

# Sustainability Appraisal (SA) for the Marlborough Area Neighbourhood Plan

SA Report to accompany the Pre-submission version of  
the Neighbourhood Plan

Marlborough Area Neighbourhood Plan Steering Group

December 2020

## Quality information

<b>Prepared by</b>	<b>Checked by</b>	<b>Approved by</b>	<b>Verified by</b>
Rosie Cox Environmental Planner	Alastair Peattie Associate	Nick Chisholm-Batten Associate	Nick Chisholm-Batten Associate

## Revision History

<b>Revision</b>	<b>Revision date</b>	<b>Details</b>	<b>Name</b>	<b>Position</b>
V1.0	14 <sup>th</sup> March 2020	First draft	Rosie Cox	Environmental Planner
V2.0	16 <sup>th</sup> March 2020	Review	Alastair Peattie	Associate
V2.0	25 <sup>th</sup> March 2020	Group review	Shelley Parker	Marlborough Town Council
V3.0	09 <sup>th</sup> June 2020	Locality Review	Annabel Osborne	Neighbourhood Planning Officer
V4.0	03 <sup>rd</sup> December 2020	Revised version	Rosie Cox	Environmental Planner

**Prepared for:**

Marlborough Area Neighbourhood Plan Steering Group

**Prepared by:**

AECOM Limited  
3rd Floor, Portwall Place  
Portwall Lane  
Bristol BS1 6NA  
United Kingdom

T: +44 117 901 7000  
aecom.com

© 2020 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) for use of Locality (the “Client”) in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

**THIS PAGE IS INTENTIONALLY LEFT BLANK**

## Table of Contents

Non-technical summary.....	i
1. Introduction.....	1
2. Local Plan context and vision for the MANP .....	5
3. The Scope of the SA .....	8
4. What has plan making / SA involved to this point? .....	16
5. What are the appraisal findings at this current stage? .....	39
6. Next steps .....	53
Appendix A Context review and baseline .....	54
Appendix B Site options appraisal.....	86
Appendix C Reasonable alternatives appraisal – June 2020.....	110
Appendix D Reasonable alternatives appraisal – November 2020.....	119

**THIS PAGE IS INTENTIONALLY LEFT BLANK**

# Non-technical summary

## What is a Sustainability Appraisal?

A sustainability appraisal (SA) has been undertaken to inform the Marlborough Area Neighbourhood Plan (MANP). This process is required by the Strategic Environmental Assessment Regulations.

Neighbourhood Plan groups use SA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

## What is the Marlborough Area Neighbourhood Plan?

The MANP presents a plan for Marlborough Area for the period to 2036. The area covered by the MANP is shown in **Figure 1.1**. The Designated Area, for the purpose of the MANP, consists of four parishes:

- The town of Marlborough with Manton and the following three rural parishes;
- Preshute;
- Savernake; and
- Mildenhall – known locally as Minal

Marlborough is the geographic, economic and social heart of the area, surrounded by the three parishes; the boundaries of which all abut that of Marlborough.

The MANP is being prepared in conformity with the Wiltshire Core Strategy (WCS) (2015) and the Housing Site Allocations Plan (HSAP) (2019). Consideration will also be given to the forthcoming review of the Wiltshire Local Plan. The MANP sets out a vision and a range of policies for the MANP area, relating to a range of topics, including creating a diverse and resilient economy which is supported by attractive, healthy and affordable places to live, and improving and protecting the area's natural, built and historic environment.

It is currently anticipated that the MANP will undergo referendum in May 2021. This is in line with the newly revised PPG which sets out changes that have been introduced to neighbourhood planning in response to the coronavirus (COVID-19) pandemic.<sup>1</sup> New paragraph 107 states that referendums will be postponed in line with the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020 until 6 May 2021.

## Purpose of this SA Report

This SA Report, which accompanies the Regulation 14 version of the MANP, is the latest document to be produced as part of the SA process. The first document was the SA Scoping Report (September 2019), which includes information about the MANP area's environment and community.

The purpose of this SA Report is to:

- Identify, describe and evaluate the likely significant effects of the MANP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SA process which has been carried out to date.

---

<sup>1</sup> Ministry of Housing, Communities and Local Government (MHCLG) (2020) Planning Practice Guidance: Neighbourhood Planning [online] available at: <https://www.gov.uk/guidance/neighbourhood-planning--2#coronavirus>

The SA Report contains:

- An outline of the contents and main objectives of the MANP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SA Framework of objectives against which the MANP has been assessed;
- The appraisal of alternative approaches for the MANP;
- The likely significant environmental effects of the MANP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the MANP; and
- The next steps for the MANP and accompanying SA process.

