



Marlborough

Area Neighbourhood Plan

2021- 2036

CONSULTATION STATEMENT



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

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CONTENTS	PAGE
1. Introduction	3
Neighbourhood Plan Area Designation	3
2. The Consultation Process	4
Dateline of Events	4
Public and Stakeholder Consultation	5
Public Consultation	6
Consultation with WC	8
Pre-submission Consultation Process	8
3. Approach taken with the Pre-Submission Feedback	9
4. Pre-submission Feedback Summary Overview	9
5. Amendments made to Draft Plan in response to Regulation 14 consultation	10
6. Supporting Evidence (Links)	12

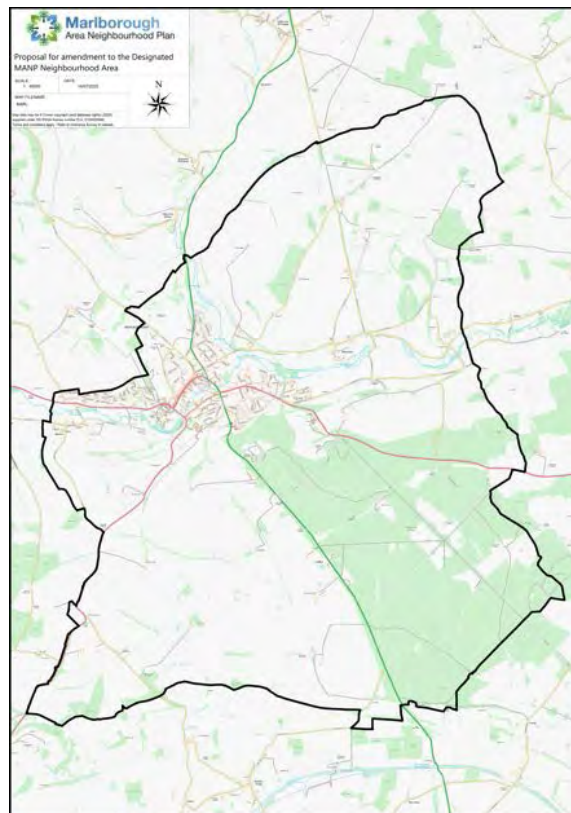
1. Introduction

This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 (as amended) in respect of the Marlborough Area Neighbourhood Plan. The legal basis of this Statement is provided by Section 15 (2) of part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:

- i. Contain details of the persons and bodies that were consulted about the proposed Neighbourhood Development Plan;
- ii. Explain how they were consulted;
- iii. Summarise the main issues and concerns raised by the persons consulted; and
- iv. Describe how those issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

Neighbourhood Area Designation

The Neighbourhood Plan Area was designated by the Local Planning Authority, Wiltshire Council on 18th November 2020. Wiltshire Council published the area application as required by regulations and no adverse comments that would not allow adoption were received. Plan A below shows the Neighbourhood Area that was designated.



Other maps can be found here; [Marlborough Town Council - Maps \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

