	123	31.15	52.00	Outgoing
24/04/2022 09:30	100	100	27.63	43.00	Incoming
24/04/2022 09:30	102	102	29.29	50.00	Outgoing
24/04/2022 09:00	97	97	26.26	40.00	Incoming
24/04/2022 09:00	107	107	30.43	49.00	Outgoing
24/04/2022 08:30	102	102	26.91	43.00	Incoming
24/04/2022 08:30	99	99	31.16	49.00	Outgoing
24/04/2022 08:00	89	89	26.51	41.00	Incoming
24/04/2022 08:00	88	88	30.67	59.00	Outgoing
24/04/2022 07:30	54	54	28.17	45.00	Incoming
24/04/2022 07:30	70	70	33.53	52.00	Outgoing
24/04/2022 07:00	58	58	28.41	49.00	Incoming
24/04/2022 07:00	44	44	33.73	66.00	Outgoing
24/04/2022 06:30	57	57	28.40	43.00	Incoming
24/04/2022 06:30	42	42	32.60	50.00	Outgoing
24/04/2022 06:00	18	18	29.33	46.00	Incoming
24/04/2022 06:00	36	36	36.83	60.00	Outgoing
24/04/2022 05:30	10	10	29.80	47.00	Incoming
24/04/2022 05:30	42	42	35.10	56.00	Outgoing
24/04/2022 05:00	7	7	33.43	41.00	Incoming
24/04/2022 05:00	13	13	35.46	55.00	Outgoing
24/04/2022 04:30	3	3	38.33	52.00	Incoming
24/04/2022 04:30	9	9	31.78	40.00	Outgoing
24/04/2022 04:00	5	5	25.80	31.00	Incoming
24/04/2022 04:00	10	10	30.60	44.00	Outgoing
24/04/2022 03:30	3	3	24.00	24.00	Incoming
24/04/2022 03:30	8	8	34.38	48.00	Outgoing
24/04/2022 03:00	1	1	46.00	46.00	Incoming
24/04/2022 03:00	3	3	27.33	32.00	Outgoing
24/04/2022 02:30	2	2	25.00	25.00	Incoming
24/04/2022 02:30	4	4	32.00	37.00	Outgoing
24/04/2022 02:00	9	9	29.00	39.00	Incoming
24/04/2022 02:00	4	4	45.00	49.00	Outgoing
24/04/2022 01:30	4	4	25.50	28.00	Incoming
24/04/2022 01:30	3	3	35.33	39.00	Outgoing
24/04/2022 01:00	6	6	32.00	50.00	Incoming
24/04/2022 01:00	4	4	32.50	41.00	Outgoing
24/04/2022 00:30	8	8	27.38	43.00	Incoming
24/04/2022 00:30	2	2	41.00	55.00	Outgoing
24/04/2022 00:00	10	10	29.50	50.00	Incoming
24/04/2022 00:00	9	9	32.78	41.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
23/04/2022 23:30	19	19	28.53	52.00	Incoming
23/04/2022 23:30	10	10	27.80	47.00	Outgoing
23/04/2022 23:00	16	16	27.94	48.00	Incoming
23/04/2022 23:00	9	9	27.89	34.00	Outgoing
23/04/2022 22:30	22	22	27.41	43.00	Incoming
23/04/2022 22:30	8	8	33.75	46.00	Outgoing
23/04/2022 22:00	17	17	30.06	46.00	Incoming
23/04/2022 22:00	15	15	34.07	49.00	Outgoing
23/04/2022 21:30	30	30	28.20	52.00	Incoming
23/04/2022 21:30	22	22	32.00	42.00	Outgoing
23/04/2022 21:00	32	32	29.22	41.00	Incoming
23/04/2022 21:00	29	29	29.83	44.00	Outgoing
23/04/2022 20:30	36	36	27.03	43.00	Incoming
23/04/2022 20:30	19	19	28.74	38.00	Outgoing
23/04/2022 20:00	45	45	27.93	54.00	Incoming
23/04/2022 20:00	31	31	27.32	37.00	Outgoing
23/04/2022 19:30	58	58	28.84	47.00	Incoming
23/04/2022 19:30	39	39	28.92	43.00	Outgoing
23/04/2022 19:00	56	56	27.23	44.00	Incoming
23/04/2022 19:00	88	88	31.93	51.00	Outgoing
23/04/2022 18:30	65	65	27.95	44.00	Incoming
23/04/2022 18:30	66	66	31.73	51.00	Outgoing
23/04/2022 18:00	94	94	26.96	43.00	Incoming
23/04/2022 18:00	88	88	30.99	52.00	Outgoing
23/04/2022 17:30	99	99	26.66	41.00	Incoming
23/04/2022 17:30	106	106	30.29	49.00	Outgoing
23/04/2022 17:00	118	118	27.87	50.00	Incoming
23/04/2022 17:00	114	114	30.28	48.00	Outgoing
23/04/2022 16:30	126	126	27.44	47.00	Incoming
23/04/2022 16:30	131	131	30.63	96.00	Outgoing
23/04/2022 16:00	116	116	26.25	43.00	Incoming
23/04/2022 16:00	137	137	30.45	50.00	Outgoing
23/04/2022 15:30	114	114	25.12	42.00	Incoming
23/04/2022 15:30	132	132	32.72	80.00	Outgoing
23/04/2022 15:00	135	135	25.49	38.00	Incoming
23/04/2022 15:00	129	129	29.76	46.00	Outgoing
23/04/2022 14:30	151	151	25.37	40.00	Incoming
23/04/2022 14:30	122	122	30.30	52.00	Outgoing
23/04/2022 14:00	138	138	26.19	46.00	Incoming
23/04/2022 14:00	154	154	30.94	51.00	Outgoing
23/04/2022 13:30	150	150	26.17	44.00	Incoming
23/04/2022 13:30	140	140	29.81	52.00	Outgoing
23/04/2022 13:00	144	144	26.06	41.00	Incoming
23/04/2022 13:00	151	151	29.95	50.00	Outgoing
23/04/2022 12:30	154	154	25.81	43.00	Incoming
23/04/2022 12:30	139	139	30.32	43.00	Outgoing
23/04/2022 12:00	170	170	25.86	44.00	Incoming
23/04/2022 12:00	152	152	29.94	44.00	Outgoing
23/04/2022 11:30	185	185	25.77	48.00	Incoming
23/04/2022 11:30	153	153	29.24	49.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
23/04/2022 11:00	194	194	26.05	43.00	Incoming
23/04/2022 11:00	154	154	30.31	49.00	Outgoing
23/04/2022 10:30	166	166	24.72	38.00	Incoming
23/04/2022 10:30	160	160	29.99	57.00	Outgoing
23/04/2022 10:00	169	169	25.82	39.00	Incoming
23/04/2022 10:00	147	147	30.12	48.00	Outgoing
23/04/2022 09:30	159	159	25.81	36.00	Incoming
23/04/2022 09:30	141	141	30.90	50.00	Outgoing
23/04/2022 09:00	136	136	25.71	42.00	Incoming
23/04/2022 09:00	141	141	29.98	46.00	Outgoing
23/04/2022 08:30	161	161	25.93	43.00	Incoming
23/04/2022 08:30	117	117	29.82	49.00	Outgoing
23/04/2022 08:00	139	139	25.66	38.00	Incoming
23/04/2022 08:00	101	101	30.84	53.00	Outgoing
23/04/2022 07:30	113	113	26.91	41.00	Incoming
23/04/2022 07:30	111	111	30.84	46.00	Outgoing
23/04/2022 07:00	77	77	26.17	53.00	Incoming
23/04/2022 07:00	61	61	35.26	55.00	Outgoing
23/04/2022 06:30	65	65	27.88	48.00	Incoming
23/04/2022 06:30	74	74	31.24	44.00	Outgoing
23/04/2022 06:00	45	45	28.47	43.00	Incoming
23/04/2022 06:00	56	56	33.98	50.00	Outgoing
23/04/2022 05:30	28	28	27.36	47.00	Incoming
23/04/2022 05:30	47	47	33.15	49.00	Outgoing
23/04/2022 05:00	23	23	29.65	47.00	Incoming
23/04/2022 05:00	30	30	30.77	46.00	Outgoing
23/04/2022 04:30	3	3	26.00	29.00	Incoming
23/04/2022 04:30	15	15	37.00	48.00	Outgoing
23/04/2022 04:00	10	10	33.50	53.00	Incoming
23/04/2022 04:00	15	15	34.73	46.00	Outgoing
23/04/2022 03:30	10	10	24.40	34.00	Incoming
23/04/2022 03:30	12	12	35.50	48.00	Outgoing
23/04/2022 03:00	3	3	34.00	44.00	Incoming
23/04/2022 03:00	5	5	40.40	45.00	Outgoing
23/04/2022 02:30	3	3	30.67	41.00	Incoming
23/04/2022 02:30	5	5	35.20	41.00	Outgoing
23/04/2022 02:00	6	6	31.33	43.00	Incoming
23/04/2022 02:00	6	6	34.00	50.00	Outgoing
23/04/2022 01:30	11	11	29.91	43.00	Incoming
23/04/2022 01:30	2	2	52.00	54.00	Outgoing
23/04/2022 01:00	5	5	24.20	31.00	Incoming
23/04/2022 01:00	3	3	30.67	40.00	Outgoing
23/04/2022 00:30	1	1	23.00	23.00	Incoming
23/04/2022 00:30	5	5	30.40	38.00	Outgoing
23/04/2022 00:00	6	6	34.00	64.00	Incoming
23/04/2022 00:00	2	2	27.00	27.00	Outgoing
22/04/2022 23:30	10	10	29.70	39.00	Incoming
22/04/2022 23:30	4	4	32.00	56.00	Outgoing
22/04/2022 23:00	14	14	29.43	50.00	Incoming
22/04/2022 23:00	11	11	26.36	33.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
22/04/2022 22:30	21	21	27.67	52.00	Incoming
22/04/2022 22:30	6	6	30.50	48.00	Outgoing
22/04/2022 22:00	18	18	27.78	43.00	Incoming
22/04/2022 22:00	15	15	28.40	45.00	Outgoing
22/04/2022 21:30	36	36	27.64	44.00	Incoming
22/04/2022 21:30	39	39	28.69	43.00	Outgoing
22/04/2022 21:00	25	25	27.48	37.00	Incoming
22/04/2022 21:00	23	23	30.74	48.00	Outgoing
22/04/2022 20:30	40	40	28.90	46.00	Incoming
22/04/2022 20:30	29	29	28.07	41.00	Outgoing
22/04/2022 20:00	56	56	26.38	43.00	Incoming
22/04/2022 20:00	31	31	30.97	47.00	Outgoing
22/04/2022 19:30	67	67	27.97	49.00	Incoming
22/04/2022 19:30	44	44	30.16	58.00	Outgoing
22/04/2022 19:00	74	74	27.24	47.00	Incoming
22/04/2022 19:00	79	79	31.29	50.00	Outgoing
22/04/2022 18:30	96	96	28.41	42.00	Incoming
22/04/2022 18:30	80	80	32.14	48.00	Outgoing
22/04/2022 18:00	118	118	25.60	44.00	Incoming
22/04/2022 18:00	96	96	32.89	65.00	Outgoing
22/04/2022 17:30	123	123	26.16	46.00	Incoming
22/04/2022 17:30	87	87	29.53	43.00	Outgoing
22/04/2022 17:00	168	168	25.93	43.00	Incoming
22/04/2022 17:00	121	121	28.21	47.00	Outgoing
22/04/2022 16:30	179	179	24.99	39.00	Incoming
22/04/2022 16:30	130	130	30.29	57.00	Outgoing
22/04/2022 16:00	203	203	25.23	50.00	Incoming
22/04/2022 16:00	132	132	30.41	49.00	Outgoing
22/04/2022 15:30	200	200	24.27	43.00	Incoming
22/04/2022 15:30	169	169	29.43	48.00	Outgoing
22/04/2022 15:00	190	190	25.10	42.00	Incoming
22/04/2022 15:00	158	158	29.99	47.00	Outgoing
22/04/2022 14:30	195	195	25.76	47.00	Incoming
22/04/2022 14:30	155	155	30.34	56.00	Outgoing
22/04/2022 14:00	187	187	24.41	41.00	Incoming
22/04/2022 14:00	156	156	29.54	46.00	Outgoing
22/04/2022 13:30	188	188	26.02	43.00	Incoming
22/04/2022 13:30	136	136	30.89	58.00	Outgoing
22/04/2022 13:00	148	148	25.46	45.00	Incoming
22/04/2022 13:00	156	156	29.79	46.00	Outgoing
22/04/2022 12:30	154	154	25.06	45.00	Incoming
22/04/2022 12:30	131	131	30.19	43.00	Outgoing
22/04/2022 12:00	159	159	25.82	40.00	Incoming
22/04/2022 12:00	143	143	30.42	52.00	Outgoing
22/04/2022 11:30	157	157	25.93	38.00	Incoming
22/04/2022 11:30	154	154	30.18	49.00	Outgoing
22/04/2022 11:00	156	156	24.48	38.00	Incoming
22/04/2022 11:00	133	133	29.33	47.00	Outgoing
22/04/2022 10:30	156	156	23.03	35.00	Incoming
22/04/2022 10:30	152	152	26.97	49.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
22/04/2022 10:00	119	119	21.45	32.00	Incoming
22/04/2022 10:00	154	154	28.03	50.00	Outgoing
22/04/2022 09:30	173	173	23.10	38.00	Incoming
22/04/2022 09:30	141	141	28.05	45.00	Outgoing
22/04/2022 09:00	126	126	24.03	35.00	Incoming
22/04/2022 09:00	152	152	28.06	43.00	Outgoing
22/04/2022 08:30	142	142	24.18	39.00	Incoming
22/04/2022 08:30	134	134	27.54	47.00	Outgoing
22/04/2022 08:00	130	130	24.38	37.00	Incoming
22/04/2022 08:00	137	137	30.65	52.00	Outgoing
22/04/2022 07:30	136	136	25.27	45.00	Incoming
22/04/2022 07:30	154	154	29.61	46.00	Outgoing
22/04/2022 07:00	127	127	26.19	43.00	Incoming
22/04/2022 07:00	151	151	31.34	49.00	Outgoing
22/04/2022 06:30	126	126	26.87	45.00	Incoming
22/04/2022 06:30	195	195	32.00	89.00	Outgoing
22/04/2022 06:00	86	86	26.55	48.00	Incoming
22/04/2022 06:00	163	163	32.01	51.00	Outgoing
22/04/2022 05:30	60	60	27.02	46.00	Incoming
22/04/2022 05:30	93	93	36.04	56.00	Outgoing
22/04/2022 05:00	30	30	27.27	39.00	Incoming
22/04/2022 05:00	72	72	35.18	53.00	Outgoing
22/04/2022 04:30	15	15	29.67	42.00	Incoming
22/04/2022 04:30	54	54	35.13	59.00	Outgoing
22/04/2022 04:00	2	2	23.50	24.00	Incoming
22/04/2022 04:00	23	23	37.70	55.00	Outgoing
22/04/2022 03:30	9	9	31.22	57.00	Incoming
22/04/2022 03:30	14	14	36.93	51.00	Outgoing
22/04/2022 03:00	3	3	29.33	43.00	Incoming
22/04/2022 03:00	4	4	42.25	57.00	Outgoing
22/04/2022 02:30	5	5	35.80	43.00	Outgoing
22/04/2022 02:00	2	2	34.00	37.00	Incoming
22/04/2022 02:00	4	4	31.25	48.00	Outgoing
22/04/2022 01:30	6	6	27.17	34.00	Incoming
22/04/2022 01:30	1	1	31.00	31.00	Outgoing
22/04/2022 01:00	8	8	30.12	40.00	Incoming
22/04/2022 01:00	4	4	44.25	59.00	Outgoing
22/04/2022 00:30	6	6	25.33	31.00	Incoming
22/04/2022 00:30	2	2	38.50	51.00	Outgoing
22/04/2022 00:00	3	3	34.33	41.00	Incoming
22/04/2022 00:00	2	2	44.00	55.00	Outgoing
21/04/2022 23:30	5	5	25.40	31.00	Incoming
21/04/2022 23:30	11	11	36.27	52.00	Outgoing
21/04/2022 23:00	12	12	34.83	59.00	Incoming
21/04/2022 23:00	5	5	39.00	45.00	Outgoing
21/04/2022 22:30	24	24	28.62	43.00	Incoming
21/04/2022 22:30	10	10	26.80	44.00	Outgoing
21/04/2022 22:00	16	16	30.56	63.00	Incoming
21/04/2022 22:00	16	16	28.31	40.00	Outgoing
21/04/2022 21:30	29	29	25.90	42.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
21/04/2022 21:30	17	17	27.47	52.00	Outgoing
21/04/2022 21:00	55	55	25.27	37.00	Incoming
21/04/2022 21:00	39	39	28.79	42.00	Outgoing
21/04/2022 20:30	36	36	27.97	46.00	Incoming
21/04/2022 20:30	39	39	30.33	46.00	Outgoing
21/04/2022 20:00	54	54	25.70	38.00	Incoming
21/04/2022 20:00	37	37	28.32	43.00	Outgoing
21/04/2022 19:30	65	65	26.51	53.00	Incoming
21/04/2022 19:30	57	57	29.98	58.00	Outgoing
21/04/2022 19:00	89	89	26.57	46.00	Incoming
21/04/2022 19:00	66	66	31.27	60.00	Outgoing
21/04/2022 18:30	86	86	25.93	48.00	Incoming
21/04/2022 18:30	78	78	31.51	78.00	Outgoing
21/04/2022 18:00	108	108	26.90	53.00	Incoming
21/04/2022 18:00	97	97	30.16	44.00	Outgoing
21/04/2022 17:30	151	151	26.50	46.00	Incoming
21/04/2022 17:30	77	77	31.23	48.00	Outgoing
21/04/2022 17:00	163	163	25.94	45.00	Incoming
21/04/2022 17:00	128	128	29.73	47.00	Outgoing
21/04/2022 16:30	193	193	25.94	43.00	Incoming
21/04/2022 16:30	132	132	29.73	52.00	Outgoing
21/04/2022 16:00	209	209	25.99	44.00	Incoming
21/04/2022 16:00	147	147	30.10	47.00	Outgoing
21/04/2022 15:30	212	212	25.24	39.00	Incoming
21/04/2022 15:30	166	166	29.51	44.00	Outgoing
21/04/2022 15:00	200	200	24.95	47.00	Incoming
21/04/2022 15:00	151	151	30.13	46.00	Outgoing
21/04/2022 14:30	143	143	24.60	38.00	Incoming
21/04/2022 14:30	134	134	29.87	90.00	Outgoing
21/04/2022 14:00	181	181	25.16	38.00	Incoming
21/04/2022 14:00	181	181	29.95	49.00	Outgoing
21/04/2022 13:30	150	150	25.85	40.00	Incoming
21/04/2022 13:30	128	128	28.59	48.00	Outgoing
21/04/2022 13:00	170	170	25.32	50.00	Incoming
21/04/2022 13:00	159	159	30.63	94.00	Outgoing
21/04/2022 12:30	159	159	25.70	40.00	Incoming
21/04/2022 12:30	135	135	31.07	53.00	Outgoing
21/04/2022 12:00	146	146	25.64	46.00	Incoming
21/04/2022 12:00	129	129	30.20	50.00	Outgoing
21/04/2022 11:30	134	134	25.67	43.00	Incoming
21/04/2022 11:30	154	154	30.00	108.00	Outgoing
21/04/2022 11:00	187	187	24.87	39.00	Incoming
21/04/2022 11:00	114	114	31.06	62.00	Outgoing
21/04/2022 10:30	164	164	25.87	50.00	Incoming
21/04/2022 10:30	134	134	30.15	49.00	Outgoing
21/04/2022 10:00	138	138	25.21	41.00	Incoming
21/04/2022 10:00	117	117	30.43	53.00	Outgoing
21/04/2022 09:30	198	198	25.09	39.00	Incoming
21/04/2022 09:30	152	152	30.10	106.00	Outgoing
21/04/2022 09:00	144	144	25.56	49.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
21/04/2022 09:00	142	142	29.46	41.00	Outgoing
21/04/2022 08:30	166	166	25.25	39.00	Incoming
21/04/2022 08:30	141	141	29.84	52.00	Outgoing
21/04/2022 08:00	136	136	26.19	43.00	Incoming
21/04/2022 08:00	175	175	30.21	44.00	Outgoing
21/04/2022 07:30	150	150	26.35	40.00	Incoming
21/04/2022 07:30	133	133	29.86	42.00	Outgoing
21/04/2022 07:00	136	136	25.65	43.00	Incoming
21/04/2022 07:00	195	195	30.63	45.00	Outgoing
21/04/2022 06:30	105	105	26.28	39.00	Incoming
21/04/2022 06:30	185	185	30.47	55.00	Outgoing
21/04/2022 06:00	97	97	27.57	51.00	Incoming
21/04/2022 06:00	177	177	32.51	55.00	Outgoing
21/04/2022 05:30	62	62	29.84	43.00	Incoming
21/04/2022 05:30	138	138	33.67	54.00	Outgoing
21/04/2022 05:00	25	25	27.36	43.00	Incoming
21/04/2022 05:00	80	80	34.89	58.00	Outgoing
21/04/2022 04:30	12	12	31.83	47.00	Incoming
21/04/2022 04:30	53	53	36.02	58.00	Outgoing
21/04/2022 04:00	8	8	30.50	41.00	Incoming
21/04/2022 04:00	43	43	36.26	52.00	Outgoing
21/04/2022 03:30	6	6	28.67	48.00	Incoming
21/04/2022 03:30	10	10	34.10	45.00	Outgoing
21/04/2022 03:00	3	3	30.67	39.00	Incoming
21/04/2022 03:00	9	9	34.67	47.00	Outgoing
21/04/2022 02:30	3	3	27.33	34.00	Incoming
21/04/2022 02:30	3	3	32.00	37.00	Outgoing
21/04/2022 02:00	2	2	32.50	34.00	Incoming
21/04/2022 02:00	2	2	36.00	38.00	Outgoing
21/04/2022 01:30	10	10	27.10	34.00	Incoming
21/04/2022 01:30	5	5	33.60	44.00	Outgoing
21/04/2022 01:00	6	6	26.17	33.00	Incoming
21/04/2022 01:00	1	1	40.00	40.00	Outgoing
21/04/2022 00:30	7	7	28.43	35.00	Incoming
21/04/2022 00:30	1	1	65.00	65.00	Outgoing
21/04/2022 00:00	13	13	27.54	43.00	Incoming
21/04/2022 00:00	4	4	27.00	50.00	Outgoing
20/04/2022 23:30	13	13	27.31	53.00	Incoming
20/04/2022 23:30	1	1	27.00	27.00	Outgoing
20/04/2022 23:00	13	13	34.08	53.00	Incoming
20/04/2022 23:00	6	6	33.00	43.00	Outgoing
20/04/2022 22:30	30	30	30.17	49.00	Incoming
20/04/2022 22:30	8	8	32.00	43.00	Outgoing
20/04/2022 22:00	26	26	31.00	47.00	Incoming
20/04/2022 22:00	12	12	32.50	40.00	Outgoing
20/04/2022 21:30	42	42	28.57	42.00	Incoming
20/04/2022 21:30	18	18	38.67	83.00	Outgoing
20/04/2022 21:00	42	42	27.60	43.00	Incoming
20/04/2022 21:00	23	23	29.30	44.00	Outgoing
20/04/2022 20:30	52	52	27.25	43.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
20/04/2022 20:30	35	35	29.80	44.00	Outgoing
20/04/2022 20:00	65	65	26.91	58.00	Incoming
20/04/2022 20:00	43	43	29.40	49.00	Outgoing
20/04/2022 19:30	57	57	27.05	44.00	Incoming
20/04/2022 19:30	40	40	28.32	44.00	Outgoing
20/04/2022 19:00	57	57	26.68	43.00	Incoming
20/04/2022 19:00	59	59	31.17	52.00	Outgoing
20/04/2022 18:30	99	99	27.18	47.00	Incoming
20/04/2022 18:30	65	65	31.88	72.00	Outgoing
20/04/2022 18:00	102	102	26.58	50.00	Incoming
20/04/2022 18:00	90	90	31.28	46.00	Outgoing
20/04/2022 17:30	139	139	27.08	43.00	Incoming
20/04/2022 17:30	97	97	29.06	46.00	Outgoing
20/04/2022 17:00	159	159	26.23	41.00	Incoming
20/04/2022 17:00	114	114	29.68	44.00	Outgoing
20/04/2022 16:30	186	186	25.32	43.00	Incoming
20/04/2022 16:30	128	128	29.51	44.00	Outgoing
20/04/2022 16:00	178	178	26.05	46.00	Incoming
20/04/2022 16:00	153	153	28.91	50.00	Outgoing
20/04/2022 15:30	179	179	25.51	43.00	Incoming
20/04/2022 15:30	152	152	30.15	52.00	Outgoing
20/04/2022 15:00	238	238	24.62	40.00	Incoming
20/04/2022 15:00	146	146	28.68	47.00	Outgoing
20/04/2022 14:30	171	171	25.57	47.00	Incoming
20/04/2022 14:30	143	143	29.16	88.00	Outgoing
20/04/2022 14:00	146	146	25.99	43.00	Incoming
20/04/2022 14:00	150	150	28.80	46.00	Outgoing
20/04/2022 13:30	157	157	25.22	41.00	Incoming
20/04/2022 13:30	148	148	29.13	50.00	Outgoing
20/04/2022 13:00	166	166	24.60	39.00	Incoming
20/04/2022 13:00	137	137	28.65	49.00	Outgoing
20/04/2022 12:30	143	143	24.77	40.00	Incoming
20/04/2022 12:30	152	152	27.49	47.00	Outgoing
20/04/2022 12:00	151	151	25.28	43.00	Incoming
20/04/2022 12:00	120	120	28.48	48.00	Outgoing
20/04/2022 11:30	148	148	25.26	43.00	Incoming
20/04/2022 11:30	136	136	29.09	49.00	Outgoing
20/04/2022 11:00	154	154	25.45	41.00	Incoming
20/04/2022 11:00	140	140	29.11	46.00	Outgoing
20/04/2022 10:30	177	177	24.65	43.00	Incoming
20/04/2022 10:30	130	130	29.31	54.00	Outgoing
20/04/2022 10:00	133	133	23.96	38.00	Incoming
20/04/2022 10:00	141	141	27.18	53.00	Outgoing
20/04/2022 09:30	142	142	24.99	38.00	Incoming
20/04/2022 09:30	138	138	27.75	41.00	Outgoing
20/04/2022 09:00	145	145	26.14	47.00	Incoming
20/04/2022 09:00	139	139	28.64	45.00	Outgoing
20/04/2022 08:30	116	116	25.73	41.00	Incoming
20/04/2022 08:30	158	158	30.32	55.00	Outgoing
20/04/2022 08:00	131	131	26.22	46.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
20/04/2022 08:00	138	138	29.36	43.00	Outgoing
20/04/2022 07:30	101	101	24.52	35.00	Incoming
20/04/2022 07:30	109	109	28.53	44.00	Outgoing
14/04/2022 05:00	2	2	36.50	38.00	Incoming
14/04/2022 05:00	21	21	32.33	47.00	Outgoing
14/04/2022 04:30	17	17	29.71	44.00	Incoming
14/04/2022 04:30	51	51	36.18	58.00	Outgoing
14/04/2022 04:00	8	8	32.50	41.00	Incoming
14/04/2022 04:00	29	29	35.76	53.00	Outgoing
14/04/2022 03:30	5	5	29.00	55.00	Incoming
14/04/2022 03:30	22	22	35.82	50.00	Outgoing
14/04/2022 03:00	3	3	28.67	42.00	Incoming
14/04/2022 03:00	6	6	31.83	39.00	Outgoing
14/04/2022 02:30	2	2	23.00	24.00	Incoming
14/04/2022 02:30	4	4	32.25	46.00	Outgoing
14/04/2022 02:00	1	1	32.00	32.00	Incoming
14/04/2022 02:00	6	6	29.33	32.00	Outgoing
14/04/2022 01:30	8	8	29.75	37.00	Incoming
14/04/2022 01:30	1	1	39.00	39.00	Outgoing
14/04/2022 01:00	10	10	28.50	35.00	Incoming
14/04/2022 00:30	1	1	28.00	28.00	Outgoing
14/04/2022 00:30	1	1	24.00	24.00	Incoming
14/04/2022 00:00	9	9	31.44	58.00	Incoming
14/04/2022 00:00	4	4	33.25	57.00	Outgoing
13/04/2022 23:30	6	6	28.33	40.00	Incoming
13/04/2022 23:30	3	3	30.33	35.00	Outgoing
13/04/2022 23:00	10	10	32.50	43.00	Incoming
13/04/2022 23:00	6	6	35.67	49.00	Outgoing
13/04/2022 22:30	13	13	28.69	37.00	Incoming
13/04/2022 22:30	13	13	28.92	43.00	Outgoing
13/04/2022 22:00	17	17	25.18	38.00	Incoming
13/04/2022 22:00	14	14	29.50	44.00	Outgoing
13/04/2022 21:30	27	27	28.85	47.00	Incoming
13/04/2022 21:30	49	49	33.61	50.00	Outgoing
13/04/2022 21:00	44	44	28.32	47.00	Incoming
13/04/2022 21:00	26	26	29.46	49.00	Outgoing
13/04/2022 20:30	31	31	29.84	49.00	Incoming
13/04/2022 20:30	22	22	33.09	66.00	Outgoing
13/04/2022 20:00	42	42	24.90	41.00	Incoming
13/04/2022 20:00	42	42	30.67	52.00	Outgoing
13/04/2022 19:30	49	49	29.39	54.00	Incoming
13/04/2022 19:30	41	41	29.27	52.00	Outgoing
13/04/2022 19:00	82	82	26.17	60.00	Incoming
13/04/2022 19:00	57	57	30.70	48.00	Outgoing
13/04/2022 18:30	121	121	27.44	46.00	Incoming
13/04/2022 18:30	71	71	30.39	60.00	Outgoing
13/04/2022 18:00	108	108	26.18	47.00	Incoming
13/04/2022 18:00	82	82	31.18	46.00	Outgoing
13/04/2022 17:30	133	133	26.17	46.00	Incoming
13/04/2022 17:30	97	97	29.28	46.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
13/04/2022 17:00	183	183	25.21	43.00	Incoming
13/04/2022 17:00	148	148	30.43	52.00	Outgoing
13/04/2022 16:30	214	214	24.75	40.00	Incoming
13/04/2022 16:30	137	137	29.33	81.00	Outgoing
13/04/2022 16:00	212	212	25.52	40.00	Incoming
13/04/2022 16:00	157	157	30.48	46.00	Outgoing
13/04/2022 15:30	229	229	24.68	42.00	Incoming
13/04/2022 15:30	130	130	30.94	56.00	Outgoing
13/04/2022 15:00	201	201	24.72	49.00	Incoming
13/04/2022 15:00	147	147	29.62	89.00	Outgoing
13/04/2022 14:30	181	181	24.76	43.00	Incoming
13/04/2022 14:30	154	154	29.73	53.00	Outgoing
13/04/2022 14:00	160	160	24.17	52.00	Incoming
13/04/2022 14:00	177	177	28.81	51.00	Outgoing
13/04/2022 13:30	165	165	24.14	41.00	Incoming
13/04/2022 13:30	148	148	29.81	49.00	Outgoing
13/04/2022 13:00	159	159	24.06	43.00	Incoming
13/04/2022 13:00	133	133	30.85	62.00	Outgoing
13/04/2022 12:30	162	162	24.41	39.00	Incoming
13/04/2022 12:30	139	139	29.29	54.00	Outgoing
13/04/2022 12:00	169	169	25.14	39.00	Incoming
13/04/2022 12:00	147	147	30.02	54.00	Outgoing
13/04/2022 11:30	129	129	24.70	41.00	Incoming
13/04/2022 11:30	161	161	28.87	45.00	Outgoing
13/04/2022 11:00	174	174	24.86	40.00	Incoming
13/04/2022 11:00	155	155	30.79	48.00	Outgoing
13/04/2022 10:30	163	163	24.93	40.00	Incoming
13/04/2022 10:30	140	140	30.31	46.00	Outgoing
13/04/2022 10:00	146	146	24.68	38.00	Incoming
13/04/2022 10:00	158	158	30.39	52.00	Outgoing
13/04/2022 09:30	150	150	24.84	39.00	Incoming
13/04/2022 09:30	144	144	28.31	90.00	Outgoing
13/04/2022 09:00	156	156	24.89	38.00	Incoming
13/04/2022 09:00	130	130	30.08	52.00	Outgoing
13/04/2022 08:30	153	153	25.31	43.00	Incoming
13/04/2022 08:30	119	119	31.00	53.00	Outgoing
13/04/2022 08:00	116	116	25.34	40.00	Incoming
13/04/2022 08:00	179	179	30.39	94.00	Outgoing
13/04/2022 07:30	123	123	25.23	40.00	Incoming
13/04/2022 07:30	158	158	29.38	45.00	Outgoing
13/04/2022 07:00	113	113	26.23	44.00	Incoming
13/04/2022 07:00	160	160	30.35	47.00	Outgoing
13/04/2022 06:30	135	135	26.41	47.00	Incoming
13/04/2022 06:30	179	179	30.98	49.00	Outgoing
13/04/2022 06:00	90	90	28.07	53.00	Incoming
13/04/2022 06:00	192	192	32.02	52.00	Outgoing
13/04/2022 05:30	54	54	27.89	46.00	Incoming
13/04/2022 05:30	136	136	32.88	51.00	Outgoing
13/04/2022 05:00	33	33	26.61	62.00	Incoming
13/04/2022 05:00	85	85	35.05	52.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
13/04/2022 04:30	17	17	28.94	47.00	Incoming
13/04/2022 04:30	48	48	34.12	50.00	Outgoing
13/04/2022 04:00	4	4	30.00	42.00	Incoming
13/04/2022 04:00	31	31	37.97	52.00	Outgoing
13/04/2022 03:30	6	6	27.67	45.00	Incoming
13/04/2022 03:30	14	14	35.57	56.00	Outgoing
13/04/2022 03:00	1	1	47.00	47.00	Incoming
13/04/2022 03:00	7	7	37.86	50.00	Outgoing
13/04/2022 02:30	3	3	33.33	41.00	Incoming
13/04/2022 02:30	7	7	31.57	48.00	Outgoing
13/04/2022 02:00	4	4	23.25	25.00	Incoming
13/04/2022 02:00	2	2	44.50	50.00	Outgoing
13/04/2022 01:30	6	6	23.33	27.00	Incoming
13/04/2022 01:00	3	3	23.00	24.00	Outgoing
13/04/2022 01:00	5	5	39.60	59.00	Incoming
13/04/2022 00:30	5	5	31.20	51.00	Incoming
13/04/2022 00:30	1	1	38.00	38.00	Outgoing
13/04/2022 00:00	7	7	24.00	28.00	Incoming
13/04/2022 00:00	5	5	37.40	57.00	Outgoing
12/04/2022 23:30	2	2	23.00	24.00	Incoming
12/04/2022 23:30	2	2	42.00	49.00	Outgoing
12/04/2022 23:00	2	2	31.50	34.00	Incoming
12/04/2022 23:00	10	10	34.80	46.00	Outgoing
12/04/2022 22:30	7	7	33.86	53.00	Incoming
12/04/2022 22:30	9	9	28.67	39.00	Outgoing
12/04/2022 22:00	12	12	28.92	42.00	Incoming
12/04/2022 22:00	12	12	31.08	40.00	Outgoing
12/04/2022 21:30	25	25	28.24	40.00	Incoming
12/04/2022 21:30	20	20	29.30	41.00	Outgoing
12/04/2022 21:00	30	30	27.17	50.00	Incoming
12/04/2022 21:00	23	23	28.09	49.00	Outgoing
12/04/2022 20:30	32	32	27.88	37.00	Incoming
12/04/2022 20:30	22	22	32.18	43.00	Outgoing
12/04/2022 20:00	41	41	25.93	37.00	Incoming
12/04/2022 20:00	44	44	28.84	44.00	Outgoing
12/04/2022 19:30	59	59	27.19	49.00	Incoming
12/04/2022 19:30	59	59	29.80	50.00	Outgoing
12/04/2022 19:00	68	68	26.56	43.00	Incoming
12/04/2022 19:00	59	59	29.97	53.00	Outgoing
12/04/2022 18:30	107	107	28.37	58.00	Incoming
12/04/2022 18:30	71	71	30.38	59.00	Outgoing
12/04/2022 18:00	93	93	27.08	55.00	Incoming
12/04/2022 18:00	69	69	30.97	50.00	Outgoing
12/04/2022 17:30	142	142	25.44	53.00	Incoming
12/04/2022 17:30	91	91	31.14	52.00	Outgoing
12/04/2022 17:00	162	162	25.98	43.00	Incoming
12/04/2022 17:00	101	101	30.96	50.00	Outgoing
12/04/2022 16:30	191	191	24.00	38.00	Incoming
12/04/2022 16:30	133	133	31.29	50.00	Outgoing
12/04/2022 16:00	202	202	25.20	44.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
12/04/2022 16:00	133	133	29.52	48.00	Outgoing
12/04/2022 15:30	196	196	24.88	43.00	Incoming
12/04/2022 15:30	156	156	29.30	49.00	Outgoing
12/04/2022 15:00	192	192	24.54	39.00	Incoming
12/04/2022 15:00	152	152	30.41	45.00	Outgoing
12/04/2022 14:30	142	142	23.58	42.00	Incoming
12/04/2022 14:30	148	148	29.97	50.00	Outgoing
12/04/2022 14:00	173	173	24.30	37.00	Incoming
12/04/2022 14:00	163	163	28.85	43.00	Outgoing
12/04/2022 13:30	179	179	25.17	40.00	Incoming
12/04/2022 13:30	148	148	29.49	48.00	Outgoing
12/04/2022 13:00	143	143	25.30	40.00	Incoming
12/04/2022 13:00	156	156	28.87	42.00	Outgoing
12/04/2022 12:30	160	160	24.71	41.00	Incoming
12/04/2022 12:30	123	123	30.70	47.00	Outgoing
12/04/2022 12:00	151	151	24.93	43.00	Incoming
12/04/2022 12:00	119	119	29.82	66.00	Outgoing
12/04/2022 11:30	138	138	23.87	36.00	Incoming
12/04/2022 11:30	144	144	29.53	44.00	Outgoing
12/04/2022 11:00	140	140	23.91	37.00	Incoming
12/04/2022 11:00	143	143	28.51	44.00	Outgoing
12/04/2022 10:30	155	155	24.09	42.00	Incoming
12/04/2022 10:30	121	121	30.10	53.00	Outgoing
12/04/2022 10:00	163	163	24.18	36.00	Incoming
12/04/2022 10:00	145	145	30.63	49.00	Outgoing
12/04/2022 09:30	124	124	24.27	39.00	Incoming
12/04/2022 09:30	150	150	30.00	49.00	Outgoing
12/04/2022 09:00	129	129	23.85	40.00	Incoming
12/04/2022 09:00	131	131	30.46	47.00	Outgoing
12/04/2022 08:30	120	120	24.74	44.00	Incoming
12/04/2022 08:30	141	141	30.25	57.00	Outgoing
12/04/2022 08:00	127	127	24.02	40.00	Incoming
12/04/2022 08:00	148	148	29.28	46.00	Outgoing
12/04/2022 07:30	108	108	24.43	38.00	Incoming
12/04/2022 07:30	135	135	29.08	45.00	Outgoing
12/04/2022 07:00	119	119	25.82	41.00	Incoming
12/04/2022 07:00	168	168	29.82	46.00	Outgoing
12/04/2022 06:30	121	121	26.23	41.00	Incoming
12/04/2022 06:30	191	191	30.16	46.00	Outgoing
12/04/2022 06:00	85	85	27.95	47.00	Incoming
12/04/2022 06:00	165	165	31.10	52.00	Outgoing
12/04/2022 05:30	66	66	27.95	50.00	Incoming
12/04/2022 05:30	141	141	32.59	47.00	Outgoing
12/04/2022 05:00	32	32	27.66	44.00	Incoming
12/04/2022 05:00	78	78	33.53	59.00	Outgoing
12/04/2022 04:30	17	17	28.41	43.00	Incoming
12/04/2022 04:30	45	45	33.91	52.00	Outgoing
12/04/2022 04:00	8	8	24.38	34.00	Incoming
12/04/2022 04:00	17	17	37.41	51.00	Outgoing
12/04/2022 03:30	13	13	32.54	67.00	Incoming