## Appraisal of reasonable alternatives for the MANP

A key element of the SEA process is the appraisal of ‘reasonable alternatives’ for the MANP. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*’.

**Chapter 4** of this SA Report therefore describe how the SA process to date has informed the preferred development strategy for the MANP area. As the delivery of new housing development through the MANP is what is most likely to have a significant effect on SA objectives, it was determined that this issue should be the primary focus of the consideration of alternatives through the SA process. Case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process/ report that is focused and accessible.

The potential sites and spatial strategy options (packages of sites) for delivering development in line with the MANP objectives, will directly or indirectly influence the topic areas identified above and the Parish Council’s preferred approach.

## Site options

Sites potentially in contention for allocation through the Marlborough Neighbourhood Plan were identified by the Town Council, with support from officers of Wiltshire Council and by professional planning consultancy, O’Neill Homer. A Site Assessment Report (November, 2020) has been prepared by O’Neill Homer, which summarises the site assessment process and outcomes that have informed the selection of housing site allocations in the MANP and forms an important part of its published evidence base.

Appendix A of the Site Assessment (Stage 1) provides an appraisal of the suitability of sites available for the potential development of housing, education, and community facilities within the MANP area.<sup>2</sup> Eleven sites have been considered for housing and social infrastructure through the Site Assessment Report. The findings of the assessment show that all eleven of the sites considered are suitable for housing and are realistic candidates for consideration through plan-making.

In light of the conclusions of the Site Assessment Report (2020), these eleven suitable sites have been further considered and reviewed by the MANP Steering Group for promoting housing development for the purposes of the Neighbourhood Plan.

In March 2020 the SA process undertook an appraisal of the key environmental constraints present at each of the eleven sites and potential effects that may arise as a result of housing development at these locations (see **Table NTS.1** overleaf). The locations of these sites are presented in **Figure 4.1** of this report.

---

<sup>2</sup> O’Neill Homer (2020) Marlborough Area Neighbourhood Plan Site Assessments Report



**Table NTS.1 Sites considered through the SA process**

Site no.	Name	Site. capacity
1	Land off Elcot Lane	45-50
2	Further Land off Elcot Lane	102
3	Land South of A4, London Road	60
4	Further Land west of Salisbury Road	98
5	Barton Dene	130
6	Pelham Court	20
7	Former Resource Centre	30
8	Land at Kelham Gardens	9 flats
9	Mildenhall land adjacent Home Farm Close	18
10	Mildenhall Adj Playing Field	21
11	Police Station	24

Table NTS.2 below presents summary appraisal findings in relation to the eleven individual site options, with more detailed appraisal findings presented within Appendix B.

**Table NTS.2: Summary of SA site appraisal findings**

Site	Air quality	Biodiversity	Climate change	Landscape	Historic Env	Land, soil and water resources	Population and community	Health and wellbeing	Transport
Site 1	Red	Blue	Blue	Red	Red	Blue	Green	Red	Blue
Site 2	Red	Blue	Red	Red	Red	Blue	Green	Red	Blue
Site 3	Red	Red	Blue	Red	Blue	Blue	Green	Blue	Blue
Site 4	Red	Red	Blue	Red	Yellow	Red	Green	Red	Blue
Site 5	Red	Blue	Yellow	Red	Red	Blue	Green	Blue	Green
Site 6	Red	Yellow	Red	Green	Green	Blue	Blue	Green	Green
Site 7	Red	Blue	Blue	Yellow	Yellow	Red	Green	Green	Blue
Site 8	Red	Yellow	Red	Green	Green	Green	Green	Green	Green
Site 9	Red	Yellow	Blue	Red	Red	Blue	Green	Blue	Red
Site 10	Red	Yellow	Blue	Red	Red	Blue	Green	Blue	Red
Site 11	Red	Yellow	Yellow	Green	Green	Green	Green	Green	Green

Key	
Likely adverse effect (without mitigation measures)	Red
Likely positive effect	Green
Neutral/no effect	Yellow
Uncertain effects	Blue

Site 11, followed by site 8 perform most positively against the SA themes, with Sites 2, 9 and 10 identified as the least well performing. All sites with the exception of Site 6 perform positively against the Population and community SA theme given the delivery of housing to meet local needs. Site 6 performs as 'uncertain' due to the potential loss of a Wiltshire Core Strategy Principal Employment Site.