2. The Consultation Process

Dateline of Events

2.1 The dateline of events below outlines The Marlborough Neighbourhood Plan consultation process up until March 2021.

- In **2015**, the parishes of Marlborough, Mildenhall, Preshute and Savernake agreed to work together towards the production of a Neighbourhood Plan
- A call for volunteers was made and the Marlborough Area Neighbourhood Plan (MANP) Steering Group was formedⁱ with Marlborough Town Council acting as its co-ordinating body, with a Terms of Reference being adopted on the **28th April 2016**.ⁱⁱ
- On **26th May 2016** the Steering Group received a very informative presentation from the North Wessex Downs AONB about the work of the AONB and its role in the neighbourhood planning process.
- An Open Day was held on **18th June 2016** and a small stand was booked at the MantonFest on **25th June 2016** to help raise awareness of the project.
- A Neighbourhood Plan website was set up, giving updates on progress, showing Steering Group minutes of meetings, and inviting feedback.
- Autumn Road Shows were held as follows:
 - Manton Village Hall on the 17th September 2016
 - Mildenhall Village Hall 2nd October 2016
 - Savernake Hospital 12th January 2017
- Following the initial consultation, a Housing Needs Analysisⁱⁱⁱ, a Car Parking Survey^{iv}, and a Town Centre Benchmarking Report^v were carried out throughout **2017**. The beginning of **2018** was spent collating all of this information. In **July 2018** the Steering Group appointed a consultant to assist in taking the community feedback and evidence forward.
- A call for sites was made in **November 2018 and January 2019** asking landowners to put forward potential sites to meet community need – affordable housing, more car parking, improved health facilities, a replacement for Preshute School, recreation land and a new cemetery.^{vi}
- From **12th July and to 12th August 2019**, a further informal consultation was held. Comments supported the work to date and proposals on these issues.^{vii}
- Drop-in exhibitions were held in the Marlborough Neighbourhood area at Marlborough Town Hall, Manton Village Hall, Mildenhall Village Hall, and at Marlborough Area Board during this period.
- In **November 2019** consultants were commissioned to prepare design studies to inform such policies in the plan.
- **2020** consisted of gathering of further evidence with the inability to meet in person due to the Covid 19 pandemic.
- In **July 2020** Preshute Parish Council made the decision to withdraw from the process. A press statement explained the neighbourhood area re-designation process and the minimal disruption to the process.
- In **August 2020** a new neighbourhood area application was made and approved in **November 2020**.
- A communication strategy was put in place for the formal "Regulation 14" consultation exercise, taking into account Covid restrictions, which meant that face to face meetings could not be held.

- A survey was also available online at the Town Council's website at: www.marlborough-tc.gov.uk and shared widely via social media. Flyers were delivered to every household. Paper copies were also available at the Town Council offices and in the library. Banners and posters were displayed on notice boards throughout the town and the consultation and exhibitions also promoted via Marlborough News and in an editorial in the Gazette & Herald and Town and Country magazine.
- On the **22nd February 2021**, a press release was issued notifying the public of the Formal Consultation Process (Regulation14).^{viii}
- The Formal Consultation Process began on **18th January 2021 and ran until the 8th March 2021**.^{ix}
- As part of the Formal Consultation Process Public Meetings were held on Wednesday **27 January 2021***and **Wednesday 24 February 2021** Via Zoom^{xi}

Note: Throughout the process regular updates have been provided at Town and Parish Council meetings, Marlborough Area Board Meetings and Marlborough Town Council Planning Meetings. Minutes of these meetings can be viewed online at [Marlborough Town Council - Home \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk) and [Mildenhall Parish Council - Mildenhall Parish Council \(mildenhallwiltshire.org.uk\)](http://mildenhallwiltshire.org.uk) and [Home - Savernake Parish Council \(savernake-pc.org\)](http://savernake-pc.org)

Additionally, throughout the process regular update meetings have been held with Wiltshire Council, and these and steering group meeting minutes are published on the Marlborough Town Council website and can be found at [Marlborough Town Council - Neighbourhood Plan \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

Public and Stakeholder Consultation

2.2 Stakeholder

The following bodies were consulted on the process of making The Marlborough Neighbourhood Plan as required by the Neighbourhood Planning (General) Regulations 2012 Part 5 (b). Known as the Schedule 1 consultation bodies;

- Action for the River Kennet
- Aster Housing
- Crown Estate (Walsingham Planning s agents)
- Kennet & Avon Medical Partnership
- Local Landowners
- Marlborough College
- Marlborough Town Council
- Marlborough High Street Retailers Association
- Mildenhall Parish Council
- NFU
- North Wessex Downs AONB
- Preshute Parish Council
- Ogbourne St Andrew Parish Council
- Ogbourne St George Parish Council
- Aldbourne Parish Council
- Ramsbury Parish Council

