



Historic England

Marlborough Area Neighbourhood Plan (MANP)  
c/o Marlborough Town Council  
Council Offices  
5 High Street  
Marlborough  
Wiltshire, SN8 1AA

Our ref: PL00599413  
Your ref:  
Telephone 0117 975 0680

8<sup>th</sup> March 2021

FAO Shelley Parker, Town Clerk and Secretary to MANP

Marlborough Area Neighbourhood Plan: Regulation 14 Pre-Submission consultation

Thank you for your email dated 25<sup>th</sup> January 2021 consulting us on the Pre-Submission version of the Marlborough Area Neighbourhood Plan.

We very much appreciate the opportunity to familiarise ourselves with the Plan and identify those aspects of its proposed policy coverage with which we are likely to have an interest. Our attention tends to focus mainly on those policies advocating site allocations as it is these which, if not informed by appropriate evidence, can have an inadvertent and harmful impact on the historic environment.

For this reason we take the opportunity to highlight at the earliest opportunity our guidance on such matters as, respectively, site allocations, the setting of heritage assets, the SEA process, and Neighbourhood Plans more generally. We note from our records that we did so in our response to the SEA/SAScoping consultation from AECOM in September 2019, and more recently in a revised SEA Screening consultation from Wiltshire Council at the beginning of this year.

By following this guidance Plans are best able to produce an evidence base which identifies relevant heritage assets and demonstrates an understanding of their heritage significance, especially their setting. This can then help inform the site evaluation process in accordance with statutory SEA guidance and ensure that the eventual Plan and SEA Environmental Report or Sustainability Appraisal can demonstrate conformity with overarching policy within the National Planning Policy Framework (NPPF) and Local Plan for the protection and enhancement of the historic environment.



Historic England, 1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ  
Telephone 0117 975 1308  
HistoricEngland.org.uk



Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.

On this basis our main interest is policy MARL1 which allocates residential development across 5 sites. While other policies also advocate site allocations these tend to be brownfield sites with broad redevelopment criteria. MARL1 in contrast embraces some greenfield sites and proposes specific quanta of development.

We can summarise our observations as follows:

1. Identifying relevant sites could be made easier through the use of consistent referencing within relevant documents. For example, Site 1 in MARL1 – Land off Elcot Lane - is referred to originally as site 1A then site A in the Site Assessment Report, but then as site 1 in the SA
2. We note the referencing within the AECOM December 2020 Sustainability Appraisal (SA) to our guidance above (p8) but can find no indication of its application in the assessment of the proposed sites, either within the SA or in related evidence documents such as the Site Assessment Report also dated December 2020. This makes it difficult to determine how relevant historic environment considerations have featured in the site assessment process – including the consideration of alternative options - and to confirm that the conclusions are adequately informed.
3. This is important when adverse effects have been identified as the nature and extent of those effects affects in turn the outcome of the SA process. Equally, where no effects on heritage assets have been identified it is important to be sure that this is actually the case.
4. The SA bases its assessment mainly on the Site Assessment Report. That Report (p8) identifies “likely adverse effect” on the historic environment for two of the sites prior to determining mitigation measures. However, a similar table in the SA (p11) qualifies this status to “without mitigation” which risks creating the inference that the sites can be satisfactorily delivered through the process of mitigation though the basis for the addition of the qualification - or that mitigation in itself in whatever form would be sufficient - is unclear.

In terms of more detailed consideration of the 5 sites in question:

5. Site 1: Land off Elcot Lane. This proposes 50 homes and requires the layout and form of housing to be designed in such a way as to sustain and enhance the setting of Elcot Mill House and Elcot Mill Stables heritage assets. The Site Assessment Report (p22) identifies the site as lying within the setting of listed buildings but does not define their significance or the contribution to it made by their setting. The SA (p87) elaborates by referring to the assets as Grade II Listed Buildings within 50m of the site and confirms the potential of development to adversely impact on the setting of these important features, notably affecting views to and from them.