All sites perform negatively against the Air quality SA theme, given that development at any site will result in residents travelling within Marlborough AQMA to access services and facilities within the town centre, contributing to air quality issues.

In terms of Climate change, it is recognised that while development at sites alone is not likely to have a significant negative effect on climate change, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. Sites 5 and 11 therefore performs as 'neutral' in this respect, with the majority of other sites performing 'uncertain' where access to the town centre is less than satisfactory. Sites 6 and 8 are worst performing against the Climate change SA theme given the risk of flooding at these sites.

In terms of the Health and wellbeing theme, sites 6, 7, 8 and 11 perform positively given their location in terms of Marlborough town centre, health and recreational facilities. Sites 3, 5, 9 and 10 are 'uncertain' where there is good access to either health or recreational facilities, while sites 1, 2 and 4 performs negatively where access is poor to both health and recreational facilities.

In relation to the Transportation theme; positive effects have been concluded for sites 5, 6, 8 and 11 due to their location in terms of access to sustainable transport opportunities, and as the sites are within walking distance of Marlborough town centre. Sites perform less positively where they may still rely on the car to travel to the town centre (sites 1 - 4 and 7). Sites 9 and 10 perform negatively given their location outside of Marlborough town, in the neighbouring village of Mildenhall. Sites would be reliant on the car for access to Marlborough for all day-to-day services and facilities; given the limited offer in Mildenhall village.

Sites 1-5, 9 and 10 perform negatively against the Landscape SA theme due to potential adverse effects on the character, setting and intrinsic qualities of the North Wessex Downs AONB. Sites 6, 8, and 11, although also within the AONB, are brownfield sites in the built up area, and therefore residual effects are not anticipated to be of significance. Positive effects are concluded for these sites given development would likely improve the site, which currently includes a disused building/ car parking facilities. Similar effects are anticipated for the Historic Environment SA theme, with the potential for positive effects in this respect if high quality design standards were adhered to.

Sites 1, 2, 5, 6, 9 and 10 perform negatively against the Historic environment SA theme as they are located within/ within close proximity of a designated heritage asset, and there is the potential to lead to adverse effects on distinctiveness and/or setting; for example through impacting on views in/ out of the site. It is also noted that is the potential for positive effects in this respect if high quality design standards were adhered to.

In terms of the Land, soil and water resources, uncertainty relates to the evidence base, given recent land classification has not been carried out in this location. Sites 4 and 7 perform negatively where they fall within a Source Protection Zone.

Site 3 and Site 4 perform negatively against the Biodiversity SA theme as it falls within a SSSI IRZ and also includes priority habitat within/ adjacent to the site. All other sites with the exception of sites 6, 8, 9 and 10 perform as 'uncertain' as they fall within a SSSI IRZ and/or have the potential to impact upon priority habitat outside of the site. Sites 6, 8, 9, 10 and 11 perform as 'neutral' where they are brownfield land in the centre of the town, and/ or are not constrained in terms of designated sites, nor priority habitat.

## Establishing reasonable alternatives

Taking O'Neill Homer's preliminary assessment of sites, and the SA of site options (presented above) reasonable alternatives were explored for sites 1, 3, 4, 5, 7, 8 and 11 in March 2020. The following three spatial options were assessed through the SA, with findings summarised in **Section XX** of the main report (and detailed findings presented at **Appendix C**):

**Option A: Sites 1, 5, 7, 8 and 11**

243 dwellings (98 affordable homes plus 13 Marlborough college homes and provision of medical centre at Site 5)

**Option B: Sites 5, 7, 8 and 11**

193 dwellings (86 affordable homes including the 13 Marlborough college homes as such and provision of medical centre at Site 5)

**Option C: Sites 1, 3, 4, 7, 8 and 11**

271 dwellings (125 affordable homes and green space for informal recreation and ecological habitats)

## Revised reasonable alternatives appraisal – November 2020

Since June 2020 the situation in terms of the availability and capacity of sites options for consideration through the emerging Marlborough Area Neighbourhood Plan has changed. Notably:

- It became clear that future of the Police Station would be resolved before the MANP had reached its final stages and the Steering Group agreed that it would no longer be considered for allocation.
- Wiltshire Council confirmed that the developable area of Cherry Orchard had to be reduced by half to take account of a restrictive covenant, thereby reducing its capacity to 15 homes.
- While the Steering Group had agreed that its preferred option would be to allocate the Barton Dene, Elcot Lane, Cherry Orchard and Kelham Gardens sites of Option A, it has become clear that neither Wiltshire Council nor Preshute Parish Council would support the MANP if it included the allocation of Land at Barton Deane for 130 dwellings. With the decision of Preshute Parish Council to withdraw from the MANP in July 2020, the options had to be revisited (to remove the part of the Barton Dene site that extends into Preshute Parish and to lower the total number of homes).

