



Marlborough

Area Neighbourhood Plan

2021 – 2036

SUBMISSION PLAN



Published by Marlborough Town Council, Mildenhall Parish Council and Savernake Parish Council for examination under the Neighbourhood Planning (General) Regulations 2012 as amended.

AUGUST 2021

Guide to Reading this Plan

Of necessity, this Neighbourhood Plan is a detailed technical document. The purpose of this page is to explain the structure and help you find your way around the plan.

1. Introduction & Background

This section explains the background to this Neighbourhood Plan and its purpose in the local planning system.

2. The Neighbourhood Plan Area

This section details many of the features of the designated area.

3. Planning Policy Context

This rather technical section relates this Plan to the National Planning Policy Framework and the planning policies of Wiltshire Council.

4. Community Views on Planning Issues

This section explains the community involvement that has taken place.

5. Vision, Objectives & Land Use Policies

This is the key section. Firstly, it provides a statement on the Neighbourhood Plan Vision and Objectives. It then details Policies which are proposed to address the issues outlined in the Foreword and in Section 4. These Policies are listed on page 5. There are Policy Maps at the back of the plan and additional information in the Appendices to which the policies cross reference.

6. Implementation

This section explains how the Plan will be implemented and future development guided and managed. It suggests projects which might be supported by the Community Infrastructure Levy which the Town and Parish Councils will have some influence over. Finally, it deals with a number of issues which although relevant are outside the scope of a Neighbourhood Plan.

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FOREWORD

The Marlborough Neighbourhood Plan area contains the attractive market town of Marlborough and the parishes of Mildenhall and Savernake. It comprises varied countryside including a forest, river valleys and chalk down land. Our consultations with the residents of the area have revealed that there is a pressing need for affordable housing, a shortage of parking capacity, a variety of community infrastructure needs and a strong desire to preserve both our environment and our heritage.

The Neighbourhood Plan Steering Group has worked hard to achieve a workable compromise that balances these varied needs and has sought help and advice from the community, expert consultancies, various agencies and the local planning authority, Wiltshire Council in order to compile this plan.

The Plan is intended to cover the period up to 2036 with revisions and updates in line with the National Planning Policy Framework (NPPF), giving stability to the processes of development and conservation within our community.

The journey that has led to the completion of this plan has not been an easy one, but we believe that it has been worthwhile, enabling our community to put Localism in to action and have a say in our future development.

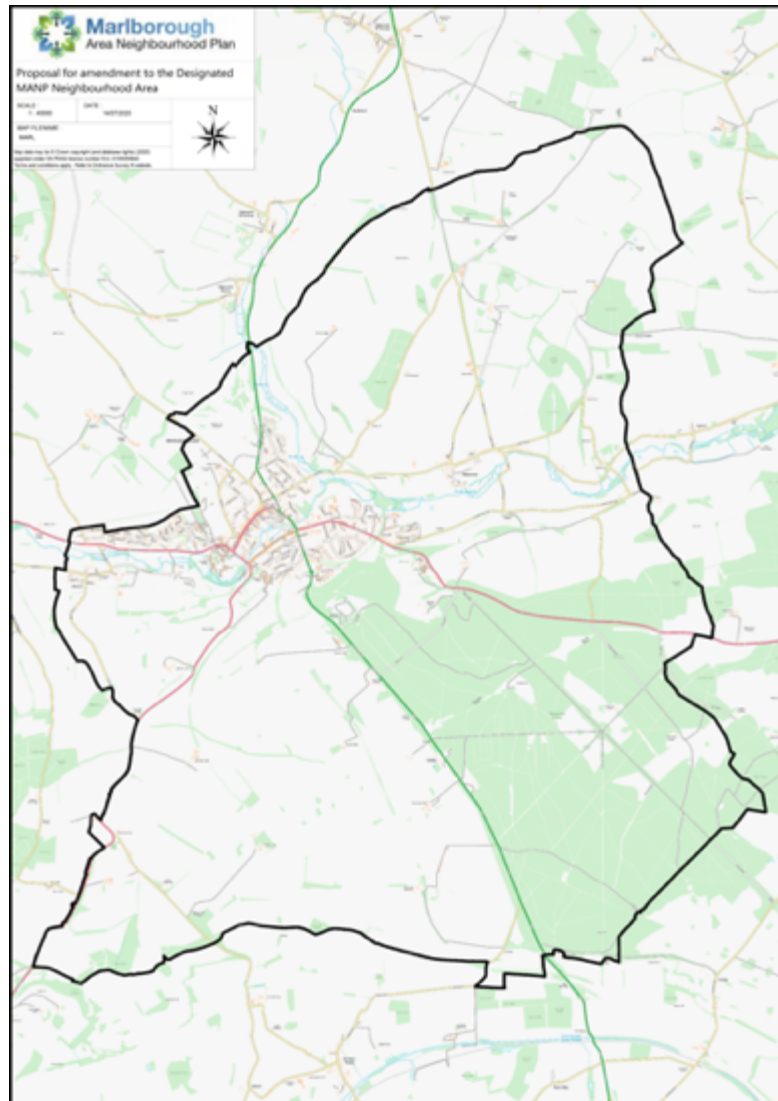
Mervyn Hall
Chair, Marlborough Area Neighbourhood Plan Steering Group

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1. INTRODUCTION & BACKGROUND

1.1 Marlborough Town Council, Mildenhall Parish Council and Savernake Parish Council (“the Councils”) have prepared a Neighbourhood Plan in accordance with the Neighbourhood Planning (General) Regulations of 2012 (as amended). The local planning authority, Wiltshire Council, designated the Neighbourhood Area covering all three parishes on 18 November 2020 for this purpose (see Plan A below).



Plan A: Designated MANP Neighbourhood Plan Area

1.2 The purpose of the Neighbourhood Plan is to set out a series of planning policies that will be used to help determine planning applications in the area in the period to 2036. Some policies relate to specific sites or land in the area; others apply across the area. Once made after its referendum in due course, the Plan will form part of the development plan for Wiltshire for this area, alongside the adopted Wiltshire Core Strategy and saved policies of the Kennet Local Plan. In due course these will be replaced by the new Wiltshire Local Plan, which will also cover the period to 2036.

1.3 Neighbourhood Plans provide local communities with the chance to manage the quality of development of their areas. Once part of the 'development plan' for the area, their policies carry full weight alongside other plan policies in helping Wiltshire Council to determine planning applications. Plans must therefore contain only land use planning policies that can be used for this purpose. This often means that there are important issues of interest to the local community that cannot be addressed in a Plan if they are not directly related to planning.

1.4 The principles of sustainability underpin proposed land use in the Neighbourhood Plan. The former U.N. General-Secretary Kofi-Annan identified five pillars of sustainable development: water, health, energy, agriculture and biodiversity. In the context of the Neighbourhood Plan these correspond to protecting & improving the local economy, empowering the local community, and protecting and improving the local environment.

1.5 Although there is considerable scope for the local community to decide on its planning policies, Neighbourhood Plans must meet a number of 'basic conditions'. In simple terms, the conditions are:

- Is the Plan consistent with the national planning policy?
- Is the Plan consistent with local planning policy?
- Does the plan promote the principles of sustainable development?
- Has the process of making the plan met the requirements of environmental laws?

1.6 In addition, the Councils need to demonstrate to an independent examiner that they have successfully engaged with the local community in preparing the Plan. If the examiner is satisfied, and considers the Plan meets the above conditions, then the Plan will go to a referendum of the local electorate. If a simple majority of the turnout votes in favour of the Plan, then it becomes part of the development plan.

'Planning for the Future' White Paper

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.

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.

The Submission Plan

1.9 A draft ('Pre-Submission ') Plan was published for consultation in February 2021 in line with the Regulations. The Councils have reviewed the comments received from the local community and other interested parties, including Wiltshire Council, and have made changes to this final version. They have also updated some of the other reports published in the evidence base (see Appendix B).

Sustainability Appraisal (including Strategic Environmental Assessment)

1.10 A Strategic Environmental Assessment (SEA) assesses the environmental implications of a proposed policy or plan in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004. It allows for the potential effects of policy proposals to be assessed and makes recommendations for how the potential for harmful effects may be avoided or successfully mitigated.

1.11 Wiltshire Council confirmed in its screening opinion of August 2019 that a SEA is required. The Councils appointed expert independent consultants, AECOM, via the Neighbourhood Planning Support Programme, to undertake the SEA and requested that it be scoped to include economic and social objectives as a Sustainability Appraisal (SA/SEA). When consulted, the statutory bodies confirmed their support for this approach.

1.12 The SA/SEA process has run alongside the preparation of the Neighbourhood Plan as per the Regulations. Iterations between the two processes has enabled the potential for significant harmful environmental effects to be mitigated and for the economic and social benefits to be accentuated. This has been an important exercise as the Councils have sought to balance increasing the number of affordable homes with the national landscape and heritage designations in the area.

1.13 Overall, the SA/SEA predicts the likelihood for positive, neutral and negative effects arising from plan implementation. A copy of the Final SA/SEA report is published alongside the Neighbourhood Plan for examination.

Habitats Regulations

1.14 Wiltshire Council has screened the draft and final versions of the Neighbourhood Plan in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). The final screening opinion concludes that, on the basis of information provided by Thames Water and validated by the Environmental 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. The HRA report is published separately in the evidence base.

2. THE NEIGHBOURHOOD PLAN AREA

(With grateful thanks to Susanne Harris for its compilation)

Overview

2.1 The designated area, for the purpose of the development of the Marlborough Area Neighbourhood Plan, consists of three parishes: the town of Marlborough with Manton and the rural parishes of Savernake and Mildenhall (known locally as 'Minal').

2.2 Marlborough is the geographic, economic and social heart of the area. The boundaries of the two rural parishes abut that of Marlborough and all three parishes share common landscapes of the Marlborough Downs, the River Kennet and Savernake Forest and all sit entirely within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).

2.3 The River Kennet rises north of Avebury and flows through part of the North Wessex Downs AONB and Marlborough. It is an important chalk stream that runs through the centre of Marlborough which is built in the river valley and on the slopes of the Marlborough Downs to the north with Savernake Forest as its southerly boundary. The Forest is a privately owned 4,500 acre forest. There is evidence of human activity from the Bronze and Iron Ages and during the Roman period continuing through to the present day. First mentioned in AD 934 in written Saxon records, the Forest has been passed down since 1066 through an unbroken line of 31 generations. Sir John Seymour was the guardian of the Forest in the 1500s and it was at the family seat of 'Wolf Hall' that Henry VIII met Jane Seymour who was to become his wife and the mother of Edward VI. The public has access to the Forest which has SSSI status and its many beautiful walks and drives include the four mile long 'green avenue' of beech trees designed by Capability Brown.

A Brief History

2.4 Set within the Stonehenge and Avebury World Heritage Site, Marlborough was a focus for human activity as early as the late Neolithic period as evidenced by the Marlborough Mound – a monument contemporary with but smaller than Silbury Hill. Continuity of occupation and activity through the Bronze Age is evidenced in the tumuli on the common. Then, during the Iron Age on Forest Hill an *oppidum* (small town) was of sufficient importance to mint coins and was perhaps a determining factor in the decision of the Roman invaders to locate their major fortress of *Cunetio* nearby at Mildenhall (Minal).

2.5 Later, a Saxon settlement established around The Green is believed to have expanded towards the west until the Norman Conquest when a castle was built in the west of the present town precinct at the site of the Marlborough Mound. During the later Norman period the regular tenements of the High Street were laid out, although the architecture that we see today is from the 18th and 19th centuries as a great fire in 1653 destroyed almost entirely the medieval structures.

2.6 Located at a strategic staging point on the road from Bath to London, during the 18th and early 19th centuries there were many inns, trades and retailers associated with the stagecoach traffic. When the advent of the railways ended this lucrative trade, the establishment of Marlborough College in 1843 on the site of the former castle brought significant new business and employment opportunities for the town which have continued until the present time.

Marlborough: Built Environment

2.7 Marlborough has a rich built environment with an attractive and thriving retail centre. It is a vibrant market town with a distinct wide High Street which still maintains a traditional market twice weekly. The High Street is the centre of retail activity in the area with a mix of national chains and independent shops, cafes, teashops, pubs and hotels. The unique and vibrant blend of commercial establishments include clothing, jewellery, art, books, gifts, interior design, furnishings, fabrics and antiques which attract many visitors to the town.

2.8 The town centre and parts of its surrounding area lie within a designated Conservation Area. Its buildings are a charming mix of architectural styles from cottages to Georgian houses. There are many quaint cobbled alleyways and courtyards leading off of the High Street and an imposing church at each end of the main street.

Marlborough: Open Spaces and Leisure Facilities

2.9 Near the town centre is the River Kennet with a water meadow and an attractive riverside walk, a children's playground, and the public Priory Garden. Within 5 minutes' walk it is possible to access the Common and the local golf course. A second large recreation ground with a good variety of play equipment and a skate-park can be found to the south of the town centre. There is also a bowling green and a purpose-built Community and Youth Centre here which is likely to have a change of use in the near future because of lack of local authority funding. There is a local authority run Leisure Centre on the west side of Marlborough.

2.10 On the eastern side of Marlborough the public have access to 15 acres of water meadows at Stonebridge Lane which provides nature walks with some access for the disabled. This area is used for environmental projects undertaken by Action for the River Kennet, for scientific research and educational purposes and is a well-used local amenity.

Marlborough: Education

2.11 The west end of Marlborough High Street is dominated by Marlborough College, an independent school founded in 1843. The College is established on over 280 acres of an attractive landscape of downland and water-meadows. There are many interesting and historic buildings at the heart of the College, some of which are listed. The Old Castle Inn (now C House) was one of the main coaching inns of the town between 1750 and 1843. The College Chapel in Victorian Gothic style was built in 1886 and next to the chapel is the neo-classical Memorial Hall built in 1925.

Recently, an ancient mound within the College grounds, the Marlborough Mound, was scientifically dated at 2,400 years old which makes it contemporary with Silbury Hill.

2.12 State education within Marlborough is provided by Marlborough St Mary's CE Primary School, Preshute Primary School and St John's Marlborough. St John's Marlborough is an eleven to eighteen years co-educational academy which moved into its present £26.5 million state-of-the-art buildings in 2009. St John's is an academically successful school, there is a great demand for places and the school is currently oversubscribed.

Marlborough: Health facilities

2.13 In Marlborough there is one medical practice and three dental surgeries. Situated just outside Marlborough is the Savernake Community Hospital. Originally a Victorian cottage hospital, it has been updated and extended and now provides an inpatient ward, a number of outpatient services and is the base for the Marlborough Neighbourhood Team who cares for patients in their own home.

Marlborough: Transport and Car Parking

2.14 The main transport routes through Marlborough are the A4 road which runs east/ west from London to Bath and the A346 which runs north/south connecting the south coast ports and the A303 arterial route to the M4 motorway and beyond to the Midlands and the North of the country.

2.15 The 2011 Wiltshire Council and Community Area Joint Strategic Assessment highlighted a number of local transport-related issues, namely speeding, pedestrian safety, freight and air quality issues on Herd Street / Barn Street, accessibility for non-car users from rural locations, route maintenance and pedestrian and cycle facilities. The community is generally concerned about traffic congestion, parking problems for residents, workers and visitors to the town and high levels of air pollution.

2.16 Wiltshire Council and the A338/A346 HGV Working Group have agreed a statement of common ground to address these problems. The Council has also requested the Highways Agency to amend relevant signage on the A303 trunk road. The A338/A346 Working Party's long term aim is to de-prime the A338/A346 in an attempt to reduce the amount of HGV traffic in the town and surrounding villages.

2.17 In 2010 Wiltshire Council's report 'Options for an Air Quality Management' designated Marlborough as a blanket Air Quality Management Area based on the residential areas of the town and continued that, 'the UK National Air Quality Objective for the annual mean concentration of nitrogen dioxide of 40 ug/m3 is likely to be exceeded'. Figures showing levels of NO2 levels at seven sites in Marlborough from 2008 to 2014 show that readings from 5 of the sites exceed the UK National Air Quality Objective. With the increase in traffic locally and nationally air pollution since 2014 is expected to be considerably higher' although the increased use of electric vehicles are considered may reduce these pollution levels.

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 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.

2.19 Although there are eight official car parks in Marlborough (providing 638 spaces) at peak times there are parking shortages. 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.

Marlborough: Industry and Commerce

2.20 Most of the town's manufacturing businesses manufacturing businesses have left the town because of the lack of land needed to facilitate their expansion. Companies such as Garrards and Fringevision left in the 1960's, the Wingrove and Edge Tannery in 1980's and in the later years Hayden's Bakery, Avco Engineering and Microlights. Tenable Screw Company has remained in town and owns land suitable for expansion. Some of the buildings vacated by Avco Engineering have been upgraded and now host a variety of small, individual enterprises.

2.21 There is a modern business park on the southern outskirts of the town which accommodates a wide variety of businesses including trade suppliers, commercial offices, a food producer, a supermarket, a vehicle repairer, a filling station and a dental practice. There are small pockets of industry and commerce throughout the town and also along the northern side of the A4 road, west of Marlborough. The major employers in Marlborough are education establishments - primarily Marlborough College but also St John's Marlborough and the Primary Schools. Other significant employment opportunities are found within the numerous retail and catering outlets and also in health and care services including care homes.

Marlborough: Housing

2.22 Marlborough has a reputation for being a wealthy area with the majority of its housing stock consisting of large, detached houses but it does have three large areas of former social housing built from the 1920's to the 1950 's and which are now a mix of privately owned and housing association homes.

2.23 In the 1980's significant private housing was built on the west side of Marlborough at Barton Park with further housing added at College Fields more recently. In the last five years St John's Park has been developed on the eastern edge of Marlborough and School Walk on the south. Both of these estates are a mixture of housing types.

2.24 There is a local perception 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 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.

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. 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.

2.26 Recently, planning permission has been granted to landowners, the Crown Estate, for the building of 175 houses (of which 40% should be affordable) and a 60 bed hotel on the southern outskirts of Marlborough on their Salisbury Road site which has almost been completed. Another developer, McCarthy & Stone, have built 27 apartments for the over 55's at Granham Hill and Renaissance Retirement have completed 28 luxury apartments for over 55's at a site in Stone Yard, London Road.