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
12/04/2022 03:30	13	13	32.31	44.00	Outgoing
12/04/2022 03:00	4	4	39.00	49.00	Incoming
12/04/2022 03:00	5	5	43.40	52.00	Outgoing
12/04/2022 02:30	7	7	42.29	58.00	Outgoing
12/04/2022 02:00	2	2	20.50	21.00	Incoming
12/04/2022 02:00	2	2	34.50	38.00	Outgoing
12/04/2022 01:30	7	7	23.57	28.00	Incoming
12/04/2022 01:30	1	1	31.00	31.00	Outgoing
12/04/2022 01:00	2	2	41.00	50.00	Incoming
12/04/2022 01:00	5	5	34.20	44.00	Outgoing
12/04/2022 00:30	3	3	28.67	41.00	Incoming
12/04/2022 00:30	1	1	19.00	19.00	Outgoing
12/04/2022 00:00	7	7	36.14	53.00	Incoming
12/04/2022 00:00	1	1	54.00	54.00	Outgoing
11/04/2022 23:30	2	2	41.00	42.00	Incoming
11/04/2022 23:30	1	1	31.00	31.00	Outgoing
11/04/2022 23:00	3	3	27.33	34.00	Incoming
11/04/2022 23:00	8	8	28.62	39.00	Outgoing
11/04/2022 22:30	7	7	34.14	49.00	Incoming
11/04/2022 22:30	6	6	27.17	37.00	Outgoing
11/04/2022 22:00	19	19	31.47	56.00	Incoming
11/04/2022 22:00	9	9	28.44	40.00	Outgoing
11/04/2022 21:30	18	18	28.83	49.00	Incoming
11/04/2022 21:30	11	11	30.55	41.00	Outgoing
11/04/2022 21:00	20	20	28.35	43.00	Incoming
11/04/2022 21:00	16	16	27.06	37.00	Outgoing
11/04/2022 20:30	26	26	25.38	35.00	Incoming
11/04/2022 20:30	18	18	28.22	47.00	Outgoing
11/04/2022 20:00	33	33	29.15	46.00	Incoming
11/04/2022 20:00	29	29	29.17	40.00	Outgoing
11/04/2022 19:30	41	41	25.90	37.00	Incoming
11/04/2022 19:30	41	41	28.78	43.00	Outgoing
11/04/2022 19:00	47	47	28.04	49.00	Incoming
11/04/2022 19:00	46	46	29.52	46.00	Outgoing
11/04/2022 18:30	86	86	27.21	43.00	Incoming
11/04/2022 18:30	75	75	30.29	47.00	Outgoing
11/04/2022 18:00	86	86	26.38	40.00	Incoming
11/04/2022 18:00	67	67	31.76	49.00	Outgoing
11/04/2022 17:30	108	108	25.51	40.00	Incoming
11/04/2022 17:30	84	84	29.12	46.00	Outgoing
11/04/2022 17:00	122	122	24.98	37.00	Incoming
11/04/2022 17:00	103	103	29.84	46.00	Outgoing
11/04/2022 16:30	180	180	25.16	41.00	Incoming
11/04/2022 16:30	134	134	30.04	59.00	Outgoing
11/04/2022 16:00	173	173	26.72	46.00	Incoming
11/04/2022 16:00	149	149	29.97	47.00	Outgoing
11/04/2022 15:30	192	192	25.31	46.00	Incoming
11/04/2022 15:30	169	169	29.96	105.00	Outgoing
11/04/2022 15:00	197	197	26.05	41.00	Incoming
11/04/2022 15:00	137	137	30.26	42.00	Outgoing

Measurements records

Date	Number of measurements	Number of vehicles	Average speed	Maximum speed	Direction
11/04/2022 14:30	182	182	25.56	44.00	Incoming
11/04/2022 14:30	148	148	31.30	48.00	Outgoing
11/04/2022 14:00	168	168	23.88	40.00	Incoming
11/04/2022 14:00	145	145	28.93	44.00	Outgoing
11/04/2022 13:30	146	146	25.48	43.00	Incoming
11/04/2022 13:30	135	135	30.15	84.00	Outgoing
11/04/2022 13:00	140	140	24.72	36.00	Incoming
11/04/2022 13:00	142	142	28.84	52.00	Outgoing
11/04/2022 12:30	145	145	25.09	45.00	Incoming
11/04/2022 12:30	156	156	30.35	58.00	Outgoing
11/04/2022 12:00	144	144	25.29	41.00	Incoming
11/04/2022 12:00	121	121	31.93	50.00	Outgoing
11/04/2022 11:30	125	125	26.28	41.00	Incoming
11/04/2022 11:30	142	142	28.82	47.00	Outgoing
11/04/2022 11:00	146	146	25.86	44.00	Incoming
11/04/2022 11:00	151	151	28.26	44.00	Outgoing
11/04/2022 10:30	156	156	26.14	43.00	Incoming
11/04/2022 10:30	136	136	29.46	46.00	Outgoing
11/04/2022 10:00	133	133	24.99	46.00	Incoming
11/04/2022 10:00	159	159	29.64	47.00	Outgoing
25/03/2022 09:30	15	15	27.33	35.00	Outgoing
25/03/2022 09:30	17	17	23.00	29.00	Incoming

DRAFT MARLBOROUGH AREA NEIGHBOURHOOD PLAN 2021-2036 DECISION STATEMENT (PROCEEDING TO REFERENDUM)

1. INTRODUCTION

- 1.1. Pursuant to the Wiltshire Council constitution and in particular Part 3D, the Corporate Director for Place within whose remit Spatial Planning falls is authorised to make decisions on Neighbourhood Plan proposals following the examination of a Neighbourhood Plan proposal in accordance with the Town and Country Planning Act 1990 (as amended) and the Neighbourhood Planning (General) Regulations 2012 (as amended) and all other relevant legislation.

2. BACKGROUND

- 2.1. The designated area for the draft Marlborough Area Neighbourhood Plan comprises the whole of the parishes of Marlborough, Mildenhall and Savernake. On 18th November 2020 Wiltshire Council formally approved that the Marlborough Neighbourhood Area (i.e., the land within the parishes of Marlborough, Mildenhall and Savernake) be designated in accordance with the Neighbourhood Planning (General) Regulations 2012.
- 2.2. Marlborough Town Council – the ‘qualifying body’, submitted the draft Marlborough Area Neighbourhood Plan 2021-2036 (submission August 2021), along with supporting documents, to Wiltshire Council on 13th September 2021 for consultation, independent examination and the remaining stages of the draft Plan’s preparation in accordance with the Neighbourhood Planning (General) Regulations 2012.
- 2.3. Following submission of the draft Marlborough Area Neighbourhood Plan, Wiltshire Council publicised the Plan and supporting documents and invited representations during the consultation period 20th September 2021 to 8th November 2021.
- 2.4. In October 2021, Wiltshire Council appointed an independent examiner, Mr Andrew Matheson MSc MPA DipTP MRTPI FCIH, to examine the draft Plan and consider whether it should proceed to referendum.
- 2.5. The examiner’s report was received in May 2022 and concluded that subject to making the modifications recommended in the report, that the draft Plan meets the Basic Conditions and should proceed to referendum. The examiner also recommended that the Marlborough Neighbourhood Area (the parish area) is an appropriate area within which to hold a referendum.
- 2.6. In accordance with legislation, Wiltshire Council must consider each of the recommendations made in the examiner’s report, decide what action to take in

response to each recommendation and what modifications should be made to the draft Plan in order to be satisfied that it meets the Basic Conditions and is compatible with Convention Rights. If the authority is satisfied, then a referendum must be held. Consideration also needs to be given as to whether to extend the area to which the referendum is to take place.

3. DECISION AND REASONS

- 3.1. Wiltshire Council must be satisfied that the neighbourhood plan meets the Basic Conditions, is compatible with the Convention rights and complies with the provision made by or under sections 61E (2), 61J and 61L of the Town and Country Planning Act 1990, or that the draft order would meet those conditions, be compatible with those rights and comply with that provision if modifications were made to the draft order.
- 3.2. Wiltshire Council has considered the examiner's recommendations and reasons for them. Wiltshire Council has decided to make the examiner's modifications with additional modifications by the Council to the draft Marlborough Area Neighbourhood Plan, for the purpose of correcting errors (which includes amendments necessary to achieve accuracy and consistency in the wording of policies and supporting text) and to ensure that it meets legal requirements, including the Basic Conditions as set out in legislation. **Appendix 1** sets out these modifications, together with the reasons for them.
- 3.3. The Council is satisfied that the Neighbourhood Plan, as modified, complies with the legal requirements and can proceed to referendum.
- 3.4. The Council also agrees with the examiner that the referendum area should reflect the extent of the parishes of Marlborough, Mildenhall and Savernake.
- 3.5. I declare that I have no private interest in respect of this matter that would prevent me from making this decision.

Signed:



Parvis Khansari
Corporate Director for Place
Wiltshire Council

Dated: 25th May 2022

APPENDIX 1

Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Guidance for using this document

The following table sets out the modifications that are required to be made to the Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) together with the explanation and reason for modification. This should be read alongside the report dated 10th May 2022 of the independent examiner, Andrew Matheson to Wiltshire Council on the draft Marlborough Area Neighbourhood Plan.

Throughout the table, specific changes that are required are shown as follows:

- text in **bold and underlined** identifies new text to be added to the Plan.
- text that is shown as ~~red italic strikethrough~~ identifies text to be deleted from the Plan.

The relevant paragraph, policy and page numbering relates to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021), hereafter referred to as the 'MANP', as submitted to Wiltshire Council. For each change, the table sets out the examiner's recommendation as set out in his report together with the modification that is required to be made to the neighbourhood plan. Some additional changes are also included that are not in the examiner's report to correct errors such as typos.

As a result of some modifications, consequential amendments may be required to the final MANP to be published for the purposes of the referendum. These can include changing section headings, amending the contents page, renumbering paragraphs or pages and ensuring that supporting appendices and other documents align with the final version of the Plan.

APPENDIX 1

Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
R1	9	Cover page and the whole document	<p><u>EXAMINER COMMENT:</u></p> <p>On the front cover of the plan and in any other locations, remove references to "Submission Plan"</p> <p><u>WILTSHIRE COUNCIL COMMENT:</u></p> <p>Add 'Referendum Version' to the front cover of the draft plan.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Remove "Submission Plan" from the cover page and add 'Referendum Version' as follows. <p>Submission Plan <u>Referendum Version</u></p> <ul style="list-style-type: none"> Remove submission Plan from any other location in the draft plan. 	For clarity and accuracy
R2	9	Page 3, Contents & Page 5, List of Policies	<p><u>EXAMINER COMMENT:</u></p> <p>Under the headings "Contents" and "List of Policies" review the content for accuracy and in the light of the recommendations below</p> <p><u>REQUIRED MODIFICATION:</u></p> <p>Amend where necessary for clarity and accuracy the text in the 'contents' list section on page 3 and the 'list of policies'</p>	For clarity and accuracy

APPENDIX 1

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Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
			section on page 5 of the plan in line with the examiners recommendations stated below.	
R3	9	Pages 6 and 7. Introduction and Background	<p><u>EXAMINER COMMENT:</u></p> <p>Under the heading "1. Introduction & Background" amend the title of Plan A to read 'Designated Neighbourhood Area'.</p> <p>Amend the first two bullet points of paragraph 1.5 to: 'Does the Plan have regard to national policy and guidance?' and 'Is the Plan in general conformity with the Wiltshire Core Strategy?'</p> <p>Remove paragraphs 1.7 & 1.8 referencing the 'Planning for the Future' White Paper; renumber subsequent paragraphs accordingly.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the title of Plan A on page 6 of the plan as follows: <p>Plan A: Designated MANP Neighbourhood Plan Area</p> <ul style="list-style-type: none"> Amend the first two bullet points of paragraph 1.5 as follows: <p><u>Does is the Plan have regard to consistent with the national planning policy and guidance?</u></p>	For clarity and accuracy

APPENDIX 1

Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
			<p>Is the Plan consistent with local planning policy <u>in general conformity with the Wiltshire Core Strategy?</u></p> <ul style="list-style-type: none"> Remove paragraphs 1.7 and 1.8 on page 8 of the plan and renumber subsequent paragraphs accordingly as follows: <p>1.7 During the preparation of the plan in August 2020, the Government published for consultation its White Paper, 'Planning for the Future', which proposes to make significant changes to both the development plan and management system. It indicates that there is a future for neighbourhood planning in that system, but the precise role that plans will play is not yet clear. With the Queen's Speech of May 2021 announcing a Planning Bill for Autumn 2021, the expectation is that the new system will be in place in 2022.</p> <p>1.8 The Councils anticipate that the new system will still require local communities to engage in shaping how their settlements will develop and in ensuring their heritage and landscapes are given proper protection. It may also enable communities to define local design standards, and the Neighbourhood Plan contains proposals in all of these respects.</p> <p>1.9 <u>1.7</u></p> <p>1.10 <u>1.8</u></p> <p>1.11 <u>1.9</u></p> <p>1.12 <u>1.10</u></p>	

APPENDIX 1

Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
			<p>1.13 <u>1.11</u></p> <p>1.14 <u>1.12</u></p>	
R4	9	Page 8, paragraphs 1.12 and 1.14	<p><u>EXAMINER COMMENT:</u></p> <p>Under the sub-heading "Sustainability Appraisal (including Strategic Environmental Assessment)" in the second sentence of paragraph 1.12 replace "has" with 'have' and in the second sentence of paragraph 1.14 replace "Environmental" with 'Environment'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the second sentence of paragraph 1.12 as follows: '...Iterations between the two processes has have enabled the potential for significant harmful environmental effects to be mitigated and for the economic and social benefits to be accentuated.' Amend the second sentence of paragraph 1.14 as follows: ' ... The final screening opinion concludes that, on the basis of information provided by Thames Water and validated by the Environmenta Agency, the Neighbourhood Plan policies will not have a significant effect on a European site, either on their own or in combination with other policies and projects.' 	For clarity and accuracy

APPENDIX 1

Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
R5	10	Page 11, Marlborough: Education	<p><u>EXAMINER COMMENT:</u></p> <p>Under the sub-heading "Marlborough: Education" in paragraph 2.12 delete the unsourced "and is currently oversubscribed"</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the last sentence of paragraph 2.12 in the subheading 'Marlborough: Education' as follows: <p>'...St John's is an academically successful school, there is a great demand for places and the school is currently oversubscribed.</p>	For clarity and accuracy
R6	10	Page 12, Paragraph 2.18	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 2.18 delete as irrelevant to the Plan content: "The service from Bedwyn requires a joined-up transport infrastructure and timetables for both rail and bus services as the current provisions are not meeting local needs".</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 2.18 under the sub-heading 'Marlborough: Transport and Car Parking' as follows: <p>'2.18 Transport in the MANP is heavily reliant on private vehicles. There is no longer a rail link from Marlborough although at present there are commuter services from Great Bedwyn and Swindon stations. The service from Bedwyn requires a joined-up transport</p>	For clarity and accuracy

APPENDIX 1

Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
			infrastructure and timetables for both rail and bus services as the current provisions are not meeting local needs. Public bus services during the evenings in rural areas were considered to be in need of improvement in the Marlborough Area Plan in 2012. Since then further cuts have been made to bus services with more cuts proposed in the near future. Inadequate public transport exacerbates rural isolation and many low income groups have to rely on public transport to access services and employment.'	
R7	10	Page 12, Paragraph 2.19	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 2.19 after "at peak times there are parking shortages" add '(Marlborough Neighbourhood Plan Car Parking Study, 2017)'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 2.19 under the sub-heading 'Marlborough: Transport and Car Parking' as follows: <p>2.19 Although there are eight official car parks in Marlborough (providing 638 spaces) at peak times there are parking shortages <u>'(Marlborough Neighbourhood Plan Car Parking Study, 2017)'</u>. There is a limited amount of land available for innovative car parking solutions and, given current and foreseeable public funding constraints, it is feasible that this will remain a problem for the considerable future.</p>	For clarity and accuracy

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Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
R8	10	Page 13, Paragraph 2.24	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 2.24 between "There is a local perception" and "that the imbalance of local housing stock" add ', apparent from public consultation on this Plan,'. Also, in paragraph 2.24 after "as Wiltshire Council's Core Strategy noted" add 'for Wiltshire (para 2.13 p19)'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 2.24 under subheading 'Marlborough: Housing' as follows: <p>'2.24 There is a local perception, <u>apparent from public consultation on this Plan</u>, that the imbalance of local housing stock is as a result of recent planning decisions which do not meet the needs of local people. The perceived lack of affordable housing stock to meet the needs and incomes of local people is further compounded by its landscape setting. Consequently, the amount of suitable land for new houses is restricted. As Wiltshire Council's Core Strategy '<u>for Wiltshire (para 2.13 p19)</u>' noted, the gradual deterioration of affordability has left many residents experiencing difficulty gaining access to the housing market, especially given the low household-based income of certain areas.'</p>	For clarity and accuracy
R9	10	Page 13, Paragraph 2.25	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 2.25 replace "The average house price in 2015 in Marlborough was £318,450. This was considerably higher than the Wiltshire average of £255,060 and was highest of Wiltshire's 20</p>	For clarity and accuracy

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			<p>community areas" with the update provided by the Qualifying Body: 'The average house price in Marlborough is between 40% and 50% higher than the average property price in Wiltshire as a whole (Source: Zoopla, 5 May 2021), the breakdown by type of house is: Terraced +46%, Semi-detached +43%, Detached +52%.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 2.25 under subheading 'Marlborough: Housing' as follows: <p>'2.25 The average house price in 2015 in Marlborough was £318,450. This was considerably higher than the Wiltshire average of £255,060 and was highest of Wiltshire's 20 community areas. The average house price in Marlborough is between 40% and 50% higher than the average property price in Wiltshire as a whole (Source: Zoopla, 5 May 2021), the breakdown by type of house is: Terraced +46%, Semi-detached +43%, Detached +52%. According to the 2011 census the population of Marlborough was 8,400. The present population is estimated to be around 9,200 following inward migration as a result of recent completed housing developments between 2011 and the present.'</p>	
R10	10	Page 13, Paragraph 2.25	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 2.25 provide a source reference for each element of "The present population is estimated to be around 9,200 following inward migration as a result of recent completed housing developments between 2011 and the present" or delete.</p>	For clarity and accuracy

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			<p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Provide a source reference for the figures mentioned in paragraph 2.25 or delete 	
R11	12	Page 16, Paragraph 3.6	<p><u>EXAMINER COMMENT:</u></p> <p>Under heading "3. Planning Policy Context" add to paragraph 3.6: 'Within the Plan it is noted (Table 4.9) that the "Indicative Housing Requirement to 2026" for Marlborough has already been exceeded by 3.1%.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 3.6 on page 16 of the plan as follows: <p>'3.6 Additionally, the Wiltshire Housing Site Allocations Plan was adopted by Wiltshire Council in February 2020 and also forms part of the development plan. It amended the settlement boundary in Marlborough. <u>Within the Plan it is noted (Table 4.9) that the "Indicative Housing Requirement to 2026" for Marlborough has already been exceeded by 3.1%.</u></p>	For clarity and accuracy and to meet the Basic Conditions.
R12	12	Page 17, Paragraph 3.10	<p><u>EXAMINER COMMENT:</u></p> <p>Replace paragraph 3.10 with the following: 'Wiltshire Council has subsequently confirmed that, based on the emerging spatial strategy, there is no strategic necessity for 245 open market</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>dwelling over the period of the draft Plan to 2036 in order to meet the assessed need of the Housing Market Area. Assessed need would be met by a contribution of a minimum of 50 dwellings, the preferred focus for growth being Royal Wotton Bassett.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Replace paragraph 3.10 under subheading 'Strategic Planning Policy' as follows: <p>3.10 It proposes that the 'brownfield target' (of 160 of the 680 homes for Marlborough) will form the 'indicative housing target' for neighbourhood plans (as per NPPF §65). It notes that 'it would be unreasonable to require a neighbourhood plan to always meet its target by itself, but there would need to be evidence to show how a current target will be met or why a shortfall is acceptable'. However, in discussions with officers, a target of 50 homes is considered a more achievable target based on the forecast availability of brownfield sites in the town. In that regard, it notes that 'on current evidence, further employment land is not needed at Marlborough ... and the existing supply is available and capable of meeting the needs', reflecting the importance for the future sustainability of the town of retaining existing employment sites.</p> <p><u>3.10 Wiltshire Council has subsequently confirmed that, based on the emerging spatial strategy, there is no strategic necessity for 245 open market dwellings over the period of the draft Plan to 2036 in order to meet the assessed need of the Housing Market Area. Assessed need would be met by a</u></p>	

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			<u>contribution of a minimum of 50 dwellings, the preferred focus for growth being Royal Wotton Bassett.</u>	
R13	12	Page 17, Paragraph 3.12	<p><u>EXAMINER COMMENT:</u></p> <p>Add to paragraph 3.12: 'However, from research conducted specifically for the MANP (Affordable Housing Needs in Marlborough Area Neighbourhood Plan, Cobweb Consultation, June 2020 update), the estimate of affordable housing requirement for Marlborough is higher than that for the area which was proposed by WC. The exact process by which WC arrived at its estimate of affordable provision for the Marlborough area is not set out but the figure probably takes into account WC's view of land supply and environmental constraints. The Neighbourhood Plan has therefore set out to maximise land supply for housing whilst seeking to respect the environmental constraints of the AONB. As national Planning Guidance confirms, "A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy" (Reference ID: 41-044-20190509).'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 3.12 under subheading 'Strategic Planning Policy' as follows: <p>'3.12 In general terms, the 'direction of travel' of strategic planning policy for Marlborough, as set out in these new documents, is little</p>	For clarity and accuracy to meet the Basic Conditions.

