

Page 5 – Policy Contents – MARL10 & MARL11 are on Page 36, not page 35.

### **MARL10: Enhancing Marlborough Conservation Area**

Perhaps prefix the Marlborough Conservation Area Statement with ‘adopted’.

**5.33** – perhaps consider rewording this slightly to future proof the wording if/when the 2003 document is updated, for example: ‘... *contained in the adopted Conservation Area Statement (2003, or as updated) and supplemented by the 2020 Marlborough Townscape Study.*’

The current conservation area statement was not adopted by Wiltshire Council, it was adopted under the previous authority Kennet District Council, now part of Wiltshire Council, a unitary authority. Despite this change, the document remains valid supplementary planning guidance.

### **Marlborough Town Character Study (MTCS)**

Overall, this is a thorough document that to identify character areas of Marlborough that are in addition to the adopted Conservation Area. As it states, it is a supplementary document to the NHP policy but cannot supplement the adopted CA statement as a whole, as the majority of the areas covered are not within the conservation area. However I think this is clearly understood and acknowledged, as is the desire that one day the conservation area boundary could be extended to include some of these key areas. I would suggest that there is some kind of formal monitoring of change in these key areas on a regular basis so that their quality of character and appearance is recorded to support the classification of these areas as those of special quality, although this would of course be resource dependent. This cannot prevent development, but will assist in the longer term by identifying extra protection measures, if these are considered necessary.

**2.24** – ‘principle’ view? Principal.

### **Locally listed buildings**

**2.38** – ‘Arcades’ are generally referred to as ‘pent roofs’ in Marlborough, rather than as arcades. The posts/bases to No.130 is not historic, but the importance of the pent roofs to the Marlborough streetscape character is emphasised in the adopted CA statement.

No.102/103 High Street – currently Boots the Chemist – the modern shop front has a neutral impact on the streetscene however I disagree with the assessment that the upper floors have a neutral value – I consider this building to have positive impact on the streetscene, being a good example of an early 20<sup>th</sup> century building, similar in style to the grade II listed No.100 a few doors down. In fact, this ‘neutral’ assessment here seems to contradict the findings in Appendix A with regard to this building.

N.B. No.25 High Street is grade II listed building was listed in 1974 however the original building was demolished in 1978 and subsequent changes, including replacement with a new building (approved in 2000). The fact that the building still appears as listed appears to be an anomaly, as the building has not been removed from the statutory list and it should be.

**3.5** The ‘Vernacular revival’ is a more umbrella term for this revival style (as used in the list description of Upper Cross, Clement’s Meadow etc), although the use of the word ‘English’ tends to refer to the US version of the revival.

**3.20/3.22** I am concerned over the expectations of the ASQs vs the Conservation Area status – dwellings that are not listed benefit from permitted development rights, many of which are not controlled by the siting of a property within a conservation area – additional protection measures to preserve details such as windows and doors would require the creation of an Article 4(2) Direction,

and there is not an A4(2)D in Marlborough – many of the buildings are listed, or are flats or businesses that do not have the same rights. Simply by extending the CA boundary would not guarantee extra protections to dwelling houses.

**5.5** – Spelling of ‘Dene’...

**5.13** – again the reference to the ‘2003’ statement. I would suggest being so specific as to the precise edition in circulation and refer to the CA statement ‘as adopted’, to future proof the document from any subsequent updates to the current appraisal.

**5.14 A** – 3<sup>rd</sup> bullet point – driveways – the use of tarmac/hard surfaces may be difficult to control due to permitted development rights.

**B** – 2<sup>nd</sup> bullet point – ‘stories’ = US plural; storeys = UK plural

**E** – 5<sup>th</sup> bullet point – ‘rom’?

**5.19** – local green space designation – the importance of these green spaces is already known and protected by their inclusion within the Conservation Area and forming the setting to many listed buildings. I do not consider extra designation would allow them any additional protection to what they already have. Obviously there is the opportunity to stress their importance in addition to that already contained within the adopted CA statement.

**5.21** – the Conservation Area is probably due a review considering the last one was in 2003, however limits in resources have affected any potential for this work to be undertaken but it is something that should be addressed.

#### **MARL11 – Enhancing Marlborough Areas of Special Quality**

Cross reference with previous comments on the MTCS, as comments are relevant to this Policy.

Generally the bullet points for each identified AoSQ are clear and concise and what is said is sound assessment and advice for these areas. Some items, such as hedges and surface treatments might not fall within planning control, but identification of these elements that contribute to overall character is important.

**E** – Salisbury Rd/London Rd – St Margaret’s Cottages (sometimes incorrectly referred to as ‘Close’) – their official address is George Lane.

#### **MARL12 – Enhancing Manton Conservation Area**

It is clear that the majority of the points have derived from the adopted CA statement and therefore the advice is generally sound and does not deviate from this supplementary guidance.