Manton Village and the Parishes of Savernake and Mildenhall (Minal)

2.27 Manton is a small village on the western outskirts of Marlborough but lies within the Marlborough parish boundary. There is evidence that Manton village has medieval origins probably around what is the village playing field. Manton has developed along the High Street and the majority of the village is within the Manton Conservation Area. Sarcen stone is a naturally occurring material in this area and has been frequently used in the building of cottages, houses and walls. Also included in the Conservation Area is the former water mill which is now a residential property.

2.28 The village primary school is Preshute Primary School, which feeds into St John's Marlborough. The village has a public house, 'The Oddfellows'. The Church of St George is 0.5 miles (0.80 km) west of the village. Manton was transferred to Marlborough civil parish in 1934 and is now within the parish of Marlborough and Manton.

2.29 Savernake is a civil parish immediately south and southeast of Marlborough. The settlements in the parish are the hamlets of Cadley and Clench Common. Savernake Forest covers the eastern half of the parish. The hamlet of Cadley is an agricultural community in the northwest of the parish at the edge of Savernake Forest, on the A346 between Marlborough and Burbage. Savernake Hospital is the most important building with new housing behind the hospital adding to Forest Hill, its largest residential area. Within the Savernake Parish, Savernake Forest and Tottenham Park are categorised by Historic England as Grade Two Listed/Registered Historic Parks and Gardens.

2.30 Mildenhall (Minal), is a small, rural parish consisting of the village of Mildenhall (Minal) and the hamlets of Poulton and Stitchcombe. It is approximately one and a half miles east of Marlborough. Mildenhall (Minal) covers just over 1,460 acres and is situated in the Kennet Valley, surrounded by water meadows, woodlands, farmland and part of Savernake Forest. In 2011 the population of Mildenhall (Minal) was 477.

2.31 In the village there is the Church of John the Baptist, of Saxon origins but much of the present building dates from the thirteenth century. There is a single village public house the 'Horseshoe Inn'. The Village School has closed and there are no longer any shops. There is a modern village hall, built in 1988.

2.32 Housing is mainly in a ribbon development along the Marlborough to Ramsbury road and around the church and consists of cottages and houses from the 18th and 19th centuries, social and private housing built in the 20th century, farmhouses and Durnford Mill, but some are dated much earlier. On the east side of the village is a significant archaeological site which was the important Roman fortress town of *Cunetio*.

3. PLANNING POLICY CONTEXT

3.1 The designated neighbourhood plan area lies within the unitary authority area of Wiltshire Council.

National Planning Policy

3.2 The National Planning Policy Framework (NPPF) published by the Government is an important guide in the preparation of local plans and neighbourhood plans. The following paragraphs of the latest version are considered especially relevant to the neighbourhood plan:

- Achieving sustainable development (§13)
- Neighbourhood Planning (§28 - 30)
- Delivering a wide choice of high quality homes (§62)
- Building a strong, competitive economy (§81 - §83)
- Ensuring the vitality of town centres (§86)
- Promoting healthy safe communities (§92 - §93)
- Open space and recreation (§98 - §99)
- Local green spaces (§101 - 103)
- Good design (§130)
- Conserving and enhancing the natural environment (§174 - §176)
- Conserving and enhancing the historic environment (§189 - §203)

Strategic Planning Policy

3.3 The Neighbourhood Plan must be in general conformity with the strategic policies of the Wiltshire development plan. For the purpose of the Neighbourhood Plan, the development plan primarily comprises the Wiltshire Core Strategy adopted in 2015 and some saved policies from the Kennet Local Plan 2011.

3.4 The most important strategic policies applying to the Marlborough Area are:

- Core Policy 1 – defines Marlborough as a “market town” and directs significant development that will increase jobs and homes in the town to help sustain, and where necessary enhance, services and facilities to the town. Manton is defined as a “small village” and limits development to that needed to help meet housing needs of the settlement and to improve employment opportunities, services and facilities. The settlement of Mildenhall is not defined.
- Core Policy 2 – defines a boundary/limit of development for Marlborough and limits development in Manton to infill within the existing built area.
- Core Policy 3 – sets out an infrastructure delivery strategy, including the use of the adopted Wiltshire Community Infrastructure Levy (CIL) and S106 obligations
- Core Policy 14 – confirms the spatial strategy for the Marlborough Community Area as set out in Core Policy 1. It identifies the Principal Employment Areas in Marlborough and requires an additional 3 ha of employment land to be provided. It also sets the Community Area housing requirement figure of 920 new homes, with 680 directed to the town of Marlborough (which includes 220 new homes on Land to the West of Salisbury Road which is now on site).

3.5 There is also a wide range of development management policies that apply to the area. Those that are especially relevant to this area include:

- Core Policy 34 – supporting employment uses (B1, B2 or B8) within Market Towns and limiting employment uses in rural areas to meet specific criteria.
- Core Policy 35 – retaining defined Principal Employment Areas and supporting their intensification.
- Core Policy 36 – encouraging the regeneration of brownfield sites in Market Towns.
- Core Policy 40 – supporting new and extended tourist accommodation facilities in Market Towns, in Small Villages at an appropriate scale in relation to the settlement as a whole and in rural areas where it would retain buildings that would otherwise be lost.
- Core Policy 43 – designating Marlborough and the surrounding area as a 40% affordable housing zone, requiring sites of five or more dwellings to provide at least 40% affordable homes.
- Core Policy 44 – allowing rural exception sites to come forward as allocations or applications meeting certain criteria.
- Core Policy 45 – requiring housing type, mix and size to be delivered in line with existing Wiltshire evidence or updated local evidence, if available.
- Core Policy 51 – recognising the importance of designated landscapes like the North Wessex Downs AONB
- Core Policy 55 – requiring measures to be taken to help tackle problems in the Air Quality Management Areas, which include that in Marlborough
- Core Policy 57 – requiring high standards of design and encouraging place shaping through new development
- Core Policy 61 – requiring attention to be paid to the effects of new development on the local transport network and to reducing the need to travel by car
- Saved Policy HH10 – identifying an Area of Minimum Change along the River Kennet through the town
- Saved Policy ED18 – identifying a Prime Shopping Area in Marlborough Town Centre to manage the retail mix
- Saved Policy ED19 – identifying Marlborough Town Centre to manage the non-retail mix
- Saved Policy AT24 – proposing a Riverside Walk along the Kennet in Marlborough

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.

3.7 Wiltshire Council is currently undertaking a Local Plan Review to 2036. It published the 'Emerging Spatial Strategy' and 'Planning for Marlborough' documents for consultation at the same time as the Draft Neighbourhood Plan consultation in February 2021. Although the Local Plan will not be adopted prior to the examination and making of the Neighbourhood Plan it is sensible to anticipate its emerging policy proposals and to be aware of its evidence base.

3.8 The Emerging Spatial Strategy identifies Marlborough as one of a number of Market Towns in the county, which have 'the potential for significant development that will increase the number of jobs and homes to help sustain/ enhance services and facilities and promote self-containment and sustainable communities'. It expects the focus of smaller villages like Manton and Mildenhall will continue to be on protecting the countryside and only development that can meet local needs.

3.9 In rehearsing alternative development strategies, it notes the 680 homes to be built in the Marlborough area from 2006 – 2026 and sets out a requirement for another 680 homes in the period 2016 – 2036 as part of a wider strategy for the Swindon Housing Market Area within which Marlborough sits. It notes that with existing completions and commitments the residual total housing number for Marlborough to 2036 is 245 homes. However, it also notes that 'this level of growth does however represent a challenge given Marlborough sits within a constrained location compared to the wider Housing Market Area'.

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.

3.11 The 'Planning for Marlborough' document includes a profile of the area that matches the evidence prepared for the Neighbourhood Plan and that includes an initial assessment of four sites put forward by landowners that lie within or immediately adjoin the Neighbourhood Area (i.e. Elcot Lane, Salisbury Road, College Roads and Barton Dene). It concludes by noting that the Neighbourhood Plan is coming forward with the intention of making housing site allocations, which may avoid the Local Plan itself having to serve that purpose. As the coincidence of the plans had the potential to confuse the local communities and other stakeholders, the Steering Group liaised closely with Wiltshire Council to ensure that the MANP synchronises well with the emerging Local Plan in terms of their respective strategic objectives.

3.12 In general terms, the 'direction of travel' of strategic planning policy for Marlborough, as set out in these new documents, is little 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.

3.13 There are other development plans – waste and minerals for example – that apply in the MANP area and other strategies and initiatives (the Local Transport Plan and Climate Emergency Task Group for example), but none are considered directly relevant to this Neighbourhood Plan. There are also other made neighbourhood plans in the vicinity, notably at Burbage, Pewsey and Wootton Rivers, all adjacent to Savernake parish, but none contain policies that are of direct relevance to this area.

4. COMMUNITY VIEWS ON PLANNING ISSUES

4.1 Working through a Communication and Engagement Strategy, the Steering Group held initial consultations in 2016 with views collected at open days and from surveys distributed throughout the then Neighbourhood Plan Area. This included the parish of Preshute until July 2020. Feedback gave a clear direction of what was important to address. The key points were:

Housing

- Lack of affordable housing for sale and for rent, specifically for younger people or those looking to downsize including more social housing
- More variety in the range of sizes of homes, including smaller family homes
- Less retirement complexes

Amenities

- Lack of parking capacity for residents
- Additional GP services and improved GP facilities, including parking provision
- A replacement Preshute Primary School
- Improvement of local sports facilities
- Additional cemetery provision
- Lack of comprehensive planning, specifically in delivering infrastructure

Countryside and Recreation

- Open spaces are valued and should be protected from harmful development
- Maintenance and improvement of existing green spaces
- Improved access to the countryside through enhancing the existing network of rights of way, footpaths and cycle ways and new public open spaces

Business and Employment

- An increase in high density employment locations
- Promotion of tourism
- Lack of parking for visitors and workers
- Support for rural diversification and use of rural buildings

Design, Conservation and Heritage

- Protecting local areas of outstanding natural beauty, specifically the Rivers Kennet and Og and their associated water meadows

4.2 This was followed by professional studies to back up these initial findings including a Housing Needs and Requirements Study, a Car Parking Study, Town Centre Benchmarking exercise and a Town Character Assessment. Alongside this, a call for sites was made asking landowners to put forward potential sites to meet community need – affordable housing, more car parking, improved health facilities, a replacement for Preshute School in Manton, recreation land and a new cemetery.

4.3 In July and August 2019 and before finalising the draft Pre-Submission Plan, comments were sought on the policies being proposed as well as possible site allocations to ensure the views of the community were properly captured.

4.4 Exhibitions were held in Marlborough, Manton and Mildenhall as well as opportunities to input to an online consultation. Feedback from this wide consultation reiterated those views taken in 2016. The full Consultation Report is at: https://www.marlborough-tc.gov.uk/images/Neighbourhood_Plan/Informal_Consultation_Report_Full_.pdf

4.5 Throughout the Regulation 14 consultation period on the draft plan, presentations were given, and local input sought. All responses were then considered in producing the plan for submission to WC. A full account of consultation, including the Regulation 14 consultation, is demonstrated in the Consultation Statement submitted alongside this Plan.

5. VISION, OBJECTIVES & LAND USE POLICIES

Vision

5.1 The vision of the neighbourhood plan area in 2036 is:

"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."

Objectives

5.2 The key objectives of the Neighbourhood Plan are:

- Conserving and enhancing our special heritage assets and the landscape and scenic beauty of the North Wessex Downs Area of Outstanding Natural Beauty
- Delivering affordable housing to address the present shortfall
- Maintaining and enhancing the Town Centre as a successful service centre
- Securing the long-term future of community and sports facilities
- Protecting and enhancing the area's most valued open spaces and improving connectivity

Land Use Policies

5.3 The following policies relate to the development and use of land in the designated Marlborough Area. They focus on specific planning matters that are of greatest interest to the local community, especially in seeking to address the shortage of affordable housing and in providing essential social infrastructure.

5.4 There are many parts of the parishes that are not affected by these policies, and there are many other policy matters that have been left to the adopted (and/or emerging) Wiltshire Local Plan to cover. This has avoided unnecessary repetition of policies between the two plans, though they have a mutual, helpful inter-dependence.

5.5 Each policy is numbered and titled, and it is shown in bold italics. Where necessary, the area to which it will apply is shown on the Policies Map attached to the document. After each policy is some supporting text that explains the purpose of the policy, how it will be applied and, where helpful, how it relates to other development plan policies.

Summary Overview of Vision, Key objectives, and related Policies

MANP Vision in 2036	Key objectives	Policy
<i>"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</i>	Conserving and enhancing our special heritage assets and the landscape and scenic beauty of the North Wessex Downs Area of Outstanding Natural Beauty	MARL9 'Enhancing Marlborough Conservation Area' MARL10 'Enhancing Marlborough Areas of Special Quality' MARL11 'Enhancing Manton Conservation Area' MARL12 'Enhancing Mildenhall Conservation Area' MARL13 'Protecting Local Heritage Assets' MARL17 'Conserving the Scenic Beauty of the AONB' MARL18 'Achieving Dark Skies' MARL19 'Building to the PassivHaus Standard'
	Delivering affordable housing to address the present shortfall	MARL1 'Delivering Affordable Homes in Marlborough' MARL2 'Encouraging Affordable Homes in Mildenhall' MARL3 'Meeting Local Housing Needs'
	Maintaining and enhancing the Town Centre as a successful service centre	MARL4 'Supporting a Thriving Town Centre' MARL5 'Improving Public Parking'
	Securing the long-term future of community and sports facilities	MARL7 'Protecting & Supporting Community Facilities'

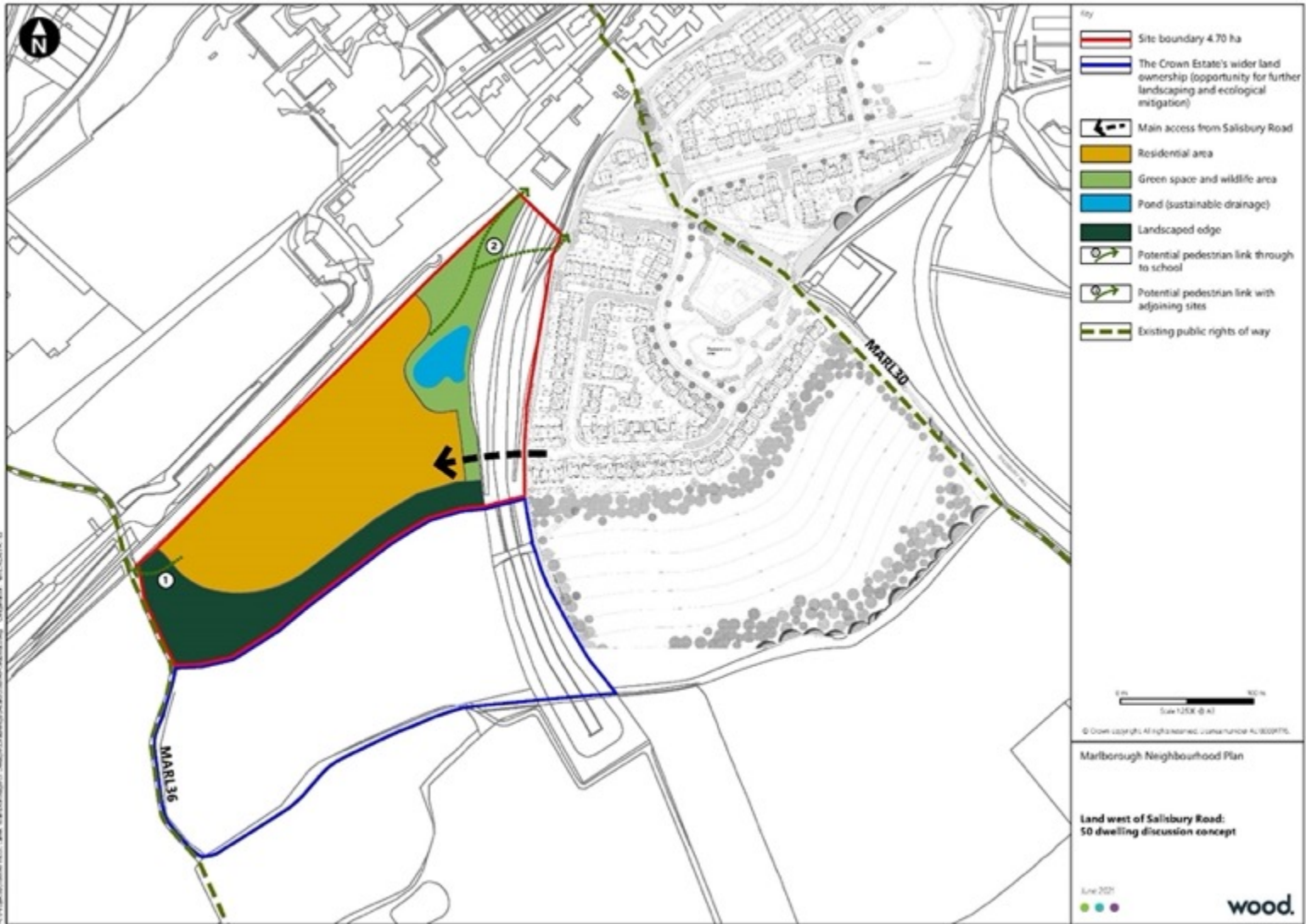
those who live in or visit the Marlborough Neighbourhood Plan Area.”		MARL8 'Protecting and Improving Sports Facilities' MARL6 'Delivering New Cemetery Land'
	Protecting and enhancing the area's most valued open spaces and improving connectivity	MARL14 'Protecting and Improving Green Infrastructure' MARL15 'Protecting Local Green Spaces' MARL16 'Protecting Valued Community Open Spaces'

Policy MARL1: Delivering Affordable Homes in Marlborough

A. The Neighbourhood Plan allocates the following sites in Marlborough for residential development schemes, as shown on the Policies Map. Development proposals will be supported, provided they accord with the respective site-specific requirements and with other relevant policies of the development plan:

Land Rear of Salisbury Road

- ***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 woodland planting as an extension to the existing copse (a County Wildlife Site).***