## Re-establishing reasonable alternatives

In terms of reasonable alternative Spatial Options A – C assessed above, Options A and B were no longer feasible due to the loss of the main part of the Barton Dene site (now lying outside the MANP boundary). With Option C also ruled out (as would deliver too many houses in total and would not provide an opportunity to relocate the medical centre, new options had to be formulated, taking into account further changes to site capacities and community consultation (see at **Section 4.53 – 4.55** of the main report).

The three new options are set out below in **Table NTS.4**, and illustrated in **Figures 4.5 – 4.7** of the main report.

**Table NTS.4 November 2020 Reasonable alternative spatial options**

Site	November 2020 Spatial Options		
	Option D	Option E	Option F
	Capacity	Capacity	Capacity
1. Land off Elcot Lane	50	50	50
3. Land South of A4, London Road	60		60
4. Land rear of Salisbury Road	50	50	
5. Barton Dene		40	40
7. Former Resource Centre	30	30	15 - 30
8. Land at Kelham Gardens	10	10	10

<b>Total dwellings delivered during plan period</b>	<b>200</b>	<b>180</b>	<b>175 - 190</b>
<b>Affordable homes</b>	<b>96</b>	<b>86</b>	<b>85 - 91</b>
Other uses	<i>Public open space. Covenant at FRC resolved</i>	<i>Public open space. Covenant at FRC resolved. Medical centre at Barton Dene</i>	<i>Public open space. Resolution of covenant at FRC uncertain.</i>

## Revised alternatives appraisal findings

In November 2020 the SA process undertook an appraisal of the relative sustainability merits and constraints at each of the three new alternative spatial options.

**Table NTS.5** below presents summary appraisal findings in relation to the three options, with more detailed appraisal findings presented within **Appendix D**.

**Table NTS.5: Summary alternatives appraisal findings**

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7, and 8
<b>Air quality</b>			
Rank of preference	=	=	=
Significant effect?	No	No	No
<b>Biodiversity</b>			
Rank of preference	2	1	2
Significant effect?	No	No	No
<b>Climate change</b>			
Rank of preference	3	1	2
Significant effect?	No	No	No
<b>Landscape</b>			
Rank of preference	3	1	2
Significant effect?	Yes – Negative	Yes – Negative	Yes - Negative
<b>Historic environment</b>			
Rank of preference	1	2	2
Significant effect?	No	Uncertain	Uncertain
<b>Land, soil and water resources</b>			
Rank of preference	3	1	2
Significant effect?	Yes – Negative	Yes – Negative	Yes - Negative
<b>Population and community</b>			
Rank of preference	3	1	2
Significant effect?	Yes – Positive	Yes – Positive	Yes – Positive

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7, and 8
<b>Health and wellbeing</b>			
Rank of preference	3	2	1
Significant effect?	No	Yes – Positive	Yes – Positive
<b>Transportation</b>			
Rank of preference	2	1	1
Significant effect?	No	No	No

**Summary findings:**

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the MANP.

The appraisal has highlighted the potential for **positive effects** as a result of development at all options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the MANP. **Option D** performs most positively in this respect given it will deliver the highest level of growth.
- **Options E and F** will deliver a new medical centre to meet social infrastructure needs.
- Through **Option E** the allocation of Site 4 would resolve the restrictive covenant at adjoining Site 7, improving pedestrian and cycling connectivity between Salisbury Road and the town centre. It is uncertain whether these benefits could be delivered through **Option F** and the allocation of Site 3.

The appraisal has highlighted the potential for **negative effects** as a result of development at all options, which are summarised as follows:

- **All options** will result in residents travelling by private vehicle within Marlborough AQMA to access services and facilities given poor accessibility to and frequency of public transport, contributing to localised air quality issues.
- **All options** may increase recreational/ disturbance pressures related to nationally and locally designated biodiversity sites
- **All options** will result in the potential loss of greenfield land, with the potential for loss of BMV agricultural land if found to be Grade 3a.
- **All options** would lead to greenfield development within the North Wessex Downs AONB, with the potential for significant long term negative effects on character, setting and intrinsic qualities. Mitigation is unlikely to significantly reduce the extent of these negative effects given that options would lead to development in previously undeveloped areas, where low capacity for change is identified (notably Site 1 (**all options**)).
- **All options** have the potential to impact upon the local townscape and setting of the Marlborough Area, with low capacity for change identified. **Options E and Option F** are also constrained by local heritage assets, with the potential for adverse effect on setting of the Marlborough Conservation Area and Grade II Listed Buildings.