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			different than that of the last few years. The town is not regarded as sustainable location for growth of any scale and must address its challenges within its environmental constraints. <u>However, from research conducted specifically for the MANP (Affordable Housing Needs in Marlborough Area Neighbourhood Plan, Cobweb Consultation, June 2020 update), the estimate of affordable housing requirement for Marlborough is higher than that for the area which was proposed by WC. The exact process by which WC arrived at its estimate of affordable provision for the Marlborough area is not set out but the figure probably takes into account WC's view of land supply and environmental constraints. The Neighbourhood Plan has therefore set out to maximise land supply for housing whilst seeking to respect the environmental constraints of the AONB. As national Planning Guidance confirms, "A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy" (Reference ID: 41-044-20190509).</u>	
R14	15	Page 22, Policy MARL1 : Delivering Affordable Homes in Marlborough	<p><u>EXAMINER COMMENT:</u></p> <p>In Policy MARL1 delete sub-heading "Land Rear of Salisbury Road" and the related Policy content, including the map.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> In Policy MARL1 delete sub-heading 'Land Rear of Salisbury Road' and its Policy content as follows: 	For clarity and accuracy to meet the Basic Conditions.

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			<p><u>Land Rear of Salisbury Road</u></p> <ul style="list-style-type: none"> • The housing scheme shall comprise up to 50 homes on a developable area of approx. 2 Ha • The housing scheme shall comprise a tenure mix of 50% affordable housing and 50% open market housing • The scheme shall have a main highways access to Salisbury Road via the new Marleberg Grange scheme which minimises the loss of land of biodiversity interest on the former railway line and compensates for that loss with a net gain as part of an approved biodiversity strategy and that is achieved in a way that does not disturb with lighting or other highways structures the bat flight line to the nearby tunnel roost • A biodiversity strategy shall demonstrate how the proposal will retain and enhance the green infrastructure along its eastern boundary (the former railway line) to provide a habitat corridor towards the Savernake Forest SSSI to its south and to connect with the corridor to its north as part of demonstrating its proposals to deliver a biodiversity net gain • The layout shall also provide a footpath and cycleway connection with the adjoining Cherry Orchard site and Marleberg Grange and a footpath connection through the site to existing public right of way MARL36 which provides a link through to St John's Academy • The layout, the form and height of housing and the landscape scheme shall reflect the land contours and shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB • Adjoining land to the south of the site boundary shall incorporate landscaping and ecological mitigation where required, including 	

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			<p>woodland planting as an extension to the existing copse (a County Wildlife Site).</p> <ul style="list-style-type: none"> Delete the map relating to the Land Rear of Salisbury Road on the page following 22 which is not numbered. 	
R15	16	Page not numbered, Policy MARL1 : Delivering Affordable Homes in Marlborough	<p><u>EXAMINER COMMENT:</u></p> <p>In Policy MARL1 under sub-heading "Land at Barton Dene" reword the Policy as follows (as a general principle, the use of letters or numbers for Policy paragraphs, rather than bullet points, will allow the content of Policies to be readily referenced):</p> <p>'Within the site boundary shown on the adjacent plan, proposals will be supported for up to 40 homes on a developable area of no more than 1.5 Ha, limited to ensure that the development retains a natural setting, and subject to the following:</p> <p>a) Land shall be safeguarded adjoining the existing leisure centre, as illustrated on the adjacent plan, for the potential provision of new medical facilities to serve the town, this safeguarding will be reviewed within the first review of the Neighbourhood Plan;</p> <p>b) The proposals shall include for 40% affordable housing;</p> <p>c) The layout and form of development shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB and to protect and enhance the setting of Barton Farm House and Barton Farm Stables; the northern boundary has a high sensitivity, and this should be reflected in the finished building heights and boundary treatment;</p> <p>d) A Landscape Visual Impact Assessment, including consideration of heritage assets, shall inform the proposals and accompany the submission;</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>e) Key existing green infrastructure, including mature trees, within the site shall be retained and protected from the impacts of development, subject to practical limitations;</p> <p>f) Safe vehicular, cycle and pedestrian access must be achieved, with appropriate mitigation; this must not compromise access to, or the continued presence and operation of, the existing leisure centre;</p> <p>g) Interconnectivity with the existing footpath network should be achieved whilst respecting existing rights of way; and</p> <p>h) A biodiversity strategy shall demonstrate how the proposal will deliver a biodiversity net gain.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> In Policy MARL1 reword the policy text under sub-heading 'Land at Barton Dene' as follows: <p><u>Land at Barton Dene</u></p> <p>• The scheme shall comprise up to 40 homes on a developable area of no more than 1.5 Ha with sufficient land safeguarded for the potential provision of a new medical centre to serve the town</p> <p>• The housing scheme shall comprise a tenure mix of 40% affordable housing and 50% open market housing as well as 10% private rented housing for occupancy only by qualifying current and former employees of Marlborough College (of an equivalence to affordable rented accommodation)</p>	

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			<ul style="list-style-type: none"> • The housing scheme shall not be occupied until the land has been made available on reasonable terms to an appropriate body to deliver the medical centre • The land for the medical centre will adjoin the existing leisure centre • In the event that a proposal is not made for the medical centre within a timeframe set out in a planning condition then the land may be released for residential use • The layout and form of development shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB and to sustain and enhance the setting of Barton Farm House and Barton Farm Stables • Key existing green infrastructure within the site shall be retained where practicable and incorporated within the development proposals • Neither the housing nor the medical centre scheme shall compromise the access to, or the continued presence and operation of, the existing leisure use on the site • A biodiversity strategy shall demonstrate how the proposal will deliver a biodiversity net gain <p><u>Within the site boundary shown on the adjacent plan, proposals will be supported for up to 40 homes on a developable area of no more than 1.5 Ha, limited to ensure that the development retains a natural setting, and subject to the following:</u></p>	

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			<p><u>a) Land shall be safeguarded adjoining the existing leisure centre, as illustrated on the adjacent plan, for the potential provision of new medical facilities to serve the town, this safeguarding will be reviewed within the first review of the Neighbourhood Plan;</u></p> <p><u>b) The proposals shall include for 40% affordable housing;</u></p> <p><u>c) The layout and form of development shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB and to protect and enhance the setting of Barton Farm House and Barton Farm Stables; the northern boundary has a high sensitivity, and this should be reflected in the finished building heights and boundary treatment;</u></p> <p><u>d) A Landscape Visual Impact Assessment, including consideration of heritage assets, shall inform the proposals and accompany the submission;</u></p> <p><u>e) Key existing green infrastructure, including mature trees, within the site shall be retained and protected from the impacts of development, subject to practical limitations;</u></p> <p><u>f) Safe vehicular, cycle and pedestrian access must be achieved, with appropriate mitigation; this must not compromise access to, or the continued presence and operation of, the existing leisure centre;</u></p> <p><u>g) Interconnectivity with the existing footpath network should be achieved whilst respecting existing rights of way; and</u></p>	

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			<u>h) A biodiversity strategy shall demonstrate how the proposal will deliver a biodiversity net gain.</u>	
R16	18	Page not numbered, Policy MARL1 : Delivering Affordable Homes in Marlborough	<p><u>EXAMINER COMMENT:</u></p> <p>In Policy MARL1 under sub-heading "Land off Cherry Orchard" reword the Policy as follows: 'Within the site boundary shown on the adjacent plan, proposals will be supported for at least 15 homes on a developable area of no more than 1.0 Ha, limited to ensure that the development retains a natural setting, and subject to the following:</p> <ul style="list-style-type: none"> a) The proposals shall include for 40% affordable housing; b) The scheme shall have a highways access on to Cherry Orchard only with appropriate mitigation to assure safe vehicular, cycle and pedestrian access; c) The layout shall retain public right of way MARL30 through and on the boundary of the site; d) The issues arising from part of the site's location within the Marlborough public water Source Protection Zone 1 must be satisfactorily addressed; e) A biodiversity strategy shall include for retaining the green infrastructure along its south-western boundary to protect the habitat corridor (the former railway line) towards the Savernake Forest SSSI to its south, as well as demonstrating proposals to deliver a biodiversity net gain; and f) The layout and form of development shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB. 	For clarity and accuracy to meet the Basic Conditions.

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			<p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> In Policy MARL1 reword the policy text under 'Land off Cherry Orchard' as follows: <p><u>Land off Cherry Orchard</u></p> <p>The housing scheme shall comprise up to 30 homes on a developable area of approx. 1.0 Ha</p> <ul style="list-style-type: none"> The housing scheme shall comprise a tenure mix of 40% affordable housing and 60% open market housing The scheme shall have a highways access on to Cherry Orchard only The layout shall retain public right of way MARL30 through and on the boundary of the site and shall also provide footpath and cycleway connectivity through to the adjoining Land Rear of Salisbury Road site A biodiversity strategy shall demonstrate how the proposal will retain the green infrastructure along its south-eastern boundary to provide a habitat corridor (the former railway line) towards the Savernake Forest SSSI to its south as part of demonstrating its proposals to deliver a biodiversity net gain <p><u>Within the site boundary shown on the adjacent plan, proposals will be supported for at least 15 homes on a developable area of no more than 1.0 Ha, limited to ensure that the development retains a natural setting, and subject to the following:</u></p>	

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			<p><u>a) The proposals shall include for 40% affordable housing;</u></p> <p><u>b) The scheme shall have a highways access on to Cherry Orchard only with appropriate mitigation to assure safe vehicular, cycle and pedestrian access;</u></p> <p><u>c) The layout shall retain public right of way MARL30 through and on the boundary of the site;</u></p> <p><u>d) The issues arising from part of the site's location within the Marlborough public water Source Protection Zone 1 must be satisfactorily addressed;</u></p> <p><u>e) A biodiversity strategy shall include for retaining the green infrastructure along its south-western boundary to protect the habitat corridor (the former railway line) towards the Savernake Forest SSSI to its south, as well as demonstrating proposals to deliver a biodiversity net gain; and</u></p> <p><u>f) The layout and form of development shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB.</u></p>	
R17	19	Page 27, Policy MARL1 : Delivering Affordable Homes in Marlborough	<p><u>EXAMINER COMMENT:</u></p> <p>In Policy MARL1 under sub-heading "Land at Kelham Gardens" provide an identifiable boundary for the site being allocated and reword the Policy as follows:</p> <p>'Within the site boundary shown on the adjacent plan, proposals</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>will be supported for a flatted scheme of up to 10 homes on a developable area of approx. 0.1 Ha, subject to the following:</p> <ul style="list-style-type: none"> a) The proposals shall include for 40% affordable housing; b) The buildings shall be no more than 2.5 storeys in height; c) The scheme shall have a highway access on to Kelham Gardens only; d) The risk from flooding both within the site and beyond the site arising from the development must be addressed as required by national policy and appropriate mitigation measures included through a sequential approach to the development layout as part of a site-specific Flood Risk Assessment; and e) A biodiversity strategy shall demonstrate how the proposal and any works necessary to address ground contamination will avoid any harmful effects on the River Kennet SSSI to its immediate south.' <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> • Provide an identifiable boundary for the 'Land at Kelham Gardens' on the adjacent plan. • In Policy MARL1 reword the policy text under subheading 'Land at Kelham Gardens' as follows: <p><u>Land at Kelham Gardens</u></p> <p>The housing scheme shall comprise a flatted scheme of up to 10 homes on a developable area of approx. 0.1 Ha</p>	

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			<p>• The housing scheme shall comprise a tenure mix of 40% affordable housing and 60% open market housing</p> <p>• The buildings shall be no more than 2.5 storeys in height</p> <p>• The scheme shall have a highways access on to Kelham Gardens only</p> <p>• A flood risk assessment shall demonstrate how the risks from flooding will be managed within the site and how the scheme will not result in increasing flood risk beyond the site</p> <p>• A biodiversity strategy shall demonstrate how the proposal and any works necessary to address ground contamination will avoid any harmful effects on the River Kennet SSSI to its immediate south</p> <p><u>Within the site boundary shown on the adjacent plan, proposals will be supported for a flatted scheme of up to 10 homes on a developable area of approx. 0.1 Ha, subject to the following:</u></p> <p><u>a) The proposals shall include for 40% affordable housing;</u></p> <p><u>b) The buildings shall be no more than 2.5 storeys in height;</u></p> <p><u>c) The scheme shall have a highway access on to Kelham Gardens only;</u></p> <p><u>d) The risk from flooding both within the site and beyond the site arising from the development must be addressed as required by national policy and appropriate mitigation</u></p>	

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			<p><u>measures included through a sequential approach to the development layout as part of a site-specific Flood Risk Assessment; and</u></p> <p><u>e) A biodiversity strategy shall demonstrate how the proposal and any works necessary to address ground contamination will avoid any harmful effects on the River Kennet SSSI to its immediate south.</u></p>	
R18	20	Page 28, Policy MARL1 : Delivering Affordable Homes in Marlborough	<p><u>EXAMINER COMMENT:</u></p> <p>In Policy MARL1 under sub-heading "D. For the avoidance of doubt,", remove the second sentence.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> In Policy MARL1 amend sub-heading 'D' as follows: <p>D. For the avoidance of doubt, Policy MARL3 will apply to all of the site allocation schemes in respect of the housing type mix.</p> <p>Proposals for single tenure, specialist accommodation schemes or other housing schemes intended for older people on a site allocated for housing uses will not benefit from this policy.</p>	For clarity and accuracy
R19	20	Page 28, paragraph 5.6	<p><u>EXAMINER COMMENT:</u></p> <p>Under the heading "Policy MARL1: Delivering Affordable Homes in Marlborough" amend paragraph 5.6 to read: 'This policy allocates three sites in Marlborough to deliver a total of approximately 26 affordable homes from a total of approximately 65 homes.</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.6 as follows <p>5.6 This policy allocates four sites in Marlborough to deliver a total of approx. 61 affordable (or equivalent affordable) homes from a total of approx. 130 homes. Together with other recent proposals, this policy will enable the delivery of more than 120 new affordable homes in the MANP area. The location of the town in the AONB has enabled a higher number of affordable homes to be secured than Core Policy 43. <u>approximately 26 affordable homes from a total of approximately 65 homes.</u></p>	
R20	21	Page 28, paragraph 5.8	<p><u>EXAMINER COMMENT:</u></p> <p>Amend the third sentence of paragraph 5.8 to replace “two of the four sites are outside but adjoin its development boundary” with ‘one of the three sites is outside but adjoins its development boundary’ and the NPPF paragraph reference from “172” to ‘176’.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.8 as follows <p>5.8 The evidence to demonstrate this level of need for new affordable homes is contained in the separate Housing Needs Assessment report. The policy requirements for each site have been derived from the site assessment process, including mitigation measures identified in the Sustainability Appraisal report. Given the</p>	For clarity and accuracy to meet the Basic Conditions.

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			town lies within the North Wessex Downs AONB, and two of the four sites are outside but adjoin its development boundary <u>one of the three sites is outside but adjoins its development boundary</u> , the process has also included an assessment of the need for the new homes, of the scope for meeting the need for those homes in some other way and of any detrimental effect on the landscape (and the extent to which that could be moderated) in line with NPPF §17 26 <u>26</u> . All of the details of these assessments are contained in the Site Assessment report, which is published separately.	
R21	21	Page 28, paragraph 5.9	<p><u>EXAMINER COMMENT:</u></p> <p>Replace the fourth sentence of paragraph 5.9 with: 'It has been demonstrated that there are insufficient available and suitable sites of a lower flood risk than this site to meet the Marlborough housing requirement, thus the sequential test is passed. As it is 'not possible for development to be located in areas with a lower risk of flooding taking into account wider sustainable development objectives (as per NPPF paragraph 163)', the exception test has been applied.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Replace the fourth sentence of paragraph 5.9 as follows: <p>Although the MANP is able to allocate land outside the flood zone, it is considered that the remediation and redevelopment of the site for a new residential use presents a more sustainable</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>option than leaving the land derelict, and so the sequential test is passed.</p> <p><u>It has been demonstrated that there are insufficient available and suitable sites of a lower flood risk than this site to meet the Marlborough housing requirement, thus the sequential test is passed. As it is 'not possible for development to be located in areas with a lower risk of flooding taking into account wider sustainable development objectives (as per NPPF paragraph 163)', the exception test has been applied.</u></p>	
R22	21	Page 29, paragraph 5.10	<p><u>EXAMINER COMMENT:</u></p> <p>Replace paragraph 5.10 with: 'The site at Barton Dene represents a modest extension of the development boundary in a sustainable location with non-car accessibility to the town centre. The site has been assessed as 'major development' in the AONB, as per NPPF paragraph 172, and it has been concluded that the public benefits of the development – in this instance the delivery of vital affordable homes – outweigh its detrimental effects on the local environment and landscape, the effects of which are assessed as capable of appropriate mitigation.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> • Replace paragraph 5.10 as follows: <p>The other two sites at Barton Dene and Rear of Salisbury Road will represent modest extensions of the development boundary in sustainable locations with high non-car accessibility to the town</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>centre. Both have been assessed as 'major development' in the AONB, as per NPPF §172, which has concluded that the public benefits of their development—the leverage of delivering 50% affordable homes, rather than the normal 40% requirement—outweigh their detrimental effects on the local environment and landscape, the extent of which both sites will be capable of successful moderation.</p> <p><u>The site at Barton Dene represents a modest extension of the development boundary in a sustainable location with non-car accessibility to the town centre. The site has been assessed as 'major development' in the AONB, as per NPPF paragraph 176, and it has been concluded that the public benefits of the development – in this instance the delivery of vital affordable homes – outweigh its detrimental effects on the local environment and landscape, the effects of which are assessed as capable of appropriate mitigation.</u></p>	
R23	21	Page 28, Paragraph 5.11	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.11, first sentence, replace “130” with ‘65’ and replace “greater” with ‘significant’; delete the third sentence commencing “The Rear of Salisbury Road scheme ...</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.11 as follows: <p>5.11 Although the cumulative effect of delivering 130 65 new homes on local transport and other social infrastructure, as well as</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>the heritage assets, AONB and AQMA will inevitably cause some degree of harm over the present state, it is considered that that much of that harm can be mitigated (as required by Clause B of the policy) and the ability to deliver new affordable homes carries greater significant weight in the planning balance. Clause B also requires that the schemes realise opportunities to improve the local network of footpaths and cycleways, as well as ensuring their own layouts are well suited to walking and cycling. The Rear of Salisbury Road scheme, for example, will enable the scheme and the wider area to better connect with the town centre and school.</p> <p>The Town and Parish Councils will seek to co-ordinate these improvements with their own investment plans using their CIL Fund (see §6.12).</p>	
R24	22	Page 29, Policy MARL2 : Encouraging Affordable Homes in Marlborough	<p><u>EXAMINER COMMENT:</u></p> <p>Reword Policy MARL2 as follows (for consistency with my recommendations for MARL1 I am showing letters, but numbers would be equally acceptable):</p> <p>'Proposals to deliver affordable homes for first-time buyers in Mildenhall are encouraged provided:</p> <ul style="list-style-type: none"> a) The new housing respects the village character and form and is provided as infill within the existing built area; b) All of the homes have two or three bedrooms only and are either discounted market sales housing or other routes to affordable homes for first-time buyers; c) The design and layout of the scheme sustains and enhances the significance of the Mildenhall Conservation Area and the setting of other heritage assets as defined in Policy MARL12; 	For clarity and accuracy to meet the Basic Conditions.

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			<p>d) The layout and form of housing is designed to conserve the designated landscape of the North Wessex Downs Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics, and</p> <p>e) Where appropriate to the location, a landscape scheme is designed to support the transition from the built area of the village into the surrounding countryside.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL2 as follows: <p>Proposals to deliver an affordable housing scheme in Mildenhall will be encouraged and supported, provided:</p> <p>1. The scheme comprises no more than ten units, each of which has two or three bedrooms only;</p> <p>2. All of the units are affordable homes in the form of either discounted market sales housing or units that provide other affordable routes to home ownership for households under 40 years of age;</p> <p>3. The design and layout of the scheme sustains and enhances the significance of the Mildenhall Conservation Area and the setting of other heritage asset as defined in Policy MARL12;</p> <p>4. The layout and form of housing shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB and, where appropriate to the location, shall include the provision of a landscape scheme to successfully manage the transition from the built up village into the surrounding countryside.</p>	

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			<p><u>Proposals to deliver affordable homes for first-time buyers in Mildenhall are encouraged provided:</u></p> <p><u>a) The new housing respects the village character and form and is provided as infill within the existing built area;</u></p> <p><u>b) All of the homes have two or three bedrooms only and are either discounted market sales housing or other routes to affordable homes for first-time buyers;</u></p> <p><u>c) The design and layout of the scheme sustains and enhances the significance of the Mildenhall Conservation Area and the setting of other heritage assets as defined in Policy MARL12;</u></p> <p><u>d) The layout and form of housing is designed to conserve the designated landscape of the North Wessex Downs Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics, and</u></p> <p><u>e) Where appropriate to the location, a landscape scheme is designed to support the transition from the built area of the village into the surrounding countryside.</u></p>	
R25	22	Page 29, Paragraph 5.12	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.12 replace "an affordable housing scheme" with 'infill affordable homes for first-time buyers'.</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.12 as follows: <p>5.12 This policy encourages the owners of land to bring forward proposals in conjunction with Wiltshire Council and the Parish Council for an affordable housing scheme <u>infill affordable homes for first-time buyers</u>. In doing so, it sets out the key development requirements to ensure a successful scheme, both in terms of its housing outcome and its design quality. It operates alongside Policy MARL12, recognising that much of the village lies in the Mildenhall ('Minal') Conservation Area.</p>	
R26	23	Page 30, Paragraph 5.13	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.13 delete the third sentence.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Delete the third sentence in paragraph 5.13 as follows: <p>5.13 Evidence from public consultations with the villagers indicate a desire to see more younger people in the village to maintain its vibrancy in the face of an otherwise aging population. The affordable housing evidence (Cobweb) identified the overall affordable housing needs of the MANP area, including Mildenhall. It concludes that the MANP needs to bring forward proposals for at least 100 affordable homes to address this issue and Policy MARL1 contains the majority of those proposals.</p>	For clarity and accuracy to meet the Basic Conditions.

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R27	23	Page 30, Paragraph 5.14	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.14 delete the second sentence</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Delete the second sentence of paragraph 5.14 and update NPPF paragraph as follows: <p>5.14 At Mildenhall, the key driver is more specific than the wider MANP area, i.e. to deliver homes specifically suited to young people and families. The village has some local services and the higher order services (schools, medical etc) are located only a mile away in Marlborough. This is broadly in line with the Government's 'starter home' and 'entry-level home' proposition (as per NPPF §742) which are forms of affordable housing that are especially well-suited to targeting young people as first-time buyers but cannot be delivered in this location due to its position in the AONB.</p>	For clarity and accuracy to meet the Basic Conditions.
R28	23	Page 30, Paragraph 5.15	<p><u>EXAMINER COMMENT:</u></p> <p>Replace paragraph 5.15 with: 'This Policy is a locally appropriate response to Core Policy 44 which says "a proactive approach to the provision of affordable housing will be sought in conjunction with parish councils and working with local communities and other parties."</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Replace paragraph 5.15 as follows: <p>5.15 The policy provision is similar to that of a rural exception site and blends and refines elements of Core Policies 43, 44 and 45 of the Core Strategy in respect of providing a specific type of affordable homes in a manner that reflects most of the requirements of the 'rural exception site' criteria.</p> <p><u>This Policy is a locally appropriate response to Core Policy 44 which says "a proactive approach to the provision of affordable housing will be sought in conjunction with parish councils and working with local communities and other parties.</u></p>	
R29	23	Page 30, Policy MARL3 : Meeting Local Housing Needs	<p><u>EXAMINER COMMENT:</u></p> <p>Reword Policy MARL3 as follows: 'To be supported, development proposals for the sites allocated at MARL1 and for windfall sites within the designated Marlborough Settlement Boundary must address evidenced local housing needs and maximise their contribution of two and three bed affordable housing, wherever possible exceeding the levels stipulated in Wiltshire Council Policy. Specialist accommodation for elderly people is not considered a current priority.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Reword Policy MARL3 as follows: 	For clarity and accuracy to meet the Basic Conditions.

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			<p>Proposals for windfall housing development within the defined Marlborough development boundary will only be supported if they will deliver homes of a two or three bedroom type. Proposals for single tenure, specialist accommodation or other housing schemes intended for older people will be resisted.</p> <p><u>To be supported, development proposals for the sites allocated at MARL1 and for windfall sites within the designated Marlborough Settlement Boundary must address evidenced local housing needs and maximise their contribution of two and three bed affordable housing, wherever possible exceeding the levels stipulated in Wiltshire Council Policy. Specialist accommodation for elderly people is not considered a current priority.</u></p>	
R30	23	Page 30, Paragraph 5.16	<p><u>EXAMINER COMMENT:</u></p> <p>Amend paragraph 5.16 by replacing "it discourages proposals for any form of housing intended for older people" with 'it seeks to maximise the proportion of housing that is affordable and to discourage proposals for any form of housing intended solely for older people</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.16 as follows: <p>5.16 The policy serves two purposes: it refines Core Policy 45 by specifying the focus on smaller household and family housing in</p>	For clarity and accuracy to meet the Basic Conditions.

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			the town and it discourages proposals for any form of housing intended for older people <u>it seeks to maximise the proportion of housing that is affordable and to discourage proposals for any form of housing intended solely for older people.</u> Together with the delivery of affordable homes by the consistent application of Core Policy 43, this policy and the site allocation policies of MANP form the bedrock of the plan's housing objective.	
R31	24	Page 31, Paragraph 5.19	<u>EXAMINER COMMENT:</u> Delete the last two sentences of paragraph 5.19. <u>REQUIRED MODIFICATION:</u> <ul style="list-style-type: none"> Delete the last two sentences of paragraph 5.19 as follows: <p>5.19 Whilst there will continue to be a market demand for such schemes, the opportunity cost of losing precious brownfield sites that could have delivered affordable homes and their effect in accelerating the aging population is unsustainable in a town like Marlborough. With such a healthy provision of this type of housing now in the town, there is no additional need for the remainder of the plan period. Future reviews of the MANP will assess if this policy position needs to change in the light of any new evidence on the demand and supply in that segment.</p>	For clarity and accuracy to meet the Basic Conditions.
R32	24	Page 31, Policy MARL4 : Supporting a	<u>EXAMINER COMMENT:</u> Amend Policy MARL4 to add a new element C (and re-letter subsequent paragraphs): 'The Town Centre will be an appropriate	For clarity and accuracy to meet the Basic Conditions.