Land at Barton Dene

- ***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***
- ***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)***
- ***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***



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The scaling of this drawing cannot be assured

Revision	Date	Drawn	Checked

-  Site Boundary
-  Residential Frontage
-  Existing Barton Farm Complex
-  Listed Building
-  Existing Residential Dwellings
-  Possible Location for Medical Centre
-  Main Vehicular Routes
-  Existing Lane providing access to northern field
-  Public Right of Way
-  Pedestrian Movement
-  Green Infrastructure
-  Existing Structural Vegetation
-  Proposed Planting
-  Proposed Attenuation

Project
**MARLBOROUGH COLLEGE,
 MARLBOROUGH**
 Drawing Title
CONCEPT MASTER PLAN

Date	Scale	Drawn by	Checked by
18.05.21	1:2500@A3	M.D.	A.J.
Project No	Drawing No	Revision	
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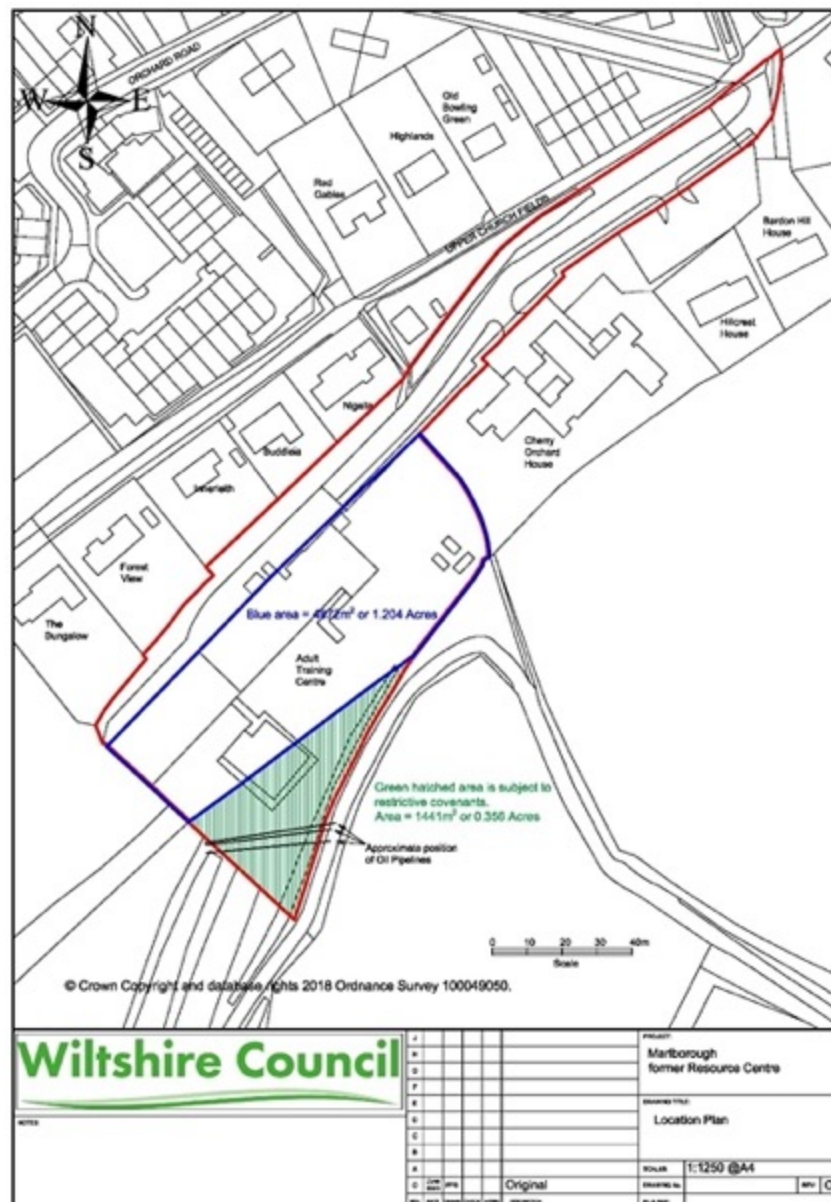
Urban Planning • Public Transport & Street Design • Architecture •
 Landscape Planning & Design • Infrastructure & Environmental Planning •
 Heritage • Digital Communication •
 Community & Engagement • Socioeconomic, Economics

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Land off Cherry Orchard

- The housing scheme shall comprise up to 30 homes on a developable area of approx. 1.0 Ha
- 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



Land at Kelham Gardens

- The housing scheme shall comprise a flatted scheme of up to 10 homes on a developable area of approx. 0.1 Ha
- The housing scheme shall comprise a tenure mix of 40% affordable housing and 60% open market housing
- The buildings shall be no more than 2.5 storeys in height
- The scheme shall have a highways access on to Kelham Gardens only
- 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
- 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, taking into account existing problems on the strategic highway network in the area and having full regard to the need to improve air quality in the designated Marlborough Air Quality Management Area. In addition, the proposals will be required to deliver excellent footpath and cycleway provision with their sites and to maximise opportunities to improve connectivity in the immediate area.

C. Archaeological investigations will be required in accordance with existing development plan policies and, where applicable, the design of schemes should respond to any finds.

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

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.

5.7 This total quantum of housing development over the plan period fits within the range that will be proposed for Marlborough in the emerging Wiltshire Local Plan. Although access to affordable housing will remain an issue for the long term sustainability of the town, this provision will go some way to replacing the stock of affordable homes lost to 'right to buy'. In addition, the Barton Dene site provides an opportunity for either the existing health centre to relocate from its constrained site on George Lane if it wishes to in the future or for an additional health facility to serve the growing population of the town and its wider rural area. This alternative or additional site is also close to the town centre and accessible by public transport and may enable a hub of community uses to be developed along with the existing leisure centre.

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 town lies within the North Wessex Downs AONB, and two of the four sites are outside but adjoin its development boundary, 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 §172. All of the details of these assessments are contained in the Site Assessment report, which is published separately.

5.9 Two of the sites are previously developed ('brownfield') land, for which there is a priority over allocating land outside the development boundary. Both have been made available and the respective land interests have confirmed during the site assessment process that the policy provisions will deliver viable schemes. In the case of Kelham Gardens, the site lies in a flood zone. 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 option than leaving the land derelict, and so the sequential test is passed. The land interest has provided a draft scheme layout that indicates it is possible to design a scheme that will be safe for its lifetime without increasing flood risk elsewhere, and so, subject to these details being presented in a flood risk assessment at the planning application stage, the exception test is also passed.

5.10 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 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.

5.11 Although the cumulative effect of delivering 130 new homes on local transport and other social infrastructure, as well as 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 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. The Town and Parish Councils will seek to co-ordinate these improvements with their own investment plans using their CIL Fund (see §6.12).

Policy MARL2: Encouraging Affordable Homes in Mildenhall

Proposals to deliver an affordable housing scheme in Mildenhall will be encouraged and supported, provided:

- 1. The scheme comprises no more than ten units, each of which has two or three bedrooms only;***
- 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;***
- 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;***
- 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.***

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. 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.

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.

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 §71) 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.

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.

Policy MARL3: Meeting Local Housing Needs

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.

5.16 The policy serves two purposes: it refines Core Policy 45 by specifying the focus on smaller household and family housing in the town and it discourages proposals for any form of housing intended for older people. 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.

5.17 The evidence base shows that two and three bedroom housing types will meet the needs of the existing and future population of the town as it seeks to address affordability and the effects of in-commuting that is the norm for many of those who work in the town but have to live in lower cost areas many miles away like Swindon. With the continuing loss of existing affordable homes through the 'right to buy' this is increasingly important to tackle.

5.18 The older persons accommodation market segment has been more than well provided for in recent brownfield development schemes in the town which have delivered no affordable housing. A review undertaken of consented schemes revealed that approx. 180 dwellings have been built in Marlborough since 2001 that are available only to households of 55+ age to occupy. With relatively little overall increase in the housing stock of the town prior to the recent Marleberg Grange scheme, this represents more than a modest proportion of that increase.

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.

Policy MARL4: Supporting a Thriving Town Centre

The Neighbourhood Plan identifies the Marlborough Town Centre on the Policies Map. Located within the Town Centre boundary, the Primary Shopping Area comprises the Primary and Secondary shopping frontages.

A. On ground floors within Primary Shopping Frontages, development proposals for Commercial, Business and Service uses will be supported. On ground floors within Secondary Shopping Frontages, development proposals for Commercial, Business and Service uses and Pub or Drinking Establishment and Hot Food Take-away uses will be supported.

B. On ground floors within the Town Centre, development proposals for new or intensified Commercial, Business and Service uses and Pub or Drinking Establishment and Hot Food Take-away uses should be carefully designed and mitigated to ensure that the amenity of existing residential uses is not negatively impacted upon and that the potential for statutory nuisance is avoided.

C. Proposals for new residential uses on upper floors will be supported, provided they:

- 1. are carefully designed to achieve a good quality of life for residents;***
- 2. 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;***
- 3. 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;***
- 4. 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 made to delineate between residential access routes and areas required for commercial activity; and***
- 5. minimise street clutter by directing supporting infrastructure such as bin stores and cycle facilities away from active frontages.***

D. 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.

E. 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.

5.20 This policy is intended as an interim expression of how the community wishes to see the town centre thrive in a 'post-Covid' world. But with great uncertainty on how changes to national policy will affect town centres, it is expected that the new Local Plan will provide a longer-term policy framework. It will have more time, and evidence, to determine how the planning system can best be used to secure the success of the town centre.

5.21 In the meantime, this policy seeks to sustain and build on the success of the town centre as a vibrant and vital heart of the town and the wider rural area and as a visitor destination. The combination of its historic form and range of retail, commercial and other uses makes it one of the best performing and liked town centres in Wiltshire. However, although it has ridden the retail storms of the last decade better than most, with few vacant units, we cannot be complacent in the face of increasing competition from online retailing.

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 the Order and to broaden their scope and detail. The retail evidence base has been used to define 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.

5.23 It also defines, for the first time, primary and secondary shopping frontages. The primary shopping frontage is focused on High Street from Hyde Lane up to and including the lower part of Kingsbury Street and Oxford Street up to The Parade, including the row of shops and restaurants behind the Town Hall. It also includes Hughenden Yard. This frontage comprises a wide range of multiple and independent retailers, the main town centre food store (Waitrose) and many cafés, restaurants, pubs and hotels. Although long and wide, the High Street is a busy centre with regular market days and with the benefit of some car parking spaces and local bus service routes.

5.24 The secondary frontages are: Hilliers Yard (from the High Street to the river), The Parade (northside from High Street to New Road), New Road (from Oxford Street to London Road), London Road (from The Parade to Five Alls Court), Kingsbury Street (from above the Town Hall to Silverless Street) and High Street (northside from Hyde Lane to Bath Road). The large majority of properties in these frontages have active ground floor, commercial uses, with fewer retailers and more service providers and some properties that have always been or have been converted into a residential use.

In generally lower cost but convenient locations the frontages remain an important and integral part of the town centre offer. As the new Order excludes Pub and Take away uses from its definition of Commercial, Business and Services Uses, the policy identifies them as being suitable in the secondary frontages.

5.25 The goal is to sustain this special retail-led mix of commercial uses within the Town Centre to promote a thriving daytime and evening economy whilst recognising the important contribution that other uses, including residential development, can make in promoting a vibrant and competitive town centre where people want to visit, live and work. The policy will achieve this goal by promoting a healthy and competitive town centre with a retail-led mix of uses at ground floor level; encouraging the effective and efficient use of upper floors for appropriate main town centre uses and residential uses. It will form part of a broader Town Centre Plan, which the Town Council will lead once the MANP is adopted. That plan will cover a wider range of non-land use planning initiatives.

5.26 The policy will operate alongside national and other development plan policies relating to heritage assets (including policies MARL10 and MARL14 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 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.

Policy MARL5: Improving Public Parking

A. The Neighbourhood Plan allocates land adjacent to Marlborough Rugby Club, as shown on the Policies Map, for an informal public car parking use. Proposals will be supported, provided:

- 1. There will be no permanent buildings or structures or other urbanising effects such as kerbs, paved footways or landscape bunding;***
- 2. The car park comprises a grass grid, permeable surface only;***
- 3. Its use will be confined to cars and not any high-sided vehicle;***
- 4. Vehicular access to the car park is in a location and of a type to be agreed with the Highways Authority;***
- 5. the 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***
- 6. Any impact on the amenities of adjoining residents can be satisfactorily mitigated.***

B. Proposals to establish additional public car parking spaces at other suitable locations in the town, including EV charging points, and to make better use of under-utilised land for parking using shuttle bus services at weekends to serve the town centre will be encouraged.

5.27 The policy forms a key part of the strategy for sustaining the success of the town centre and therefore complements Policy MARL4 by allocating land for new public car parking spaces. The surveys of car parking capacity in the town centre indicate that there are insufficient spaces at peak times to accommodate local and visitor trips. There is a danger that if left unaddressed, the viability of the town centre may suffer.

5.28 The Town Council has explored the practicalities of securing suitable land in the town for this purpose. The only feasible site is the land 500m north of the town centre adjacent to Marlborough Rugby Football Club. The land is available and will allow 10 minute walking trips via Free's Avenue and Kingsbury Street. It will also continue to explore how to secure additional spaces on suitable land as opportunities arise in the future. It also forms part of the open setting to the Grade II listed former Union Workhouse at St. Luke's Court and relates well to the remainder of the Common. The policy therefore makes a number of requirements to keep to a minimum the visual intrusion into this setting by way of the design and operation of the car park. Implementation may give consideration to how parking is managed.

5.29 There may be other opportunities to address this issue. For instance, the use of a shuttle bus from underutilised parking areas such as private business parking spaces at the Marlborough Business Park and St Johns School at the weekend may help to relieve pressure on the existing car parking spaces as well as the Town Council's continued commitment to discouraging car use. Additional lighting at the walkway to the High Street has also been highlighted as an important matter to be considered.

Policy MARL6: Delivering New Cemetery Land

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.

5.30 The Town Council has identified the need for the provision of additional burial space over the plan period. It has therefore made available a parcel of land it controls at The Common, adjacent to the existing cemetery on Free's Avenue. The policy will therefore enable the expansion of the existing cemetery on the only available land that is technically suited to this purpose.

Policy MARL7: Protecting & Supporting Community Facilities

A. The Neighbourhood Plan defines the following properties as community facilities:

In Marlborough:

- **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**
- **Marlborough Medical Practice, George Lane, Marlborough, SN8 4 BY**

In Manton:

- **Manton Village Hall, Marlborough, SN8 4HR**

In Mildenhall:

- **Mildenhall Village Hall, Home Farm Close, Mildenhall, Marlborough, SN8 2NY**

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. Development proposals to sustain or extend the viable use of existing community facilities, and the development of new facilities, will be supported.

5.31 This policy identifies community facilities and affords them protection to ensure that the long-term potential value of land in community use is not lost without good reason. It also encourages the improvement of facilities to ensure they remain viable, but other planning policies will still need to be addressed. Its intent is broadly in line with Wiltshire Core Strategy Policy 49, although this only applies to rural areas, in this case for application to the facilities identified for Mildenhall and Manton. The existing development plan remains silent on community facilities in market towns.

5.32 The Neighbourhood Plan Group have been collecting evidence on community facilities within the neighbourhood plan area that are valued by the community and offer a valuable resource to support community life. Whilst some facilities are very well known and already protected, others are less so and some may, at some time in the future, come under increased financial pressure. The purpose of this policy is therefore to secure these assets in the long term for the benefit of the people of Marlborough and surrounding parishes and to apply a test of viability, which otherwise would not exist, to give added protection to them.

Policy MARL8: Protecting and Improving Sports Facilities

A. Where proposals are made to improve and create new sports facilities to serve the neighbourhood area, significant weight will be given to their community and health and well-being value.

B. The Neighbourhood Plan defines the following properties as existing sports facilities:

In Marlborough:

- **Marlborough Town Football Club, Elcot Lane, Marlborough, SN8 2BG (Adult Football);**
- **Elcot Lane Village Green, Elcot Lane, SN8 2BG (Youth Football)**
- **Marlborough Rugby Football Club, The Common, Marlborough, SN8 1D (Adult and Youth Rugby, and Youth Football)L;**
- **Marlborough Golf Club, The Common, Marlborough, SN8 1DU (Golf);**
- **Marlborough Tennis Club, Port Hill, Marlborough, SN8 1DU (Adult and Youth Tennis);**
- **Marlborough Bowls Club, Salisbury Road, Marlborough, SN8 4AD(Bowls);**
- **Recreation Ground, Salisbury Road, SN8 4AE (Adult and Youth Football)**
- **St John's Marlborough, Granham Hill, Marlborough, SN8 4AX (Multi Sports);**
- **Marlborough College, Bath Road, Marlborough, SN8 1PA (Multi Sports).**

In Mildenhall:

- **Minal Cricket Club and Sports Field, Mildenhall, Marlborough, SN8 2LY (Cricket and Youth Football)**

In Savernake

- **Marlborough Sports Club, Savernake Forest, Marlborough, SN8 3HN (Cricket and Youth Football)**

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.

5.33 This policy serves two purposes: it is intended to encourage landowners and sports facility operators to bring forward proposals to improve and create new sports facilities; and it seeks to protect existing facilities from unnecessary loss. In doing so, it complements Policy MARL7 but with a specific focus on sports uses.

5.34 Although the plan area benefits from a good range of sports facilities, some are privately owned and operated and, in any event, there is a growing demand for additional capacity from the local community. The Steering Group sought to identify specific opportunities to allocate land for new provision during the preparation of the MANP, but this was not possible; the availability and suitability (topography, accessibility for example) of sites is very limited. No landowners offered any land for these purposes. However, there are new projects – the new facilities are St. John's

School are very welcomed – and the Town Council will continue to work with local sports clubs to find other opportunities.

Policy MARL9: A Design Code for the Marlborough Conservation Area

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.