- Axford Parish Council
- Little Bedwyn Parish Council
- Burbage Parish Council
- Easton Royal Parish Council
- Wootton Rivers Parish Council
- Milton Lilbourne Parish Council
- Wilcot Parish Council
- Residents of the designated Neighbourhood Plan Area
- Savernake Parish Council
- Sports Clubs and Marlborough Sports Forum
- Thames's water
- Transition Marlborough
- St Johns School
- Wiltshire Council
- Swindon Borough Council
- West Berkshire Council
- Test Valley Council
- New Forest District Council
- Dorset Council
- South Somerset Council
- Mendip Council
- Bath and Northeast Somerset Council
- South Gloucestershire Council
- Cotswold District Council
- Canal and River Trust
- Natural England
- The Environment Agency
- Historic England
- Highways England
- Southern Water
- National Grid
- Community Area Board (Wiltshire Councillors + Community Engagement Manager)
- Primary Care Trust
- Electricity Provider
- Gas Provider
- Sewage Undertaker
- Water Undertaker

Public consultation

- 2.3 10,000 leaflets were produced to communicate and promote the MANP and these were distributed in May 2016 via Royal Mail, and leaflet drops in Town locations in the High Street, the library, the doctor's surgery, the dentists, and thereafter to use at promotional events.
- 2.4 Between April and June 2016, a website was set up to ensure information was made available to the community area, and support in promoting the MANP

process. (In 2018 this was brought under the administration of Marlborough Town Council to support the increased use of the website as a mechanism for community engagement).

2.5 Exhibitions were held in Marlborough, Manton, Savernake and Mildenhall.

An Open Day was run at Marlborough Town Hall on the 18th June 2016 to share and discuss the to promote the Neighbourhood plans and initiate engagement with residents. Offering a café and quiz to support this process it invited views on Housing, Transport, Environment and Employment . More than 150 attended the Open Day, with just under 150 feedback forms being completed on the day. A stand was also booked at the MantonFest on 25th June 2016 to help raise awareness. An advertisement was also placed in the festival programme brochure.

The consultation feedback identified the following key issues^{xii}:

- Housing & Amenities: Affordable Homes, GP Facilities, schools, and infrastructure including an extension to the cemetery, lack of parking and congestion
- Countryside & Recreation: Sport, leisure, recreations, saving green spaces, the AONB and safeguarding the natural environment, including improving air quality

Feedback on Employment was limited but highlighted the need for more focus on a digital future, particularly for small businesses.

Autumn Roadshows in 2016/17 followed the initial consultations format using the same feedback forms. The Manton Roadshow had a good turnout and a letter drop had been made to all residents in Preshute parish about the event. The Mildenhall roadshow had also gathered useful feedback. It became clear that there was a need for an improved path between Mildenhall and Marlborough. Only 10 visitors attended the Savernake roadshow considered to be largely a result of poor weather with snow forecast. Despite this it was a useful session which also gathered useful feedback and largely reflected the themes already identified.

2.6 In January 2017 Cobweb Consultants were commissioned to carry out a Housing needs Survey aimed at residents.^{xiii} This survey also included the needs of local employers for additional employment land.

2.7 The events, activities and surveys flagged up community concerns about the lack of affordable housing, parking difficulties, need for expansion of the cemetery and GP surgery, and the infants' school, and of the need to preserve and if possible enhance the heritage, AONB status, green environment and land for sport and leisure activities.

2.8 In the light of concerns, the Steering Group put significant effort into securing the maximum amount of affordable housing possible, identifying potential sites for the infants' school, and for the surgery, and into facilitating

communications between the parties responsible for delivery and the landowners.

- 2.9 In respect of the infants' school, The Governors and WC decided instead to invest in new buildings on the existing site.
- 2.10 In respect of the surgery, the Police Station on George Lane was offered when it came up for sale, but after some months the Clinical Commissioning Group and Surgery rejected this site. An alternative site was found as part of a proposed housing development at Barton Dene.
- 2.11 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 for housing and other community facilities to ensure the views of the community were properly captured.
- 2.12 Feedback from this wide consultation can be viewed in the full Consultation Report is at: [Informal Consultation Report Full .pdf \(marlborough-tc.gov.uk\)](https://www.marlborough-tc.gov.uk/informal-consultation-report-full.pdf). The majority of respondents agreed with the MANP approach on housing development and meeting local social infrastructure needs i.e., through allocating specific sites for them. The need for additional car parking continued to be raised as well as the need for a Town Centre Master Plan which the Town Council has now committed to preparing in the future. There was also clear support for the plan's approach to employment. A wide variety of helpful comments about design, conservation and heritage was also received.