I am concerned that some of this is worded in a way that could conflict with the outline of identified elements of materials and character that are clearly stated within the adopted Conservation Area Statement – for example, yes, there is the use of slate on some roof coverings, but to refer to it as ‘common’ along with the use of the more predominant and historic plain clay tile (and more historic thatch) is confusing and blurring the lines of the advice contained within the adopted statement. This section does really need some careful reconsideration and rewording so that it does not conflict or contradict with the CA statement. Slate was introduced with the advent of the railway, but it is not (or should not be seen as just as ‘common’ as the two other roofing materials. The same goes for the use of ‘common’ in reference to dormer windows.

The repetition of this information, and in some cases incorrectly done so, seems unnecessary as these materials are adequately covered within the adopted CA statement.

**5.39** – reference to the Marlborough Design Study – I have not seen this report. I commented below (5.44) about this perhaps being an error, and should be ‘Character Study’, but Manton is not referenced within the Character Study and the statement here that the 2003 statement has been reviewed as part of the ‘MANP Design Study’ is confusing.

#### **MARL13 – Enhancing Mildenhall Conservation Area**

As with MARL12 above, it is clear that the majority of the points have derived from the adopted CA statement and therefore the advice is generally sound and does not deviate from this supplementary guidance.

Again, the ‘common’ use of natural slate should be played down.

Correction – 7<sup>th</sup> bullet point, 9<sup>th</sup> point down – use of thatch on rectilinear ‘plan’ forms, not ‘plane’ forms.

**5.41** Again the use of the ‘Design Study’, as commented above. Mildenhall is not referenced within the Character Study, so that statement here that the 2004 statement has been reviewed as part of the ‘MANP Design Study’ is confusing.

#### **MARL14 (A & B) – Protecting local heritage assets**

**A)** – references Appendix A as being the list of local lists, is Appendix B (Key Passageways) also included?

**5.44** – The Council’s desire to adopt a local list has unfortunately been restricted to date due to resources, so this attempt to address this is welcomed. However there are errors within the list either in numbering/address point or identification – these have been addressed in the section below, so the document does require some editing/correction before making this document final. Some of the entries put forward are also questionable candidates, again these are questioned below. The comprehensive list does not include heritage assets in Manton/Preshute or Mildenhall – is this because the CA statements are considered to be sufficient in this case from the NHP perspective? This is a little confusing, as it is stated that ‘each building and structure is described in the separate MANP Design Study’ – this implies that the list includes all of the buildings/structures, not just those within Marlborough. Also it mentions a ‘Design Study’ – is this an error and should this be the ‘Character Study’?

#### **APPENDIX A – local heritage assets**

Firstly, my main concern is the number of errors contained within this appendix, mostly of mis-identified numbers/buildings amongst a few other anomalies or omissions. I have been through all of the addresses listed and identified these errors (some are from the original statement), but it really does need to be re-checked and amended accordingly.

Cross-referencing these buildings on a map would be extremely beneficial, especially if/when buildings change names – purely for ease of identification, similar to the mapping given to listed buildings. I appreciate this is another large undertaking, but some of the addresses are not easy to identify and a map would aid clarity.

Also, I note that most of the buildings identified as significant unlisted buildings in the adopted CA statement are listed as local list buildings in the appendix, however there are some significant

buildings that have not been carried over into the appendix, for example, the significant unlisted buildings within the Marlborough College complex of buildings, that are identified in the adopted statement are not contained within the list. I understand and have seen the relevant section commenting on those that are proposed for removal if/when the 2003 statement is reviewed, but I have found some anomalies in my review of this document. I assume that this document is supposed to be a complete/definitive list of buildings considered worthy of local list status rather than having to cross reference the two documents? The former would certainly make for a more

Some of the buildings identified within the Appendix would be curtilage listed and therefore do not need to be identified as heritage assets.

My concern is that in some areas, the list of buildings seems to contain practically every historic building that survives that is not already listed, especially those along George Lane. Some of the buildings along George Lane, although nice solid historic buildings, should not be classed as heritage assets in my opinion.

N.B.: CA is shorthand for Conservation Area. CAS is shorthand for Conservation Area Statement (2003). HA is shorthand for 'heritage asset'. I have also not listed those that are accepted or as already identified in the CAS, unless there is an error, so it is accepted that these are agreed or are correct in detail: this is purely to keep my comments concise.

Cardigan Road – outside of CA. Agree all are of Heritage Asset quality/interest

- Upper Cross and Lodge – Lodge is known as 'Holly Lodge' = Agree HAs
- Red House = Agree HA
- White House = Agree HA

College Fields – Barton Farm – surviving historic buildings tend to be curtilage listed with the grade II farmhouse.

The Common – Not CA yet part of the Common is a Scheduled Monument.