5.35 This policy directs applicants bringing forward proposals within the Marlborough Conservation Area or its setting to the design principles and guidance contained in the adopted Conservation Area Statement (2003 or as updated) and supplemented by the 2020 Marlborough Town Character Study. Together, these documents define the significance of what is one of England's finest historic town centres. The Statement has been adopted as supplementary planning guidance and remains in force. The Study supplements and carries the same weight as the Statement by updating some of its content in relation to the Conservation Area but also extends to cover adjoining parts of the town.

5.36 The policy complements the provisions of the NPPF and the adopted policies CP57 and CP58 of the Core Strategy by drawing attention to the guidance that is specific to this Conservation Area. Over the plan period, the guidance may be updated again. In which case, for the purpose of implementing this policy, applicants will be expected to have regard to the most up to date guidance. Not every element of the guidance will be relevant to an application. Rather, applicants are expected to acknowledge, understand and respond to the defined significance that is relevant in justifying their proposals.

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

The Neighbourhood Plan identifies Areas of Special Quality at Cross Lane/Cardigan Road/Leaze Lane/Back Lane (North Side), at St. John's Close, at The Common/Herd Street, at Back Lane (South Side) and at Salisbury Road/London Road, as shown on the Policies Map.

Development proposals located within an Area of Special Quality should demonstrate that they have had full regard to the following characteristics that contribute to the significance of its local architectural and historic interest:

A. Cross Lane/Cardigan Road/Leaze Lane/Back Lane (North Side)

- ***The prominence of tall, informal, dense hedges which line both sides of Cross Lane and Hyde Lane, often on raised banks above the road level that are both historic country lanes assimilated into the development of Marlborough***
- ***Many of the houses retain their extensive grounds with mature planting and tall trees***

- *The driveways are in gravel which suits the informal, semi-rural quality but where tarmac or block hard landscaping has been introduced to frontages and cross overs it has diminished the character of the area*
- *Dense mature hedges and secluded houses define the north side of Back Lane*
- *Leaze Lane is a narrow informal unmetalled track with houses primarily dating from the interwar period that are substantial, detached properties in extensive gardens with mature planting and hedges*
- *There is a strong visual relationship and continuity in views from Leaze Lane along Hyde Lane*
- *The White House is of local architectural merit and is consistent in its built form with others along the lane to create a coherent group value*
- *The medium height hedges and occasional, prominent mature trees along the front plot edges create a verdant rural character to the Cardigan Road part of the Area*
- *Houses are set back from the road by garden frontages defined by hedge rows, through which driveway openings are restricted to a minimum.*
- *Houses have an asymmetrical architectural character with a limited palate of materials often used decoratively, including chequered brick work, tile hanging to upper floors, decorative brick or stone detailing to windows and doors, string courses and plinths.*
- *The roofscape is significant, including the visual contribution of dormers, gables and chimney stacks.*

B. St. John's Close

- *The houses are in groups with similar architectural articulation of form with a strong Arts & Crafts character*
- *The two eastern ranges comprise one and a half stories with long sweeping tile roofs over painted rough cast ground floor brick walls*
- *The paired cottages to the west side are of one and a half storeys with hipped tile roofs, half dormers and central chimney stacks. Painted roughcast over brick ground floors. Simple door canopies on shallow timber brackets.*
- *The buildings forming the norther side onto Hyde Lane form three ranges of differing character. Nos. 7 and 8 are two storeys with sprocketed eaves extending over two storey canted bays on the southern elevations and central brick stack.*
- *The mass of the roofs is articulated by a series of balanced flat roofed or pitched half dormers and evenly spaced substantial chimney stacks*
- *The rear elevations to the eastern ranges have a simpler, continuous roofscape which is punctuated by evenly spaced, dormers with paired windows under shallow mono-pitched roofs*
- *The properties fronting onto Hyde Lane are screened by high hedgerows on the raised banks.*
- *Consistent architectural details include simple flat roofed canopies over entrances on simple moulded timber brackets.*
- *The area forms a distinctive architectural feature in views from Free's Avenue and the Common*
- *The open space comprising allotment land but also two sets of garages and open land at the centre of the Area is an essential setting enabling the appreciation of the group value of buildings that surrounds it*

C. The Common/Herd Street

- **A group of late 19th Century early 20th century mansions along the south side of The Common define the northern edge of the historic town and its abutment with the common.**
- **The buildings are a prominent historic group of their period and social status in views across The Common and from Free's Avenue defining the northern entrance to the town in long views from Port Hill**
- **Thorn Hanger and Fairview retain much of their common asymmetrical built form and detailing characteristic of the vernacular revival.**
- **Boundary treatments survive, including the Thorn Hanger Arts & Crafts style flat hooded entrance gateway from the street and brick wall with moulded stone copping. The ornate cast iron railing and gate to Fairview are also contemporary with the main house."**

D. Back Lane (South Side)

- **Smaller houses of mid and late 20th century with open front gardens and ancillary buildings, located on long, narrow burgage plots that relate to the town centre functions**

E. Salisbury Road/London Road

- **Long range views of the key building group around the junction of Salisbury Road, London Road and George Lane are significant, including Nos. 107 and 108 London Road, Nos. 25 – 34 London Road and 22-33 Salisbury Road (Albany Terrace)**
- **The gardens and verge setting to St Margaret's Cottages form an important space that is resonant of their original design and layout and their setting adjacent to the river.**
- **The arrangement of historic fenestration, roof forms and architectural features, such as chimney stacks, characterize buildings of otherwise simple architectural form.**
- **Building elevations generally run parallel to the road arrangement and are articulated to define corner positions.**
- **The cobbled pedestrian access from Nos. 1- 7 St Margaret's Close through to London Road is an important connection that is characteristic of the area.**
- **The character and appearance of the area around London Road bridge, including that part in the Conservation Area and its riverside setting, could be enhanced and better revealed to afford a stronger visual interconnectivity between the areas.**

5.37 As encouraged by NPPF §126 and other recent Government policy initiatives, this policy identifies five Areas of Special Quality (ASQ) by way of their local architectural and/or historic interest, following a detailed review by the 2020 Marlborough Town Character Study. This same designation was made in the Kennet Local Plan, but only covered the Cross Lane/Cardigan Road/Back Lane area.

5.38 As then, the Study recognises that this part of the town has a degree of interest that sets it apart from the norm and (as set out in Section 6 below) there are two ASQs where this interest is considered to be so special that they warrant including in

a revised Conservation Area boundary, which they currently adjoin. The MANP itself cannot do this and so, until such a time that they are, they will operate as ASQs. It reviewed the former Cross Lane/Cardigan Road/Back Lane ASQ to assess if it continued to justify such a designation. It concludes that it does so, and that it should be extended to include parts of Leaze Lane, which has a similar history and appearance. But, the Study also concludes that the part of that original ASQ that is the south side of Back Lane has a character and history that contributes far more to the evolution of the town centre to its south than the ASQ to its north, should be included in the Conservation Area. In the meantime, as a result of it having this distinct character from the Cross Lane/Cardigan Road ASQ, the south side of Back Lane has been designated a separate ASQ in the meantime.

5.39 The Study concludes there are three other areas that should be ASQs at St. John's Close, at The Common/Herd Street and at Salisbury Road/London Road. Although St. John's Close adjoins the Cross Lane/Cardigan Road ASQ, it too has a very distinct character and history and so is designated an ASQ in its own right. Like Back Lane (South Side), the Study concludes that the small areas of The Common/Herd Street and around the junction of Salisbury Road and London Road also make an important contribution to the significance of the adjoining Conservation Area and should both be included within it in due course. Again, as an interim measure, both are designated as ASQs.

5.40 The ASQ designation is regarded as a 'non-designated heritage asset' as per NPPF §197 and is provided for by adopted policies CP57 and CP58 of the Core Strategy. As such, applicants will be expected to acknowledge, understand and respond to the status and design guidance of each area in order to demonstrate that any adverse harm caused to the significance of the ASQ is justified. The characteristics identified in the policy are not intended to be applied with great prescription; rather they define the essential features of each area, the importance of which will depend on the location and nature of the proposal.

Policy MARL11: A Design Code for Manton

A. Development proposals located within the Manton Conservation Area should demonstrate that they have paid full regard to the following characteristics that contribute to the significance of its special architectural and historic interest:

- ***The importance of reinforcing the essential character of the village by recognising the following characteristics:***
 - ***The common use of timber for windows and doors;***
 - ***The common use of mellow red/orange brick and brilliant white render for building materials with occasional use of sarsen stone or flint***
 - ***The common use of clay plain tile or thatch as roofing materials with occasional very tall chimneys on the most important heritage assets in the village;***
- ***The importance of the group value of designated and non-designated heritage assets to defining important settings, most notably the Village Green and Manton Weir, Farm House and Stables, requiring any new or replacement buildings or structures in these locations to reinforce that group value;***

- *The importance of the contribution of other structures of distinctive heritage interest (most notably sarsen stone and flint boundary walls and building plinths), significant trees and hedges to the character of the Conservation Area.*
- *The village is hidden on a steep southern slope on all approaches other than from the open landscape of the river valley to its west, but is dramatically revealed from along Bridge Street (with long views to the Village Green and the Old Post Office; the river bank is seen through the wetland glade, water meadow and mill, which has a tranquillity that is both distinctive and of a rare rural character); from Preshute Lane (with shorter views to 73 High Street framed along the narrow lane by Peacock Cottage and the Village Hall/former reading Room); and from Manton Drove (with High Street only revealed from the narrow lane by the view of the white-rendered, double-fronted and slate-roofed no.48)*
- *The village is seen nestled in the slope from longer views from the west as a result of its buildings being of a low height (bungalows or low, two-storey) which sit within the mature trees in the gardens of buildings on West Manton and Manton Road*
- *The importance of the character of High Street derived from its sequence of spaces created by gentle curves and by its varying profile, e.g. narrowing at 50-54 at the back of pavement and with a combination of 58 and the original Preshute School building*
- *The prominence in the streetscene of a number of buildings (listed and non-listed) that punctuate or terminate key views, e.g. 7 High Street, the Old Post Office, the Oddfellows P.H., 24-26 High Street*
- *The occasional prominence of mature trees in front gardens along High Street, along Preshute Lane, around Jubilee Field*
- *Manton Grange is an Edwardian red brick mansion standing in extensive grounds and can be seen in views from Preshute Lane; it is an asset of special quality to the Conservation Area*

B. Development proposals located outside the Manton Conservation Area should demonstrate that they have paid full regard to the following characteristics:

- *Medium height front hedges and detached buildings set in deep plots along Manton Road and High Street create a complementary rural village setting to the historic core beyond*
- *Manton Drove is narrow and deeply cut into the landscape with many mature trees and front hedges which also create a complementary rural village setting to the historic core beyond*
- *Bergamot Close and Manton Close are small enclaves of smaller, detached modern buildings with regular plots within mature trees and amenity land; the bungalows of Manton Close, which is on higher slope than the older village below, sit well within the village*

5.41 This policy sets out a series of characteristics that are considered to be essential features that contribute to defining the significance of the Manton Conservation Area and its setting. They are derived from the 2003 Conservation Area Statement, which has been reviewed as part of the Manton Design Study (see separate report).

5.42 The policy complements the provisions of the NPPF and the adopted policies CP57 and CP58 of the Core Strategy by drawing attention to the guidance that is specific to this Conservation Area. Not every characteristic will be relevant to an application and the policy does not set out a prescriptive list of design features that must be slavishly incorporated into every scheme. Rather, applicants are expected to acknowledge, understand and respond to the characteristics that are relevant in justifying their proposals.

Policy MARL12: A Design Code for Mildenhall

A. Development proposals located within the Mildenhall Conservation Area should have full regard to the following design principles and heritage features:

- ***The important role played by mature trees and hedges to defining the character of Church Lane***
- ***The sequence of building lines along the main street with tight and then wider street profiles shaping views punctuated by the gable ends of listed and other buildings of local historic interest***
- ***The absence of plot sub-division in the fabric of the area, with all buildings having a frontage to the main street or Church Lane***
- ***The prominence of Kennet Cottage in terminating views along the main street and in combining with Romans Halt opposite to create a distinct character for Church Lane***
- ***The prominence of No.42 on the main street in punctuating views along the main road from east and west***
- ***The occasional unobstructed glimpse view from the village to the surrounding countryside between buildings***
- ***The importance of the group value of designated heritage assets, other buildings and structures and open spaces to defining important settings, most notably:***
 - ***the playing fields;***
 - ***the wall and gate piers to the former Rectory leading to the Church of St John the Baptist and its setting at the bottom of Church Lane; and***
 - ***the buildings and layout of Home Farm Yard***
 - ***the prominence of the group of buildings at the entrance to Werg from the B4192***
 - ***The narrow lane of Werg to the south leading to uninterrupted views across the river and into and unmade track with wide verges, hedges and trees creating an attractive rural scene in the east leading to the south of the Conservation Area***
 - ***The open riparian land of the river valley on both sides of the River Kennet***
 - ***the occasional presence and reuse of former farm buildings as a reminder of the agricultural past of the village***
 - ***The common use of timber for windows and doors and of flint, sarsen stone, timber frame and brick, plain clay tile or thatch in building and boundary materials***
 - ***the common use of thatch in simple rectilinear plan forms retaining or re-introducing the long straw tradition moving away from combed wheat reed***

- ***The retention of brick chimney stacks where decorative or operational, and the use of these as important features on new large expanses of roof***

B. Development proposals located outside the Mildenhall Conservation Area should have full regard to the following design principles:

- ***The role played by generally 1-2 storey, detached buildings set back within large plots behind mature trees and hedges and of grass verges in the setting to the Conservation Area***
- ***The prominence of key sites in long and revealed views in the setting of and into the Conservation Area, notably west from the B4192, south down Greenways Road, south down Woodlands Road and east from the B4192***

5.43 This policy sets out a series of characteristics that are considered to be essential features that contribute to defining the significance of the Mildenhall Conservation Area and its setting. They are derived from the 2004 Conservation Area Statement, which has also been reviewed as part of the Mildenhall Design Study (see separate report).

5.44 The policy complements the provisions of the NPPF and the adopted policies CP57 and CP58 of the Core Strategy by drawing attention to the guidance that is specific to this Conservation Area. As with Policies MARL10 and MARL11, not every characteristic will be relevant to an application and the policy does not set out a prescriptive list of design features that must be slavishly incorporated into every scheme. Rather, applicants are expected to acknowledge, understand and respond to the characteristics that are relevant in justifying their proposals.

MARL13: Protecting Local Heritage Assets

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.

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.

5.45 The policy identifies a number of buildings in the Parishes that, whilst not designated as listed buildings, either have some local heritage value, including where applicable archaeological interest, for the purposes of applying Core Strategy Policy CP58 on the historic environment. Together, policies MARL9 – MARL13 highlight the significance of the MANP Area's heritage assets.

5.46 Applicants are also alerted to the presence of the Stonehenge, Avebury and Associated Sites World Heritage Site adjacent to the north west boundary of the designated neighbourhood area, with a small section falling inside the designated neighbourhood area. Existing national and strategic policies provide the necessary

detail and protection, specifically Wiltshire Core Strategy Policy 59 which requires accountability to be demonstrated in the Design and Access Statement of schemes.

5.47 Wiltshire Council does not yet hold a list of local heritage assets. The 2020 Townscape Study has reviewed the 'locally significant buildings' identified in the 2003 Marlborough Conservation Area Statement and has made recommendations for inclusion in this policy. The respective Design Studies for Manton and Mildenhall have also been used to identify qualifying buildings and structures. Each building and structure is described in the separate Design Study.

Policy MARL14: Protecting and Improving Green Infrastructure

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 through the town and neighbouring parishes and for mitigating climate change. 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.

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.

C. Proposals that will lead to the loss of land 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.

D. Proposals that will contribute to sequestering carbon through appropriate woodland planning 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 location within the Network that has been designated for that purpose.

5.48 This policy supports Core Policy 50 on Biodiversity and Core Policy 52 on Green Infrastructure by defining a network of green infrastructure assets in and around the neighbourhood plan area as a means of promoting walking, cycling and recreation, of improving local biodiversity through connecting habitats and in places of sequestering carbon through woodland planting.

5.49 It also incorporates (and therefore replaces) saved policies HH10 (Area of Minimum Change) and AT24 (Riverside Walk in Marlborough) as the areas to which they applied is included within the Network and the policy serves much the same purpose. It will be implemented in part by investments by the Town and Parish

Councils in improving footpath and cycleway connectivity using their CIL Fund (see §6.12).

5.50 The policy requires that all development proposals that lie within the Network, or that adjoin it, should consider how they may improve it, or at the very least do not undermine its integrity of connecting spaces and habitats. The Policies Map shows the full extent of the Network, which allows applicants to determine if their proposals should take this policy into account. Where proposals include provision for landscaping, new means of access or new layouts, there may be an opportunity to relate the land better to the Network, for example in complementing existing biodiversity value through the design of the landscape scheme. At the very least, the policy requires that proposals that will undermine the existing value of the Network will be refused permission.

5.51 The Network will become more valuable over time, providing local residents with enhanced recreational opportunities and benefitting visitors and local tourism. Although the majority of these features are physically attached to enable habitat connectivity, some features of the Network are not. This does not devalue their integral biodiversity or recreational value and at some point in the future an opportunity may arise to achieve similar connectivity. The value of some parts of the Network to act as a 'carbon sink' to help mitigate climate change is also recognised, and all proposals should aim to maximise the opportunity to sequester carbon through appropriate planting. Further guidance will be published for applicants either by the Parish Councils once the Neighbourhood Plan is made or as part of wider green infrastructure and climate change strategies by Wiltshire Council.

Policy MARL15: Protecting Local Green Spaces

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.

- 1. Coopers Meadows, Marlborough**
- 2. Salisbury Road Recreation Ground, Marlborough**
- 3. The Victorian Cemetery, Marlborough**
- 4. Jubilee Field, Manton**
- 5. Priory Gardens, Marlborough**
- 6. Wye House Gardens, Marlborough**
- 7. Land at College Fields/Barton Park, Marlborough**

5.52 This policy designates a series of Local Green Spaces in accordance with paragraphs 99 - 100 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.

5.53 A review of all open land within and adjoining each settlement has been completed, informed by the qualifying criteria of paragraph 100 of the NPPF. The land that is considered to meet those criteria and is therefore worthy of designation

is shown on the Policies Map. 29 sites were originally reviewed and a full description and justification for each site is included in the Open Spaces in MANP Parishes Report in the evidence base.