Consultation with Wiltshire Council

- 2.13 Throughout the process of developing the Marlborough Neighbourhood Plan the Steering Group has engaged with WC via email, phone, and face-to-face meetings to seek advice and guidance. Minutes of regular process meetings with WC are published on the Marlborough Town Council website at [Marlborough Town Council - Neighbourhood Plan \(marlborough-tc.gov.uk\)](https://www.marlborough-tc.gov.uk/marlborough-town-council-neighbourhood-plan)

Pre-Submission Consultation Process

- 2.14 The Pre-Submission Plan was published and along with an invitation to comment via email or by way of submitting a comment form ^{xiv}, as per the Neighbourhood Planning (General) Regulations 2012 Part 5 (a). Also, invitations were sent to the list of organisations set out in 2.2, as per Neighbourhood Planning (General) Regulations 2012 Part 5 (b). Copies of the Pre-Submission Plan was sent to the Local Planning Authority as per Neighbourhood Planning (General) Regulations 2012 Part 5 (c).^{xv}

- 2.15 The consultation period lasted for 6 weeks, following which copies of the Pre-Submission Plan comments were uploaded to the Marlborough Town Council website and a Regulation 14 report was prepared.^{xvi}

Approach taken with the Pre-Submission Feedback

3.0 The consultation feedback from residents, statutory consultees, and landowners was considered by the Steering Group over the course of series of Steering Group meetings held between March to May 2021. In considering if and how the Plan should be changed in the light of comments made during the pre-submission feedback, the Steering Group had to bear several factors in mind.

- throughout the entire consultation process for the Plan, it was clear that local people had conflicting priorities and needs. It was therefore inevitable that compromises would have to be made, and that not everyone would agree with all the proposed policies made. The most significant conflict was that between the clearly stated wish for more affordable housing, and concerns about increased pressures on infrastructure and loss of green space that more housing would bring

- there remained with the public, despite explanations about what the Plan could and could not address, some misunderstanding as to its remit and its limitations. Therefore, some feedback was not valid. Two key areas were that the Steering Group could not magic up land, nor change Government policy on housing (e.g., to require developers to build affordable houses only), and that the plan could not address issues unrelated to land – e.g., traffic congestion, public transport, pollution

- the feedback from the pre-submission document might not accurately reflect wider community held views clearly evidenced through previous local engagement, so the views of the less vocal majority should not be forgotten in finalising the document.

The Steering Group catalogued comments made by members of the public into three categories: those where changes to the plan might be considered; those not within the remit of the Plan but which could be passed on to relevant bodies to take forward (such as the need for a Marlborough Town Centre plan), and those showing some misunderstanding where explanations could be provided. These were reviewed, along with responses made to comments made by statutory consultees.

Pre-Submission Feedback Summary Overview

4.0 In finalising the draft Plan, the Steering Group wished to preserve the following themes, which summarised local needs as stated throughout the Plan's development.

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

Amendments made to Draft Plan in response to Regulation 14 consultation^{xvii}

5.0 Amendments made to the Plan reflect the comments made above. The most significant change, given the strength of concerns about pressures on infrastructure, and about access problems, was to remove one of sites for development, and thus reduce the amount of affordable housing. This and other amendments made to the Plan have been detailed below;

5.10 **Policy MARL1: Delivering Affordable Homes in Marlborough**

- The proposed allocation on Land at Elcot Lane has been removed.