- Highfield; Lukes; Thorn Hanger: Agree all HAs

Elcot Road – Railway Bridge = Agree HA

Figgins Lane:

- Nos 1&2 are in the CAS.
- Nos 9 – 12 (inc) are in CA but not in CAS, but agree that despite the alterations, are HAS

Garden End – not in CA, but agree that Beechcroft and Edison House are HAs.

George Lane:

- Police wall and Nos. 9 & 10 walls – this needs clearer wording, as the Police station and no. 9/10 are modern buildings, but historic boundary walls survive.
- 2<sup>nd</sup> box down – house numbers need checking, as there seem to be errors here.
- Nos. 12-19 George Lane are decent turn of the 20<sup>th</sup> century semi-detached houses, but are not worthy of local listing status.
- No.20 is a mid-20<sup>th</sup> century bungalow and not worthy of inclusion.
- Nos. 21 to 26, 'St Michael's Cottages', are worthy of local listing, due to their aesthetic and historical value, due to their association with Marlborough College.
- Nos. 26 A & B – c.1970s semis, not worthy of inclusion.

- No. 27 – appears to be a pre-fabricated bungalow, not worthy of inclusion.
- Nos. 28-35 – Late Victorian/early 20<sup>th</sup> century semis – these are decent houses, but are ubiquitous and not worthy of inclusion on a local list – many examples of this type of house survive nationally and are not unique to Marlborough.
- Nos. 36 – 39 – a mix of Edwardian/mid 20<sup>th</sup> century houses and bungalows, not worthy of local list status. Reason as above.
- St Margaret's Cottages – agree worthy of inclusion, in two rows: Nos. 1 – 6 & 7 – 10.
- St Thomas More's Catholic Church – there is no mention of this church – I would expect this ecclesiastical building to be worthy of inclusion on a local list.

Herd Street – agree that No. 34A should be removed from the 2003 CAS.

High Street – North side

- No.139 – Grade II listed building (with No. 140), which dates from the 16/17<sup>th</sup> century. The description in Appendix A appears to be for Nos. 134/135, but this is also a grade II listed building dating from the 18<sup>th</sup> century.
- No. 130 } Identified in CAS Significant visual impact but of little historic value as both
- No.128/129 } are later 20<sup>th</sup> C replacements. No. 128/129 appears to have reused columns.
- No.125 – Lloyds Bank – this is definitely an HA in the CAS, but missing from the list.
- No.111 The Royal Oak – another missing building.
- No.108A – replaced a single storey unit – approved in 1985, not 21<sup>st</sup> Century.
- No.103 (LH column) – No.103 is actually Boots the Chemist – I think this is a number/labelling error and should be No.105, as that is a group with Nos. 104 & 106.
- Nos. 104, 102/103, 101 and 92 are as identified in CAS as HAs.

High Street – South side

- Angel Yard – remains of an industrial building, understood to still in commercial use. Historic and of some interest but worthy as an HA is debateable due to the alterations it has sustained.
- Nos.21/22 – As CAS.
- Nos.23/24 – As CAS.
- No.30 – GII listed.
- Nos. 31-34 – GII listed in 1949, description updated in 1974, however replacement approved in 1976/77 – needs removing from statutory list.
- Nos. 40-41 – As CAS.
- No.42 – should be included.

Hyde Lane – not in CA

- Westalls; Summerfield (former boarding house to Marlborough College); May Hill; agree all HAs.
- 'L' shaped house – map location required to confirm – I do not know which building this is.

Kingsbury Street:

This list of buildings includes ones that are further south on The Parade and New Road, rather than being on Kingsbury Street – perhaps this is an error in editing, but their inclusion on the Kingsbury Street list is confusing.

- No.27 is the public house, not 27A.

- Nos. 37, 37A, 12 and 13 are as within the CAS.
- Kingsbury Square – houses to east are missed off.

The Parade (addresses listed under Kingsbury Street):

- No.18 is GII listed.
- The Lamb Inn = as in CAS
- Cross Keys Inn = as in CAS
- United Reform Church & Coach House to rear – unclear of exact history, as on the historic maps, this building is identified as the Sunday School associated with the Congregational Chapel, GII listed.
- Coach house to rear of Pagoda – unclear which building this is. Needs clarification.

Leaze Road – unable to check any of these due to the Council's COVID 19 restrictions on visiting site, and access is not possible via Google maps/streetview.

London Road:

- No.48 – confirm as Pembroke House?
- Elcot Cottage – perhaps too altered to be considered an HA
- Nos. 83, 78, 79 & 76 (Glenthorne Cottage) – I think there is a numbering issue here, as it is unclear exactly which properties are meant to be included. There are quite a few decent late 19<sup>th</sup>/early 20<sup>th</sup> century houses along here, but they are not necessarily exceptional enough to be classed as HAs.
- Waggon Yard – this is located off London Road but its address point is London Road, so it is a little confusing that it isn't listed under London Road as opposed to being given its own entry within the list.
- Bridge over River Kennet – this is highlighted as being a significant unlisted structure within the adopted statement but it appears to be a modern replacement.