Policy MARL16: Protecting Valued Community Open Spaces

A. The Neighbourhood Plan identifies the following as Valued Community Open Spaces, as shown on the Policies Map:

1. Orchard Road Play Area
2. St Margaret's Mead Parcel 1
3. St Margaret's Mead Parcel 2
4. St. Margaret's Mead Parcel 3, Savernake Crescent
5. St John's Park Play Area
6. Plume of Feathers Garden
7. Tin Pit, land next to the River Og
8. Mildenhall Play Area
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

B. Development within a Valued Community Open Space will only be supported if it preserves and where possible enhances their contribution to the health and well-being of visitors and residents, public access and if it is ancillary to its community use. Any loss of a Space will only be permitted where alternative better provision can be secured, and an assessment has determined that the space is surplus to requirements.

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
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, Preshute

10. The Common

11. The Green - Herd Street

5.54 The policy identifies a series of Valued Community Open Spaces and seeks their preservation and, where possible, their enhancement. It is broadly in line with the objectives of the proposed Wiltshire Green Infrastructure Strategy and refines Core Policy 52 on Green Infrastructure in identifying specific locations of green infrastructure in the MANP area.

5.55 Following the review of all open land within and adjoining each settlement (see the Open Spaces in MANP Parishes Report in the evidence base), it became clear that there are a number of open spaces of public value that provide health and recreational benefit to people living and working nearby. These may not meet the tests of a Local Green Space designation, but they are valued by, and serve a particular purpose in, the local community. The policy therefore seeks to preserve these Valued Community Open Spaces, and where possible, encourage enhancements that will increase their benefits to the community and visitors. The value of the sports facilities' open spaces listed below has been captured by Policy MARL8:

1. Marlborough Town Football Club, Elcot Lane, Marlborough, SN8 2BG (Adult Football)
2. Elcot Lane Village Green, Elcot Lane, SN8 2BG (Youth Football)
3. Marlborough Rugby Football Club, The Common, Marlborough, SN8 1D (Adult and Youth Rugby, and Youth Football)
4. Marlborough Golf Club, The Common, Marlborough, SN8 1DU (Golf)
5. Marlborough Tennis Club, Port Hill, Marlborough, SN8 1DU (Adult and Youth Tennis)
6. Marlborough Bowls Club, Salisbury Road, Marlborough, SN8 4AD (Bowls)
7. Recreation Ground, Salisbury Road, SN8 4AE (Adult and Youth Football)
8. St John's Marlborough, Granham Hill, Marlborough, SN8 4AX (Multi Sports)
9. Marlborough College, Bath Road, Marlborough, SN8 1PA (Multi Sports)
10. Minal Cricket Club and Sports Field, Mildenhall, Marlborough, SN8 2LY (Cricket and Youth Football)
11. Marlborough Sports Club, Savernake Forest, Marlborough, SN8 3HN (Cricket and Youth Football)

Policy MARL17: Conserving the Scenic Beauty of the AONB

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:

Marlborough Downs and Common

- ***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**

Kennet Valley

- **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:**
 - **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**

Savernake Forest and Plateau

- **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**

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.

5.56 This policy refines Core Policy 51 of the Core Strategy and NPPF §172 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.

5.57 The three landscapes form part of larger Landscape Character Areas (LCA) identified in a variety of Landscape Character Assessments at the former Kennet and now Wiltshire and North Wessex Downs AONB scales. The Marlborough Downs to the north of the town are part of the Open Downland LCA. The Kennet Valley runs through the centre of the MANP area joining its three settlements (the market town of Marlborough and the villages of Manton and Mildenhall) and forms part of the Chalk River Valley LCA with significant biodiversity. The Savernake Plateau lies to the south of the town in the form of the Savernake Forest, which is an ancient hunting

forest with important historic sites, used extensively as an area of recreation, and it forms part of the Wooded Downland LCA. The Wansdyke series of early mediaeval defensive linear earthworks runs through the area from the Forest west towards Morgan's Hill beyond the Plan's area.

5.58 The policy sets out the key characteristics defined by these published landscape character studies, and by the published Conservation Area Appraisals for Marlborough, Manton and Mildenhall Conservation Areas. It requires development proposals to have full regard to these specific characteristics and to avoid undermining the open character and special scenic beauty of these special landscapes.

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.

Policy MARL18: Achieving Dark Skies

Where development proposals are considered otherwise appropriate within or outside of the Marlborough development boundary, or the villages of Manton and Mildenhall, special attention should be paid to ensuring any external lighting is essential only and is located and designed in such a way to conserve the dark skies of the AONB.

5.60 The AONB landscape is sensitive to change and therefore development, especially that located outside settlement boundaries, should be landscape led. Lighting is of particular importance in the AONB. Dark skies are a special quality of the AONB and one of its most important features. Marlborough was due to host a dark skies festival in 2020 which would have highlighted the issue of poorly designed and positioned lights on dark skies.

5.61 The AONB is currently working on a good practice lighting guide to help residents, developers and planners better understand the levels of darkness and the intensity of lighting in terms of luminance and positioning. This policy will play a key role in ensuring future developments are better designed to protect dark skies as well as the abundant ecological corridors within Marlborough but also to better influence residents on improving current lighting whether upgrading, reducing or removing lighting.

Policy MARL19: Building to the PassivHaus Standard

A. All development must 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 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 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.

D. All planning applications for major development are also required 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.

E. 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 evaluate the operational energy use using realistic information on the intended use, occupancy and operation of the building to minimise any performance gap.

5.62 The Climate Change Act 2008 is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements and commits the UK government by law to reducing greenhouse gas emissions to 'net zero' by 2050.

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.

5.64 The Passivhaus standard has been shown to be an effective means of improving the energy performance of new and existing buildings and is proven to avoid the 'performance gap'. The more buildings, of all uses, that meet this standard, the better. Storing emitted carbon in plant life can also reduce atmospheric carbon dioxide that is increasing global temperatures. The more that storage capacity in the local area is increased, the greater the contribution to reducing the pace of temperature increases. Passivhaus also provides additional benefits. Its very low space heating requirements ensures occupiers are more resilient to issues such as fuel poverty. It can also be the means of 'upskilling' those working in the local construction industry, and particularly younger people who wish to make a career in construction.

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.

5.66 Achieving this level of performance will make a significant contribution to mitigating climate change that the MANP can deliver, and a major contribution to Wiltshire Council's Climate Emergency Action Plan, which supports a similar level of intervention.

5.67 Clause A of the policy requires 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.

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.

5.69 The policy requires that the scheme density (measured by dwelling units/Ha) is assessed against that of the local 'character area' in the Design & Access Statement. The 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.

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.

Net Zero Operational Carbon

Ten key requirements for new buildings

By 2030 all new buildings must operate at net zero to meet our climate change targets. This means that by 2025 all new buildings will need to be designed to meet these targets. This page sets out the approach to operational carbon that will be necessary to deliver zero carbon buildings. For more information about any of these requirements and how to meet them, please refer to the: UKGBC - Net Zero Carbon Buildings Framework; BBP - Design for Performance Initiative; RIBA - 2030 Climate Challenge; GHA - Net Zero Housing Project Map; C83E - Climate Action Plan; and, LE11 - Climate Emergency Design Guide.

Low energy use

- 1 Total Energy Use Intensity (EUI) - Energy use measured at the meter should be equal to or less than:
 - 35 kWh/m²/yr (GIA) for residential¹

For non-domestic buildings a minimum DEC B (40) rating should be achieved and/or an EUI equal to or less than:

 - 45 kWh/m²/yr (GIA) for schools¹
 - 70 kWh/m²/yr (NLA) or 55 kWh/m²/yr (GIA) for commercial offices^{1,2}
- 2 Building fabric is very important therefore space heating demand should be less than 15 kWh/m²/yr for all building types.

Measurement and verification

- 3 Annual energy use and renewable energy generation on-site must be reported and independently verified in-use each year for the first 5 years. This can be done on an aggregated and anonymised basis for residential buildings.

Reducing construction impacts

- 4 Embodied carbon should be assessed, reduced and verified post-construction.⁷



Low carbon energy supply

- 5 Heating and hot water should not be generated using fossil fuels.
- 6 The average annual carbon content of the heat supplied (gCO₂/kWh) should be reported.
- 7 On-site renewable electricity should be maximised.
- 8 Energy demand response and storage measures should be incorporated and the building annual peak energy demand should be reported.

Zero carbon balance

- 9 A carbon balance calculation (on an annual basis) should be undertaken and it should be demonstrated that the building achieves a net zero carbon balance.
- 10 Any energy use not met by on-site renewables should be met by an investment into additional renewable energy capacity off-site OR a minimum 15 year renewable energy power purchase agreement (PPA). A green tariff is not robust enough and does not provide 'additional' renewables.

Notes:

Note 1 - Energy use intensity (EUI) targets
The above targets include all energy use in the building (space heating and ungrouped) as measured at the meter and exclude on-site generation. They have been derived from peak net energy use modelling for best practice examples of the best performing buildings in the UK, and a preliminary assessment of the renewable energy needs for all buildings. They are likely to be revised as more knowledge is available in these areas. Heating and hot water is not generated on-fuel, this occurs at a separate building with other zero carbon fuel use. EUI targets are the same as kWh/m²/yr. Other zero carbon heating fuels are available this metric will be adopted.

Note 2 - Commercial offices
With a typical net-zero office, 7000kWh NLA is equivalent to 50 kWh/m²/yr. Building owners and developers are recommended to target a new building rating of 4 or less using the BBP's Design for Performance protocol based on NLA.

Note 3 - Offset the carbon
It is recognised that operational emissions represent only one aspect of net-zero carbon in new buildings. Reducing where the carbon is created and offset is covered in separate guidance.

Note 4 - Adaptability climate change
Net zero carbon buildings should also be adapted to climate change. It is expected that the role of engineering a managed and heat cooling is minimised.

Developed in collaboration with:



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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 therefore exempted from this policy requirement.

5.72 Clause D requires 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.

5.73 Finally, Clause E requires an Energy Statement to be submitted to cover the following:

- an assessment of the proposal to capture regulated and unregulated emissions, the embodied emissions and the emissions associated with maintenance, repair and replacement of the new building(s), as well as its dismantling, demolition and eventual material disposal
- a calculation of the energy and carbon emissions covered by the Future Homes Standard and Building Regulations and, separately, the energy demand and carbon emissions from any other part of the development that are not covered by the Future Homes Standard or Building Regulations
- the proposal to reduce carbon emissions beyond the Future Homes Standard and Building Regulations through the energy efficient design of the site, buildings and services
- the proposal to further reduce carbon emissions through the use of zero or low-emission decentralised energy where feasible
- the proposal to further reduce carbon emissions by maximising opportunities to produce and use renewable energy on-site, utilising storage technologies where appropriate
- the proposal for a demand-side response, specifically through installation of smart meters, minimising peak energy demand and promoting short-term energy storage
- an analysis of the expected cost to occupants associated with the proposed energy strategy

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.

6. IMPLEMENTATION

6.1 The Neighbourhood Plan will be primarily implemented through Wiltshire Council, in the course of considering and determining planning applications for development in the Marlborough Neighbourhood Plan Area.

Development Management

6.2 Wiltshire Council will use a combination of the relevant Core Strategy/Local Plan and MANP policies – the ‘development plan’ for the MANP Area – to inform and determine its planning application decisions. The Town and Parish Councils are statutory consultees on planning applications made in the relevant parish area. They will endeavour to comment on and monitor all future planning applications where they consider a MANP policy has been engaged by the development proposal. They will seek to ensure that the relevant MANP policies have been identified and applied correctly by applicants and by officers in their decision reports.

6.3 The Councils will aim to meet with development management officers of Wiltshire Council once the MANP is made, and on occasions thereafter, to ensure there is a full and accurate understanding by all parties on how the policies should be applied. They may also review relevant cases so that policies may be modified in future reviews of the MANP.

Local Infrastructure Improvements

6.4 Where opportunities arise through Section 106 agreements and through the Wiltshire Community Infrastructure Levy (CIL) to secure financial contributions to invest in improving local infrastructure, the Councils will review the evidence base and community consultations for the MANP to inform their view in liaising with Wiltshire Council. This is in addition to the infrastructure projects that are proposed to be delivered through site specific policies in this Neighbourhood Plan.

6.5 The CIL was adopted in 2015 and its charging rate still applies. This charges £85/sq.m. for new dwellings (approx. £7,000 per dwelling), but a lower rate for sites allocated in the Core Strategy like Salisbury Road. Once this Plan is made, the Town and Parish Councils will receive 25% of the charge levied in their respective parts of the MANP area. The 130 homes provided for in the Plan and other consented windfall schemes may therefore generate a total CIL charge for the local councils to invest in the MANP area of more than £750k over the plan period.

Marlborough Conservation Area

6.6 The Conservation Area was designated in 1971 and reviewed in 2003. As noted in relation to Policy MARL11, the 2020 Townscape Study recommends that the Conservation Area boundary is extended to include the Back Lane and The Common/Herd Street Areas of Special Quality (ASQ). Both are considered worthy of inclusion in the Area, given their contribution to its heritage significance.

6.7 The MANP cannot itself modify the boundary of a designated Conservation Area. This can only be done following a review by Wiltshire Council as the local planning authority under S69 of the Planning (Listed Buildings & Conservation Areas) Act 1990. In which case, the Town Council will actively encourage Wiltshire Council to undertake a review, using the evidence provided in the 2020 Townscape Study, with the aim of modifying the boundary as recommended. In the meantime, both areas will continue to be identified as ASQs.

Mildenhall Housing Site

6.8 Mildenhall Parish Council will actively encourage the owners of land in suitable places on the edge of the village to come forward with proposals for a low cost housing scheme. It will seek to encourage the Community-Led Housing team at Wiltshire Community First and Wiltshire Council to work with it and the local community to bring forward a project.

Marlborough Medical Centre

6.9 The Town Council will continue to liaise with the relevant stakeholders – notably the existing George Lane Surgery owners, the Wiltshire Clinical Commissioning Group (CCG) and Marlborough College – to enable the possible relocation of the facility on George Lane to a new site at Barton Dene (as per Policy MARL1A). On the making of the MANP, it will continue to work with the CCG and others to assess the feasibility of the project.

Town Centre

6.10 Much of the success of the town centre will depend on policies and actions outside the remit of the MANP. The Town Council therefore proposes to prepare a Town Centre Plan once the MANP has been made. The plan will incorporate Policy MANP4 into a wider set of initiatives aimed at securing the long term vitality and viability of the town centre, which may benefit from the Town Council's CIL fund. It will take into account the useful feedback given by the community in response to the MANP consultations, and bring together traders, property owners, resident representatives, Wiltshire Council and others to discuss and agree objectives and actions.

Sports Facilities

6.11 The Town Council identified improving access to sports facilities in the town as an important task for the MANP. The growing population and increasing interest in organised sport from previously under-represented sections of the community mean that greater capacity is needed. This can be achieved by improving the versatility of existing facilities – all-weather playing pitches for example – and by creating new facilities. Potential new community sites were unfortunately not identified during the MANP process. However, those proposed at St. John's School will be considered, and the Town Council will make proposals for engaging with the network of sports clubs in the coming years.

Walking, Cycling & Traffic

6.12 The Town and Parish Councils have been mindful of the challenges presented by traffic on the highway network through the area. As noted in Section 2, there have been a number of initiatives over the last few years to address HGV traffic and air quality issues. These have included the provision of a bypass, in the 1980's, which was dropped due to local opposition, and more recently lobbying to de-prime the A346/338, which has been refused by the Highway Authority (Wiltshire Council). These initiatives have, so far, had a limited effect. The Councils will therefore look to invest their CIL funds to secure a range of improvements to the network of footpaths and cycleways to encourage non-car journeys within the area as far as possible, for example between the town and Savernake Forest, and between the town and Savernake Hospital.

6.13 They will also expect the respective S106 obligations of consented housing schemes (as required by Policy MARL1 for the sites allocated in the Plan) to be co-ordinated with this package of improvements, as well as aimed at making highways improvements. Specifically, the Councils are very concerned about the traffic build up at busy times on the A346 & A4 through Marlborough as the congestion both affects air quality and greatly inconveniences residents of all the Councils within the MANP area. The Councils will expect Wiltshire Council Highways to take this into account when considering planning applications and that S106 agreements are put in place to implement improvements to the road network.