Site 4 within **Option D** and **Option E** perform negatively as it falls within a Source Protection Zone (SPZ).

## Finalising the preferred approach

The Steering Group set out the following reasons for selection and rejection of Spatial Options D - F:

- Option 3 falls short of delivering essential social infrastructure within the town and even if the provision of land for a medical centre could be secured it is not as well located as Site E.
- Option 4 is selected as the preferred approach for the MANP given the ability to deliver social infrastructure in reasonably close proximity and relative distance to the town centre as well as contributing to the affordable housing shortfall and indicative housing requirement.

- Option 5 falls short of delivering additional benefits secured at Site D in terms of connecting to the town centre and whilst there may be other potential merits, with the more
- favoured Site A in reasonably close proximity and the relative distance to the town centre being considerably greater, there was no obvious, compelling reason to consider this in further detail. Nor has the landowner itself expressed a keenness to continue to promote Site C above its other Site D.

## Assessment of the Neighbourhood Plan

In March 2020 AECOM assessed an initial draft of the Pre-Submission Regulation 14 Neighbourhood Plan, providing the following **four recommendations**:

- That Policy MARL1 support biodiversity enhancements/ net gain at Land off Elcot Road. New development could promote ecological connectivity between the site and the River Kennett SSSI; extending the Neighbourhood Plan area's valued green infrastructure network.
- Encourage positive measures in new housing development to address climate change. This may include the addition of a new policy, which places an emphasis on high quality design within new development. A design led policy could ensure development proposals, where possible, realise opportunities for integrated renewable energy technologies, rainwater harvesting, water efficiency measures, and integrated vehicle electric charging points. Specifically, the Draft MANP could seek to incentivise a shift away from petrol/diesel vehicles, in order to support sustainable travel in the MANP area in line with national and local climate change commitments.
- Provide recognition to the presence of the Stonehenge, Avebury and Associated Sites WHS within the Neighbourhood Plan area, identifying potential indirect effects that may occur through the delivery of the MANP.
- Policy provisions are extended to capture the need for archaeological investigation where appropriate.

The Steering Group subsequently updated the draft Neighbourhood Plan in response to the recommendations proposed through the SA Report.

In June 2020 AECOM assessed a second draft of the Pre-Submission Regulation 14 Neighbourhood Plan, providing the following **single recommendation**:

- Encourage a shift away from petrol/diesel vehicles to increase sustainable travel in the MANP area, in line with national and local climate change commitments. For example, the inclusion of a policy criteria that requires new development to deliver or contribute to electric vehicle charging points would strengthen the MANP's approach to climate change mitigation.

The Steering Group subsequently updated the draft Neighbourhood Plan in light of the changes to evidence and site availability/ capacity, which in turn altered the overall spatial strategy (as set out in **Section 4.51** of this report).

The MANP now presents 21 planning policies for guiding development in the Marlborough Area.

## Assessment findings at this current stage

Utilising the SA Framework of objectives and assessment questions developed during the earlier scoping stage of the SA, the SA process has assessed the policies put forward through the current version of the MANP. The SA Report has presented the findings of the assessment under the following SA themes:

- |                         |                                   |
|-------------------------|-----------------------------------|
| – Air quality           | – Land, soil and water resources; |
| – Biodiversity;         | – Population and community;       |
| – Climate change;       | – Health and wellbeing; and       |
| – Landscape;            | – Transportation                  |
| – Historic Environment; |                                   |

Overall at this stage, the SA predicts the likelihood for both positive and negative effects arising from plan implementation. The new high-quality housing, community infrastructure development and green infrastructure enhancements are likely to bring about significant benefits for communities, resident health and wellbeing and biodiversity. Aspects of the Draft MANP that significantly contribute to positive outcomes include:

A growth strategy that meets identified housing needs, underpinned by evidence that provides appropriate guidance for the right mix of homes to meet local needs; with an emphasis on affordable housing delivery.

The provision of new community infrastructure (medical centre), protection of existing community infrastructure, and support for intensification of existing employment sites; to meet identified local needs and address capacity issues.

