

From: [REDACTED]
Sent: 17 March 2022 13:59
To: [REDACTED]
Subject: RE: Examination of the Marlborough Neighbourhood Plan

Importance: High
Follow Up Flag: Follow up
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Dear [REDACTED]

Thank you for the opportunity to comment on the MANPs steering groups comments to the Examiners questions.

Apologies this isn't a detailed response, I am in the middle of a statement of case for an enforcement appeal.

The methodology of the site selection/allocation has not taken a landscape led approach in our professional opinion, but a housing led approach. Plans should first establish the sensitivity of the landscape to change in protected landscapes. The most sustainable sites are not always the most likely to suit development. The AONB unit recommended that landscape assessments be carried out at an early stage in the NP process when first approached by the MANP group. The AONB commissioned a sensitivity assessment previously for the Wiltshire Core Strategy and considered a number of sites being put forward within the MANP, we drew on this when considering the allocations and within our responses including the potential for development of a site on the eastern side of Marlborough included in early drafts of the MANP which was then rejected by the MANP before reg 14 stage.

Being within a Nationally protected landscape means we have to go above and beyond what is considered normal practice. Marlborough is part of the AONB, the primary purpose of which is to conserve and enhance the natural beauty of the AONB landscape. The MANP steering group have a duty of regard to this.

We understand the need for affordable housing, as an AONB we have pushed for affordable homes in the AONB including some rural exemption sites and working with Wiltshire's Community Land Trust. However in our professional opinion and as expressed in concerns to the MANP steering group, they cannot guarantee 40% affordable homes, as we have experienced too many times developers gain permission and then submit a cost assessment to demonstrate that they cannot meet the affordable housing quota and either the percentage of affordable homes is reduced or more market housing is approved. Exception sites or a community land trust initiative would be a more supportive approach to meeting the need for affordable homes in the area. The AONBs role is to ensure that development within the AONB is appropriate and is the right development in the right place, unfortunately that is

not the case with some of the site put forward within the MANP and this is reflected in our comments to this and the Wiltshire local plan review.

MARL1 – Land rear of Salisbury Road

The AONB unit would disagree with the MANP Steering group that the site is of the same characteristics as that of the current Salisbury road allocation (an allocation which demonstrates how indicative plans at outline stage are nothing like what gets developed). Wiltshire LPA were in agreement with our assessment of the site and its detached character from the wider valley and Marlborough itself. Mitigation measures are being used to justify the allocation which is not the right method to follow, mitigation should be used as away to conserve and enhance a site and not to hide/screen it. This site is of value and goes beyond that of mere countryside.

MARL 18 – Dark skies

The AONB encouraged the MANP steering group to address lighting and dark skies in the MANP in our first response to the draft document and worked with the MANP to develop a policy that was clear and had a set vision. Marlborough is one of the worst areas for light pollution in the AONB, some of this will be improved as Wiltshire Council move through the county upgrading street lights which significantly reduces upward light spill. However more needs to be done to raise awareness of dark skies, a special quality of the AONB and to ensure that any lighting considered within future developments are necessary and essential. We have produced a dark skies position statement and a good lighting guide which demonstrates how to position lights and what type and intensity (Kelvins and LUX) are appropriate for the protected landscape.

I hope this aids in the examiners considerations of the MANP and if you require more from us please do not hesitate to contact me.

Kind regards



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Units 3 and 4

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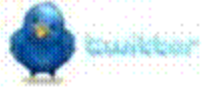
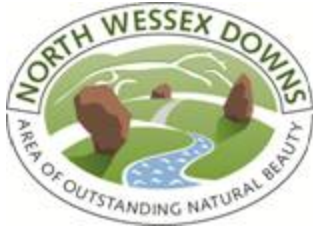
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