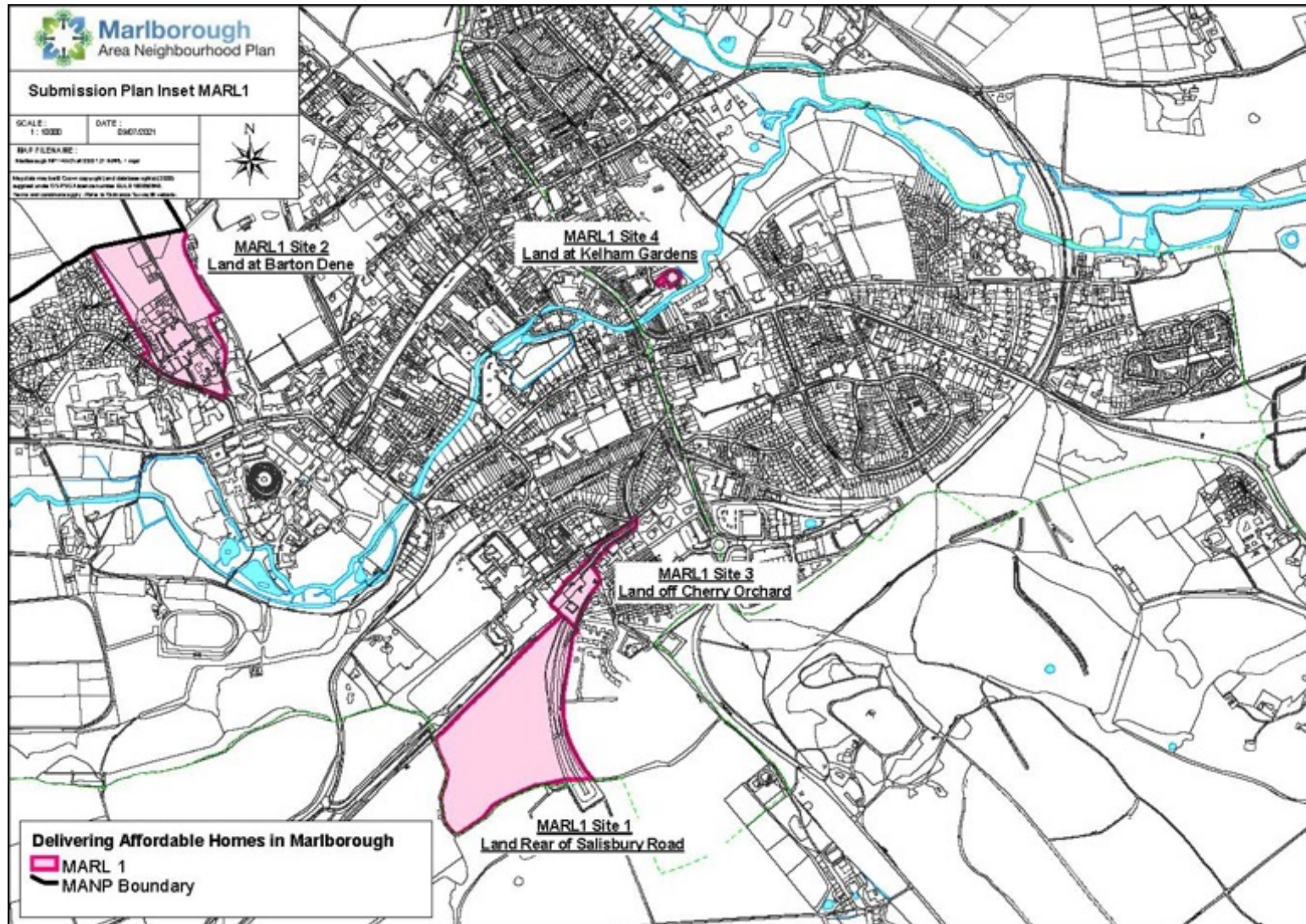
Other Non-Planning Matters

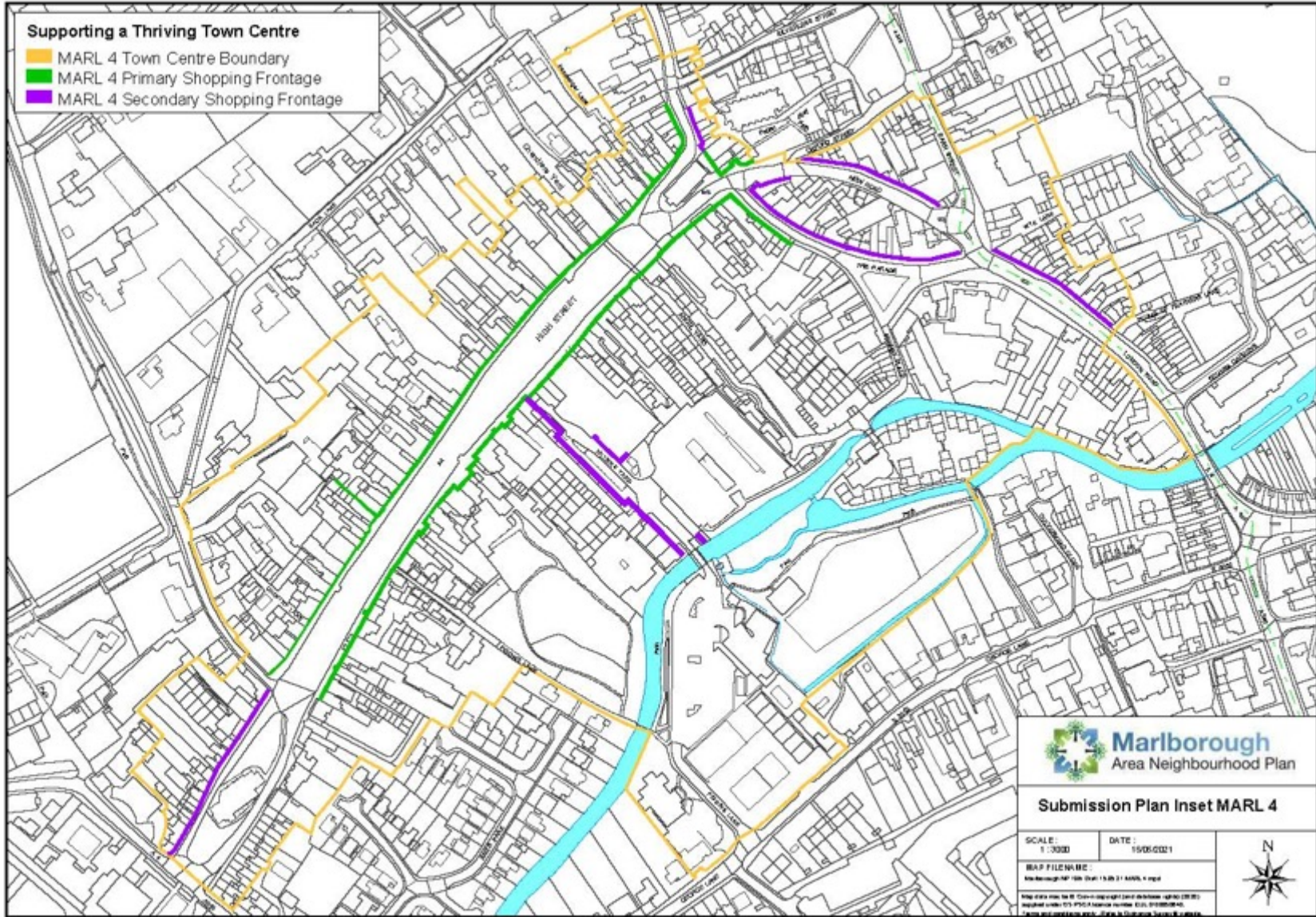
6.14 During the process of preparing the MANP, there have been many other ideas for improving or addressing current problems in the Marlborough Area that lie outside the scope of the land use planning system to control. These include, for example, improving Marlborough High Street, traffic congestion, public transport, employment opportunities. The Councils have noted these issues and will take them forward through their day-to-day business and in partnership with the local community, with Wiltshire Council, and with other relevant parties.

Reviewing the MANP

6.15 The Councils will consider undertaking a first review of the MANP after the adoption of the new Wiltshire Local Plan. The review may consider if there are any important changes in strategic policy that have rendered policies in the MANP out of date and take account of the experience of applying the policies to planning applications. They may also consider if the designated Neighbourhood Plan Area remains relevant for the purpose of neighbourhood planning in this area.

POLICIES MAP & INSETS



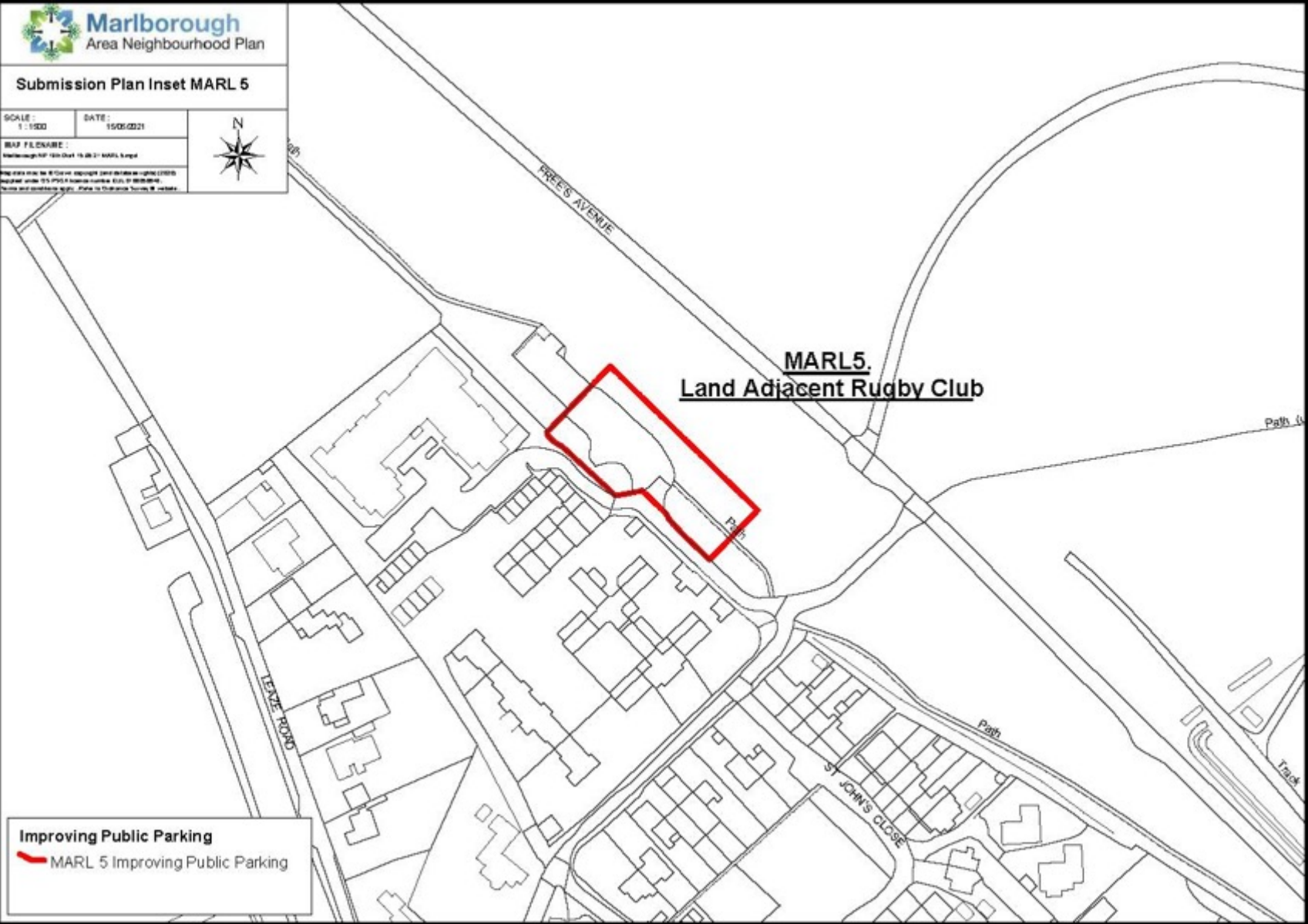


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Improving Public Parking
 MARL 5 Improving Public Parking

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MARL6.
Land at the Common

Delivering New Cemetery Land
 MARL 6 Delivering New Cemetery Land
 MANP Boundary

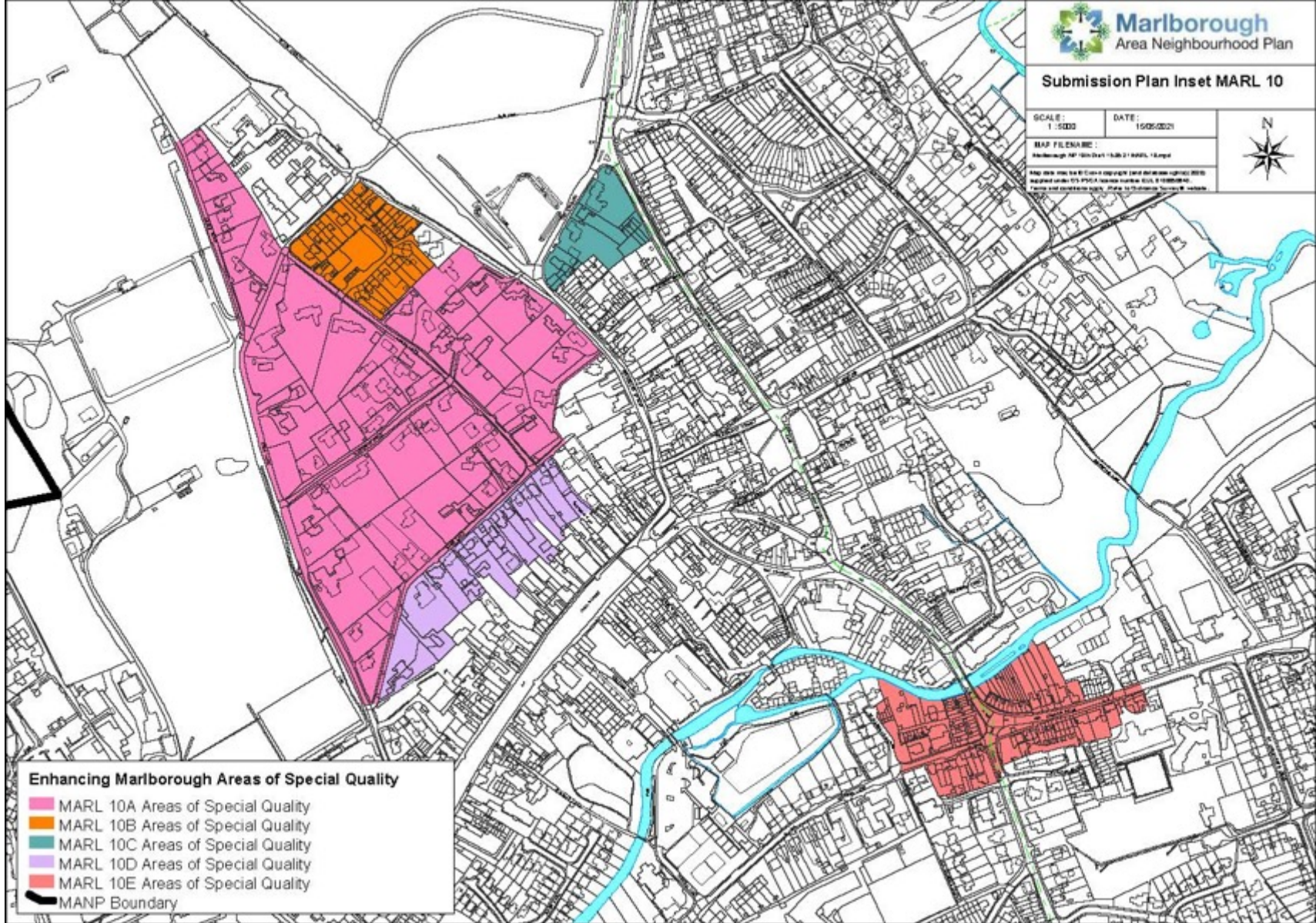


Submission Plan Inset MARL 10







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Enhancing Marlborough Areas of Special Quality

-  MARL 10A Areas of Special Quality
-  MARL 10B Areas of Special Quality
-  MARL 10C Areas of Special Quality
-  MARL 10D Areas of Special Quality
-  MARL 10E Areas of Special Quality
-  MANP Boundary