The designation of a Green Infrastructure Network for the purpose of promoting sustainable movement and ecological connectivity through the town and neighbouring parishes.

Minor positive effects are also anticipated through the requirement for biodiversity strategies alongside development. Strategies will set out how proposals will mitigate against adverse effects and promote enhancements, including habitat corridors (such as the former railway line), to deliver biodiversity net gain.

The aspects of the Draft MANP that contribute to negative outcomes relate to the permanent loss of greenfield/ agricultural land. This is anticipated as a result of four of the five site allocations proposed through the Draft MANP. It is however noted that there is some uncertainty in terms of the quality of the agricultural land.

Minor long-term negative effects are also anticipated with regards to air quality, landscape/ townscape, the historic environment, and transportation. In terms of air quality and transportation, these effects predominantly relate to a likely overall increase in private vehicle use in the MANP area. All growth proposed will be located within the Marlborough Air Quality Management Area, with potential for increased localised congestion, heightened levels of NO<sub>2</sub>, and an overall adverse effect on air quality. Active/ sustainable travel is supported through policy requirements for developing green infrastructure networks, maintenance and enhancement of footpaths and bridleways, and an improved streetscape in the town centre. However, the level of growth proposed is unlikely to improve access or frequency of sustainable transport modes. Additionally, the location of housing sites on the outskirts of the town are likely to result in continued reliance on the car for travel.

Minor negative effects are predicted for the Landscape SA theme due to the presence of the AONB, and the overall loss of previously undeveloped land within this sensitive landscape. Similarly, for the Historic Environment SA theme, potential adverse effects relate to impact on the setting of heritage assets, including the Marlborough Conservation Area; which is one of three Conservation Areas present within the Plan area, reflecting the town's rich heritage. It is however recognised that sensitive design and layout are likely to minimise the significance of any negative residual effects, but this is uncertain at this stage.

In terms of the Climate Change SA theme a key issue is flood risk. Site allocation Land at Kelham Gardens is located partially within a high flood risk area; however, it is considered on balance that the policy mitigation and the provisions of the NPPF (2019) should minimise the potential for negative effects. From a mitigation perspective, the MANP performs positively in terms of incentivising the Passivhaus standard, to minimise the energy demand of buildings; and requiring development proposals to make a financial contribution to the Marlborough Area Carbon Sink Fund, which will be invested into the area's Green Infrastructure Network. In light of these local actions aimed at tackling climate change, neutral effects are anticipated overall.

**One recommendation** is made through the appraisal as follows:

Encourage a shift away from petrol/diesel vehicles to increase sustainable travel in the MANP area, in line with national and local climate change commitments. For example, the inclusion of a policy criteria that requires new development to deliver or contribute to electric vehicle charging points would strengthen the MANP's approach to climate change mitigation.

## Next steps

Subsequent to the current consultation on the MANP, the plan will be updated by the Steering Group to reflect comments received. This SA Report will be updated to reflect the changes made to the Plan.

The MANP and SA Report will then be submitted to Wiltshire Council for their consideration. Wiltshire Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the MANP meeting legal requirements and its compatibility with the Wiltshire Core Strategy (2015), Wiltshire Housing Site Allocations Plan (2019), and forthcoming Wiltshire Local Plan Review.

If the subsequent Independent Examination is favourable, the MANP will be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the MANP, then the Neighbourhood Plan will be 'made'. Once made, the MANP will become part of the Development Plan for Marlborough Area