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		Thriving Town Centre	<p>location for local community uses and some learning and non-residential institution uses which benefit from its ease of access.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL4 to add a new element 'C' and re-letter subsequent paragraphs as follows: <p><u>C. The Town Centre will be an appropriate location for local community uses and some learning and non-residential institution uses which benefit from its ease of access.</u></p> <p><u>D.</u> Proposals for new residential uses on upper floors will be supported, provided they:</p> <ol style="list-style-type: none"> are carefully designed to achieve a good quality of life for residents; achieve well-designed development that creates a safe and comfortable living standard, and which positively addresses the townscape through good design that enhances the external appearance of buildings; take account of existing ground floor uses and mitigate accordingly to minimise the scope for conflict with existing commercial operations and ensure that future residents have a good quality of life in amenity terms and that existing commercial operations are not unduly constrained; so far as possible, avoid residential access via rear service yards in order to enhance natural surveillance and assist legibility. Where this is unavoidable, measures to enhance legibility such as lighting should be incorporated into design, and clear distinction should be 	

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			<p>made to delineate between residential access routes and areas required for commercial activity; and</p> <p>5. minimise street clutter by directing supporting infrastructure such as bin stores and cycle facilities away from active frontages.</p> <p>DE. Development proposals that require some loss of ground floor floorspace to facilitate access to upper floor residential will be supported where this can be achieved without undermining the integrity and viability of the existing unit(s); and provided it will not result in a proliferation of residential accesses that would undermine the vitality and viability of an individual shopping frontage.</p> <p>EE. All development proposals in Marlborough Town Centre must accord with Policy MARL10 and Policy MARL14 in respect of sustaining and enhancing the special architectural and historic character of the Marlborough Conservation Area and of responding to the presence of Local Heritage Assets respectively.</p>	
R33	24	Page 32, Paragraph 5.22	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.22 replace "The retail evidence base has been used to define" with 'The Kennet Local Plan defined'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.22 as follows: <p>5.22 The policy takes account of the new Use Classes Order which defines Commercial, Business and Services Uses by combining previous retail, financial services, café/restaurant, offices and other social uses. It replaces and updates the former Kennet Local Plan policies (ED18 – ED19) to bring them up to date with the NPPF and</p>	For clarity and accuracy to meet the Basic Conditions.

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			the Order and to broaden their scope and detail. The retail evidence base has been used to define The Kennet Local Plan defined the Town Centre area, which contains almost all of the uses expected of a town centre location (and as defined by the NPPF). It requires any future such use to be located within this boundary, which has been drawn to encompass potential opportunities for redevelopment. It extends behind the High Street from Bath Road and part way along London Road to include the public car parks and green spaces (Coopers Meadow and Priory Gardens) complementing the town centre.	
R34	24	Page 33, Paragraph 5.26	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.26 the reference to "MARL14" should be corrected to 'MARL13</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Change the reference to 'MARL14' to 'MARL13' in paragraph 5.26 as follows: <p>5.26 The policy will operate alongside national and other development plan policies relating to heritage assets (including policies MARL10 and MARL134 of this plan), as the Conservation Area (designated in 1971 and recognised as one of the finest in the country in 1976) covers the whole of the Town Centre and beyond. There are also more than 100 listed buildings of various grades with most others have local heritage and/or townscape</p>	For clarity and accuracy to meet the Basic Conditions.

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			value. It must also operate within the flux of permitted development rights applying to town centres, although some of those rights are not applicable here because of its heritage assets.	
R35	25	Page 33, Policy MARL5 : Improving Public Parking	<p><u>EXAMINER COMMENT:</u></p> <p>Amend element 1 of Policy MARL5 to remove “kerbs,” and correct element 5 to start with a capital letter.</p> <p>Amend the Policies Map to identify with the red line only that area not presently allocated for parking</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL5 as follows: <ol style="list-style-type: none"> There will be no permanent buildings or structures or other urbanising effects such as kerbs, paved footways or landscape bunding; The car park comprises a grass grid, permeable surface only; Its use will be confined to cars and not any high-sided vehicle; Vehicular access to the car park is in a location and of a type to be agreed with the Highways Authority; f<u>T</u>he length and width of the car park shall retain a meaningful nib of land between its southern end and Hyde Lane and shall retain the continuous swathe between its eastern edge and Free's Avenue; and Any impact on the amenities of adjoining residents can be satisfactorily mitigated. 	For clarity and accuracy to meet the Basic Conditions.

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			<ul style="list-style-type: none"> Amend the Policies Map to identify with the red line only that area not presently allocated for parking 	
R36	25	Page 34, Policy MARL6 : Delivering New Cemetery Land	<p><u>EXAMINER COMMENT:</u></p> <p>In Policy MARL6 replace the second sentence with: 'The laying out of the land must conserve the designated landscape of the North Wessex Downs Area of Outstanding Natural Beauty and its setting.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL6 as follows: <p>The Neighbourhood Plan allocates land at The Common, as shown on the Policies Map, for the purpose of extending the adjoining cemetery. Proposals for any new buildings ancillary to this use will be supported, provided they make appropriate access provision and avoid any significant harm on the North Wessex Downs AONB. <u>The laying out of the land must conserve the designated landscape of the North Wessex Downs Area of Outstanding Natural Beauty and its setting.</u></p>	For clarity and accuracy to meet the Basic Conditions.
R37	25	Page 35, Policy MARL7 : Protecting & Supporting Community Facilities	<p><u>EXAMINER COMMENT:</u></p> <p>In Policy MARL7 move the sentence "Development proposals to sustain or extend the viable use of existing community facilities, and the development of new facilities, will be supported" from element B to the beginning of element A.</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>Add to element B: 'or a change of use or a mixed use will help to retain the community benefit of a building.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL7 as follows: <p><u>A. Development proposals to sustain or extend the viable use of existing community facilities, and the development of new facilities, will be supported.</u> The Neighbourhood Plan defines the following properties as community facilities:</p> <p>In Marlborough:</p> <ul style="list-style-type: none"> Marlborough Town Hall, 5 High Street, Marlborough, SN8 1AA Marlborough Community and Youth Centre, St Margaret's Mead, Marlborough, SN8 4BA Marlborough Library, 91 High Street, Marlborough, SN8 1HD The Merchant's House and Marlborough Museum, 132 High Street, Marlborough, SN8 1HN Marlborough Scout Hut, 44 George Lane, Marlborough, SN8 4BX St Mary's Church Hall, Silverless St, Marlborough, SN8 1JQ Marlborough Leisure Centre, Barton Dene, Marlborough, SN8 1PB St Peter's Church, High Street, Marlborough, SN8 1HQ Christchurch, New Road, Marlborough, SN8 1AH Friends Meeting House, The Parade, Marlborough, SN8 1NE Marlborough Car Parks at George Lane, Waitrose, Polly, Castle & Ball, Hyde Lane, Kennet Place and The Parade 	

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			<ul style="list-style-type: none"> • Marlborough Medical Practice, George Lane, Marlborough, SN8 4 BY <p>In Manton:</p> <ul style="list-style-type: none"> • Manton Village Hall, Marlborough, SN8 4HR <p>In Mildenhall:</p> <ul style="list-style-type: none"> • Mildenhall Village Hall, Home Farm Close, Mildenhall, Marlborough, SN8 2NY <p>B. Proposals that will result in either the loss of or cause significant harm to a defined facility will be resisted, unless it can be clearly demonstrated that the operation of the facility, or the on-going delivery of the community value of the facility, is no longer financially viable, <u>or a change of use or a mixed use will help to retain the community benefit of a building.</u></p> <p>. Development proposals to sustain or extend the viable use of existing community facilities, and the development of new facilities, will be supported.</p>	
R38	26	Page 36, Policy MARL8 : Protecting and Improving Sports Facilities	<p><u>EXAMINER COMMENT:</u></p> <p>In element C of Policy MARL8 replace "has received planning permission" with ' , at least as conveniently located and well-equipped, is provided'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> • Amend element C of Policy MARL8 as follows: 	For clarity and accuracy to meet the Basic Conditions.

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			C. Proposals that will result in either the loss of or cause significant harm to an existing sport facility will be resisted, unless it can be clearly demonstrated that the operation of the facility is no longer financially viable or that a replacement facility has received planning permission <u>at least as conveniently located and well-equipped, is provided.</u>	
R38	27	Page 37, Policy MARL9 : A Design Code for the Marlborough Conservation Area	<p><u>EXAMINER COMMENT:</u></p> <p>Amend the heading of Policy MARL9 by replacing "A Design Code" with 'Design Guidance'. Also, within Policy MARL9 delete two uses of "and its setting"</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL 9 as follows: <p>Policy MARL9: A Design <u>Guidance</u> Code for the Marlborough Conservation Area</p> <p>Development proposals should sustain and enhance the special architectural and historic significance of the designated Marlborough Conservation Area and its setting. The significance of the Conservation Area and its setting are defined in the design principles and guidance of the Marlborough Conservation Area Statement and the Marlborough Town Character Study, to which all proposals must have full regard.</p>	For clarity and accuracy to meet the Basic Conditions.

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R39	27	Page 37, Policy MARL10 : A Design Code for Marlborough's Areas of Special Quality	<p><u>EXAMINER COMMENT:</u></p> <p>Amend heading of Policy MARL10 by replacing "A Design Code" with 'Design Guidance'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend MARL10 Policy heading as follows: <p>Policy MARL10: A Design Code Guidance for Marlborough's Areas of Special Quality</p>	For clarity and accuracy to meet the Basic Conditions.
R40	27	Page 40, Policy MARL11: A Design Code for Manton	<p><u>EXAMINER COMMENT:</u></p> <p>Amend heading of Policy MARL11 by replacing "A Design Code" with 'Design Guidance'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the heading for Policy MARL11 as follows: <p>Policy MARL11: A Design Code Guidance for Manton</p>	For clarity and accuracy to meet the Basic Conditions.
R41	27	Page 42, Policy MARL12: A Design Code for Mildenhall	<p><u>EXAMINER COMMENT:</u></p> <p>Amend heading of Policy MARL12 by replacing "A Design Code" with 'Design Guidance'.</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the heading for Policy MARL12 as follows <p>Policy MARL12: A Design Guidance Code for Mildenhall</p>	
R42	28	Page 43, Policy MARL13: Protecting Local Heritage Assets	<p><u>EXAMINER COMMENT:</u></p> <p>Reword Policy MARL13 as follows: 'A. The local non-designated Heritage Assets are identified on the list in Appendix A. Development proposals that directly or indirectly affect these non-designated heritage assets will be assessed with a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset. B. At the North West boundary of the Neighbourhood Area, development proposals must assess and address their impact on the Stonehenge & Avebury World Heritage Site and its setting.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL13 as follows: <p>A. The Neighbourhood Plan identifies Local Heritage Assets, as included on the list in Appendix A. Proposals that will result in harm to, or unnecessary loss of, a Local Heritage Asset, will be resisted, unless it can be demonstrated that there is a public benefit that outweighs the harm or loss.</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>B. Development will be supported which demonstrates that any potential impacts upon the World Heritage Site and its setting has been fully assessed in accordance with existing development plan policies</p> <p><u>A. The local non-designated Heritage Assets are identified on the list in Appendix A. Development proposals that directly or indirectly affect these non-designated heritage assets will be assessed with a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.</u></p> <p><u>B. At the North West boundary of the Neighbourhood Area, development proposals must assess and address their impact on the Stonehenge & Avebury World Heritage Site and its setting.</u></p>	
R43	28	Savernake Parish Local Heritage Assets Study (July 2021)	<p><u>EXAMINER COMMENT:</u></p> <p>Add to the cover of the "Savernake Parish Local Heritage Assets Study July 2021" details of the independent vetting of the content.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the evidence base text on the front cover of the Savernake Parish Local Heritage Assets Study (July 2021) report as follows: 	For clarity and accuracy to meet the Basic Conditions.

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			'Prepared by Savernake Parish Council, <u>and professionally vetted by the Neighbourhood Plan consultants</u> , as part of the evidence base of the Marlborough Area Neighbourhood Plan.'	
R44	29	Page 44, Policy MARL14: Protecting and Improving Green Infrastructure	<p><u>EXAMINER COMMENT:</u></p> <p>In element A of Policy MARL14 replace the first sentence with: 'The Green Infrastructure Network, as shown on the Policies Map, is recognised for its existing value and further potential providing open space and ecological connectivity.'</p> <p>In element C, in the first sentence, replace "land" with 'green space' and replace the last sentence with 'Development proposals that will lead to the improvement and extension of the Network will be supported in principle.'</p> <p>Reword element D as follows: 'Proposals that will contribute to sequestering carbon through appropriate woodland planting and other effective means proportionate to the scale and nature of the proposal will be supported, whether delivered on the proposal site or at another agreed location.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL14 as follows: <p>A. The Neighbourhood Plan designates a Green Infrastructure Network, as shown on the Policies Map, for the purpose of promoting sustainable movement and ecological connectivity</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>through the town and neighbouring parishes and for mitigating climate change. <u>The Green Infrastructure Network, as shown on the Policies Map, is recognised for its existing value and further potential providing open space and ecological connectivity.</u> The Network comprises The Common, the water meadows at Marlborough College, the River Kennet, Local Green Spaces, Valued Community Open Spaces, informal open spaces, allotments, playing fields, off-street footpaths/cycleways, children's play areas, woodland and land of biodiversity value.</p> <p>B. Development proposals that lie within or adjoining the Network are required to have full regard maintaining and improving the Network, including delivering a net gain to general biodiversity assets, in the design of their access and layouts, landscaping schemes and public open space provisions. In that part of the Network that forms the southern setting to the Marlborough Conservation Area, proposals must also have regard to the contribution that its open character makes to the significance of the Conservation Area.</p> <p>C. Proposals that will lead to the loss of land green space lying within the Network and that will undermine its integrity will be resisted. Development proposals that will lead to the extension of the Network will be supported, provided they are co-ordinated with local investment projects to improve the Network and they are consistent with all other relevant policies of the development plan.</p> <p>D. Proposals that will contribute to sequestering carbon through appropriate woodland planting and other effective means</p>	

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			proportionate to the scale and nature of the proposal will be supported, whether delivered on the proposal site or at another agreed location within the Network that has been designated for that purpose.	
R45	29	Whole document	<p><u>EXAMINER COMMENT:</u></p> <p>Amend the related Policy Maps to exclude all green areas that were identified in relation to Policy MARL17</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend policy maps, removing green areas identified relating to Policy MARL17 	For clarity and accuracy to meet the Basic Conditions.
R46	30	Page 45, Policy MARL15: Protecting Local Green Spaces	<p><u>EXAMINER COMMENT:</u></p> <p>Amend the opening sentence of Policy MARL15 to 'Local Green Spaces are designated in the locations listed below and shown on the Policies Map and in detail in Appendix B.' (re-letter the existing Appendix B accordingly).</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the opening sentence of Policy MARL15 as follows <p>The Neighbourhood Plan designates Local Green Spaces in the locations shown on the Policies Map and listed below. Proposals for inappropriate development in a Local Green Space will only be supported in very special circumstances.</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p><u>Local Green Spaces are designated in the locations listed below and shown on the Policies Map and in detail in Appendix B</u></p> <ul style="list-style-type: none"> • Re-letter Appendix B accordingly. 	
R47	30	Page 45, Paragraphs 5.52 and 5.53.	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.52 amend "paragraphs 99 - 100 of the NPPF" to read 'paragraphs 101 - 103 of the NPPF.'</p> <p><u>WILTSHIRE COUNCIL COMMENT:</u></p> <p>In paragraph 5.53 amend '...criteria of paragraph 100 of the NPPF.' To read '.... Criteria of paragraph 102 of the NPPF.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> • Amend paragraph 5.52 on page 45 as follows: <p>'5.52 This policy designates a series of Local Green Spaces in accordance with paragraphs 101 - 103 of the NPPF. A designation has the policy effect of the equivalence of the Green Belt in terms of the definition of 'inappropriate' development and of the 'very special circumstances' test when determining planning applications located within a designated Local Green Space.'</p> <ul style="list-style-type: none"> • Amend paragraph 5.53 on page 45 as follows: 	For clarity and accuracy to meet the Basic Conditions.

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			'5.53 A review of all open land within and adjoining each settlement has been completed, informed by the qualifying criteria of paragraph 100 102 of the NPPF.'	
R48	30	Policies Map	<p><u>EXAMINER COMMENT:</u></p> <p>Amend the Policies Map to remove the Space at Marlborough Green which is not being designated; also amend the boundary of the Salisbury Road Recreation Ground Local Green Space to exclude the surfaced, entrance car park.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the policies map to remove 'Space at Marlborough Green' and amend the boundary of 'Salisbury Road Recreation Ground Local Green Space' 	For clarity and accuracy to meet the Basic Conditions.
R49	30	Appendix	<p><u>EXAMINER COMMENT:</u></p> <p>Add an Appendix B to provide individual maps of the designated spaces at a scale that allows the boundary to be identified with absolute clarity.</p> <p><u>REQUIRED MODIFICATION</u></p> <ul style="list-style-type: none"> Add an Appendix B to show individual maps of designated spaces at a scale that allows the boundary to be clearly identified 	For clarity and accuracy to meet the Basic Conditions.

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R50	31	Page 46, Policy MARL16: Protecting Valued Community Open Spaces	<p><u>EXAMINER COMMENT:</u></p> <p>Within "Policy MARL16: Protecting Valued Community Open Spaces" in the opening sentence of element A replace "Map" with 'Maps'.</p> <p>Reword element B as follows: 'Development within a Valued Community Open Space will only be supported if it preserves and where possible enhances its contribution to the health and wellbeing of visitors and residents, public access, and it is ancillary to the community use and retains the openness of the Space. Any loss of a Space will only be permitted where alternative better provision has been secured, or an assessment has demonstrated that the Space is surplus to requirements.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL16 as follows: <p>A. The Neighbourhood Plan identifies the following as Valued Community Open Spaces, as shown on the Policies Maps:</p> <ol style="list-style-type: none"> Orchard Road Play Area St Margaret's Mead Parcel 1 St Margaret's Mead Parcel 2 St. Margaret's Mead Parcel 3, Savernake Crescent St John's Park Play Area Plume of Feathers Garden Tin Pit, land next to the River Og Mildenhall Play Area 	For clarity and accuracy to meet the Basic Conditions.

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			<p>9. Kennet Place Waterfront Garden 10. Land at College Fields / Barton Park, Betjeman Road 11. Land at College Fields / Barton Park, MacNeice Drive 12. Land at College Fields / Barton Park Hawkins Meadow 13. The Bath Road Triangle, next to the A4 at Manton 14. Land to the north of St John The Baptist Church, Mildenhall 15. Maurice Way Green Parcel 1 16. Maurice Way Green Parcel 2 17. Land at Cadley on the western side of the A346 from Cadley Garage to Dobie and Wyatt's 18. The Pound, Manton 19. Manton Green 20. War Memorial, London Road</p> <p>B. Development within a Valued Community Open Space will only be supported if it preserves and where possible enhances their <u>its</u> contribution to the health and wellbeing of visitors and residents, public access and if it is ancillary to it's the community use <u>and retains the openness of space</u>. Any loss of a Space will only be permitted where alternative better provision <u>has been</u> can be secured, and <u>or</u> an assessment has determined <u>demonstrated</u> that the sSpace is surplus to requirements.</p> <p>C. The Neighbourhood Plan identifies the following as Valued Community Open Spaces with existing protection: 1. Dam of Kings Fishpond – Tin Pit 2. Elcot Lane Village Green 3. Elcot Lane Allotments 4. St John's Close Allotments 5. Stone Bridge Lane Allotments</p>	

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			6. St Mary's Church Yard, Marlborough 7. St Peter's and St Paul's Church Yard, Marlborough 8. St John the Baptist Church Yard, Minal 9. St George's Church Yard, Presbute 10. The Common 11. The Green - Herd Street	
R51	31	New Policies Maps	<p><u>EXAMINER COMMENT:</u></p> <p>Check and amend as required the boundary to the Space MARL16 17 at Cadley to exclude any private garden land</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> In relation to Policy MARL16 check and amend as required on the Policies Maps the boundary of the Valued Community Open Spaces at point '7' (Tin Pit, land next to the River Og) and point '17' (Land at Cadley on the western side of the A346 from Cadley Garage to Dobie and Wyatt's), to exclude any private garden land and ensure it is accurately identified. 	For clarity and accuracy to meet the Basic Conditions.
R52	31	Policies Maps	<p><u>EXAMINER COMMENT:</u></p> <p>Incorporate the Spaces identified under Policy MARL16 onto the same Policies Maps as Policy MARL14, ensuring that the boundaries are identified clearly, and add the boundaries, separately distinguished, for the spaces identified in element C of Policy MARL16.</p>	For clarity and accuracy to meet the Basic Conditions.

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			<u>REQUIRED MODIFICATION:</u> <ul style="list-style-type: none"> Add the Space identified by Policy MARL16 onto the same Policies Map as Policy MARL14, showing clear boundaries 	
R53	32	Page 47, Policy MARL17: Conserving the Scenic Beauty of the AONB	<u>EXAMINER COMMENT:</u> Delete element B of Policy MARL17 (and consequently remove the letter A from the first element). <u>REQUIRED MODIFICATION:</u> <ul style="list-style-type: none"> Delete element B from policy MARL17 and remove letter A from the first element as follows: <p>Policy MARL17: Conserving the Scenic Beauty of the AONB</p> <p>A. Development proposals outside the defined Marlborough development boundary and of the built up areas of Manton and Mildenhall will only be supported if it can be demonstrated they will conserve and enhance the landscape and special scenic beauty of the Area of Outstanding Natural Beauty and they have had full regard to the following specific characteristics of the following landscapes:</p> <p>Marlborough Downs and Common</p> <ul style="list-style-type: none"> primarily an essentially rural, agricultural character of visually exposed, open arable landscapes but with an intimate and pastoral character in areas of valley floor pasture associated with the River Og native and robust character of dense blocks of woodland are scattered across the downs 	For clarity and accuracy to meet the Basic Conditions.

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			<p>Kennet Valley</p> <ul style="list-style-type: none"> • open arable landscape along the chalk valley sides but with a tranquil, intimate and pastoral character on the valley floor in closer proximity to the River Kennet enclosed by the chalk valley sides • Marlborough is bounded at each end by flat riverside meadows: <ul style="list-style-type: none"> North and South of the River Kennet at Manton Land north and south of the River Kennet between Stonebridge Lane and the disused railway track North and South of the River Kennet at Preshute Lane West and East of the River Og from Marlborough to Bay Bridges North and South of the River Kennet between Marlborough and Mildenhall and on to the boundary with Axford Parish North and South of the River Kennet from Manton to the boundary between Preshute Parish and Fyfield Parish. North and south of the River Kennet at Treacle Bolly in Marlborough • there are open views across the valley of the Mildenhall Conservation Area on the north bank of the River Kennet • the traditional linear pattern of Manton is nestled in the riverside meadows along with Manton Copse <p>Savernake Forest and Plateau</p> <ul style="list-style-type: none"> • mainly, an essentially rural, agricultural character of visually exposed, open arable landscapes but with the native and robust character of the dense block of woodland of the Savernake Forest and also Wansdyke and West Woods • Northwest facing escarpment from Pantawick Edge along the edge of the plateau to the Mildenhall and Axford parish boundaries at Stitchcombe including Three Cornered Field 	

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			<i>B. Proposals that seek to justify building an isolated home outside the development boundary on the basis that either their design is of exceptional quality or is truly outstanding or innovative or would significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area will be refused.</i>	
R54	32	Page 48, Paragraph 5.56	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.56 amend the NPPF paragraph number from "172" to '176'.</p> <p><u>REQUIRED MODIFICATION</u></p> <ul style="list-style-type: none"> Amend paragraph 5.56 as follows: <p>5.56 This policy refines Core Policy 51 of the Core Strategy and NPPF §1726 in identifying the specific features of the North Wessex Downs AONB landscape across the MANP area that is especially valued. The landscape consists of open chalk down land, river valleys, woodland and a wooded plateau. Specific to the MANP area are the Marlborough Downs, Savernake Forest, the River Kennet valley and its water meadows.</p>	For clarity and accuracy to meet the Basic Conditions.
R55	32	Page 49, Paragraph 5.59	<p><u>EXAMINER COMMENT:</u></p> <p>Delete paragraph 5.59 (renumbering subsequent paragraphs accordingly).</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Delete paragraph 5.59 and re number subsequent paragraphs accordingly <p>5.59 Finally, in the light of this evidence base, the policy considers there is no development proposal that can be made in this part of Wiltshire and the North Wessex Downs AONB where the requirements specific to clause (e) of NPPF §79 can be deemed to be met. The Downs, Kennet Valley and Forest are very special and deeply rural. They are not appropriate for architectural experimentation, nor are evidently in need of their design standards being raised. Instead, such experimentation, especially in taking forward the PassivHaus standard, can be pursued within the allocation policies of this plan or in more appropriate locations outside the area. However, the policy allows for proposals to come forward that are consistent with the other qualifying criteria of NPPF §79.</p> <p>5.60 5.59 5.61 5.60 Etc...</p>	
R56	33	Page 50, Policy MARL19: Building to the PassivHaus Standard	<p><u>EXAMINER COMMENT:</u></p> <p>Within Policy MARL19, in element A replace “must” with ‘are encouraged to’.</p> <p>In element B, first sentence, replace “should” with ‘are encouraged to’.</p>	For clarity and accuracy to meet the Basic Conditions.

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			<p>Delete element C (and re-letter subsequent elements accordingly). In element D replace "required" with 'encouraged'. Delete the first two sentences of element E and in the third sentence replace "shall" with 'are encouraged to'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend Policy MARL19 as follows: <p>Policy MARL19: Building to the PassivHaus Standard A. All development must are encouraged to be 'zero carbon ready by design' to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping. B. Wherever feasible, all buildings should are encouraged to be certified to a Passivhaus or equivalent standard with a space heating demand of less than 15KWh/m2/year. Where schemes that maximise their potential to meet this standard by proposing the use of terraced and/or apartment building forms of plot size, plot coverage and layout that are different to those of the character area within which the proposal is located, this will be supported, provided it can be demonstrated that the scheme will not have a significant harmful effect on the character area. C. All planning permissions granted for new and refurbished buildings should demonstrate that they have been tested to ensure the buildings will perform as predicted and will include a planning condition to require the provision of a Post Occupancy Evaluation Report to the Local Planning Authority within a</p>	

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			<p>specified period, unless exempted by Clause B. Where the Report identifies poor energy performance and makes recommendations for reasonable corrective action, the applicant must demonstrate that those actions have been implemented before the condition will be discharged.</p> <p>DC. All planning applications for major development are also required encouraged to be accompanied by a Whole Life-Cycle Carbon Emission Assessment using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its entire life.</p> <p>ED. An Energy Statement will be submitted to demonstrate compliance with the policy (except for householder applications). The statement will include a passive design capacity assessment to demonstrate how opportunities to reduce the energy use intensity (EUI) of buildings over the plan period have been maximised in accordance with the energy hierarchy. Designers shall are encouraged to evaluate the operational energy use using realistic information on the intended use, occupancy and operation of the building to minimise any performance gap.</p>	
R57	33	Page 50, Paragraph 5.63	<p><u>EXAMINER COMMENT:</u></p> <p>Delete paragraph 5.63, which is now dated (and renumber subsequent paragraphs accordingly)</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Delete paragraph 5.63 and renumber subsequent paragraphs accordingly 	For clarity and accuracy to meet the Basic Conditions.

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			5.63 The Government's Energy White Paper published in December 2020 now sets out the government's Vision and 10-point transition plan for how the UK will reach the UK target of 'net zero' carbon emissions by 2050. The White Paper confirmed the government's intention to ensure significant strides are made to improve building energy performance to meet this target. The Government has also confirmed in its response to the Future Homes Standard consultation that it does not intend to amend the Planning and Energy Act 2008 and that as a result the setting of energy efficiency standards at the Local Plan or Neighbourhood Plan scale is permissible.	
R58	33	Page 51, Paragraph 5.65	<p><u>EXAMINER COMMENT:</u></p> <p>Amend paragraph 5.65 to read:</p> <p>'This policy is intended to encourage a step change in the energy performance of all new developments in the MANP area through the use of the Passivhaus or equivalent standard of building design. Along with the passive design capacity assessment, designers can demonstrate achievement of the standard using a design for performance methodology such as the Passivhaus Planning package or CIBSE TM34 Operational Energy.'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.65 as follows: 	For clarity and accuracy to meet the Basic Conditions.