Marlborough Area Neighbourhood Plan

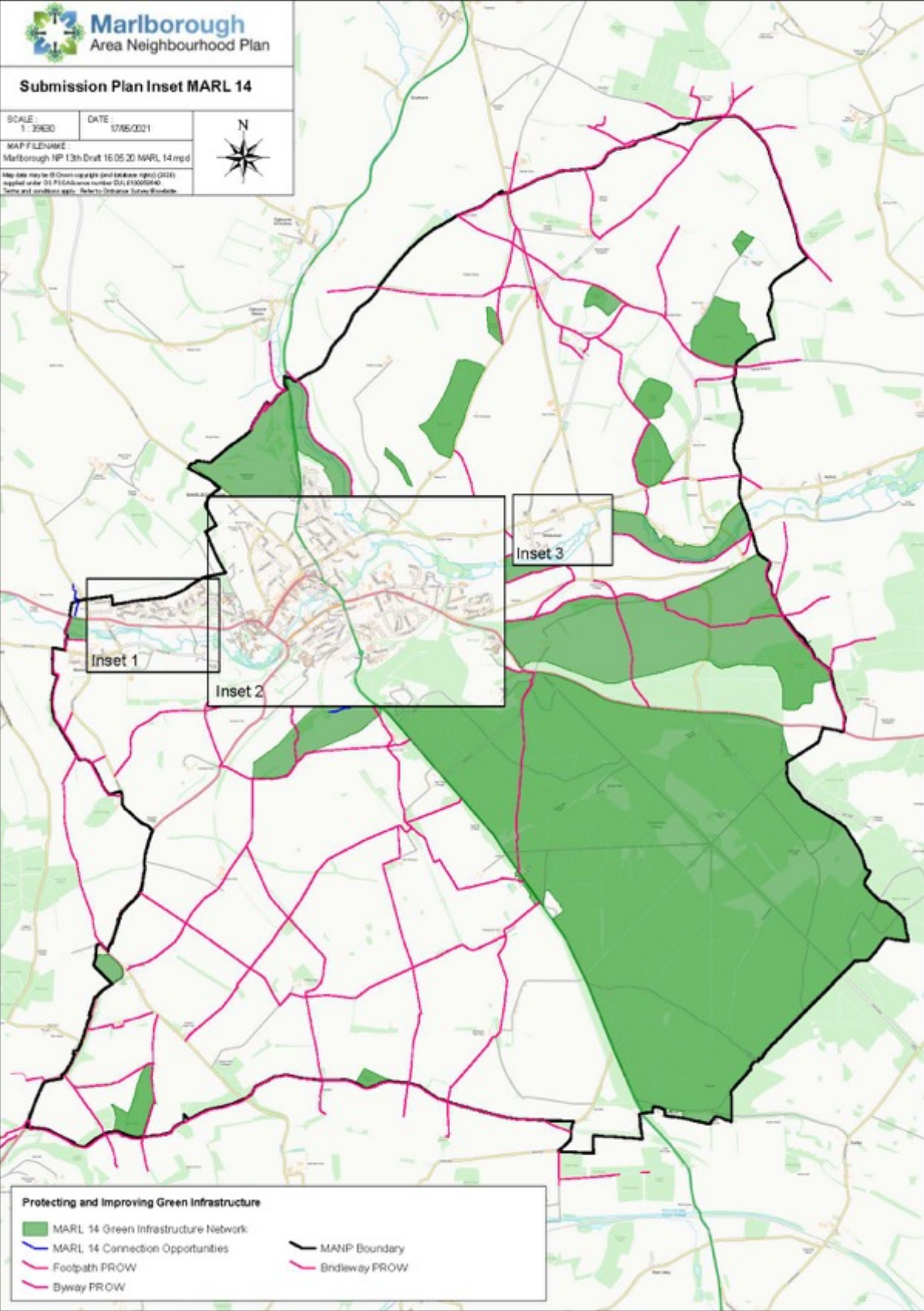
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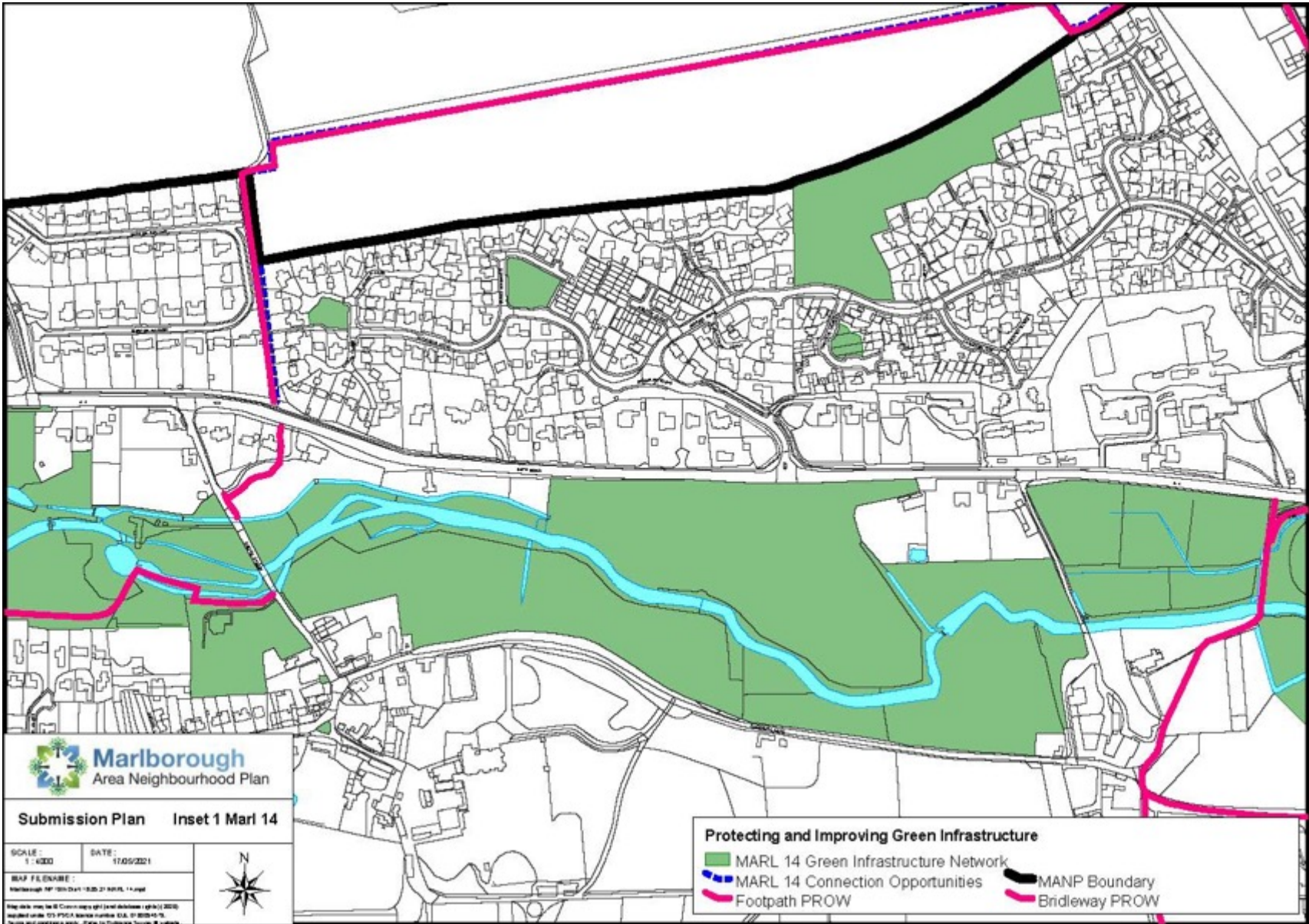
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Protecting and Improving Green Infrastructure

- MARL 14 Green Infrastructure Network
- MARL 14 Connection Opportunities
- Footpath PROW
- Bridleway PROW
- Byway PROW
- MANP Boundary



 **Marlborough**
Area Neighbourhood Plan

Submission Plan Inset 1 Marl 14

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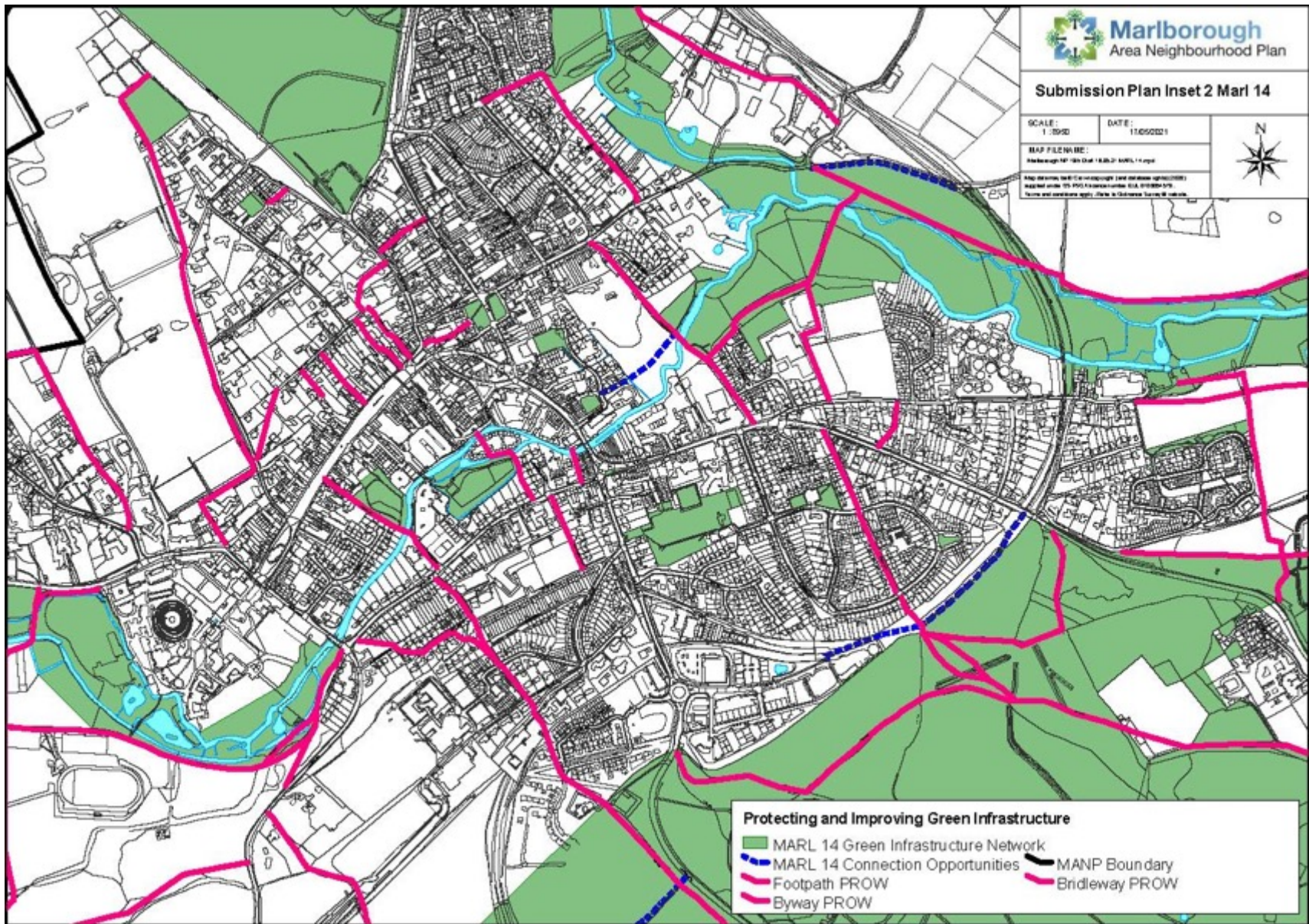


Protecting and Improving Green Infrastructure

- MARL 14 Green Infrastructure Network
- MARL 14 Connection Opportunities
- Footpath PROW
- MANP Boundary
- Bridleway PROW

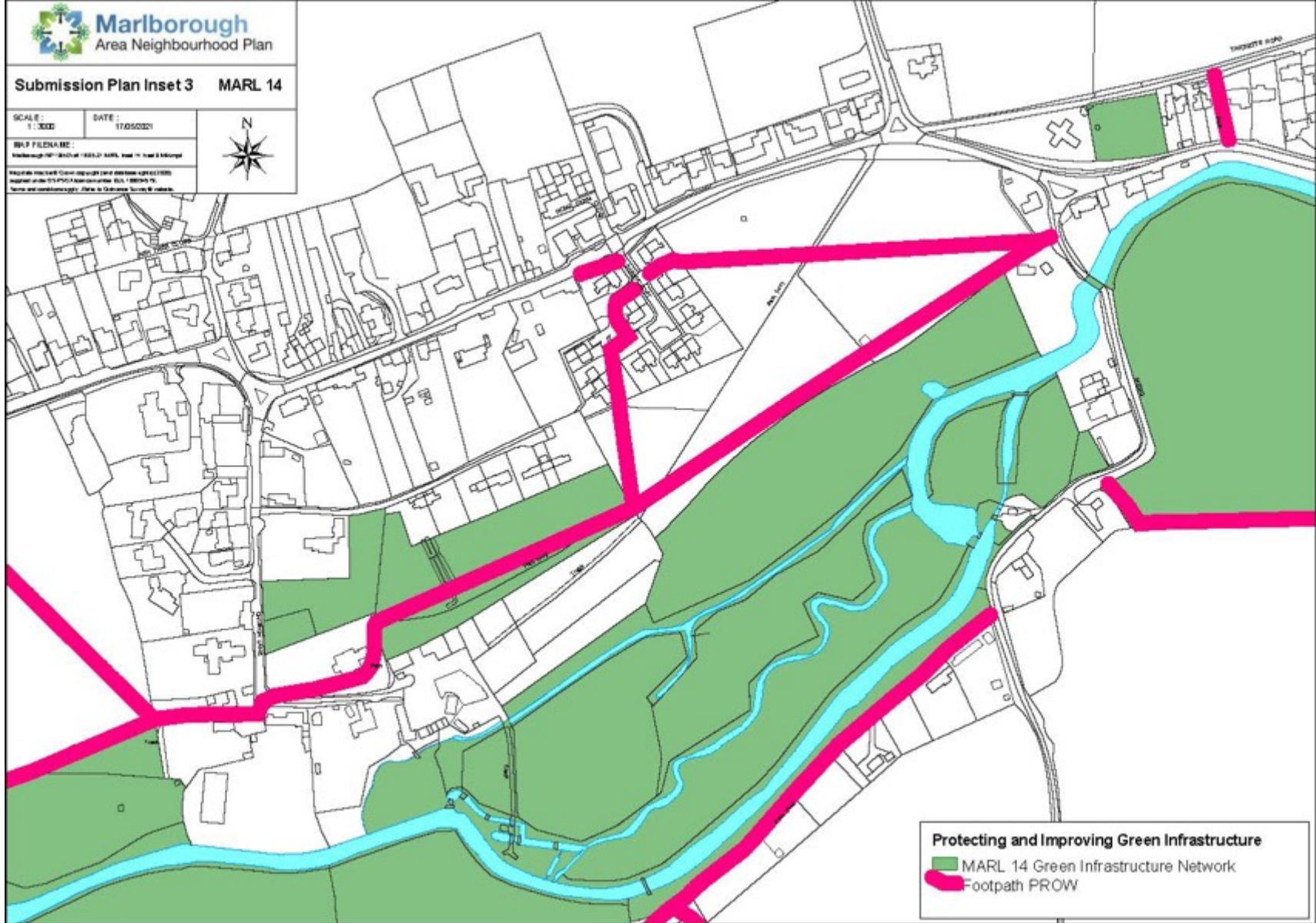
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Protecting and Improving Green Infrastructure

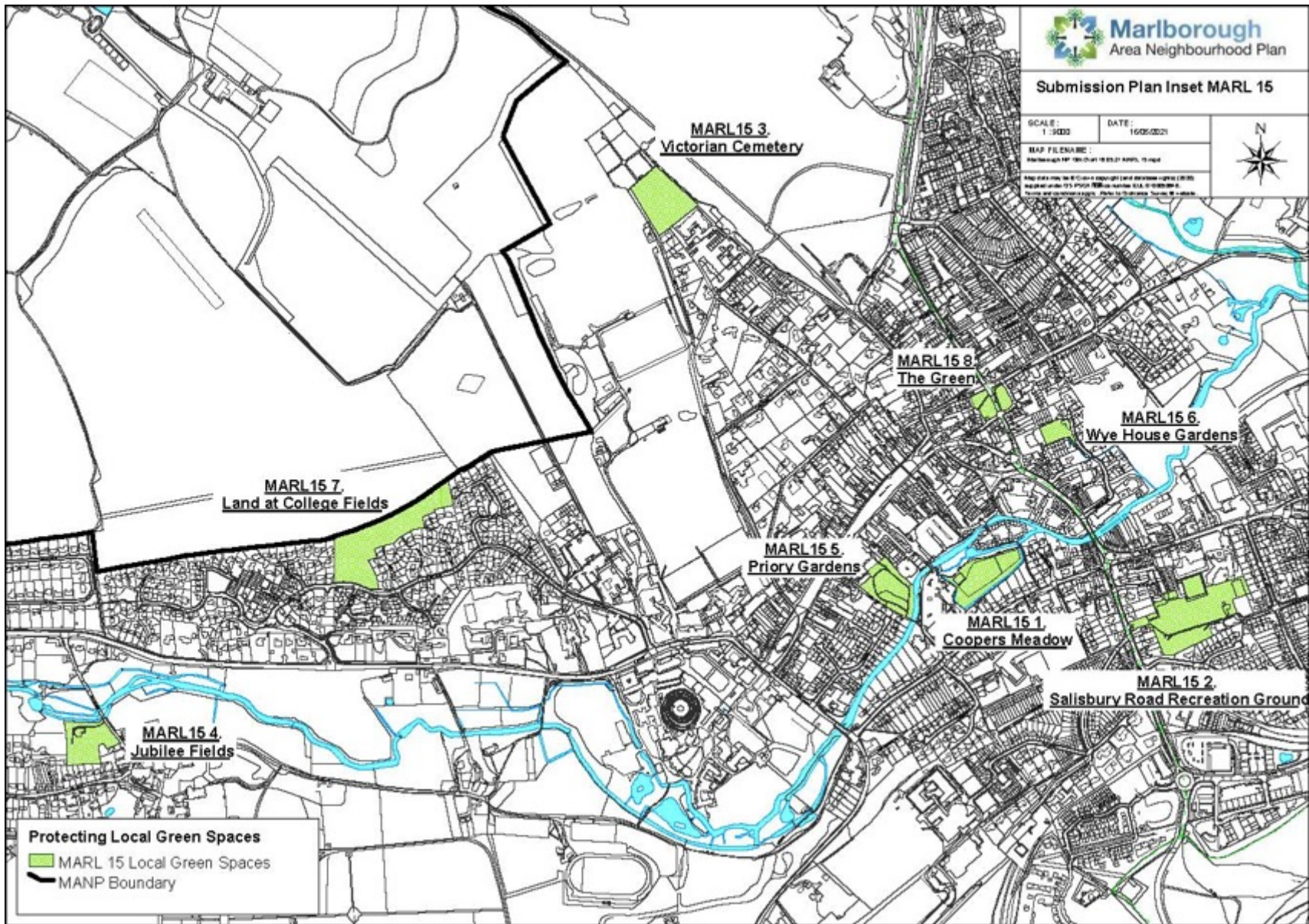
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- MARL 14 Connection Opportunities
- Footpath PROW
- Byway PROW
- MANP Boundary
- Bridleway PROW