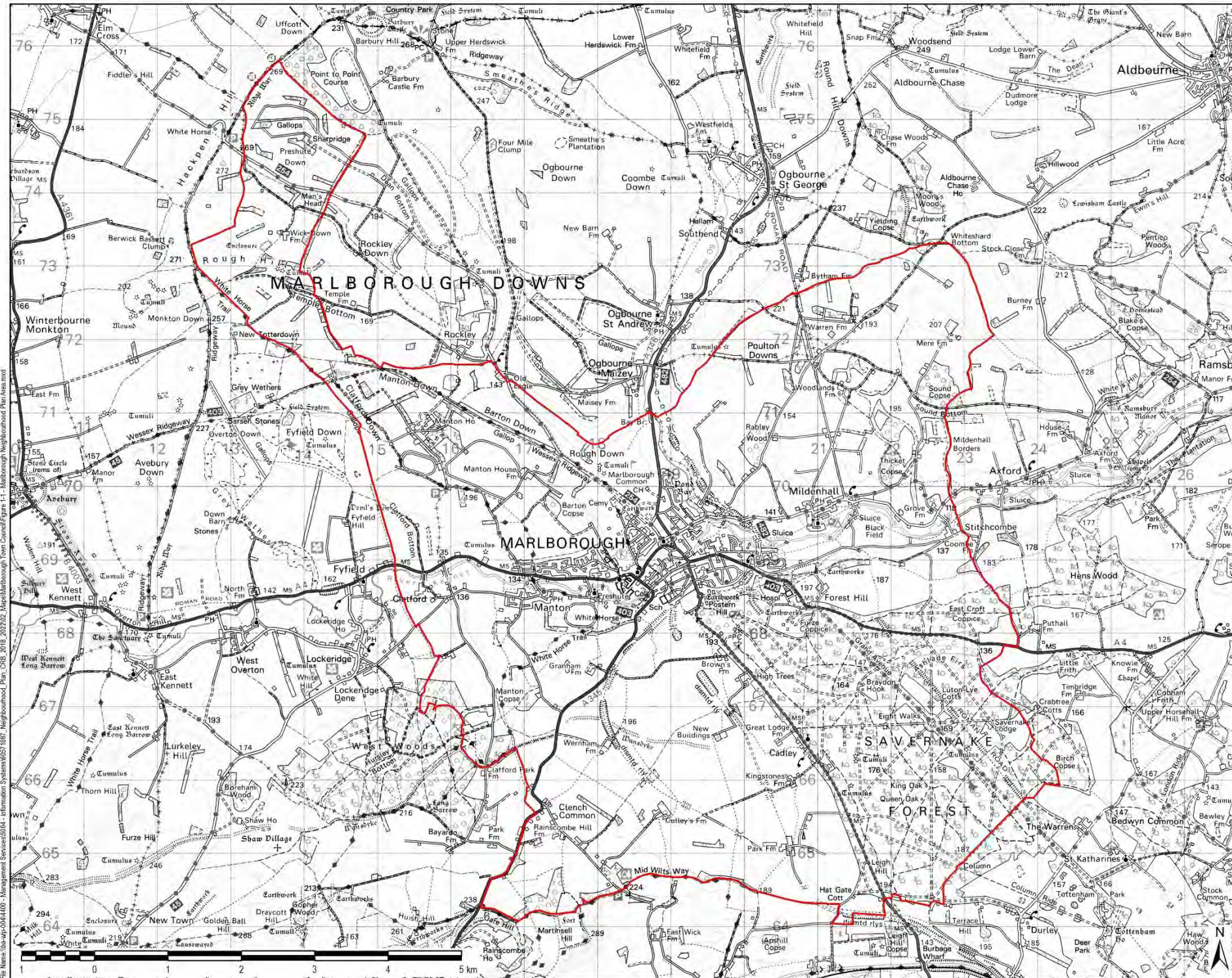


# 1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal (SA) in support of Marlborough Area’s emerging Neighbourhood Plan.
- 1.2 The Marlborough Area Neighbourhood Plan (MANP) is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Wiltshire Core Strategy (WCS) (2015) and Housing Site Allocations Plan (HSAP) (2019). Consideration will also be given to the forthcoming Review of the Wiltshire Local Plan.
- 1.3 It is currently anticipated that the Marlborough Area Neighbourhood Plan will be submitted to Wiltshire Council in 2021.
- 1.4 Key information relating to the MANP is presented in **Table 1.1**.

**Table 1.1: Key facts relating to the Marlborough Area Neighbourhood Plan**

Name of Responsible Authority	Marlborough Area Neighbourhood Plan Steering Group
Title of Plan	Marlborough Area Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Marlborough Area Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Wiltshire Core Strategy and emerging Housing Site Allocations Plan. Consideration will also be given to the forthcoming Review of the Wiltshire Local Plan.</p> <p>The Marlborough Area Neighbourhood Plan will be used to guide and shape development within the Marlborough Neighbourhood Plan area.</p>
Timescale	To 2036
Area covered by the plan	The Marlborough Area Neighbourhood Plan area covers the four parishes of Marlborough, Preshute, Savernake, and Mildenhall in Wiltshire ( <b>Figure 1.1</b> ).
Summary of content	The Marlborough Area Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Shelley Parker, Town Clerk, Marlborough Town Council Email: <a href="mailto:townclerk@marlborough-tc.gov.uk">townclerk@marlborough-tc.gov.uk</a>



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

**LEGEND**

- Marlborough Neighbourhood Plan Area

Copyright:  
 Contains Ordnance Survey Data © Crown Copyright and database right 2019.  
 Reproduced from Ordnance Survey digital map data © Crown copyright 2019. All rights reserved. Licence number 0100031673.