5.1 Land Rear of Salisbury Road

- Highways access requirements to minimise the loss of land of biodiversity interest and safeguard the bat flight-line to the nearby tunnel roost has been included.
- Footpath and cycleway connection requirements has been included.
- Requirements for the non-developable area to be laid out as an extension to the new public open space at Marleberg Grange now indicates this is on the southern part of the site.
- An updated concept plan has been included. (Yet to be received?)

5.2 Land at Barton Dene

- The reference to the 155m AOD contour line has been removed as it related to the land north of the site within Preshute which is no longer included within the neighbourhood area/ allocation.
- Release of the land set aside for the medical centre for residential use if it does not come forward within a timeframe set out in a planning condition.
- An updated concept plan has been included.

5.3 Land at Cherry Orchard

- A concept plan was unavailable but a plan showing site constraints as currently understood has been included.

5.4 Land at Kelham Gardens

- Amendments to the policy have been made to with regards to flood risk and air quality.
- An updated concept plan has been included.

5.5 **Policy MARL2: Managing Change at George Lane, Marlborough & MARL6: Using Scarce Employment Land Efficiently**

The policy has been deleted mainly due to permitted development rights changes introduced since the publication of the plan.

5.6 **Policy MARL3 Encouraging Affordable Homes in Mildenhall, Policy MARL4: Meeting Local Housing Needs, Policy MARL5: Supporting a Thriving Town Centre, Policy MARL7: Improving Public Parking, MARL8: Delivering New Cemetery Land, MARL9: Protecting & Supporting Community Facilities, MARL10: Enhancing Marlborough Conservation Area, MARL11: Enhancing Marlborough Areas of Special Quality, MARL12: Enhancing Manston Conservation Area, MARL12: Enhancing Mildenhall Conservation Area, MARL15 Protecting and Improving Green Infrastructure, MARL16: Protecting Local Green Spaces, MARL17: Protecting Valued Community Open Spaces, MARL18: Conserving the Scenic Beauty of the AONB, MARL19: Achieving Dark Skies & MARL20: Mitigating Climate Change – New Buildings**

Renumbering and other minor amendments to reflect changes in national policy since the publication of the plan and in response to comments received during the consultation.

5.7 **New Policy MARL8: Protecting and improving Sports Facilities**

In response to comments received from the community. Whilst the plan had sought to allocate land for such purposes, no land was forthcoming in the call for sites, so the policy refers generally to the need to support such sports uses.

5.8 **MARL14: Protecting Local Heritage Assets**

- Renumbering
- Additional properties added.

5.9 **MARL21: Mitigating Climate Change – carbon sinking**

The policy has been deleted in response to comments received by statutory bodies and land interests, and elements were merged into MARL 15.

- 5.10 Comments and suggestions made from the public which are not relevant to the Plan but which have been or will be referred to other parties for action include those relating to town centre design, retail shops, lighting, High Street parking, electric charging points, public transport, and employment opportunities.

Links to **Supporting Evidence**

ⁱ [Marlborough Town Council - Meet the Team \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

ⁱⁱ [TOR - Final 28.4.16.pdf \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

ⁱⁱⁱ [Microsoft Word - Marlborough report v7 \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{iv} [MANP Car Parking Study Report.FINAL.pdf \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^v [Final Benchmarking Report.pdf \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{vi} [Advert Call For Sites.pdf \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{vii} [Informal Consultation Report Full .pdf \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{viii} [PR.Feb21 - Final.pdf \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{ix} [Marlborough Town Council - Regulation 14 Documents \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^x [Marlborough Neighbourhood Plan \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{xi} [Marlborough Neighbourhood Plan \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{xii} [Informal Consultation 2016.pdf \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{xiii} [Microsoft Word - Marlborough report v7 \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{xiv} [Marlborough Town Council - Regulation 14 Consultation Intro \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{xv} [MANP Pre-Submission Plan \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{xvi} [Marlborough Town Council - Regulation 14 Documents \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)

^{xvii} [MANP Regulation 14 Feedback Summary Report \(marlborough-tc.gov.uk\)](http://marlborough-tc.gov.uk)