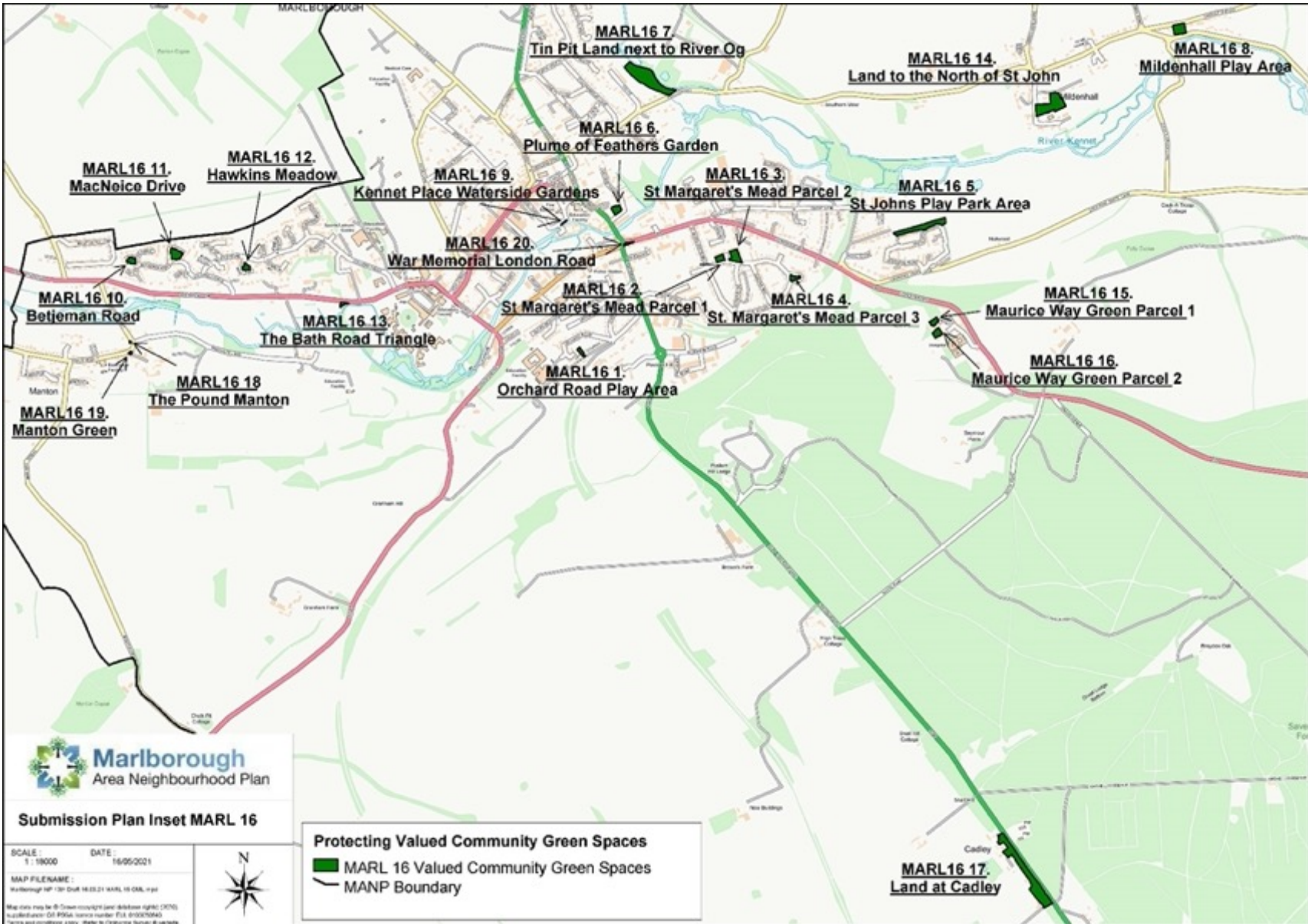
Protecting and Improving Green Infrastructure
 MARL 14 Green Infrastructure Network
 Footpath PROW

Submission Plan Inset MARL 15

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Protecting Local Green Spaces
■ MARL 15 Local Green Spaces
— MANP Boundary



Submission Plan Inset MARL 16

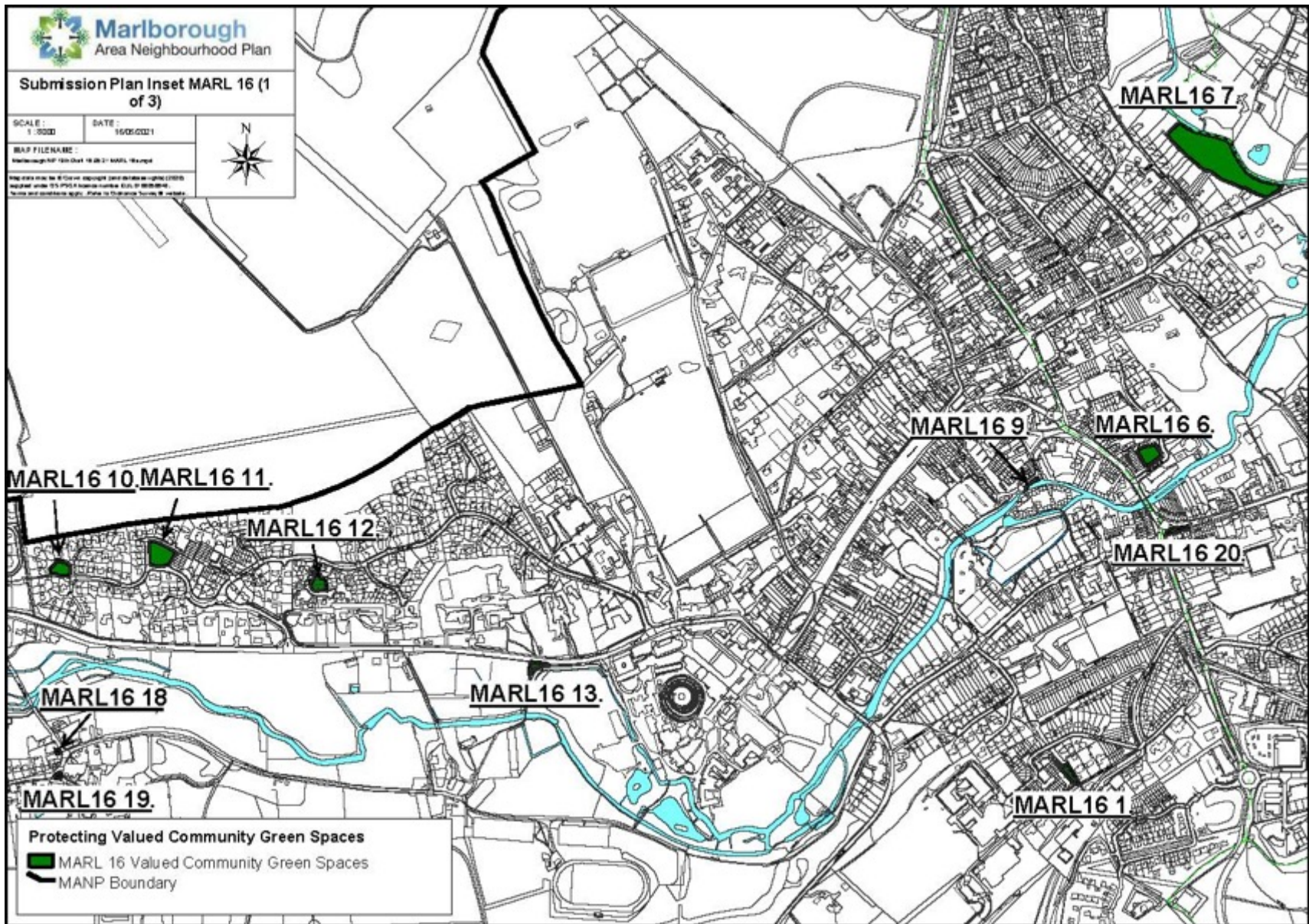
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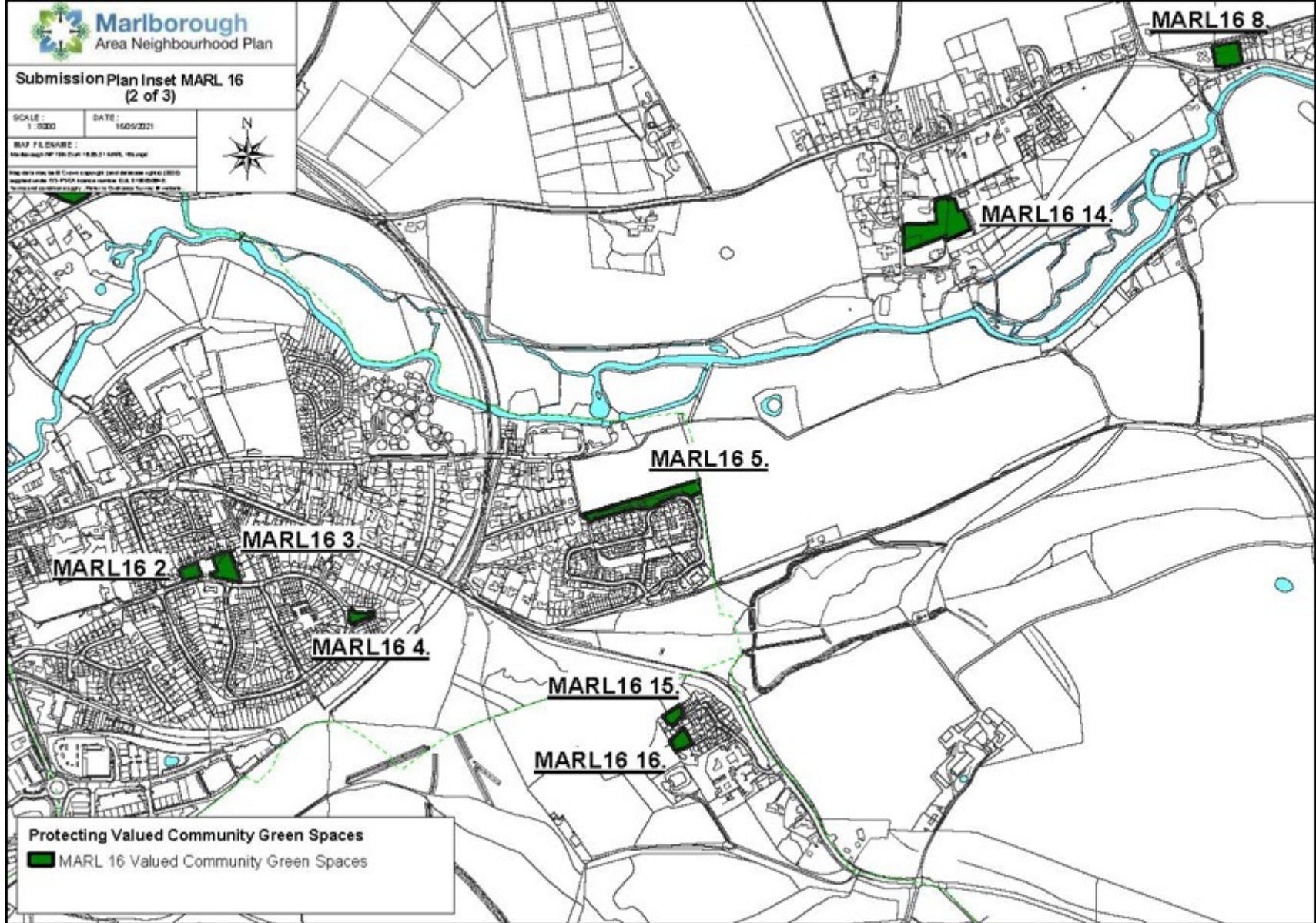


Protecting Valued Community Green Spaces

- MARL 16 Valued Community Green Spaces
- MANP Boundary



Protecting Valued Community Green Spaces
 MARL 16 Valued Community Green Spaces
 MANP Boundary

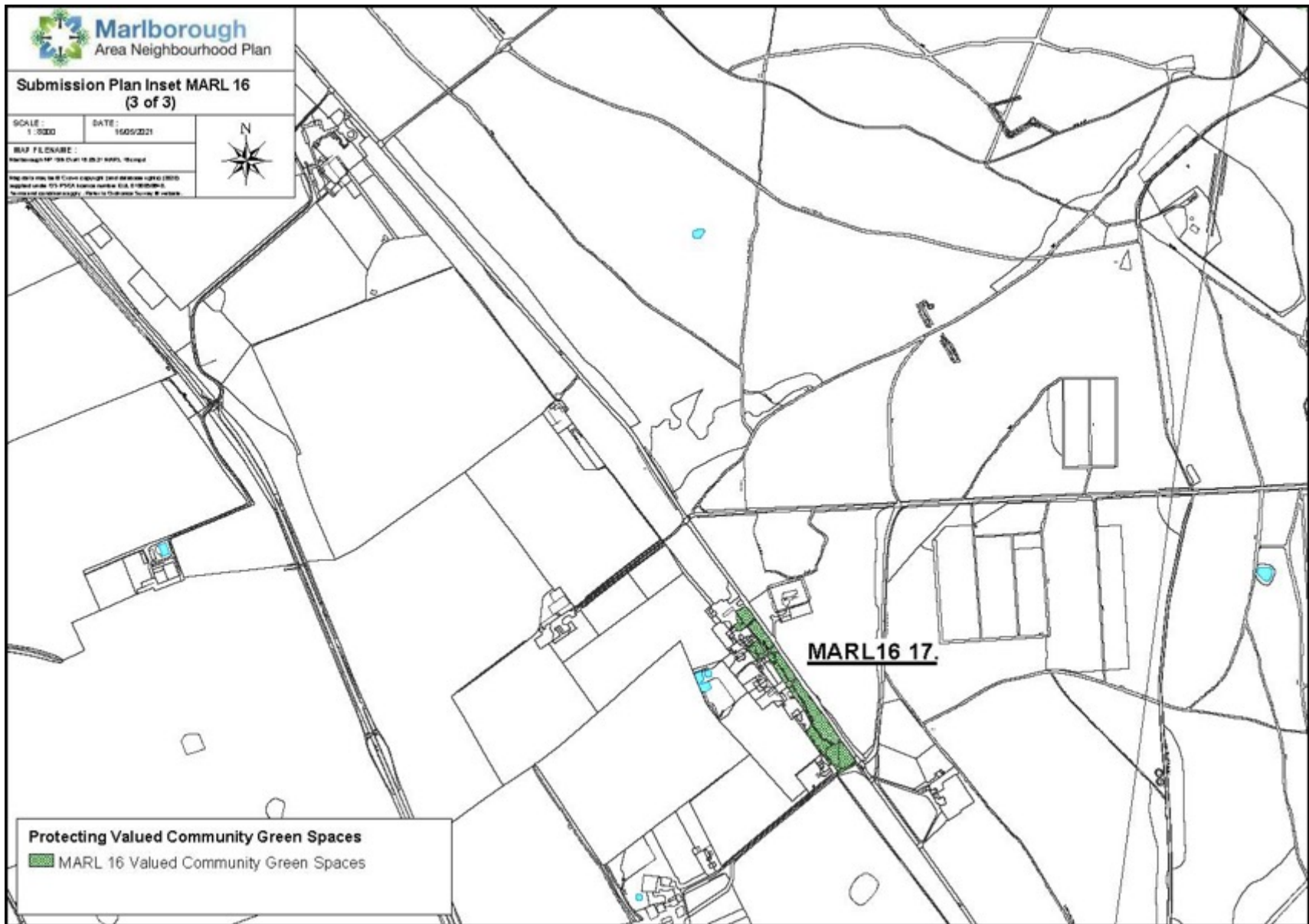


Submission Plan Inset MARL 16
(3 of 3)

SCALE: 1:2000 DATE: 16/05/2021

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Protecting Valued Community Green Spaces
■ MARL 16 Valued Community Green Spaces

APPENDIX A: SCHEDULE OF LOCAL HERITAGE ASSETS (POLICY MARL13)

The following schedule comprises the list of Local Heritage Assets for inclusion in Policy MARL13 that have been identified by the Marlborough Town Character Study 2021, the Manton & Mildenhall Design Study May 2021 and the Schedule of significant unlisted buildings for Savernake Parish. The specific local heritage value of each asset is defined in those reports.

Marlborough	<ul style="list-style-type: none"> • See Appendix A of the Marlborough Town Character Study
Manton	<ul style="list-style-type: none"> • The former Reading Room, Preshute Lane • The Village Hall, Preshute Lane • No.1 Preshute Lane • Peacock Cottage, Preshute Lane • 72 High Street • Manton Grange, High Street • Manton Weir Stables/West Lodge/Scrumpety Burrows • 66-67 High Street • 7-8 High Street • Former Up The Garden Path P.H., High Street • Preshute School • 58 High Street • 59 High Street • 1-2 School Lane • The Old Chapel, High Street • 50-54 High Street • 48 High Street • 24 and 26 High Street • East Lodge, London Road • Manton Corner, London Road
Mildenhall	<ul style="list-style-type: none"> • Clifton House and Honeysuckle Cottages on the main street • Nos. 48 – 51 on the main street • No. 42 on the main street • Glebelands Cottages on the main street • Nos. 27 – 29 on the main street • Home Farm on the main street • Corner Thatch and outbuilding, Woodlands Road • Barns to Kennett Cottage • The Cottage, Church Lane • Outbuildings at Rectory Garden House, Church Lane • Glebe House, Church Lane • Church Farm, Church Lane • The Knap, Werg/A4192 • The Old Forge/Old Forge Cottage, A4192 • Weavers, Cock-A-Troop Lane
Savernake	<ul style="list-style-type: none"> • The remaining original part of Savernake Hospital • Braydon Oak • Savernake Lodge • Traditional farm buildings at Browns Farm • New buildings at Browns Farm • High Trees House • Snail Hill Cottage

	<ul style="list-style-type: none"> • Traditional building at Cadley Garage • 27-31 Cadley • School House and Old School, Cadley • 36 Cadley • Traditional timber buildings at Kingstones Farm • Savernake Park Farmhouse • Hat Gate Cottages • Keepers Cottage, Culleys Farm • The Chapel at Clench Common • Old airfield huts at Overton Heath Farm • Old Hanger building at Levetts Farm • Levetts Farmhouse • Water Tower at Levetts Farm • Wernham Farmhouse
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APPENDIX B: SCHEDULE OF EVIDENCE

The list below contains all documents prepared, collected and reviewed in the process of preparing the Plan (all prepared by MANP unless otherwise indicated).

- Marlborough Area Neighbourhood Plan Site Assessments Report May 2021
- Final Sustainability Appraisal for the Marlborough Area Neighbourhood Plan, AECOM, June 2021
- Final Habitats Regulations Assessment Report, Wiltshire Council, August 2021
- Marlborough Area Neighbourhood Plan Supporting Statement on Housing Proposals, January 2021
- Marlborough Area Neighbourhood Plan Housing Needs and Requirements Study, Cobweb Consulting, May 2017
- Affordable Housing needs in Marlborough Area Neighbourhood plan, Cobweb Consultation, June 2020 update
- Retirement Housing Developments in Marlborough, June 2021
- Marlborough and the Parishes Business Survey, Cobweb Consulting, April 2017
- Marlborough Town Character Study, Sage Gray Architects Ltd, June 2021
- Marlborough Conservation Area Statement, Kennet District Council, June 2003
- Manton Conservation Area Statement, Kennet District Council, June 2003
- Mildenhall Conservation Area Statement, Kennet District Council, June 2004
- Manton & Mildenhall Design Study, May 2021
- Schedule of significant unlisted buildings for Savernake Parish, June 2021
- Marlborough Town Benchmarking Report, People and Places Ltd, January 2019
- Marlborough Neighbourhood Plan Car Parking Study, People and Places Ltd, September 2017
- Open Spaces in the MANP Area
- North Wessex Downs AONB Management Plan 2019 – 2024
- Wiltshire Core Strategy adopted January 2015 and evidence base
- Wiltshire Local Plan Review consultations and evidence base 2019/20