New Road:

- Nos 7 & 8 should perhaps be considered for inclusion, despite the poor shop fronts/signage and replacement windows.
- Outbuildings to the rear of The Parade – many of these are already considered to be curtilage listed (No.11 New Rd is curtilage to Nos. 1&2 The Parade; those to rear of Nos. 3 and 4 The Parade are also curtilage listed).

Railway Bridges

- High Bridge and Tumbledown – unsure of locations.

St John's Close – not CA, but agree to HA status.

Salisbury Road:

- Nos.22-33 'London Road' – these have the wrong name/address – they are Nos. 22-33 Salisbury Road. Nos. 25-24 London Road are Grade II listed. Needs correcting to avoid confusion.
- 'Nos. 18-5' – the row is actually numbered from 5 to 16 (inc) – an historic row, all altered, especially with replacement windows. Nos. 5-8 are now rendered. Nos.13-12 are higher status cottages than Nos. 4-12.

Tin Pit Lane – the whole historic row also includes Nos. 10 and 11, and is known as ‘Poulton Cottages’.

Waggon Yard – see London Road

Anomalies:

- Nos.19-20 High Street are shown as listed on the adopted CAS map – the arch/carriage entrance forms part of these GII listed buildings but it is shown as blue on the adopted map as a ‘yard entry’ on the map’s key.
- No. 111 – along with No.110 – both are listed – map error noted.

The significant unlisted buildings that are within the Marlborough College complex of buildings have not been included.

## **APPENDIX B – Key Passageways**

It is agreed that the historic passageways (including lanes/yards) are adequately covered in the adopted CAS, and therefore this seems like a repetition of information, unless it is being used to formally identify any of these are HAs for a ‘local list’. However many of these yards and lanes are accessed via archways that are part of listed buildings.

### **High Street – South side**

- Ailesbury Court arch – GII listed
- Angel Yard arch – part of Nos. 8 & 9 High St, GII listed.
- Alma Place arch – part of GII listed No. 12 High St
- Figgin’s Lane – part of public highway
- High St to The Priory – as per the CAS
- Hilliers Yard – as per the CAS
- Polly Tea Rooms – not within the CAS – this does not appear to be an historic ‘yard’ to a former coaching inn (or similar) but rather an outside area with its resulting shape due to the burgrave plot development that has defined a lot of the character of Marlborough’s High Street.
- Riding School Yard – access via archway, part of GII listed No.17 (now Waitrose). No.3 Riding School Yard is a GII listed building.
- Wellington Place – forms curtilage/outside garden space to GII listed former Ivy House Hotel, now in private ownership.

### **High Street – North side**

- Bernard’s Court – as per CAS
- The Castle and Ball Hotel – GII listed building, inc archway. Private car park.
- Chandlers Yard – access GII listed to No.136
- Chantry Lane – as per CAS
- Hughenden Yard – as per CAS – through access to Hyde Lane car park
- Nos.104/105 & 106/107 – appears to be an error in the original CAS, as the other access to Hughenden Yard is via an archway access forming part of GII listed No.106.
- Hyde Lane – as per CAS
- Ironmonger Lane – access is via archway that forms part of GII listed (former) Midland Bank.
- Macklins Court – as per CAS
- Militia Court – as CAS – accessed off Chantry Lane

- Neate's Yard – access via archway to GII No.121
- Penny 'Yard' – error – Penny 'Lane' – access via GII listed Nos. 122-124
- Russell Square – access via GII listed No.105 (listed with Nos. 104-106).
- St Peter's Terrace – access via GII listed No.80 (error in CAS)
- Smith's Yard – as CAS

#### Churchyard/The Green/Barn Street/The Parade

- Patten Alley - as per CAS
- Perrin's Hill – description unclear, as this is the pedestrian area to the rear of the Town Hall from Kingsbury Street to the High Street, not exactly The Parade.
- Wye House – at one time, this was the former residence of local architect C. E. Ponting – GII listed and within the CA.

#### London Road

- Five Alls Court – GII listed buildings within CA
- No.1 London Rd/ No.12 Barn Street – this is formerly known as 'Wye Lane'
- 'Wagon Court' – this is actually 'Waggon Yard'

#### Kingsbury Street

- Footpath to west – this has a GII listed wall forming part of one boundary
- Kingsbury Square – GII listed buildings within CA, also contains HAs
- Kingsbury Terrace – GII listed buildings within CA
- Stonebridge Lane – Error in location, as nowhere near Kingsbury Street!