There appears to be no evidence to indicate how the setting of the heritage assets in question has informed the in-principle suitability of the site for development or that it



is capable of delivering the quantum of housing in question as per the requirements of the policy without causing harm. There is no indication of how it has been determined that mitigation is appropriate rather than the avoidance or minimisation of harm in accordance with the provisions of the NPPF, or the form that mitigation should assume in order that impact on the heritage assets is reduced to an acceptable degree. For example, it is possible that evidence might suggest that development should be set further back from the assets and in doing so reduce the number of housing units the site can accommodate. With no indication of the methodology used to identify heritage assets it is possible that there may be others which should be considered.

6. Site 2: Rear of Salisbury Road. This proposes approx. 50 homes. The Site Assessment Report (p34) states that the site does not lie within “close proximate” to heritage assets but there are no details to support how this conclusion has been arrived at. This view is echoed by the SA(p94), again with no substantiation. As our guidance on Setting indicates, proximity cannot in itself automatically be deemed an accurate indication of setting or potential for impact upon it.
7. Site 3: Land at Barton Dene. This proposes approx. 40 homes and development is required to sustain and enhance the setting of Barton Farm House and Barton Farm Stables. The Site Assessment Report (p40) states that the entrance to the site lies within the setting of a listed building but doesn’t identify it. The SA(p96) identifies the site as being in close proximity to Marlborough Conservation Area, and being located 50m from the Grade II Listed Barton Farm Stables. The potential for development to impact on the settings of these important features is confirmed, notably affecting views to and from them, with adverse effect predicted notwithstanding the potential for screening from existing vegetation and infrastructure.

We would take this opportunity to highlight the advice in our Setting guidance that intervisibility or intermediate screening are not in themselves automatic or sole definitions of setting or means of avoiding harmful impacts upon it.

As with point 5. above, there appears to be no evidence to substantiate the site’s ability to deliver the quantum of development proposed without causing harm to heritage assets. In the absence of information on the methodology employed it is not clear whether there are other heritage assets whose setting should be taken account of.

8. Site 4: Land off Cherry Orchard. This proposes up to 30 homes. The Site Assessment Report (p49) states that there are no heritage assets in close proximity to the site, a view echoed by the SA. Our comments are as per point 6. above.
9. Site 5: Land at Kelham Gardens. This proposes approx. 10 homes. The Site Assessment Report (p81) states that the site is not within the setting of heritage assets but does not substantiate this assertion. The SA(p102) identifies the site as lying approximately 60m north of the Marlborough Conservation Area and confirms that development has the potential to impact upon the setting of this heritage feature.



The SA also refers to the site's brownfield status and that high quality design standards could maintain and enhance the Conservation Area's special qualities, distinctiveness and setting. While this may be true there is no indication of how the setting of the Conservation Area has been understood to be able to confirm that the quantum of development in question can be delivered and still achieve that objective.

Overall, we consider it worth drawing attention to the summary of the SA on page ix. It highlights the potential for adverse impacts on the setting of heritage assets arising from the Plan but asserts that sensitive design and layout are likely to minimise the significance of any negative residual effects, but that this is uncertain at this stage. This declaration emphasises both the importance of more adequate evidence to confirm that design and layout will in themselves be sufficient to avoid harm to heritage assets or minimise or mitigate it to an acceptable level, and that in the absence of such evidence it is perhaps premature to suggest that such measures are all that is required.

We would therefore strongly encourage your community to address the above points prior to formally submitting the Plan for Examination, and in doing so to liaise with Wiltshire Council planning and conservation officers to ensure an enhanced evidence base appropriately covers all relevant heritage considerations. This is not to automatically imply that the sites in principle and in the manner of their promotion are unsuitable for development – only that their promotion needs to be better supported by evidence in order to demonstrate appropriate conformity with the NPPF for the protection and enhancement of the historic environment.

Elsewhere in the Plan, we applaud your community on its care and attention to defining, protecting and enhancing the area's distinctive local historic environment, through such measures as the production of the Town Character Study, and its application to the promotion of discrete aspects of character and quality through policies MARL 11, 12 & 13.

Our congratulations to your community on its progress to date and we wish it well in the making of its Plan.

Yours sincerely

David Stuart

David Stuart  
Historic Places Adviser  
[david.stuart@historicengland.org.uk](mailto:david.stuart@historicengland.org.uk)

cc Michael Kilmister, Wiltshire Council



Historic England, 1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ  
Telephone 0117 975 1308  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