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			<p>5.65 This policy is in five parts, the combination of which is intended to deliver a step change in the energy performance of all new developments in the MANP area and, in doing so, encourage and incentivise the use of the Passivhaus or equivalent standard of building design. Along with the passive design capacity assessment, it is anticipated that designers will demonstrate compliance using a design for performance methodology such as the Passivhaus Planning package or CIBSE TM34 Operational Energy.</p> <p><u>This policy is intended to encourage a step change in the energy performance of all new developments in the MANP area through the use of the Passivhaus or equivalent standard of building design. Along with the passive design capacity assessment, designers can demonstrate achievement of the standard using a design for performance methodology such as the Passivhaus Planning package or CIBSE TM34 Operational Energy.</u></p>	
R59	33	Page 51, Paragraph 5.66	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.66 delete "which supports a similar level of intervention".</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.66 as follows: <p>5.66 Achieving this level of performance will make a significant contribution to mitigating climate change that the MANP can</p>	For clarity and accuracy to meet the Basic Conditions.

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			deliver, and a major contribution to Wiltshire Council's Climate Emergency Action Plan, which supports a similar level of intervention.	
R60	33	Page 51, Paragraph 5.67	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.67, first sentence, replace "requires" with 'encourages'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.67 as follows: <p>5.67 Clause A of the policy requires encourages developers to ensure they address the Government's climate change targets and energy performance at the very initial stages of design. 'Zero Carbon Ready by Design' means making spatial decisions on layout and orientation of buildings at the outset to maximise the passive design benefits ('free heat') of a site and avoids leaving this to technical choices and assessment at the Building Regulation stage, by which time the opportunity may have been lost.</p>	For clarity and accuracy to meet the Basic Conditions.
R61	33	Page 51, Paragraph 5.68	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.68 delete all but the first sentence</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.68 as follows: 	For clarity and accuracy to meet the Basic Conditions.

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			<p>5.68 Its Clause B requires all schemes, no matter what their intended use or size other than householder extensions, to use the Passivhaus Planning Package (PHPP) or equivalent design methodology for all buildings where it is feasible to do so. This means that the applicant must demonstrate those factors that make its use unfeasible, for example, the topography and orientation of the site. In respect of scheme viability, any extra-over cost of building to the 'zero carbon ready' Passivhaus standard (now less than 5%) will diminish to zero well within the period of this Plan, as per both the Governments Regulatory Impact Assessments and research by the Passivhaus Trust. The policy will also ensure that expensive and unnecessary retrofit costs are not passed down to building occupiers in the future, particularly in an area which has relatively high property values. Scheme viability will not therefore be acceptable as a reason for not using the Standard, unless the applicant can demonstrate the scheme has abnormal costs to accommodate.</p>	
R62	34	Page 52, Paragraph 5.69	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.69, first sentence, replace "requires" with 'expects'</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.69 as follows: <p>5.69 The policy requires expects that the scheme density (measured by dwelling units/Ha) is assessed against that of the local 'character area' in the Design & Access Statement. The</p>	For clarity and accuracy to meet the Basic Conditions.

APPENDIX 1

Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
			applicant will be expected to use policies MARL9 – MARL13, and the respective Conservation Area Appraisals and MANP Design Study as the baseline for the Statement.	
R63	34	Page 52/54, Paragraphs 5.70 & 5.71	<p><u>EXAMINER COMMENT:</u></p> <p>Delete paragraphs 5.70 & 5.71</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Delete paragraphs 5.70 and 5.71 as follows: <p>5.70 Proposals seeking to apply the PHPP must be able to demonstrate that the Passivhaus standard can be achieved. Prior to commencement a 'pre-construction compliance check' completed by a Passivhaus Designer accredited by the Passive House Institute (PHI) will be required and secured by condition. Upon completion a Quality Approved Passivhaus certificate for each building will be required prior to occupation, again secured by condition.</p> <p>5.71 Clause C requires the developer of a consented housing development scheme of any size to carry out a Post-Occupancy Evaluation (POE) including actual metered energy use, and to submit the report to the local planning authority. It will be implemented by attaching a planning condition, which will only be discharged once the report has been submitted and any recommended actions to rectify any performance gap with the design stage assessment are carried out by the developer. Passivhaus-certified schemes will not fail in this way and they are</p>	For clarity and accuracy to meet the Basic Conditions.

APPENDIX 1

Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
			therefore exempted from this policy requirement.	
R64	34	Page 54, Paragraph 5.72	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.72, first sentence, replace "Clause D requires" with 'Clause C encourages' and delete the second sentence.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.72 as follows: <p>5.72 Clause D requires C encourages all development proposals that are not householder applications to be accompanied by a Whole Life-Cycle Carbon Emissions Assessment. This requirement will be added to the Wiltshire Council Validation Checklist for outline and full planning applications applying to proposals in the MANP area until such a time that there is a county-wide requirement.</p>	For clarity and accuracy to meet the Basic Conditions.
R65	34	Page 54, Paragraph 5.73	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.73 replace "Clause E requires an Energy Statement to be submitted" with 'Clause D encourages the use of an Energy Statement'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.73 as follows: 	For clarity and accuracy to meet the Basic Conditions.

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Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
			5.73 Finally, Clause E requires an Energy Statement to be submitted Clause D encourages the use of an Energy Statement to cover the following:	
R66	34	Page 54, Paragraph 5.74	<p><u>EXAMINER COMMENT:</u></p> <p>In paragraph 5.74 delete the second sentence.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend paragraph 5.74 as follows: <p>5.74 In summary, every new build or redevelopment project in the MANP Area provides an opportunity to make a difference and a contribution towards meeting our climate change targets for 2050. This new information requirement need not be an unreasonable expectation of even the smallest schemes for new buildings. Land values in the MANP area are high relative to build costs and ought to be sufficient to ensure requirements to tackle improving carbon performance are viable.</p>	For clarity and accuracy to meet the Basic Conditions.
R67	34	No page number. Policies & Maps Insets	<p><u>EXAMINER COMMENT:</u></p> <p>Amend the heading "Policies Map & Insets" (p58) to 'Policies Maps and Insets'.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the heading 'Policies Map & Insets' as follows: <p>Policies Map & and Insets'</p>	For clarity and accuracy

APPENDIX 1

Modifications required to be made to the draft Marlborough Area Neighbourhood Plan (2021-2036) (submitted version August 2021) in response to the Examiner's recommendations and to correct errors

Reference number	Page in Examiner's Report	Related MANP page / section / document	Recommendation and proposed modification	Reason for modification
R68	34	Character and Design Studies	<p><u>EXAMINER COMMENT:</u></p> <p>Consider improving the Character/Design Studies to provide consistent detailing of the non-designated heritage assets.</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Consider improving the Character/ Design Studies 	For clarity and accuracy
R69	34	Page 74, Appendix B: Schedule of Evidence	<p><u>EXAMINER COMMENT:</u></p> <p>Amend the heading "Appendix B: Schedule of Evidence" to 'Appendix C: Schedule of Evidence' and add hyperlinks to copies of as many as possible of the documents listed</p> <p><u>REQUIRED MODIFICATION:</u></p> <ul style="list-style-type: none"> Amend the heading of Appendix B: Schedule of Evidence as follows: <p>APPENDIX B<u>C</u>: SCHEDULE OF EVIDENCE</p> <ul style="list-style-type: none"> Add hyperlinks to copies of as many as possible of the documents listed. 	For clarity and accuracy
R70	N/A	Whole Document	<p><u>WILTSHIRE COUNCIL COMMENT:</u></p> <p>Check and amend as necessary the page numbering, section headings, footnote, table, figure, map, appendix and paragraph numbering.</p>	Consequential amendments

MARLBOROUGH AREA NEIGHBOURHOOD PLAN 2021 - 2036

**The Report of the Independent Examiner to Wiltshire Council on the
Marlborough Area Neighbourhood Plan**

**Andrew Matheson MSc MPA DipTP MRTPI FCIH
Independent Examiner
10th May 2022**

Summary

I was appointed by Wiltshire Council, in agreement with Marlborough Town and Mildenhall and Savernake Parish Councils, in October 2021 to undertake the Independent Examination of the Marlborough Area Neighbourhood Plan.

The Examination has been undertaken by written representations. I visited the Neighbourhood Area on 18th March 2022 after resolving my initial enquiries of the Qualifying Bodies.

The Area Neighbourhood Plan proposes a local range of policies and seeks to bring forward positive and sustainable development in the Marlborough Neighbourhood Area. There is an evident focus on safeguarding the very distinctive, local character of the area whilst accommodating future change and growth.

The Plan has been underpinned by extensive community support and engagement. The social, environmental and economic aspects of the issues identified have been brought together into a coherent plan which adds appropriate local detail to sit alongside the Wiltshire Core Strategy (adopted January 2015).

Subject to a series of recommended modifications set out in this Report, some of more significance than others, I have concluded that the Marlborough Area Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.

I recommend that the referendum should be held within the Neighbourhood Area.

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Introduction

This report sets out the findings of the Independent Examination of the Marlborough Area Neighbourhood Plan 2021 - 2036. The Plan was submitted to Wiltshire Council by Marlborough Town and Mildenhall and Savernake Parish Councils in their capacity as the 'Qualifying Bodies' responsible for preparing the Neighbourhood Plan.

Neighbourhood Plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently incorporated within the National Planning Policy Framework (NPPF) in 2012 and this continues to be the principal element of national planning policy. A new NPPF was published in July 2021 and it is against the content of this NPPF that the Plan is examined. The changes between the 2019 and 2021 revisions of the NPPF have not been significant in the examination of Policies in this Plan.

This report assesses whether the Marlborough Area Neighbourhood Plan is legally compliant and meets the 'basic conditions' that such plans are required to meet. It also considers the content of the Plan and, where necessary, recommends modifications to its policies and supporting text. This report also provides a recommendation as to whether the Marlborough Area Neighbourhood Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Marlborough Area Neighbourhood Plan would then be used in the process of determining planning applications within the Plan boundary as an integral part of the wider Development Plan.

The Role of the Independent Examiner

The Examiner's role is to ensure that any submitted Neighbourhood Plan meets the legislative and procedural requirements. I was appointed by Wiltshire Council, in agreement with Marlborough Town and Mildenhall and Savernake Parish Councils, to conduct the Examination of the Marlborough Area Neighbourhood Plan and to report my findings. I am independent of both Wiltshire Council and the Town and Parish Councils. I do not have any interest in any land that may be affected by the Plan.

I possess the appropriate qualifications and experience to undertake this role. I have over 40 years' experience in various local authorities and third sector bodies as well as with the professional body for planners in the United Kingdom. I am a Chartered Town Planner and a panel member for the Neighbourhood Planning Independent Examiner Referral Service (NPIERS). I am a Member of the Royal Town Planning Institute.

In my role as Independent Examiner I am required to recommend one of the following outcomes of the Examination:

- the Marlborough Area Neighbourhood Plan is submitted to a referendum; or
- the Marlborough Area Neighbourhood Plan should proceed to referendum as modified (based on my recommendations); or
- the Marlborough Area Neighbourhood Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. If recommending that the Neighbourhood Plan should go forward to referendum, I must then consider whether or not the referendum area should extend beyond the Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 Act (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by Qualifying Bodies.

These are helpfully covered in the submitted Basic Conditions Statement and, subject to the contents of this Report, I can confirm that I am satisfied that each of the above points has been properly addressed and met.

In undertaking this Examination I have considered the following documents:

- Marlborough Area Neighbourhood Plan 2021 - 2036 as submitted
- Marlborough Area Neighbourhood Plan Basic Conditions Statement (August 2021)
- Marlborough Area Neighbourhood Plan Consultation Statement (June 2021)
- Sustainability Appraisal (SA) for the Marlborough Area Neighbourhood Plan (August 2021)
- Content at: <https://wiltshire-consult.objective.co.uk/kse/event/36476>
- Content at: www.marlbrough-tc.gov.uk/neighbourhood-plan
- Representations made to the Regulation 16 public consultation on the Marlborough Area Neighbourhood Plan
- The Wiltshire Core Strategy (WCS) adopted in January 2015
- Saved policies in the former Kennet Local Plan 2011 (KLP), as set out in Appendix D of the WCS.
- Wiltshire Housing Site Allocations Plan (WHSAP), adopted 25 February 2020.
- The Wiltshire Local Plan Review
- National Planning Policy Framework (NPPF) (2021)
- Neighbourhood Planning Regulations (2012)
- Planning Practice Guidance (PPG) (March 2014 and subsequent updates)

I carried out an unaccompanied visit to the Neighbourhood Area on 18th March 2022. I looked at all the various sites and locations identified in the Plan document in their rural setting.

The legislation establishes that, as a general rule, Neighbourhood Plan examinations should be held without a public hearing, by written representations only. Having considered all the information before me, including the representations made to the submitted plan which I felt made their points with clarity, I was satisfied that the Marlborough Area Neighbourhood Plan could be examined without the need for a public hearing and I advised Wiltshire Council accordingly. The Qualifying Bodies and the Local Planning Authority have helpfully responded to my enquiries so that I may have a thorough understanding of the facts and thinking behind the Plan, and the correspondence is being shown on Wiltshire Council's Neighbourhood Planning website for the Marlborough Area Neighbourhood Plan.

Marlborough Neighbourhood Area

A map showing the boundary of the Marlborough Neighbourhood Area has been provided within the Neighbourhood Plan. Further to an application made by Marlborough Town and Mildenhall and Savernake Parish Councils, Wiltshire Council approved the designation of the Neighbourhood Area on 18th November 2020. This satisfied the requirement in line with the

purposes of preparing a Neighbourhood Plan under section 61G(1) of the Town and Country Planning Act 1990 (as amended).

Consultation

In accordance with the Neighbourhood Planning (General) Regulations 2012, the Qualifying Bodies have prepared a Consultation Statement to accompany the Plan.

The Planning Practice Guidance says:

“A qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan [or Order] and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging Neighbourhood Plan [or Order]
- is made aware of how their views have informed the draft Neighbourhood Plan [or Order].” (Reference ID: 41-047-20140306)

The submitted Consultation Statement confirms that as long ago as 2015 the Parishes of Marlborough, Mildenhall, Preshute (who later withdrew) and Savernake agreed to work together towards the production of a Neighbourhood Plan, with a Steering Group formed in 2016. Across the Summer and Autumn of 2016 Open Day and Roadshow events were held across the Neighbourhood Area, publicised with 10,000 leaflets, to raise awareness and invite input into the scoping of the Plan. At the same time a dedicated website was set up to accompany these activities. Survey work was undertaken across 2017 and in July 2018 the Steering Group appointed a consultant to assist in taking the community feedback and evidence forward.

Following a ‘call for sites’ in November 2018/ January 2019 (sites for affordable housing, more car parking, improved health facilities, a replacement for Preshute School, recreation land and a new cemetery), in July/August 2019 drop-in exhibitions were held at Marlborough Town Hall, Manton Village Hall, Mildenhall Village Hall, and at Marlborough Area Board at which comments were invited and subsequently collated. At this juncture Preshute Parish withdrew, involving a re-designation of the Neighbourhood Area.

The official Regulation 14 six-week consultation period on the Pre-Submission Marlborough Area Neighbourhood Plan ran from 18th January 2021 until the 8th March 2021. Because of Covid restrictions at the time, consultation events had to be held via Zoom; two were held in January and February. A survey was also available online and shared widely via social media. Flyers were delivered to every household and a wide variety of identified ‘stakeholders’ were also contacted. Paper copies of the Plan were also available at the Town Council offices and in the library. Banners and posters were displayed on notice boards throughout the town and the consultation and exhibitions also promoted via Marlborough News and in an editorial in the Gazette & Herald and Town and Country magazine. The many responses to the consultation are shown in an attachment to the Consultation Statement with details of how these comments influenced the redrafting of the Plan prior to submission.

Accordingly, overall, I am satisfied that the consultation process accords with the requirements of the Regulations and the Practice Guidance and that, having regard to national policy and guidance, the Basic Conditions have been met. In reaching my own conclusions about the specifics of the content of the Plan I will later note points of agreement or disagreement with Regulation 16 representations, just as the Qualifying Bodies have already done for earlier consultations. That does not imply or suggest that the consultation has been inadequate, merely that a test against the Basic Conditions is being applied.

Representations Received

Consultation on the submitted Plan, in accordance with Neighbourhood Planning Regulation 16, was undertaken by Wiltshire Council from Monday 20th September to Monday 8th November 2021. I have been passed the representations – 29 in total – which were generated by the consultation and which are included alongside the submitted Plan on Wiltshire Council's Neighbourhood Planning website. I agreed to receive a late submission from Natural England, received 19 November 2021 (shown as Comment ID:30 on the website) and I have made reference to their comments within this Report. I have not mentioned every representation individually but this is not because they have not been thoroughly read and considered in relation to my Examiner role, rather their detail may not add to the pressing of my related recommendations which must ensure that the Basic Conditions are met.

A significant 'theme' amongst representations from the community has been a concern about the decision to address the housing needs of the Neighbourhood Area 2026 – 2036 in advance of the firming up or adoption of the Wiltshire Local Plan Review now in preparation. Contrary to many assertions in representations, the Planning Guidance (Paragraph: 009 Reference ID: 41-009-20190509) is clear that Neighbourhood Plans "can be developed before or at the same time as the local planning authority is producing its local plan". However, a number of further expectations are noted in the Guidance and I will address those as I examine the policy content in detail below.

The Neighbourhood Plan

Marlborough Town and Mildenhall and Savernake Parish Councils are to be congratulated on their extensive efforts to produce a Neighbourhood Plan for their area that will guide development activity over the period to 2036. I can see that a sustained effort has been put into developing a Plan around a vision that by 2036:

"The Marlborough Neighbourhood Plan Area has grown sustainably, carefully balancing its social, economic and environmental needs. The open character and special scenic beauty of the Area of Outstanding Natural Beauty has been preserved, and in some cases enhanced. Low income groups including young people have found more affordable homes and are finding job opportunities not far from home.

We have improved medical facilities and there is a wide range of community facilities. The town centre in Marlborough is now a place for residents and visitors of all ages. It has sustained its special retail-led mix of commercial uses and has a thriving daytime and evening economy, which has made it a strong asset to the overall Wiltshire visitor economy. The landscape and its easy accessibility together with the protection of the natural and historic environment afforded by new developments, have created net gains in biodiversity and, as a consequence, improved the health and wellbeing of those who live in or visit the Marlborough Neighbourhood Plan Area."

The Plan document is impressively presented with a combination of text, maps and policies that are, subject to the specific points that I make below, well laid out and helpful for the reader. The Plan has been kept to a manageable length by not overextending the potential subject matter and the coverage of that.

It is an expectation of Neighbourhood Plans that they should address the issues that are identified through community consultation, set within the context of higher-level planning policies. There is no prescribed content and no requirement that the robustness of proposals should be tested to the extent prescribed for Local Plans. Where there has been a failure by the Qualifying Bodies to address an issue in the round, leading to an inadequate statement of policy, it is part of my role wherever possible to see that the community's intent is sustained in an appropriately modified wording for the policy. It is evident that the community

has made positive use of “direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area” (Planning Practice Guidance Reference ID: 41-001-20140306).

Individually, I can see that the Policies address legitimate matters for a Neighbourhood Plan as identified with the community. I will later look at the Policies in turn so as to ensure that the Basic Conditions are met, which include an obligation to be in general conformity with Core Strategy strategic policies. Having considered all the evidence and representations submitted as part of the Examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It works from a positive vision for the future of the Neighbourhood Area and promotes policies that are, subject to amendment to variable degrees, proportionate and sustainable. The Plan sets out the community’s priorities whilst seeking to identify and safeguard the Marlborough area’s distinctive features and character. The plan-making had to find ways to reconcile the external challenges that are perceived as likely to affect the area with the positive vision agreed with the community. All such difficult tasks were approached with transparency, with input as required and support from Wiltshire Council.

However, in the writing up of the work into the Plan document, it is sometimes the case that the phraseology is imprecise, not helpful, or it falls short in justifying aspects of the selected policy. This is not uncommon in a community-prepared planning document and something that can readily be addressed in most instances. Accordingly, I have been obliged to recommend modifications so as to ensure both clarity and meeting of the ‘Basic Conditions’. In particular, Plan policies as submitted may not meet the obligation to “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” (NPPF para 16). I bring this particular reference to the fore because it will be evident as I examine the policies individually and consider whether they meet or can meet the ‘Basic Conditions’.

Basic Conditions

The Independent Examiner is required to consider whether a Neighbourhood Plan meets the “Basic Conditions”, as set out in law following the Localism Act 2011; in December 2018 a fifth Basic Condition was added relating to the Conservation of Habitats and Species Regulations 2017. In order to meet the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the Plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations;
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(d).

The submitted Basic Conditions Statement has very helpfully set out to address the issues in relation to these requirements in the same order as above and has tabulated the relationship between the policy content of the Plan and its higher tier equivalents. I note that the local strategic policies are set out in the Wiltshire Core Strategy adopted in 2015. From the accompanying Strategic Environmental Assessment and Habitats Regulations Assessment, I am satisfied that, after appropriate modification, the making of the Plan will not breach the Basic Condition relating to the Habitats and Species Regulations 2017.

I have examined and will below consider the Neighbourhood Plan against all of the Basic Conditions above, utilising the supporting material provided in the Basic Conditions Statement and other available evidence as appropriate.

The Plan in Detail

I will address the aspects of the Area Neighbourhood Plan content that are relevant to the Examination in the same sequence as the Plan. Recommendations are identified with a bold heading and italics, and I have brought them together as a list at the end of the Report.

Front cover

A Neighbourhood Plan must specify the period during which it is to have effect. I note that there is a prominent reference to the Plan period 2021 – 2036 on the front cover. The references to “Submission Plan” can now be removed.

Guide to Reading this Plan

This is a very helpful introductory section.

Contents

The content listing will need to be reviewed in the light of my Recommendations below.

Foreword

No comment.

List of Policies

I note some discrepancies between the titles of Policies here and those used in the body of the Plan document. The listing will need to be reviewed in the light of my Recommendations below.

1. Introduction & Background

Figure 1

The Neighbourhood Plan is required to include a map of the designated “Neighbourhood Area”. I note that Plan A provides the required detail, although the title should say ‘Neighbourhood Area’ rather than “Neighbourhood Plan Area”.

Similarly, paragraph 5.1 does not use the actual terminology of the Basic Conditions; “consistent with” is not the wording used in relation to either national policy or the Core Strategy.

‘Planning for the Future’ White Paper

It is apparent that the White Paper will have no bearing on the content or Examination of the Marlborough Neighbourhood Plan.

Sustainability Appraisal

I note that a Strategic Environmental Assessment (SEA) within the context of a Sustainability Appraisal (SA) and a Habitats Regulations Assessment (HRA) have been undertaken and copies provided alongside the Submission Plan. The HRA screening exercise concluded that the draft Plan will not trigger the requirement for appropriate assessment (under The Conservation of Habitats and Species Regulations 2017 (amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019)). I concur with Wiltshire Council that the SA “approach is welcomed as it maximises the draft Plan’s contribution to sustainable development, thereby seeking to achieve the Basic Condition of contributing to sustainable development”. However, Natural England in their representation commented: “We advise that the SA is flawed and consequently the allocation is not justified. Specifically, looking at the Table 4.6 of the ‘Revised alternatives appraisal findings’ Natural England does not agree with the determination for both option D and option E that there would be ‘no significant effect’ on biodiversity. The justification on page 117 makes no reference to potential impacts on bats. We advise that there would be likely significant effects on the

significant bat population using Marlborough Railway Tunnel as discussed earlier in this response.” The Qualifying Bodies have responded: “AECOM has been happy to reaffirm [its previous advice] in response the examiner’s questions and the challenges made by WC, Natural England and Historic England” and “the disused railway and priority habitat in the corner of the site are not designated, and as a result, [AECOM] could not conclude there would be significant effects once mitigation has been taken into account”.

Historic England and the Environment Agency have also made comments about the extent to which the SA/SEA has been attentive to matters of their respective concern. It is unfortunate that the document is not more explicit about its attention to matters raised by the statutory consultation bodies. I also note some other shortcomings in the final report, such as it acknowledges a mitigation that probably could not and actually does not appear in the Submission Plan (“requiring development proposals to make a financial contribution to the Marlborough Area Carbon Sink Fund”, page x) and another that is probably misrepresented as “incentivising” (“delivering a step change in the energy performance of all new developments in the MANP area, notably incentivising the Passivhaus standard”, twice mentioned p x). However, the overall approach and nature of the conclusions and recommendations are, in my judgement, not significantly compromised by the matters noted here. The Report does what it says it sets out to do: “assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties” (p i). It provides, in as an objective way as possible, an appraisal of identifiable harms and how their worst effects might be addressed. What it does not do is remove from the plan-maker the obligation to judge when identified mitigations are appropriate to the scale of the harms. This obligation was recognised in relation to the decision to exclude the Elcot Lane site from further consideration because of its assessed social impact. Other judgements may be more complex.

Recommendation 1:

1.1 On the front cover, and in any other locations, remove references to “Submission Plan”.

1.2 Under the headings “Contents” and “List of Policies” review the content for accuracy and in the light of my Recommendations below.

1.3 Under the heading “1. Introduction & Background”:

1.3.1 Amend the title of Plan A to read ‘Designated Neighbourhood Area’.

1.3.2 Amend the first two bullet points of paragraph 1.5 to:

- Does the Plan have regard to national policy and guidance?*
- Is the Plan in general conformity with the Wiltshire Core Strategy?*

1.3.3 Remove paragraphs 1.7 & 1.8 referencing the ‘Planning for the Future’ White Paper; renumber subsequent paragraphs accordingly.

1.4 Under the sub-heading “Sustainability Appraisal (including Strategic Environmental Assessment)”:

1.4.1 In the second sentence of paragraph 1.12 replace “has” with ‘have’.

1.4.2 In the second sentence of paragraph 1.14 replace “Environmental” with ‘Environment’.

2. The Neighbourhood Plan Area

I expressed to the Qualifying Bodies a concern that, whilst this section is designed largely to be a descriptive summary, where the content breaks into commentary it may be vital for source referencing to be provided. In the absence of input from the Qualifying Bodies I have selected the items for which an authoritative source is needed.

Recommendation 2:

Under the heading “The Neighbourhood Plan Area”:

2.1 In paragraph 2.12 delete the unsourced “and is currently oversubscribed”.

2.2 In paragraph 2.18 delete as irrelevant to the Plan content: “The service from Bedwyn requires a joined-up transport infrastructure and timetables for both rail and bus services as the current provisions are not meeting local needs”.

2.3 In paragraph 2.19 after “at peak times there are parking shortages” add ‘(Marlborough Neighbourhood Plan Car Parking Study, 2017)’.

2.4 In paragraph 2.24 between “There is a local perception” and “that the imbalance of local housing stock” add ‘, apparent from public consultation on this Plan,’.

2.5 In paragraph 2.24 after “as Wiltshire Council’s Core Strategy noted” add ‘for Wiltshire (para 2.13 p19)’.

2.6 In paragraph 2.25 replace “The average house price in 2015 in Marlborough was £318,450. This was considerably higher than the Wiltshire average of £255,060 and was highest of Wiltshire’s 20 community areas” with the update provided by the Qualifying Body: ‘The average house price in Marlborough is between 40% and 50% higher than the average property price in Wiltshire as a whole (Source: Zoopla, 5 May 2021), the breakdown by type of house is: Terraced +46%, Semi-detached +43%, Detached +52%.”

2.7 In paragraph 2.25 provide a source reference for each element of “The present population is estimated to be around 9,200 following inward migration as a result of recent completed housing developments between 2011 and the present” or delete.

3. Planning Policy Context

National Planning Policy

Since the Neighbourhood Plan was submitted a new version of the NPPF has been published and it is against this that my Examination must be conducted. I do not see any conflicts arising from the new content of the NPPF but I will, as part of this Examination, identify corrections needed to bring the Plan references into line with the 2021 NPPF (helped by some of the comments within representations).

Strategic Planning Policy

Given that the Neighbourhood Plan is delivering new allocations of housing land in advance of the Local Plan Review, it is important that this section provides a clear housing requirement context and that subsequent content is evidently consistent with it. The context provided by the NPPF (paragraph 11) is that “strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas [that include Areas of Outstanding Natural Beauty (AONB)] or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”.

Planning Guidance (Paragraph: 009 Reference ID: 41-009-20190509) is clear that Neighbourhood Plans “can be developed before or at the same time as the local planning authority is producing its local plan”. However, a number of further expectations are then noted:

“Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan

is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development” “The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.” In other words, the Local Plan can trump the Neighbourhood Plan if there are unresolved differences. “Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination.” Paragraph: 101 Reference ID: 41-101-20190509 of the Guidance adds: “The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies. While there is no set method for doing this, the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as the Housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services. In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in paragraph 11, footnote 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area.” I should further note here: “Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.” (Planning Guidance Paragraph: 040 Reference ID: 41-040-20160211).

Having regard to the Guidance, I sought further clarity from the Qualifying Bodies and the local authority as to the “indicative figure” for the housing requirement for the Plan since there was a lack of clarity in paragraphs 3.9 and 3.10 of the Plan, and consequently a lack of clarity about the relationship between the site allocations to be made and the indicative requirement which they were to meet. In its explanatory note dated 31st January the local authority confirmed: “The draft Plan acknowledges that the allocation of a minimum of 50 dwellings would ensure it aligns with the Local Plan Review preferred emerging spatial strategy, in meeting its objective to ensure Marlborough appropriately contributes towards meeting the forecast scale of housing need in the Housing Market Area. The Qualifying Body is however seeking to deliver a higher quantum of residential development to deliver the affordable homes their work has indicated are required as a priority for the settlement with its own evidence base, thus seeking to demonstrate there are exceptional circumstances for further ‘major development’ within the AONB that is within the public interest. It is recognised the Qualifying Body has been asked to provide clarification on certain aspects of its evidence base, but Wiltshire Council as Local Planning Authority would like to clarify that based on the emerging spatial strategy there is no strategic necessity for 245 open market dwellings over the period of the draft Plan in order to meet the assessed need of the Housing Market Area. Assessed need would be met by a contribution of a minimum of 50 dwellings; the preferred focus for growth being Royal Wotton Bassett.” This therefore needs to be at the heart of the Strategic Housing section.

I note that there is a reference within the section to the Wiltshire Housing Site Allocations Plan 2020 but there is no acknowledgement of the content that indicates that the “Indicative Housing Requirement to 2026” for Marlborough has already been exceeded by 3.1%. In fact,

the latest monitoring report (April 2022) indicates that new construction and consents have now pushed the percentage to 9.2%. These figures help to establish that overall supply is good but, the Qualifying Bodies are suggesting that this may mask a far less satisfactory position with the supply of affordable homes. The Qualifying Bodies have commented, with input from their consultants: “The 2020 study estimate of affordable housing requirement for Marlborough is higher than that for the area which was proposed by WC. The exact process by which WC arrived at its estimate of affordable provision for the Marlborough area is not set out but the figure probably takes into account WC’s view of land supply and environmental constraints (an approach which is not relevant when assessing objective overall affordable housing need). WC did not disaggregate affordable need to produce a Marlborough figure, but the implication of its approach is that any affordable need arising in Marlborough in excess of what can be met locally will be met elsewhere in the county.” There is therefore logic in the Qualifying Bodies pursuing issues of land supply and environmental constraints, and this ought also to be acknowledged as part of the strategic context.

Recommendation 3:

Under the heading “3. Planning Policy Context”:

3.1 Add to paragraph 3.6: ‘Within the Plan it is noted (Table 4.9) that the “Indicative Housing Requirement to 2026” for Marlborough has already been exceeded by 3.1%.’

3.2 Replace paragraph 3.10 with the following:

‘Wiltshire Council has subsequently confirmed that, based on the emerging spatial strategy, there is no strategic necessity for 245 open market dwellings over the period of the draft Plan to 2036 in order to meet the assessed need of the Housing Market Area. Assessed need would be met by a contribution of a minimum of 50 dwellings, the preferred focus for growth being Royal Wotton Bassett.’

3.3 Add to paragraph 3.12: ‘However, from research conducted specifically for the MANP (Affordable Housing Needs in Marlborough Area Neighbourhood Plan, Cobweb Consultation, June 2020 update), the estimate of affordable housing requirement for Marlborough is higher than that for the area which was proposed by WC. The exact process by which WC arrived at its estimate of affordable provision for the Marlborough area is not set out but the figure probably takes into account WC’s view of land supply and environmental constraints. The Neighbourhood Plan has therefore set out to maximise land supply for housing whilst seeking to respect the environmental constraints of the AONB. As national Planning Guidance confirms, “A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy” (Reference ID: 41-044-20190509).’

4. Community Views on Planning Issues

I note the helpful cross-reference to the Consultation Statement, but there are no other matters for comment.

5. Vision, Objectives & Land Use Policies

Policy MARL1: Delivering Affordable Homes in Marlborough

I note the approach of the submitted Site Assessment Report with its narrative explanation of the whittling down selection process; since it would serve no purpose for the Examination, I have not looked at the sites rejected. In relation to the sites selected, the Report is not very convincing on the suitability of the final sites from the selection process because of its over-reliance on the, seemingly poorly evidenced, assertions of the “land interests”. As the representations from Natural England and Historic England – and the comments of the local authority too – say authoritatively, just asserting that the presence of bats can be dealt with and that listed buildings will be respected is insufficient. An objective assessment of what will

be involved and its deliverability is also required. Whilst I fully appreciate that the resources of the Qualifying Bodies are limited, the suggestion from them that “the plan maker is obliged to find those sites that will have the least effect that can be mitigated but that also offer the potential for positive effects, informed by the Sustainability Appraisal” assumes that this need only be done in comparative terms; but there should be an assessment also in absolute terms – it must be within the range of possibilities that any individual site offered as available is not acceptable in landscape terms. This is why the AONB suggest a “landscape led” approach, and whilst the Qualifying Bodies note that those words do not appear within the NPPF, it is perfectly reasonable and proper for the AONB to give guidance in this respect. Not least because “Great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues” (NPPF paragraph 176), a landscape assessment is likely to be needed to inform the search for sites. NPPF paragraph 177 does go on to indicate a very high bar for proposal to meet: “When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest”; that is a double test, “exceptional circumstances” and “where it can be demonstrated that the development is in the public interest”.

In addition to the absolute impact of proposals, there are also the cumulative impacts to consider. Development should not continue until a tipping point is reached and, say, a well-established bat population is dispersed. Similarly, whilst it is evident that a 50 dwelling development will have a comparatively smaller impact in traffic terms than a 200 dwelling development, the overall 250 dwellings may breach rather than merely compromise the road capacity of the affected parts of the network. Proposals cannot therefore be justified simply on the basis that they are smaller than or as well considered as what has gone before. I will pick up from these general points when considering below one site in particular.

A. The Neighbourhood Plan allocates

Land Rear of Salisbury Road

My assessment is that I am not presented with compelling evidence that the allocation of this site, in the terms set out, is justifiable in the face of the significant concerns expressed by expert statutory consultees. I believe that the required evidence would have to relate to a wider context than just the site itself. An appropriately evidenced allocation is vital because the NPPF (paragraph 11) says: “Plans and decisions should apply a presumption in favour of sustainable development For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay”. It is vital therefore that any allocation is thoroughly considered.

I note that this site is also amongst those being considered within the Local Plan Review, but I don’t consider the acceptance of this site within its second-stage selection process as being of great consequence here. Within that continuing process, the sustainability credentials of the site have yet to be explored and the outcome from that will not, according to the published timescale, be available until later this year. Such evidence as is made available, therefore, must be assessed for the benefit of the Neighbourhood Plan.

Having visited the site and also viewed it from numerous locations, I fully understand and agree with the assessment by the AONB in their representation, that the proposed development of this site within its boundaries only makes sense on a map. In reality, as the AONB notes, “The site is very much detached in character and orientation. Its location in an upper valley away from the main settlement gives it a strong rural character and development of this would appear set out on a limb.” I also fully understand the Wiltshire Council comment: “The disused railway woodland provides the landscape and ecological framework and the treed skyline backdrop for the new development at Marlberg Grange and

needs to be retained for its important landscape function as well as its ecological green infrastructure value.” Although a man-made feature, the heavily wooded, disused railway embankment, even in the depths of winter, provides a complete visual barrier separating the newly developed east valley from the distinctly separate and rising valley floor to the west. Although the Qualifying Bodies note the visual impact on the valley of the St John’s School site, the escarpment edge to the north provides a reasonably natural boundary between the non-intensive school site and the rural valley. The loss of a corner site to housing would have significant impacts on the whole of that west valley. Those impacts need to be fully understood before not after land within the valley is allocated for housing; this could then provide the basis for comparisons with other directions that might better accommodate Marlborough growth. That is true even before the visual impact of the cutting through of the mature land embankment (and the alternative, if the valley is to be developed, of access from the west) is itself assessed.

I am advised by the Qualifying Bodies that “The reference in paragraphs 5.16 and 5.21 of the Site Assessment Report to the publication in the evidence base of detailed LVIA’s is an error from an earlier draft of the document. Although some of that evidence has been prepared by the land interests, it was agreed with AECOM that it was not necessary for its appraisal of the spatial options and sites as reasonable alternatives. Instead, the concept plans showing the parameters for development of the two sites were deemed sufficient for this purpose.” It is unfortunate that the value of an LVIA beyond the work on the Sustainability Appraisal was not appreciated.

The AONB has also commented: “Woodland planting aimed at hiding the development is not acceptable mitigation.” And they later added: “Mitigation measures are being used to justify the allocation which is not the right method to follow, mitigation should be used as a way to conserve and enhance a site and not to hide/screen it”. I would agree that landscape planting should be site specific, and should serve a positive environmental purpose.

I note that Wiltshire Council has made related points with which I agree: “It is considered that the urban development of the site will result in the permanent loss of the undeveloped rural landscape character to an unacceptable and unjustified level based on the evidence that currently support the draft Plan.”

I note that the Qualifying Bodies have suggested that “it cannot be disputed that the Salisbury Road site is well connected to the town centre for non-car trips and will enable more such trips from the surrounding area through better connectivity”. Having walked two possible routes to/from the town centre to the site I would question whether the topography would encourage many to walk or cycle; and as the “surrounding area” is countryside (the development to the east having its own connectivity) I cannot see connectivity being a significant factor to favour the site over others differently orientated to the centre.

On the matter of ecology, Natural England has commented in relation to the proposed Salisbury Road site allocation: “It is not consistent with NPPF para 174 d) [Planning policies should be] minimising impacts on and providing net gains for biodiversity. The site is in close proximity to a site (Marlborough Railway Tunnel) likely to be of national importance for bats. In particular it is likely that the tunnel supports numbers of hibernating bats that meet or exceed the threshold for designation as a Site of Special Scientific Interest (SSSI). I attach the latest roost survey by the Wiltshire bat group as evidence demonstrating the significance of this site to bat species.” Wiltshire Council has noted in this connection: “It should be noted that the roost at the disused tunnel site is probably the largest Natterer’s bat hibernation site in the UK”. I particularly agree with Natural England where it is noted: “the current proposal differs from the [one approved to the east of the railway embankment] in a number of crucial regards;

- i. it requires a breach of integrity of the railway line. It is unclear from the information provided whether such a breach (and associated illumination and disturbance) will affect the bats concerned.
- ii. bats may be using the proposed site in an entirely different way to how they used the developed site (before development).
- iii. this development will provide cumulative severance of the tunnel entrance from the wider countryside. In the absence of knowing how the bats use the surrounding landscape, and the importance of the tunnel site, significant impacts cannot be ruled out.
- iv. no evidence has been supplied as to the effectiveness of the measures implemented on the adjoining site."

Wiltshire Council has commented: "It is considered that the Site Assessment Report does not adequately address the ecological constraints of this site and based on the current evidence base Wiltshire Council objects to the principle of the allocation of this site on ecology grounds, in addition to the landscape grounds". I should also note that Policy 14 in the Neighbourhood Plan specifically includes for "improving local biodiversity through connecting habitats" and yet the development proposal provides for the severing of a mature green corridor. Existing corridor assets also need protection since they are already part of the ecological network, whether currently designated or not.

I note that, on behalf of the Qualifying Bodies, it has been argued: "the other statutory consultees have only a single organisational interest and are not required to make difficult policy trade-offs as plan makers". However, these consultees are *statutory* consultees for a reason – their expertise – and a singularity of interest might be applied equally to the land interests. A balanced judgement between these interests to achieve sustainable development cannot exclude any of them. In relation to the Salisbury Road site, it must be my judgement that the available evidence indicates that the potential benefits from development do not outweigh the significant harms.

I should also reference the fact that other sites, that are similarly placed to serve Marlborough but may be outside the Neighbourhood Area, are being considered within the Local Plan Review; but that is beyond the scope of this Examination.

Recommendation 4:

Delete the heading "Land Rear of Salisbury Road" and the related Policy content, including the map.

Land at Barton Dene

I note that, on balance, the AONB are supportive of the allocation of this site and indicate that the boundary is well chosen: "A well designed scheme could ensure that it appears as a natural extension of Barton". Similarly, Wiltshire Council comments suggest support subject to the resolution of specific issues regarding the Policy. It is evident that the housing proposed can help to meet a known housing requirement.

I note that the allocation of this site for housing has been tied to the safeguarding of part of the site that has potential for the relocation and/or expansion of the existing Kennet and Marlborough Doctor's Surgery. Representations have commented: "The MANP proposal for a medical facility of unspecified size, with unspecified access and no parking or bus service [at Barton Dene] has no merit, justification or evidence". The Qualifying Bodies have been surprised by a representation, on behalf of the NHS BaNES, Swindon and Wiltshire Clinical Commissioning Groups (CCG) and the KAMP Surgery, in view of "the work undertaken with them in preparing the Neighbourhood Plan". The representation says: "to maintain good care and sufficient adequate capacity to the existing GP population this development is objected to, it is felt that this housing growth would put too much pressure on the GP service" and "The Barton Dene site referred to in section 6.9 of the NHP (as per Policy MARL1A) is not

the preferred workable location, therefore, an alternative will need to be explored and provisions made". The Qualifying Bodies responded to these comments: "Following a meeting with the surgery the SG discovered the comments were submitted by the CCG without the knowledge of the KAMP, and that their comments do not reflect the KAMPs position. The KAMP have confirmed their requirement for extra space for medical facilities in the town and that they do not object to the Barton Dene site being safeguarded as a suitable option for that purpose; they do not wish to comment on housing matters as this is not their remit. The land interest has confirmed that it remains happy for the policy to make provision for this use to encourage proposals to come forward until such a time that they are deemed undeliverable." On the face of it the Surgery expectation is already undeliverable because the CCG does not support the location, but since the land interest is content that the land be safeguarded, nothing is lost by retaining the option. The Qualifying Bodies had previously commented: "the Medical centre is not linked to the housing development at Barton Dene" but that is not apparent from the Policy requirements; therefore, Policy changes are needed to untangle the housing and Surgery elements. The local authority has commented: "It is suggested that the need to release the land safeguarded for a potential new medical centre could be informed by a future review of the neighbourhood plan" so that can provide for an end-stop to the safeguarding.

On other matters of Policy wording:

The AONB has commented "[The] Northern boundary has a high sensitivity, and this should be reflected in the finished building heights and boundary treatment." It is not evident that this latter comment has been respected within the draft layout included within the Plan and the related Policy criteria.

Wiltshire Council has commented: "There are some significant mature trees and areas of woodland within the site which should be retained and excluded from developable areas" and "The policy wording does not provide any detail or set out any requirements in relation to the access arrangements" and "The policy should recognise the public rights of way within and adjacent to the site with the aim of providing connections from the site to them."

Historic England has commented: "P22 of the [Basic Conditions] Statement further asserts that evidence (our underlining) indicates that only the development of Barton Dene is likely to generate potential impact on heritage assets and that this can be accommodated without causing harm. However, no additional evidence has been identified and the basis for this assertion therefore remains unclear."

Natural England has commented "In the absence of LVIA [Landscape Visual Impact Assessment] Natural England would not support development of any sites within the AONB".

I note that Core Policy 43 contains two separate affordable housing zones (30% and 40%) as presented on the policies map. Marlborough falls within the 40% zone as shown on the map within Appendix 1 of the Revised Wiltshire Planning Obligations Supplementary Planning Document (October 2016). The proposed level of affordable housing is therefore consistent with the strategic policy although I am aware that work being undertaken as part of the Local Plan Review will include new and updated viability assessments.

On the matter of the Policy expectation that the housing will be "10% private rented housing for occupancy only by qualifying current and former employees of Marlborough College" I believe this is a matter for the landowner to negotiate rather than a matter for planning policy; the principle that these are "of an equivalence to affordable rented accommodation" is not established.

Recommendation 5:

Under the sub-heading "Land at Barton Dene" reword the Policy as follows (as a general

principle, the use of letters or numbers for Policy paragraphs, rather than bullet points, will allow the content of Policies to be readily referenced):

'Within the site boundary shown on the adjacent plan, proposals will be supported for up to 40 homes on a developable area of no more than 1.5 Ha, limited to ensure that the development retains a natural setting, and subject to the following:

- a) Land shall be safeguarded adjoining the existing leisure centre, as illustrated on the adjacent plan, for the potential provision of new medical facilities to serve the town, this safeguarding will be reviewed within the first review of the Neighbourhood Plan;*
- b) The proposals shall include for 40% affordable housing;*
- c) The layout and form of development shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB and to protect and enhance the setting of Barton Farm House and Barton Farm Stables; the northern boundary has a high sensitivity, and this should be reflected in the finished building heights and boundary treatment;*
- d) A Landscape Visual Impact Assessment, including consideration of heritage assets, shall inform the proposals and accompany the submission;*
- e) Key existing green infrastructure, including mature trees, within the site shall be retained and protected from the impacts of development, subject to practical limitations;*
- f) Safe vehicular, cycle and pedestrian access must be achieved, with appropriate mitigation; this must not compromise access to, or the continued presence and operation of, the existing leisure centre;*
- g) Interconnectivity with the existing footpath network should be achieved whilst respecting existing rights of way; and*
- h) A biodiversity strategy shall demonstrate how the proposal will deliver a biodiversity net gain.'*

Land off Cherry Orchard

As the local authority representation notes: "The site is included within the current defined limits of development and is previously developed land. The principle of accommodating new development at this site would be supported in general landscape planning policy terms." The AONB adds: "Welcome the use of a brownfield site."

The Qualifying Bodies have acknowledged that this site is affected at its south-western boundary by a restrictive covenant and at that location also by its proximity to the old railway line, an important ecological site. The local authority has commented: "It is difficult to understand how the policy requirements for biodiversity net gain and conservation and enhancement of the AONB will be acceptably deliverable based on these envisaged new home numbers [30] at this small site and the likely tree removals and weakening of the existing vegetated disused railway Green Infrastructure corridor required to achieve this." I note that the Site Assessment Report says: "In June 2020 WC confirmed that the developable area of Cherry Orchard had to be reduced by half to take account of a restrictive covenant, thereby reducing its capacity to 15 homes." The AONB has added: "Ecological assessments must play a part in shaping the development." The Qualifying Bodies have advised that they understand "that proposals for a scheme of 24 homes is (*sic*) coming forward in a way that will be consistent with these policy provisions and with the broader housing supply strategy of MARL1". But that has yet to be assessed as a

deliverable proposal. In the absence of detailed evidence supporting the assessed capacity of this site there is a need to be cautious, respecting the AONB status and the ecology issues; according I propose that 'at least 15 homes' is included as the Policy expectation.

The Environment Agency has noted that this site is "partially within inner [public water] Source Protection Zone 1. This therefore needs to be addressed within the Policy.

As noted above, Marlborough falls within the 40% zone for affordable housing as shown on the map within Appendix 1 of the Revised Wiltshire Planning Obligations Supplementary Planning Document (October 2016). The proposed level of affordable housing is therefore consistent with the strategic policy.

Recommendation 6:

Under the sub-heading "Land off Cherry Orchard" reword the Policy as follows:

'Within the site boundary shown on the adjacent plan, proposals will be supported for at least 15 homes on a developable area of no more than 1.0 Ha, limited to ensure that the development retains a natural setting, and subject to the following:

- a) The proposals shall include for 40% affordable housing;*
- b) The scheme shall have a highways access on to Cherry Orchard only with appropriate mitigation to assure safe vehicular, cycle and pedestrian access;*
- c) The layout shall retain public right of way MARL30 through and on the boundary of the site;*
- d) The issues arising from part of the site's location within the Marlborough public water Source Protection Zone 1 must be satisfactorily addressed;*
- e) A biodiversity strategy shall include for retaining the green infrastructure along its south-western boundary to protect the habitat corridor (the former railway line) towards the Savernake Forest SSSI to its south, as well as demonstrating proposals to deliver a biodiversity net gain; and*
- f) The layout and form of development shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB.'*

Land at Kelham Gardens

This site too is included within the current defined limits of development and is previously developed land. However, the local authority has noted: "The land allocation lies within Flood Zone 2 and is at risk from surface water flooding. The NPPF advises that development should not be allocated or permitted in areas at risk of flooding if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Planning Practice Guidance clarifies that in plan making, this means applying a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk." Paragraph 5.9 in the Plan text says: "Although the MANP is able to allocate land outside of the flood zone it is considered that the remediation and redevelopment of the site for a new residential use presents a more sustainable option than leaving the land derelict, and so the sequential test is passed." But it is not within the scope of the Sequential Test to reach such a conclusion.

In response to this query the Qualifying Bodies have commented: "The SG considers it has correctly applied the sequential and exception tests of the NPPF but the wording used to explain this may be improved. It has been demonstrated that there are insufficient available and suitable sites of a lower flood risk than this site to meet the NP housing supply strategy,

thus the sequential test is passed. Whilst others may speculate on the availability of other sites, the SG must be clear on this matter and went to great lengths to ascertain availability in its assessment process. The SG notes WC's recent confirmation that its own data indicates there are no other available brownfield sites in the town. And as already noted, neither WC nor the AONB would support additional greenfield sites in Flood Zone 1 being allocated for housing. In which case, as it is 'not possible for development to be located in areas with a lower risk of flooding taking into account wider sustainable development objectives (as per NPPF paragraph 163)', the exception test has been applied. In doing so, the SG has explained how the redevelopment of this eyesore, derelict, contaminated but very well-located site will 'provide wider sustainability benefits to the community that outweigh the flood risk.' The land promoter has reassured the SG that the emerging proposals 'will be safe for the lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.' The allocation policy makes clear that a flood risk management [plan] will need to demonstrate this is the case at the planning application stage. The SG considers that it is not practical for a Qualifying Body or an LPA to carry out a technical assessment of detailed flood risk management proposals at the plan making stage and nor does the NPPF make it a requirement."

I note again an overreliance on assertion by other parties, whereas the Environment Agency has observed: "It is important that your Plan also considers whether the flood risk issues associated with any proposed development can be safely managed to ensure development can come forward." However, in this instance an immediately adjacent site has recently gained a planning consent for residential development (ref 20/08715/FUL), albeit subject to significant conditions regarding mitigation. Also, I note that the Environment Agency has further commented: "If development is to be allocated in area at risk of flooding, the plan should minimise the risk by taking a sequential approach to the development layout. The Kelham Gardens site contains a small island of Flood Zone 1 at the northern end, however this would need to be refined as part of site specific Flood Risk Assessment." This expectation, as well as an expectation of mitigation of the type required for the adjacent consent, should therefore feature in the allocation Policy.

In relation to the capacity of the site I note that the local authority has commented: "It is however questioned whether the area of the site is sufficient to accommodate 10 units, with 2-3 bedrooms which is the requirement of Policy MARL3, with associated parking and services within a building(s) no greater than 2.5 metres [which I believe should read storeys]. The details shown on the supporting plan is for a scheme of 9 flats, 3 of which would be 1 bed only." If the final layout requires concentration of development on part only of the site, then this would exacerbate the concerns of the local authority. "10 dwellings or more" is of course the NPPF threshold (paragraph 64) for an affordable housing provision to be required. Since it is evident that the Qualifying Bodies are seeking affordable housing through each of the site allocations, and discussions have been had with land interests on that basis, I have not recommended an amendment to this aspect of the Policy. I will later consider Policy MARL3.

Recommendation 7:

Under the sub-heading "Land at Kelham Gardens":

7.1 Provide an identifiable boundary for the site being allocated.

7.2 Reword the Policy as follows:

'Within the site boundary shown on the adjacent plan, proposals will be supported for a flatted scheme of up to 10 homes on a developable area of approx. 0.1 Ha, subject to the following:

- a) The proposals shall include for 40% affordable housing;*
- b) The buildings shall be no more than 2.5 storeys in height;*

- c) *The scheme shall have a highway access on to Kelham Gardens only;*
- d) *The risk from flooding both within the site and beyond the site arising from the development must be addressed as required by national policy and appropriate mitigation measures included through a sequential approach to the development layout as part of a site-specific Flood Risk Assessment; and*
- e) *A biodiversity strategy shall demonstrate how the proposal and any works necessary to address ground contamination will avoid any harmful effects on the River Kennet SSSI to its immediate south.'*

B. For all the above site allocations the proposals will be required to demonstrate the effects of traffic they will generate can and will be effectively mitigated

The local authority has commented: "there are no specific details of the mitigation measures that may be required and whether these relate to off-site highway works, albeit the commentary within paragraphs 6.12 – 6.13 about exploring future opportunities is recognised." A representation comments: "We cannot simply keep on building houses and hope the pollution problems go away." Now that the individual schemes are quite modest in size the scale of expectations through mitigation is also reduced. The Qualifying Bodies have commented: "Although transport assessments will be required of each of the site allocations, and any other proposals for major development, the SG wished to respond to comments raised at the Reg 14 stage and included this provision in the final policy. It is especially mindful of the AQMA [Air Quality Management Area] but considers that allocating sites that are relatively modest in size and that are distributed around the town in locations that all lie within a reasonable walking and cycling distance of the town centre would be a self-evident mitigation strategy." With the Salisbury Road site removed I agree that this approach is acceptable at the site allocation stage.

C. Archaeological investigations will be required in accordance with existing development plan policies

Whilst it is not identified in the supporting text that there are archaeological assets on or adjacent to any of the identified sites, the inclusion of element C aligns with the requirement of the NPPF and Core Policy 58 'Ensuring the Conservation of the Historic Environment' of the Core Strategy.

D. For the avoidance of doubt, Policy MARL3 will apply to all of the site allocation schemes in respect of the housing type mix

I will comment on Policy MARL3 below. Since there is a cross-reference to this Policy there is no purpose in repeating the Policy in different words at this juncture.

Recommendation 8:

Under the sub-heading "D. For the avoidance of doubt,", remove the second sentence.

Paragraphs 5.6 – 5.11

I note that a representation suggests that the Plan should: "Provide explanatory text for each of the proposed site allocations to assist understanding of the specific requirements/provisions of each site and mitigate the risk of uncertainty in future decision-making." It seems to me that the Plan does include some explanation for each, but briefly, there being an expectation that the Site Assessment Report will be accessed for fuller detail. With the Salisbury Road site excluded, I conclude that this approach is acceptable. The details here now need to be brought in line with the modifications recommended above.

Recommendation 9:

Under the heading "Policy MARL1: Delivering Affordable Homes in Marlborough":

9.1 Amend paragraph 5.6 to read: *‘This policy allocates three sites in Marlborough to deliver a total of approximately 26 affordable homes from a total of approximately 65 homes.’*

9.2 Amend the third sentence of paragraph 5.8 to replace *“two of the four sites are outside but adjoin its development boundary”* with *‘one of the three sites is outside but adjoins its development boundary’* and the NPPF paragraph reference from *“172”* to *‘176’*.

9.3 Replace the fourth sentence of paragraph 5.9 with: *‘It has been demonstrated that there are insufficient available and suitable sites of a lower flood risk than this site to meet the Marlborough housing requirement, thus the sequential test is passed. As it is ‘not possible for development to be located in areas with a lower risk of flooding taking into account wider sustainable development objectives (as per NPPF paragraph 163)’, the exception test has been applied.’*

9.4 Replace paragraph 5.10 with: *‘The site at Barton Dene represents a modest extension of the development boundary in a sustainable location with non-car accessibility to the town centre. The site has been assessed as ‘major development’ in the AONB, as per NPPF paragraph 172, and it has been concluded that the public benefits of the development – in this instance the delivery of vital affordable homes – outweigh its detrimental effects on the local environment and landscape, the effects of which are assessed as capable of appropriate mitigation.’*

9.5 In paragraph 5.11, first sentence, replace *“130”* with *‘65’* and replace *“greater”* with *‘significant’*; delete the third sentence commencing *“The Rear of Salisbury Road scheme ...”*.

As amended Policy MARL1 meets the Basic Conditions.

Policy MARL2: Encouraging Affordable Homes in Mildenhall

I note that Policy MARL2 does not allocate a specific site to meet Mildenhall’s needs nor does it identify locational criteria helping to identify a preferred location that would best fit within Mildenhall and its existing infrastructure. The Qualifying Bodies have explained: “WC was not supportive of the MANP allocating land in either village but, at the Parish Council’s request, rather than remain silent the SG instead formulated a policy that encourages proposals for affordable housing to come forward. However, the supporting text notes that this is not to meet the specific needs for such housing from the existing community (although there is wider demand in the MANP area evidenced through the Housing Needs Assessment). Such housing is wanted instead to encourage younger people and families to move into the village to build its vibrancy. Like many such villages, the community is seeing an aging and declining population and wishes to tackle this....The policy does include a criterion (4) that will help determine the extent to which the location and nature of the scheme will successfully stitch into the village fabric and meet AONB policy obligations.”

As the Qualifying Bodies have noted, the NPPF (paragraph 72) does not support the use of “exception sites” within AONB areas. The Wiltshire Core Strategy does not identify Mildenhall as a “Small Village”, which suggests that development at Mildenhall is less favoured than small villages where “development will be limited to infill within the existing built area” and where it is an expectation that “development: i) Respects the existing character and form of the settlement ii) Does not elongate the village or impose development in sensitive landscape areas iii) Does not consolidate an existing sporadic loose knit areas (sic) of development related to the settlement.” To these significant constraints must be added the requirement via Core Policy 14 and paragraph 5.78 of the Core Strategy that: “all development within the [Marlborough] Community Area will need to conserve the designated landscape of the North Wessex Downs Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics”. It is evident therefore that Mildenhall is not considered an appropriate location for any significant development.

However, Core Strategy paragraph 5.78 does also indicate support for “sustainable and measured growth throughout the plan period that will also help to deliver affordable housing in the Community Area and improve access to open market housing. This will help to provide a local workforce for current and new employers moving to the area”. And Core Policy 44 does say that, at “settlements [including] those not identified within the settlement strategy, a proactive approach to the provision of affordable housing will be sought in conjunction with parish councils and working with local communities and other parties.” It is appropriate, therefore, for the Qualifying Bodies to adopt a “proactive approach”, but this must be within the limits suggested by other related local and national Policies. Within that context, and after visiting Mildenhall, I cannot conclude that developments of anywhere approaching 10 units would be appropriate; capacity for infill and respecting “the existing character and form of the settlement” would suggest much smaller, individual sites. The Policy wording needs better to reflect the village form of Mildenhall and strategic policy expectations.

As the local authority notes, the very specific type of development suggested relies on current/historic evidence that may no longer be applicable at a future date when/if an acceptable site(s) is identified. The local authority suggestion for greater flexibility would therefore seem to be a good one.

Some aspects of the supporting statement are puzzling:

Para 5.13 suggests that “MANP needs to bring forward proposals for at least 100 affordable homes” – I believe that this is the first time that a such a figure has been suggested in the Plan document, albeit its relevance to Mildenhall is questionable.

Para 5.14 comments about: “forms of affordable housing that are especially well-suited to targeting young people as first-time buyers but cannot be delivered in this location due to its position in the AONB”. But exception sites are not the only means to deliver affordable housing if community support is available.

Recommendation 10:

Under the heading “Policy MARL2: Encouraging Affordable Homes in Mildenhall”:

10.1 Reword Policy MARL2 as follows (for consistency with my recommendations for MARL1 I am showing letters but numbers would be equally acceptable):

‘Proposals to deliver affordable homes for first-time buyers in Mildenhall are encouraged provided:

- a) The new housing respects the village character and form and is provided as infill within the existing built area;*
- b) All of the homes have two or three bedrooms only and are either discounted market sales housing or other routes to affordable homes for first-time buyers;*
- c) The design and layout of the scheme sustains and enhances the significance of the Mildenhall Conservation Area and the setting of other heritage assets as defined in Policy MARL12;*
- d) The layout and form of housing is designed to conserve the designated landscape of the North Wessex Downs Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics, and*
- e) Where appropriate to the location, a landscape scheme is designed to support the transition from the built area of the village into the surrounding countryside.’*

10.2 In paragraph 5.12 replace “an affordable housing scheme” with ‘infill affordable homes for first-time buyers’.

10.3 In paragraph 5.13 delete the third sentence.

10.4 In paragraph 5.14 delete the second sentence.

10.5 Replace paragraph 5.15 with: 'This Policy is a locally appropriate response to Core Policy 44 which says "a proactive approach to the provision of affordable housing will be sought in conjunction with parish councils and working with local communities and other parties."

As amended Policy MARL2 meets the Basic Conditions.

Policy MARL3: Meeting Local Housing Needs

As worded Policy MARL3 does not apply to allocated sites either inside or outside of the "Marlborough development boundary", which the Qualifying Bodies have confirmed is a reference to the settlement boundary defined in the Wiltshire Housing Site Allocations Plan. However, Policy MARL1 element D makes a contrary statement "for the avoidance of doubt".

I note that the 'Planning for Marlborough' Study includes a forecast that "In the years 2016-2036 the older population is expected to increase by 25% in the 60-74 age group and 85% in the 75+ age group the 30-44 age group is expected to increase by 4% and the 45-59 age group to decrease by 14%." Against this background it is difficult to see that the very specific requirements of Policy MARL3 are justified.

The Qualifying Bodies have commented: "Where there have been rare opportunities for significant brownfield site developments in the last decade or more, they have most often been developed for age-restricted, retirement complexes" and "Worse, WC has been unable to require any affordable housing contributions from these schemes given their NPPF paragraph 65(b) exemption which has superseded WC's Core Policy 46". The local authority has provided me with a tabulation that supports the concern to some degree; of the brownfield housing schemes permitted since April 2010 the data shows that only 13 of the 144 units approved were not age-restricted. I also note that all of the brownfield sites were of a size where affordable housing could have been required were it not for the specialist-related limitation. However, 210 general units were approved on non-brownfield sites. The Qualifying Bodies have commented: "with so much of the demand for this [age restricted] accommodation type being driven from outside the county, it seems reasonable to expect other suitable locations in the county to plan to meet it for the rest of the plan period", but no evidence is provided to support the "outside the county" assertion. Since the evidence, taken as a whole, is equivocal on the matter of housing the elderly, whereas the evidence on the need for affordable housing is clearer, a positively expressed Policy could oblige proposals to address both evidenced local needs and encourage a greater affordable housing element.

Recommendation 11:

Under the heading "Policy MARL3: Meeting Local Housing Needs":

11.1 Reword Policy MARL3 as follows:

'To be supported, development proposals for the sites allocated at MARL1 and for windfall sites within the designated Marlborough Settlement Boundary must address evidenced local housing needs and maximise their contribution of two and three bed affordable housing, wherever possible exceeding the levels stipulated in Wiltshire Council Policy. Specialist accommodation for elderly people is not considered a current priority.'

11.2 Amend paragraph 5.16 by replacing "it discourages proposals for any form of housing intended for older people" with 'it seeks to maximise the proportion of housing that is affordable and to discourage proposals for any form of housing intended solely for older people'.

11.3 Delete the last two sentences of paragraph 5.19.

As amended Policy MARL3 meets the Basic Conditions.

Policy MARL4: Supporting a Thriving Town Centre

This Policy matches with the expectation of NPPF paragraph 86: "Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation." I note that paragraph 5.22 says: "The retail evidence base has been used to define the Town Centre area". However, I am not presented with any evidence of the methodology used to delineate these areas. The Qualifying Bodies advised and the local authority confirmed that the defined Town Centre Area has been derived from and matches that of the Kennet Local Plan Policies Map (policies ED18 and ED19).

The local authority has noted that "any other uses not identified within the plan which could positively contribute to the vitality and viability of the centre would have to be assessed on their own merits". In this regard it is perhaps unexpected that the new Class F Community Uses are not mentioned. The Qualifying Bodies agreed that some learning and non-residential institution uses (F1) and local community uses (F2) may also be appropriate in the defined Town Centre Area and supported a recommendation to this effect.

Recommendation 12:

Under the heading "Policy MARL4: Supporting a Thriving Town Centre":

12.1 Amend the Policy to add a new element C (and re-letter subsequent paragraphs):

'The Town Centre will be an appropriate location for local community uses and some learning and non-residential institution uses which benefit from its ease of access.'

12.2 In paragraph 5.22 replace "The retail evidence base has been used to define" with 'The Kennet Local Plan defined'.

12.3 In paragraph 5.26 the reference to "MARL14" should be corrected to 'MARL13'.

As amended Policy MARL4 meets the Basic Conditions.

Policy MARL5: Improving Public Parking

I note the evidence in the study of car parking capacity in the town centre and the 'Planning for Marlborough' Study notes as a current concern "Shortage of parking at peak times, creating parking issues for both residents and visitors with uncontrolled parking on residential streets." Some representations are sceptical of the value of a parking area 10 minutes' walk from the centre. The scepticism appears to be compounded by the selection of piece of land that relates well to the Common, the type of open land that other parts of the Plan seek to protect. Whilst the Policy makes efforts to avoid an asphalt intrusion, rows of parked cars/vans would, on the face of it, be visually intrusive on both the "open setting to the Grade II listed former Union Workhouse at St. Luke's Court" and "the remainder of the Common". However, the Town Character Study does address the proposal and I note the conclusion that "It is considered that, if appropriately detailed and implemented, the improvement of the Rugby Club car park could offer the opportunity for enhancement of the area." My visit to the area confirmed that there is significant on-street parking in the vicinity. I am however unsure how, without kerbs, bunds etc, it will be possible to distinguish a "a meaningful nib of land [grass?]" and "the continuous swathe" [of grass?] to prevent damaging these with overspill parking. I note that the Character Study does not say "no kerbs" but rather "edge treatment should be appropriate to and harmonise with the natural, informal quality of the common".

From my visit to the site, it was evident that part of the site identified for allocation is already an established parking area. The only part requiring allocation is the extension to the south.

Recommendation 13:

Under the heading “Policy MARL5: Improving Public Parking”:

13.1 Amend element 1 of the Policy to remove “kerbs,” and correct element 5 to start with a capital letter.

13.2 Amend the Policies Map to identify with the red line only that area not presently allocated for parking.

As amended Policy MARL5 meets the Basic Conditions.

Policy MARL6: Delivering New Cemetery Land

It is helpful that the Neighbourhood Plan addresses land use needs based on local knowledge. Because it is not covered in the supporting text, it is unclear what “ancillary buildings” might be thought to be needed, as referred to in the Policy, and whether such buildings could be better located outside of the new site rather than on the exposed edge of the whole site. The Qualifying Body confirmed that the reference to “ancillary buildings” should be deleted.

Recommendation 14:

Within “Policy MARL6: Delivering New Cemetery Land” replace the second sentence with: ‘The laying out of the land must conserve the designated landscape of the North Wessex Downs Area of Outstanding Natural Beauty and its setting.’

As amended Policy MARL6 meets the Basic Conditions.

Policy MARL7: Protecting & Supporting Community Facilities

NPPF paragraph 93 supports positive planning for community facilities. It is helpful that local knowledge has been used to identify valued community facilities. From my visit to the area I was able to confirm that the facilities identified can appropriately be termed ‘community facilities’. I note that the related Core Policy 49 provides greater detail on a suitable test of viability to be applied. Within Core Policy 49 it is accepted that, as a second option, a change of use or a mixed use may help to retain the community benefit of a building; it is not explicitly said in MARL7 whether this is ruled in or out.

I note that, unlike the title to Policy MARL8, Policy MARL7 omits “Improvement” and the Policy wording prioritises the negative wording – what is not wanted – over the positive wording of the second sentence – what is positively sought. It is questionable whether there is a need for these two Policies to be expressed differently.

It would seem that no site-specific assessment has been made about their potential to accommodate changes to “sustain or extend the viable use”; therefore, support should only be offered ‘in principle’.

The Qualifying Bodies agreed that modified wording would be appropriate.

Recommendation 15:

Within “Policy MARL7: Protecting & Supporting Community Facilities”:

15.1 Move the sentence “Development proposals to sustain or extend the viable use of existing community facilities, and the development of new facilities, will be supported” from element B to the beginning of element A.

15.2 Add to element B: 'or a change of use or a mixed use will help to retain the community benefit of a building'.

As amended Policy MARL7 meets the Basic Conditions.

Policy MARL8: Protecting and Improving Sports Facilities

NPPF paragraph 98 acknowledges that "Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities". It is helpful that local knowledge has been used to identify valued community facilities. Some representations are critical of the Policy for not going further and allocating suitable land for additional sports facilities. I note that the 'Planning for Marlborough' Study references additional, specific requirements from the "Wiltshire Playing Pitch Strategy". The Qualifying Bodies have responded that "the SG was not able to identify suitable land for new facilities, despite its great endeavours".

In relation to the Policy wording, element C uses the phrase "or that a replacement facility has received planning permission", but planning permission of itself would not guarantee a replacement facility.

Recommendation 16:

Within "Policy MARL8: Protecting and Improving Sports Facilities", in element C, replace "has received planning permission" with ', at least as conveniently located and well-equipped, is provided'.

As amended Policy MARL8 meets the Basic Conditions.

Policy MARL 9. A Design Code for the Marlborough Conservation Area

A representation queries the use of the term "Design Code" in this and subsequent, related Policies; certainly the documents themselves do not use the term. National Planning Policy uses the term in the context of new-build developments, the Code guiding the design process. The supporting text uses "design principles and guidance" and the Town Character Study refers to the "design guidance" in the Conservation Area Statement. The Statement itself says that it "aims to provide an assessment of the Marlborough Conservation Area, for use by all those involved in influencing the management of change in its built and living form". 'Guidance' would appear to be the most appropriate term.

In law, the "setting" of a Conservation Area (unlike a Listed Building) is not subject to protection. Whilst I note that the Conservation Area Statement provides a description of the "Landscape Setting" for Marlborough, the detail relates exclusively to the defined Area. I believe that Policy MARL10 addresses other areas of importance outside of the presently defined Conservation Area. Accordingly, Policy MARL9 should be restricted to within the Conservation Area boundary leaving the planning decision maker to consider its relevance to proposals at the boundary.

The Qualifying Bodies have confirmed that they "would be happy with the examiner's suggested modification to the titles of these policies and to delete the reference to 'setting'".

Incidentally, in accessing the Conservation Area Statement I noted that none for the Marlborough Neighbourhood Area is included on the Wiltshire webpage for Conservation Areas. This seems to emphasise the value of adding hyperlinks to the 'Schedule of Evidence' document listing at Appendix B of the Neighbourhood Plan (see later recommendation).

Recommendation 17:

17.1 Within the heading “Policy MARL 9. A Design Code for the Marlborough Conservation Area” replace “A Design Code” with ‘Design Guidance’.

17.2 Within Policy MARL 9 delete two uses of “and its setting”.

As amended Policy MARL9 meets the Basic Conditions.

Policy MARL10: A Design Code for Marlborough’s Areas of Special Quality

My comment regarding the Term “Code”, above, applies equally here. I note that the proposed designations are supported by the Town Character Study and by the local authority. My visit to the Areas confirmed that these areas are of a distinctive character and warrant the special attention provided by the Policy.

Recommendation 18:

Within the heading “Policy MARL10: A Design Code for Marlborough’s Areas of Special Quality” replace “A Design Code” with ‘Design Guidance’.

As amended Policy MARL10 meets the Basic Conditions

Policy MARL11: A Design Code for Manton

My comment regarding the Term “Code”, above, applies equally here. I note that the Policy is supported by a Design Study and is supported by the local authority. My visit to the Area confirmed that the identified area is of a distinctive character and warrants the special attention provided by the Policy.

Recommendation 19:

Within the heading “Policy MARL11: A Design Code for Manton” replace “A Design Code” with ‘Design Guidance’.

As amended Policy MARL11 meets the Basic Conditions

Policy MARL12: A Design Code for Mildenhall

My comment regarding the Term “Code”, above, applies equally here. I note that the Policy is supported by a Design Study and is supported by the local authority. My visit to the Area confirmed that the identified area is of a distinctive character and warrants the special attention provided by the Policy.

Recommendation 20:

Within the heading “Policy MARL12: A Design Code for Mildenhall” replace “A Design Code” with ‘Design Guidance’.

As amended Policy MARL12 meets the Basic Conditions

MARL13: Protecting Local Heritage Assets

Both the NPPF and the Core Strategy support the identification and appropriate protection of heritage assets. I note that the non-designated heritage assets – this is the correct planning term to use within the Policy - that are the subject of this Policy have been supported through the Design Studies that accompany the Plan. I note that in respect of the Savernake Study it is said “The list of Savernake Heritage Assets was produced by Savernake Parish Council, and then professionally vetted by the Neighbourhood Plan consultants”; this therefore should be acknowledged on the cover of the Report.

A representation makes a significant point in relation to the Policy element A wording: "It is clear that the determination of applications which affect non-designated heritage assets requires a lesser test of a 'balanced judgement' by the decision maker, rather than the emphasis on the applicant to demonstrate a) the level of harm, and b) the public benefits arising from the proposed development. With regards to non-designated heritage assets, there is therefore no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated." It is suggested that Policy MARL13 be reworded in line with the NPPF expectation (paragraph 203): "In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset." The Qualifying Bodies agreed that a rewording was appropriate.

The wording of Policy element B is quite awkward given that it applies to only a small part of the Neighbourhood Area and one within which development is severely restricted. The Qualifying Bodies agreed that a rewording was appropriate.

Recommendation 21:

Under the heading "MARL13: Protecting Local Heritage Assets":

21.1 Reword Policy MARL13 as follows:

'A. The local non-designated Heritage Assets are identified on the list in Appendix A. Development proposals that directly or indirectly affect these non-designated heritage assets will be assessed with a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.'

B. At the North West boundary of the Neighbourhood Area, development proposals must assess and address their impact on the Stonehenge & Avebury World Heritage Site and its setting.'

21.2 Add to the cover of the "Savernake Parish Local Heritage Assets Study July 2021" details of the independent vetting of the content.

As amended Policy MARL13 meets the Basic Conditions

Policy MARL14: Protecting and Improving Green Infrastructure

As the local authority confirms, "The policy aligns with the objectives of Core Policy 50 'Biodiversity and Geodiversity' and Core Policy 52 'Green Infrastructure' of the WCS and applies them to the local context of the draft Plan area." The supporting statement however provides no details for the methodology for arriving at a "network" of spaces that may be considered interconnected. I am provided with details within Supporting Document 2 of 10 "Important Wildlife Corridors" most of which are not illustrated by or indexed to the Policy Map. The Qualifying Bodies have acknowledged that they "prepared the four Open Space reports throughout the plan making process to inform its policies. Not all of its work resulted in policy proposals – for example it had difficulty in mapping the Important Wildlife Corridors and decided not to include them on the MARL14 policy maps". Further, I am presented with a number of maps, under the heading "Conserving Scenic Beauty of the AONB", that, whilst they are said to relate to Policy MARL17, more obviously perhaps relate to the illustration of Policy MARL 14. Again, the Qualifying Bodies have explained that the "mapping of specific locations in the AONB (for MARL17) was incorrectly added to the MARL14 maps, an error which can be corrected in preparing new policy maps. The SG infers that this may have led to confusion between the ecological focus of MARL14 and the landscape focus of MARL17."

Whilst some spaces and ribbons have an obvious interconnectedness, others are quite isolated and, because the nature of the spaces is not stated, it is difficult to envisage their value in network terms, as opposed to their value purely as open space. A representation

requests the omission of the Water Meadows sports pitches, surface car park and amenity lawn to the south of Marlborough College and also College Fields, but I can see their open space value.

However, I note that Core Policy 52, as explained in paragraphs 6.88. & 6.89 of the Core Strategy, is all-encompassing and it suggests that the green infrastructure identified through the Neighbourhood Plan would be regarded as such for the purposes of the Wiltshire Green Infrastructure Strategy. Accordingly, subject to the correction of the Policies Maps, I conclude that Policy MARL14 is appropriately aligned with the Core Strategy.

There is the need for further clarity on some aspects of the Policy wording:

- Element A makes rather grander claims than the identification of existing Green Infrastructure can deliver.
- Element C refers to loss of “land” by which I presume is meant ‘green space’. It also requires that extensions to the Network should be “co-ordinated with local investment projects to improve the Network”, but is it of itself encouraging an improvement.
- Element D refers to “woodland planning”, by which I think is meant ‘planting’, being at a location “that has been designated for that purpose”; but there is no clarity as to from where the designation comes. If, as appears likely, this is part of the “guidance” to follow then the Policy at this stage should not reference an approach not yet consulted upon and agreed.

The Qualifying Bodies agreed “that clauses C and D may be better worded to improve their clarity as the examiner suggests, together with the provision of clearer Policies Maps”.

Recommendation 22:

Under the heading “Policy MARL14: Protecting and Improving Green Infrastructure”:

22.1 Within Policy MARL14:

22.1.1 In element A replace the first sentence with: ‘The Green Infrastructure Network, as shown on the Policies Map, is recognised for its existing value and further potential providing open space and ecological connectivity.’

22.1.2 In element C, in the first sentence, replace “land” with ‘green space’ and replace the last sentence with ‘Development proposals that will lead to the improvement and extension of the Network will be supported in principle.’

22.1.3 Reword element D as follows: ‘Proposals that will contribute to sequestering carbon through appropriate woodland planting and other effective means proportionate to the scale and nature of the proposal will be supported, whether delivered on the proposal site or at another agreed location.’

22.2 Amend the related Policy Maps to exclude all green areas that were identified in relation to Policy MARL17.

As amended Policy MARL14 meets the Basic Conditions

Policy MARL15: Protecting Local Green Spaces

I note the intention to designate 7 Local Green Spaces. Looking at the supporting document it is evident that Test 4 is inadequately expressed – or there ought to be a Test 5 – since the NPPF criterion requires that a space is “Demonstrably special to a local community and holds a *particular* local significance” (my emphasis added) whereas Test 4 refers only to “Is the site demonstrably special to the local community?” Having said that, there is evidence within the appraisal of sites that a “particular significance” for selected sites has been identified within the descriptive detail.

I note that Marlborough College has objected in their representation to the designation of site no.7 Land at College Fields/Barton Park, Marlborough; the local authority originally also made an objection but that has subsequently been withdrawn. The College notes: “the Open Spaces in MANP Area Regulation 15 Supporting Document 1 (dated 28/07/2021) identifies ‘limited recreational use’ (see page 8) and no other ‘particular local significance’. In this regard, the land must be considered to fail [the NPPF requirements]. However, it is still put forward for designation as Local Open Space in the MANP”. “Moreover, its potential to deliver on other aspects of sustainable development (i.e. social and economic), or release the potential of land adjoining, will be prematurely inhibited.” The Qualifying Bodies have responded: “The SG disagrees with Marlborough College. Should the College seek to bring forward proposals at Barton Park outside the Neighbourhood Area (in Preshute Parish) in future then it will need to make the very special circumstance case in its application (or argue why the provision of a road across the site is not ‘inappropriate development’). These are not matters that relate to the designation criteria now and this proposal does not undermine ‘the local planning of sustainable development’.” Having now seen the Space in question, I can see that it is an informal space with, apparently, well-trodden footpaths which performs an important function of retaining the original valley ridge line which is otherwise lost to housing. Accordingly, I accept that the designation criteria – set down now in the NPPF paragraphs 101 to 103 – have been met. I do not see the development of other land being precluded.

The map included in the Plan that presently defines the areas proposed for Local Green Space designation, at its scale, does not provide the necessary clarity about the boundary for each space. I note that the accompanying Supporting Document 2 does provide further clarity and for the published Plan there will need to be individual maps for each space alongside the current location map, I suggest within an Appendix. The Qualifying Bodies have agreed that more detailed maps are required. The correction of the location map to omit Marlborough Green will also need attention. During my visit to the area, I noted that a surfaced car park at the entrance to the Salisbury Road Recreation Ground Local Green Space had been included as green space; the car park should be omitted from the designated area.

Recommendation 23:

Under the heading “Policy MARL15: Protecting Local Green Spaces”:

23.1 Amend the opening sentence of the Policy to ‘Local Green Spaces are designated in the locations listed below and shown on the Policies Map and in detail in Appendix B’ (re-letter the existing Appendix B accordingly).

23.2 In paragraph 5.52 amend “paragraphs 99 - 100 of the NPPF” to read ‘paragraphs 101 - 103 of the NPPF’.

23.3 Amend the Policies Map to remove the Space at Marlborough Green which is not being designated; also amend the boundary of the Salisbury Road Recreation Ground Local Green Space to exclude the surfaced, entrance car park.

23.4 Add an Appendix B to provide individual maps of the designated spaces at a scale that allows the boundary to be identified with absolute clarity.

As amended Policy MARL15 meets the Basic Conditions

Policy MARL16: Protecting Valued Community Open Spaces

Paragraph 99 of the NPPF makes it clear that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless specific requirements are met. Policy MARL16 identifies the specific open spaces that are valued in the Neighbourhood Area.

In relation to the separation between Policies MARL14 and MARL16 the Qualifying Bodies have explained: “The SG had identified these [MARL16] spaces primarily for their community amenity and recreational value. However, its Open Space reports show that the spaces may also contribute to the wider network of primarily ecologically valued assets in the Area. Hence, the spaces are shown on the MARL14 maps, but are not specifically identified on those maps, which can be corrected on the new policy maps. It agrees that the new policy maps should be at a scale to label and clearly identify the boundary of each space.” I suggest that the two designations are shown on the same maps, at a suitable scale for the boundaries to be clear, thus making apparent the areas of overlap.

A representation queried the identification of the highway verge space at Cadley (MARL16 17) as being of community value. My understanding is that the space was identified by Savernake Parish Council. My visit to the site revealed that the space does provide a green and open frontage to the properties at this location but, whilst at the scale of map provided it was difficult to distinguish, it appears that part of a private garden space has been included with the community space; this will need checking and correction as required.

There are some issues with Policy wording clarity:

- “ancillary to its community use” – this could include buildings that would diminish the open nature of the site as long as the building is assessed as subservient to the remaining space.
- “alternative better provision can be secured, and an assessment has determined that the space is surplus to requirements” – it would seem that ‘has been’ should replace “can be” and ‘or’ replace “and”.
- It would appear that the spaces listed at C are not presently identified on the maps but could be, with a distinct identification, once the scale has been appropriately increased.

Recommendation 24:

Under the heading “Policy MARL16: Protecting Valued Community Open Spaces”:

24.1 Within Policy MARL16:

24.1.1 In the opening sentence of element A replace “Map” with ‘Maps’.

24.1.2 Reword element B as follows:

‘Development within a Valued Community Open Space will only be supported if it preserves and where possible enhances its contribution to the health and wellbeing of visitors and residents, public access, and it is ancillary to the community use and retains the openness of the Space. Any loss of a Space will only be permitted where alternative better provision has been secured, or an assessment has demonstrated that the Space is surplus to requirements.’

24.2 Check and amend as required the boundary to the Space MARL16 17 at Cadley to exclude any private garden land.

24.3 Incorporate the Spaces identified under Policy MARL16 onto the same Policies Maps as Policy MARL14, ensuring that the boundaries are identified clearly, and add the boundaries, separately distinguished, for the spaces identified in element C of Policy MARL16.

As amended Policy MARL16 meets the Basic Conditions

Policy MARL17: Conserving the Scenic Beauty of the AONB

The NPPF (paragraph 176) says: “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.” I note that two documents (and part of a third) have been submitted in support of Policy MARL17. The Qualifying Bodies have explained: “the SG generated its own information to shape its thinking about the policy [MARL17]. This supplemented the primary evidence provided by the Landscape Character Assessment reports published by Kennet and Wiltshire councils. The policy wording is derived from those reports but also reflected the SG work. The SG decided that it was not necessary to be as place specific in the submitted MANP as originally intended and therefore this policy is not shown on the Policies Maps.”

It would appear that the AONB are satisfied with the wording of Policy element A as they have not made a comment in their representation. However, a representation questions the relevance of this Policy as “Development within the AONB, and outside of the settlement boundaries, would need to have regard to the principles within the AONB Management Plan in any event.” I accept that it is reasonable for the Plan to pick up the issue that has the most widespread influence on planning for the Neighbourhood Area.

As the local authority notes, element B does not show regard to the NPPF paragraph 80; it is for the decision taker not the plan maker to determine whether the NPPF tests are met by any specific proposal.

Recommendation 25:

Under the heading “Policy MARL17: Conserving the Scenic Beauty of the AONB”:

25.1 Delete element B of Policy MARL17 (and consequently remove the letter A from the first element).

25.2 In paragraph 5.56 and the NPPF paragraph number from “172” to ‘176’.

25.3 Delete paragraph 5.59 (renumbering subsequent paragraphs accordingly).

As amended Policy MARL17 meets the Basic Conditions

Policy MARL18: Achieving Dark Skies

The NPPF (paragraph 185c) says that planning policies and decisions should: “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”. Given that the whole of the Neighbourhood Area lies within the AONB I queried whether the words “within or outside of the Marlborough development boundary, or the villages of Manton and Mildenhall” were necessary. A representation comments: “The issue we suggest should be one of specification and performance of lighting rather than resistance and prohibition.” The Qualifying Bodies responded: “The SG considers the wording to be fit for purpose, following a format of wording that is common to many neighbourhood plans and is encouraged by statutory consultees.” I agree that the Policy wording does not amount to “prohibition” and is a fair reflection of the NPPF expectation.

Policy MARL18 meets the Basic Conditions

Policy MARL19: Building to the PassivHaus Standard

I was unable to identify the suggested piece of national Policy or Guidance that says that Neighbourhood Plans may impose their own energy performance standards. Additionally, it would appear that Policy MARL19 requires additions to the National and Local List of Planning Application Requirements; it is not open to Neighbourhood Plans – which must relate to the “the development and use of land” - to do that. In response the Qualifying

Bodies provided me with a draft paper with supporting documentation from the Centre for Sustainable Energy. The paper commences: “Whilst the building regulations are steadily strengthening regulatory requirements on development, they fall well short of requiring new development to be zero carbon, and many local plans lack such policies as well. As a result, many neighbourhood planning groups are keen to adopt binding energy efficiency policies in their plans, ideally requiring new development to be zero carbon.” However, speculation about the future direction of policy does not equate with guidance. The Government’s policy approach to the energy performance of buildings, ever since the 2015 Written Ministerial Statement and the Planning & Energy Act 2008, has consistently been that the required standards (and optional standards where applicable) will be set through the Building Regulations and not through the planning system. As the paper from the Centre for Sustainable Energy seems to acknowledge, there is already a pathway for the Building Regulations to become more demanding. Whilst there is nothing to stop Neighbourhood Plans encouraging higher standards – and Qualifying Bodies engaging with land interests to encourage their delivery – requirements are set at a national level through the Building Regulations.

The paper “Addressing climate change and biodiversity net gain through the Local Plan - raising the ambition” (January 2021), for the emerging Wiltshire Council Local Plan Review, at paragraph 4.10 notes “There are numerous construction methods in operation across the country – e.g. Modern Methods of Construction and Passivhaus. Such methods generally focus on the performance of construction materials to ensure that buildings are more energy efficient (the so called – fabric first model). However, without an agreed, clear direction set out in planning policy, problems with enforcement and objections on design grounds are possible.” These issues must also inform the policy wording. Consequently, some significant amendments are needed to Policy MARL19.

Recommendation 26:

Under the heading “Policy MARL19: Building to the PassivHaus Standard”:

26.1 Within Policy MARL19:

26.1.1 In element A replace “must” with ‘are encouraged to’.

26.1.2 In element B, first sentence, replace “should” with ‘are encouraged to’.

26.1.3 Delete element C (and re-letter subsequent elements accordingly).

26.1.4 In element D replace “required” with ‘encouraged’.

26.1.5 Delete the first two sentences of element E and in the third sentence replace “shall” with ‘are encouraged to’.

26.2 Delete paragraph 5.63, which is now dated (and renumber subsequent paragraphs accordingly).

26.3 Amend paragraph 5.65 to read:

‘This policy is intended to encourage a step change in the energy performance of all new developments in the MANP area through the use of the Passivhaus or equivalent standard of building design. Along with the passive design capacity assessment, designers can demonstrate achievement of the standard using a design for performance methodology such as the Passivhaus Planning package or CIBSE TM34 Operational Energy.’

26.4 In paragraph 5.66 delete “which supports a similar level of intervention”.

26.5 In paragraph 5.67, first sentence, replace “requires” with ‘encourages’.

26.6 In paragraph 5.68 delete all but the first sentence.

26.7 In paragraph 5.69, first sentence, replace “requires” with ‘expects’.

26.8 Delete paragraphs 5.70 & 5.71.

26.9 In paragraph 5.72, first sentence, replace “Clause D requires” with ‘Clause C encourages’ and delete the second sentence.

26.10 In paragraph 5.73 replace “Clause E requires an Energy Statement to be submitted” with ‘Clause D encourages the use of an Energy Statement’.

26.11 In paragraph 5.74 delete the second sentence.

As amended Policy MARL19 meets the Basic Conditions

6. Implementation

The listing of related Town and Parish Council actions is helpful and appropriate. Planning Policy Guidance says: “Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, [but] actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.” (Planning Policy Guidance Paragraph: 004 Reference ID: 41-004-20170728). I note the commitment to “a first review of the MANP after the adoption of the new Wiltshire Local Plan”. It would be up to the Qualifying Bodies whether they wished additionally to commit to working with land interests to assist the voluntary delivery of higher energy performance standards.

Policies Map & Insets

As there are Policies Maps, plural, the title here should reflect that. Previous Recommendations have addressed modifications required to the maps for individual policies.

Recommendation 27:

Amend the heading “Policies Map & Insets” (p58) to ‘Policies Maps and Insets’.

Appendix A: Schedule of Local Heritage Assets (Policy Marl13)

The lists for Manton and Mildenhall are not detailed in the Character/Design Studies in the same manner as the list for Marlborough; this would be helpful and match with the assertion that “The specific local heritage value of each asset is defined in those reports”.

Recommendation 28:

Consider improving the Character/Design Studies to provide consistent detailing of the non-designated heritage assets.

New Appendix B: Maps of Local Green Spaces

As recommended above, a new Appendix B has been added.

Appendix B: Schedule of Evidence

As noted earlier, the existing Appendix B is to be re-lettered as Appendix C and it would be helpful to the reader of the Plan, and avoid confusion, to have the documents listed here hyperlinked to the document location.

Recommendation 29:

Amend the heading “Appendix B: Schedule of Evidence” to ‘Appendix C: Schedule of Evidence’ and add hyperlinks to copies of as many as possible of the documents listed.

Other matters raised in Representations

A few representations to the consultation on the submitted plan in accordance with Neighbourhood Planning Regulations included suggestions of other matters that the Plan might address. However, a neighbourhood plan must specifically address the development and use of land (Planning Practice Guidance ref: 41-004-20140306). And within that constraint there is no checklist of content that a Neighbourhood Plan must contain or subject matter that it must address; the range of content is entirely at the discretion of the local community and the local issues as they see them. It is not my role as Examiner to test the soundness of a Plan in terms of its coverage but rather to consider the content presented against the Basic Conditions. I cannot therefore recommend additional content in the manner that some representations have suggested.

Some representations indicate support for all or parts of the draft Plan and this helps in a small way to reassure that the extensive public consultation has been productive.

European Union (EU) and European Convention on Human Rights (ECHR) Obligations

A further Basic Condition, which the Marlborough Area Neighbourhood Plan must meet, is compatibility with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

Wiltshire Council, in its screening opinion of August 2019, following a consultation period with the statutory bodies, confirmed that a Strategic Environmental Assessment (SEA) under the Environmental Assessment of Plans and Programmes Regulations 2004 was required. The Councils appointed independent consultants, AECOM to undertake an SEA, which was scoped as a wider Sustainability Appraisal (SA/SEA) in agreement with the statutory bodies, as per the Regulations. A Draft SA/SEA ('Environmental Report') was published alongside the Pre-Submission Neighbourhood Plan for statutory consultation and a Final version (August 2021) was prepared to assess the provisions of the Submission Neighbourhood Plan. The Report concluded (in summary): "Overall, the SA predicts the likelihood for both positive and negative effects arising from plan implementation. The new high-quality housing, community infrastructure development and green infrastructure enhancements are likely to bring about significant benefits for communities, resident health and wellbeing and biodiversity The aspects of the MANP that contribute to negative outcomes relate to the permanent loss of greenfield/ agricultural land. This is anticipated as a result of four of the five site allocations proposed through the MANP From a mitigation perspective, the MANP performs positively in terms of delivering a step change in the energy performance of all new developments in the MANP area, notably incentivising the Passivhaus standard, to minimise the energy demand of buildings. In light of these local actions aimed at tackling climate change, neutral effects are anticipated overall."

As noted earlier, Natural England in their representation commented on the SEA: "We advise that the SA is flawed and consequently the allocation is not justified. Specifically, looking at the Table 4.6 of the 'Revised alternatives appraisal findings' Natural England does not agree with the determination for both option D and option E that there would be 'no significant effect' on biodiversity. The justification on page 117 makes no reference to potential impacts on bats." Once modified the Plan will not include the site off Salisbury Road and therefore the Natural England concern is resolved.

Historic England and the Environment Agency have also made comments about the extent to which the SA/SEA has been attentive to matters of their respective concern. It is unfortunate that the document is not more explicit about its attention to matters raised by the statutory consultation bodies. I also noted some other shortcomings in the final report.

However, the overall approach and nature of the conclusions and recommendations are, in my judgement, not significantly compromised by the matters noted here. The Report does what it says it sets out to do: “assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties” (p i). It provides, in as an objective way as possible, an appraisal of identifiable harms and how their worst effects might be addressed. Plan modifications will impact on but not diminish its conclusions.

Wiltshire Council’s Habitat’s Regulations Assessment (HRA) Screening of August 2019 concluded that an appropriate assessment would not be necessary in relation to the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Conservation of Habitats and Species Regulations 2010 (as amended). However, its rescreening of the Pre-Submission Neighbourhood Plan gave rise to a concern: “... that the development allocated and supported by policies MARL1 to MARL6 could give rise to a likely significant effect upon the Kennet and Lambourn Floodplain Special Areas of Conservation (SAC)”. Subsequently, the final screening report of August 2021 concluded that, in the light of the information provided by Thames Water, validated by the Environment Agency, it is possible to screen out the potential for significant effects on the Kennet and Lambourn Floodplain SAC of the final version of the MANP policies, either on their own or in combination with other policies and projects.

In regard to the European Convention on Human Rights, the Basic Conditions Statement that accompanies the Area Neighbourhood Plan states: “The Councils have been mindful of the fundamental rights and freedoms guaranteed under the European Convention on Human Rights in process of preparing the Neighbourhood Plan and considers [sic] that it complies with the Human Rights Act.” No evidence has arisen or been put forward to demonstrate that this is not the case.

Taking all of the above into account, I am satisfied that the Marlborough Area Neighbourhood Plan, as modified, is compatible with EU obligations and that it does not breach, nor is in any way incompatible with, the ECHR.

Conclusions

This Independent Examiner's Report recommends a range of modifications to the Policies, as well as some of the supporting content, in the Plan. Modifications have been recommended to effect corrections, to ensure clarity and in order to ensure that the Basic Conditions are met. Whilst I have proposed a significant number of modifications, the Plan itself remains fundamentally unchanged in the role and direction set for it by the Qualifying Bodies.

I therefore conclude that, subject to the modifications recommended, the Marlborough Area Neighbourhood Plan:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the Plan for the area;
- is compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations;
- does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(d).

On that basis I *recommend* to Wiltshire Council that, subject to the incorporation of modifications set out as recommendations in this report, it is appropriate for the Marlborough Area Neighbourhood Plan to proceed to referendum.

Referendum Area

As noted earlier, part of my Examiner role is to consider whether the referendum area should be extended beyond the Plan area. I consider the Neighbourhood Area to be appropriate and no evidence has been submitted to suggest that this is not the case. I therefore ***recommend*** that the Plan should proceed to referendum based on the Neighbourhood Area as approved by Wiltshire Council on 18rd November 2020.

Recommendations: (this is a listing of the recommendations exactly as they are included in the Report)

Rec	Text	Reason
1	<p>1.1 On the front cover, and in any other locations, remove references to “Submission Plan”.</p> <p>1.2 Under the headings “Contents” and “List of Policies” review the content for accuracy and in the light of my Recommendations below.</p> <p>1.3 Under the heading “1. Introduction & Background”:</p> <p>1.3.1 Amend the title of Plan A to read ‘Designated Neighbourhood Area’.</p> <p>1.3.2 Amend the first two bullet points of paragraph 1.5 to:</p> <ul style="list-style-type: none"> • Does the Plan have regard to national policy and guidance? • Is the Plan in general conformity with the Wiltshire Core Strategy? <p>1.3.3 Remove paragraphs 1.7 & 1.8 referencing the ‘Planning for the Future’ White Paper; renumber subsequent paragraphs accordingly.</p> <p>1.4 Under the sub-heading “Sustainability Appraisal (including Strategic Environmental Assessment)”:</p> <p>1.4.1 In the second sentence of paragraph 1.12 replace “has” with ‘have’.</p> <p>1.4.2 In the second sentence of paragraph 1.14 replace “Environmental” with ‘Environment’.</p>	For clarity and accuracy
2	<p>Under the heading “The Neighbourhood Plan Area”:</p> <p>2.1 In paragraph 2.12 delete the unsourced “and is currently oversubscribed”.</p> <p>2.2 In paragraph 2.18 delete as irrelevant to the Plan content: “The service from Bedwyn requires a joined-up transport infrastructure and timetables for both rail and bus services as the current provisions are not meeting local needs”.</p> <p>2.3 In paragraph 2.19 after “at peak times there are parking shortages” add ‘(Marlborough Neighbourhood Plan Car Parking Study, 2017)’.</p> <p>2.4 In paragraph 2.24 between “There is a local perception” and “that the imbalance of local housing stock” add ‘, apparent from public consultation on this Plan,’.</p> <p>2.5 In paragraph 2.24 after “as Wiltshire Council’s Core Strategy noted” add ‘for Wiltshire (para 2.13 p19)’.</p> <p>2.6 In paragraph 2.25 replace “The average house price in 2015 in Marlborough was £318,450. This was considerably higher than the Wiltshire average of £255,060 and was highest of Wiltshire’s 20</p>	For clarity and accuracy

	<p>community areas” with the update provided by the Qualifying Body: ‘The average house price in Marlborough is between 40% and 50% higher than the average property price in Wiltshire as a whole (Source: Zoopla, 5 May 2021), the breakdown by type of house is: Terraced +46%, Semi-detached +43%, Detached +52%.’</p> <p>2.7 In paragraph 2.25 provide a source reference for each element of “The present population is estimated to be around 9,200 following inward migration as a result of recent completed housing developments between 2011 and the present” or delete.</p>	
3	<p>Under the heading “3. Planning Policy Context”:</p> <p>3.1 Add to paragraph 3.6: ‘Within the Plan it is noted (Table 4.9) that the “Indicative Housing Requirement to 2026” for Marlborough has already been exceeded by 3.1%.’</p> <p>3.2 Replace paragraph 3.10 with the following: ‘Wiltshire Council has subsequently confirmed that, based on the emerging spatial strategy, there is no strategic necessity for 245 open market dwellings over the period of the draft Plan to 2036 in order to meet the assessed need of the Housing Market Area. Assessed need would be met by a contribution of a minimum of 50 dwellings, the preferred focus for growth being Royal Wotton Bassett.’</p> <p>3.3 Add to paragraph 3.12: ‘However, from research conducted specifically for the MANP (Affordable Housing Needs in Marlborough Area Neighbourhood Plan, Cobweb Consultation, June 2020 update), the estimate of affordable housing requirement for Marlborough is higher than that for the area which was proposed by WC. The exact process by which WC arrived at its estimate of affordable provision for the Marlborough area is not set out but the figure probably takes into account WC’s view of land supply and environmental constraints. The Neighbourhood Plan has therefore set out to maximise land supply for housing whilst seeking to respect the environmental constraints of the AONB. As national Planning Guidance confirms, “A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy” (Reference ID: 41-044-20190509).’</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3
4	Delete the heading “Land Rear of Salisbury Road” and the related Policy content, including the map.	To meet Basic Conditions 1 & 3
5	<p>Under the sub-heading “Land at Barton Dene” reword the Policy as follows (as a general principle, the use of letters or numbers for Policy paragraphs, rather than bullet points, will allow the content of Policies to be readily referenced):</p> <p>‘Within the site boundary shown on the adjacent plan, proposals will be supported for up to 40 homes on a developable area of no more than 1.5 Ha, limited to ensure that the development retains a natural setting, and subject to the following:</p>	For clarity and to meet Basic Conditions 1, 2 & 3

	<p>a) Land shall be safeguarded adjoining the existing leisure centre, as illustrated on the adjacent plan, for the potential provision of new medical facilities to serve the town, this safeguarding will be reviewed within the first review of the Neighbourhood Plan;</p> <p>b) The proposals shall include for 40% affordable housing;</p> <p>c) The layout and form of development shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB and to protect and enhance the setting of Barton Farm House and Barton Farm Stables; the northern boundary has a high sensitivity, and this should be reflected in the finished building heights and boundary treatment;</p> <p>d) A Landscape Visual Impact Assessment, including consideration of heritage assets, shall inform the proposals and accompany the submission;</p> <p>e) Key existing green infrastructure, including mature trees, within the site shall be retained and protected from the impacts of development, subject to practical limitations;</p> <p>f) Safe vehicular, cycle and pedestrian access must be achieved, with appropriate mitigation; this must not compromise access to, or the continued presence and operation of, the existing leisure centre;</p> <p>g) Interconnectivity with the existing footpath network should be achieved whilst respecting existing rights of way; and</p> <p>h) A biodiversity strategy shall demonstrate how the proposal will deliver a biodiversity net gain.'</p>	
6	<p>Under the sub-heading "Land off Cherry Orchard" reword the Policy as follows: 'Within the site boundary shown on the adjacent plan, proposals will be supported for at least 15 homes on a developable area of no more than 1.0 Ha, limited to ensure that the development retains a natural setting, and subject to the following:</p> <p>a) The proposals shall include for 40% affordable housing;</p> <p>b) The scheme shall have a highways access on to Cherry Orchard only with appropriate mitigation to assure safe vehicular, cycle and pedestrian access;</p> <p>c) The layout shall retain public right of way MARL30 through and on the boundary of the site;</p> <p>d) The issues arising from part of the site's location within the Marlborough public water Source Protection Zone 1 must be satisfactorily addressed;</p> <p>e) A biodiversity strategy shall include for retaining the green infrastructure along its south-western boundary to protect the habitat corridor (the former railway line) towards the Savernake Forest SSSI</p>	For clarity and accuracy and to meet Basic Conditions 1, 2 & 3

	<p>to its south, as well as demonstrating proposals to deliver a biodiversity net gain; and</p> <p>f) The layout and form of development shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB.'</p>	
7	<p>Under the sub-heading "Land at Kelham Gardens":</p> <p>7.1 Provide an identifiable boundary for the site being allocated.</p> <p>7.2 Reword the Policy as follows: 'Within the site boundary shown on the adjacent plan, proposals will be supported for a flatted scheme of up to 10 homes on a developable area of approx. 0.1 Ha, subject to the following:</p> <p>a) The proposals shall include for 40% affordable housing;</p> <p>b) The buildings shall be no more than 2.5 storeys in height;</p> <p>c) The scheme shall have a highway access on to Kelham Gardens only;</p> <p>d) The risk from flooding both within the site and beyond the site arising from the development must be addressed as required by national policy and appropriate mitigation measures included through a sequential approach to the development layout as part of a site-specific Flood Risk Assessment; and</p> <p>e) A biodiversity strategy shall demonstrate how the proposal and any works necessary to address ground contamination will avoid any harmful effects on the River Kennet SSSI to its immediate south.'</p>	For clarity and accuracy and to meet Basic Conditions 1, 2 & 3
8	Under the sub-heading "D. For the avoidance of doubt,", remove the second sentence.	For clarity and accuracy
9	<p>Under the heading "Policy MARL1: Delivering Affordable Homes in Marlborough":</p> <p>9.1 Amend paragraph 5.6 to read: 'This policy allocates three sites in Marlborough to deliver a total of approximately 26 affordable homes from a total of approximately 65 homes.'</p> <p>9.2 Amend the third sentence of paragraph 5.8 to replace "two of the four sites are outside but adjoin its development boundary" with 'one of the three sites is outside but adjoins its development boundary' and the NPPF paragraph reference from "172" to '176'.</p> <p>9.3 Replace the fourth sentence of paragraph 5.9 with: 'It has been demonstrated that there are insufficient available and suitable sites of a lower flood risk than this site to meet the Marlborough housing requirement, thus the sequential test is passed. As it is 'not possible for development to be located in areas with a lower risk of flooding taking into account wider sustainable development objectives (as per NPPF paragraph 163)', the exception test has been applied.'</p> <p>9.4 Replace paragraph 5.10 with: 'The site at Barton Dene represents a modest extension of the development boundary in a sustainable</p>	For clarity and accuracy and to meet Basic Condition 1

	<p>location with non-car accessibility to the town centre. The site has been assessed as ‘major development’ in the AONB, as per NPPF paragraph 172, and it has been concluded that the public benefits of the development – in this instance the delivery of vital affordable homes – outweigh its detrimental effects on the local environment and landscape, the effects of which are assessed as capable of appropriate mitigation.’</p> <p>9.5 In paragraph 5.11, first sentence, replace “130” with ‘65’ and replace “greater” with ‘significant’; delete the third sentence commencing “The Rear of Salisbury Road scheme ...”.</p>	
10	<p>Under the heading “Policy MARL2: Encouraging Affordable Homes in Mildenhall”:</p> <p>10.1 Reword Policy MARL2 as follows (for consistency with my recommendations for MARL1 I am showing letters but numbers would be equally acceptable):</p> <p>‘Proposals to deliver affordable homes for first-time buyers in Mildenhall are encouraged provided:</p> <p>a) The new housing respects the village character and form and is provided as infill within the existing built area;</p> <p>b) All of the homes have two or three bedrooms only and are either discounted market sales housing or other affordable routes to first-home ownership;</p> <p>c) The design and layout of the scheme sustains and enhances the significance of the Mildenhall Conservation Area and the setting of other heritage assets as defined in Policy MARL12;</p> <p>d) The layout and form of housing is designed to conserve the designated landscape of the North Wessex Downs Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics, and</p> <p>e) Where appropriate to the location, a landscape scheme is designed to support the transition from the built area of the village into the surrounding countryside.’</p> <p>10.2 In paragraph 5.12 replace “an affordable housing scheme” with ‘infill first-home’ affordable housing’.</p> <p>10.3 In paragraph 5.13 delete the third sentence.</p> <p>10.4 In paragraph 5.14 delete the second sentence.</p> <p>10.5 Replace paragraph 5.15 with: ‘This Policy is a locally appropriate response to Core Policy 44 which says “a proactive approach to the provision of affordable housing will be sought in conjunction with parish councils and working with local communities and other parties.”</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3
11	<p>Under the heading “Policy MARL3: Meeting Local Housing Needs”:</p> <p>11.1 Reword Policy MARL3 as follows:</p>	For clarity and

	<p>'To be supported, development proposals for the sites allocated at MARL1 and for windfall sites within the designated Marlborough Settlement Boundary must address evidenced local housing needs and maximise their contribution of two and three bed affordable housing, wherever possible exceeding the levels stipulated in Wiltshire Council Policy. Specialist accommodation for elderly people is not considered a current priority.'</p> <p>11.2 Amend paragraph 5.16 by replacing "it discourages proposals for any form of housing intended for older people" with 'it seeks to maximise the proportion of housing that is affordable and to discourage proposals for any form of housing intended solely for older people'.</p> <p>11.3 Delete the last two sentences of paragraph 5.19.</p>	accuracy and to meet Basic Condition 1
12	<p>Under the heading "Policy MARL4: Supporting a Thriving Town Centre":</p> <p>12.1 Amend the Policy to add a new element C (and re-letter subsequent paragraphs): 'The Town Centre will be an appropriate location for local community uses and some learning and non-residential institution uses which benefit from its ease of access.'</p> <p>12.2 In paragraph 5.22 replace "The retail evidence base has been used to define" with 'The Kennet Local Plan defined'.</p> <p>12.3 In paragraph 5.26 the reference to "MARL14" should be corrected to 'MARL13'.</p>	For clarity and accuracy and to meet Basic Condition 1
13	<p>Under the heading "Policy MARL5: Improving Public Parking":</p> <p>13.1 Amend element 1 of the Policy to remove "kerbs," and correct element 5 to start with a capital letter.</p> <p>13.2 Amend the Policies Map to identify with the red line only that area not presently allocated for parking.</p>	For clarity and accuracy and to meet Basic Condition 1
14	<p>Within "Policy MARL6: Delivering New Cemetery Land" replace the second sentence with: 'The laying out of the land must conserve the designated landscape of the North Wessex Downs Area of Outstanding Natural Beauty and its setting.'</p>	For clarity and to meet Basic Condition 1
15	<p>Within "Policy MARL7: Protecting & Supporting Community Facilities":</p> <p>15.1 Move the sentence "Development proposals to sustain or extend the viable use of existing community facilities, and the development of new facilities, will be supported" from element B to the beginning of element A.</p> <p>15.2 Add to element B: 'or a change of use or a mixed use will help to retain the community benefit of a building'.</p>	For clarity and accuracy and to meet Basic Condition 1
16	<p>Within "Policy MARL8: Protecting and Improving Sports Facilities", in element C, replace "has received planning permission" with ', at least as conveniently located and well-equipped, is provided'.</p>	For clarity and accuracy

		and to meet Basic Condition 1
17	<p>17.1 Within the heading “Policy MARL 9: A Design Code for the Marlborough Conservation Area” replace “A Design Code” with ‘Design Guidance’.</p> <p>17.2 Within Policy MARL 9 delete two uses of “and its setting”.</p>	For clarity and accuracy and to meet Basic Condition 1
18	Within the heading “Policy MARL10: A Design Code for Marlborough’s Areas of Special Quality” replace “A Design Code” with ‘Design Guidance’.	For clarity and accuracy and to meet Basic Condition 1
19	Within the heading “Policy MARL11: A Design Code for Manton” replace “A Design Code” with ‘Design Guidance’.	For clarity and accuracy and to meet Basic Condition 1
20	Within the heading “Policy MARL12: A Design Code for Mildenhall” replace “A Design Code” with ‘Design Guidance’.	For clarity and accuracy and to meet Basic Condition 1
21	<p>Under the heading “MARL13: Protecting Local Heritage Assets”:</p> <p>21.1 Reword Policy MARL13 as follows: ‘A. The local non-designated Heritage Assets are identified on the list in Appendix A. Development proposals that directly or indirectly affect these non-designated heritage assets will be assessed with a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.</p> <p>B. At the North West boundary of the Neighbourhood Area, development proposals must assess and address their impact on the Stonehenge & Avebury World Heritage Site and its setting.’</p> <p>21.2 Add to the cover of the “Savernake Parish Local Heritage Assets Study July 2021” details of the independent vetting of the content.</p>	For clarity and accuracy and to meet Basic Condition 1
22	<p>Under the heading “Policy MARL14: Protecting and Improving Green Infrastructure”:</p> <p>22.1 Within Policy MARL14:</p> <p>22.1.1 In element A replace the first sentence with: ‘The Green Infrastructure Network, as shown on the Policies Map, is recognised for its existing value and further potential providing open space and ecological connectivity.’</p> <p>22.1.2 In element C, in the first sentence, replace “land” with ‘green space’ and replace the last sentence with ‘Development proposals that will lead to the improvement and extension of the Network will be supported in principle.’</p>	For clarity and accuracy and to meet Basic Condition 1

	<p>22.1.3 Reword element D as follows: 'Proposals that will contribute to sequestering carbon through appropriate woodland planting and other effective means proportionate to the scale and nature of the proposal will be supported, whether delivered on the proposal site or at another agreed location.'</p> <p>22.2 Amend the related Policy Maps to exclude all green areas that were identified in relation to Policy MARL17.</p>	
23	<p>Under the heading "Policy MARL15: Protecting Local Green Spaces":</p> <p>23.1 Amend the opening sentence of the Policy to 'Local Green Spaces are designated in the locations listed below and shown on the Policies Map and in detail in Appendix B' (re-letter the existing Appendix B accordingly).</p> <p>23.2 In paragraph 5.52 amend "paragraphs 99 - 100 of the NPPF" to read 'paragraphs 101 - 103 of the NPPF'.</p> <p>23.3 Amend the Policies Map to remove the Space at Marlborough Green which is not being designated; also amend the boundary of the Salisbury Road Recreation Ground Local Green Space to exclude the surfaced, entrance car park.</p> <p>23.4 Add an Appendix B to provide individual maps of the designated spaces at a scale that allows the boundary to be identified with absolute clarity.</p>	For clarity and accuracy and to meet Basic Condition 1
24	<p>Under the heading "Policy MARL16: Protecting Valued Community Open Spaces":</p> <p>24.1 Within Policy MARL16:</p> <p>24.1.1 In the opening sentence of element A replace "Map" with 'Maps'.</p> <p>24.1.2 Reword element B as follows: 'Development within a Valued Community Open Space will only be supported if it preserves and where possible enhances its contribution to the health and wellbeing of visitors and residents, public access, and it is ancillary to the community use and retains the openness of the Space. Any loss of a Space will only be permitted where alternative better provision has been secured, or an assessment has demonstrated that the Space is surplus to requirements.'</p> <p>24.2 Check and amend as required the boundary to the Space MARL16 17 at Cadley to exclude any private garden land.</p> <p>24.3 Incorporate the Spaces identified under Policy MARL16 onto the same Policies Maps as Policy MARL14, ensuring that the boundaries are identified clearly, and add the boundaries, separately distinguished, for the spaces identified in element C of Policy MARL16.</p>	For clarity and accuracy and to meet Basic Condition 1

25	<p>Under the heading “Policy MARL17: Conserving the Scenic Beauty of the AONB”:</p> <p>25.1 Delete element B of Policy MARL17 (and consequently remove the letter A from the first element).</p> <p>25.2 In paragraph 5.56 and the NPPF paragraph number from “172” to ‘176’.</p> <p>25.3 Delete paragraph 5.59 (renumbering subsequent paragraphs accordingly).</p>	<p>For clarity and accuracy and to meet Basic Condition 1</p>
26	<p>Under the heading “Policy MARL19: Building to the PassivHaus Standard”:</p> <p>26.1 Within Policy MARL19:</p> <p>26.1.1 In element A replace “must” with ‘are encouraged to’.</p> <p>26.1.2 In element B, first sentence, replace “should” with ‘are encouraged to’.</p> <p>26.1.3 Delete element C (and re-letter subsequent elements accordingly).</p> <p>26.1.4 In element D replace “required” with ‘encouraged’.</p> <p>26.1.5 Delete the first two sentences of element E and in the third sentence replace “shall” with ‘are encouraged to’.</p> <p>26.2 Delete paragraph 5.63, which is now dated (and renumber subsequent paragraphs accordingly).</p> <p>26.3 Amend paragraph 5.65 to read: ‘This policy is intended to encourage a step change in the energy performance of all new developments in the MANP area through the use of the Passivhaus or equivalent standard of building design. Along with the passive design capacity assessment, designers can demonstrate achievement of the standard using a design for performance methodology such as the Passivhaus Planning package or CIBSE TM34 Operational Energy.’</p> <p>26.4 In paragraph 5.66 delete “which supports a similar level of intervention”.</p> <p>26.5 In paragraph 5.67, first sentence, replace “requires” with ‘encourages’.</p> <p>26.6 In paragraph 5.68 delete all but the first sentence.</p> <p>26.7 In paragraph 5.69, first sentence, replace “requires” with ‘expects’.</p> <p>26.8 Delete paragraphs 5.70 & 5.71.</p> <p>26.9 In paragraph 5.72, first sentence, replace “Clause D requires” with ‘Clause C encourages’ and delete the second sentence.</p>	<p>For clarity and accuracy and to meet Basic Condition 1</p>

	<p>26.10 In paragraph 5.73 replace “Clause E requires an Energy Statement to be submitted” with ‘Clause D encourages the use of an Energy Statement’.</p> <p>26.11 In paragraph 5.74 delete the second sentence.</p>	
27	Amend the heading “Policies Map & Insets” (p58) to ‘Policies Maps and Insets’.	For clarity and accuracy
28	Consider improving the Character/Design Studies to provide consistent detailing of the non-designated heritage assets.	For clarity and accuracy
29	Amend the heading “Appendix B: Schedule of Evidence” to ‘Appendix C: Schedule of Evidence’ and add hyperlinks to copies of as many as possible of the documents listed.	For clarity and accuracy