Purpose of Issue: **FINAL**

Client: **MARLBOROUGH TOWN COUNCIL**

Project Title: **SA FOR THE MARLBOROUGH AREA NEIGHBOURHOOD PLAN**

Drawing Title: **MARLBOROUGH NEIGHBOURHOOD AREA**

Drawn	Checked	Approved	Date
CN	JW	RP	08/09/2019
AECOM Internal Project No:		Scale 1:6 A3	
60571087		1:47,500	

THIS DOCUMENT HAS BEEN PREPARED IN ACCORDANCE WITH THE TERMS OF AECOM'S AGREEMENT WITH THE CLIENT. AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY ITS ORIGINAL CLIENT. THE FOLLOWING AGREEMENTS APPLY TO THIS USE AND ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED.

**AECOM**

1000 Market Street  
 Denver, CO 80202  
 Phone: (303) 733-4000  
 Fax: (303) 733-2000  
 www.aecom.com

File Name: \\sbs-01-0041400 - Management Services\50504 - Marlborough Town Council\Engines 1.1 - Marlborough Neighbourhood Plan Area.mxd

## Sustainability Appraisal (SA) explained

- 1.5 SA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SA for the MANP seeks to maximise the developing plan's contribution to sustainable development.
- 1.6 The SA process should be undertaken in compliance with the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.<sup>3</sup> SA widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans; however, a Neighbourhood Plan is not a Local Plan and SA is not therefore legally required.
- 1.7 In line with basic conditions, SEA screening has been undertaken for the MANP to determine if the plan is likely to lead to significant environmental effects. A draft Screening Opinion was provided by Wiltshire Council in July 2019. In accordance with Regulation 9 of the SEA Regulations, the Screening Report was sent to the three Statutory Consultees (Environment Agency, Historic England and Natural England), requesting comments within a 5-week period from 15th July 2019 to 19th August 2019.
- 1.8 All three bodies agreed with the Council's decision that the MANP requires a SEA. Notably, in response to the July 2019 Screening Report, Historic England (in an email dated 20<sup>th</sup> August 2019) concluded:

*"We note the community's desire to allocate sites for new housing and school(s) and regard this as the main focus of our attention. While the Screening Report highlights the existence of the AONB we should also highlight the high number of nationally significant designated heritage assets in the Plan area and the potential which may exist for the significance of one or more of these to be significantly affected by the Plan's proposals. Our records indicate that there are 12 Grade I & II\* and 280 Grade II Listed Buildings, 1 Grade II\* Registered Park and Garden, 6 Scheduled Monuments, and 2 Conservation Areas.*

*We would therefore endorse your authority's view that a full SEA is required."*

- 1.9 To meet the requirement for SEA, the Neighbourhood Plan is undergoing an SA process which incorporates the requirements of the SEA Directive.

### The SEA Regulations

- 1.10 The SA has been undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.11 The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.12 In line with the SEA Regulations this SA Report must essentially answer four questions:
  1. What's the scope of the SA?
  2. What has Plan-making / SA involved up to this point?
    - 'Reasonable alternatives' must have been appraised for the plan.
  3. What are the appraisal findings at this current stage?
    - i.e. in relation to the draft plan.
  4. What happens next?

---

<sup>3</sup> Directive 2001/42/EC

1.13 These questions are derived from Schedule 2 of the SEA Regulations, which present the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SA questions.

## Structure of this SA Report

1.14 This document is the SA Report for the MANP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as presented in **Table 1.2**.

**Table 1.2: Questions that must be answered by the SA Report in order to meet regulatory<sup>4</sup> requirements**

SA Report question	In line with the SEA Regulations, the report must include... <sup>5</sup>
What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
What is the sustainability 'context'?	<ul style="list-style-type: none"> <li>The relevant environmental protection <b>objectives</b>, established at international or national level</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
<b>What's the scope of the SA?</b> What is the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
What are the key issues & objectives?	<ul style="list-style-type: none"> <li>Key <b>problems/issues</b> and <b>objectives</b> that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>What has plan-making/SA involved up to this point?</b>	<ul style="list-style-type: none"> <li>Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with <b>alternatives</b></li> <li>Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.</li> </ul>
<b>What are the assessment findings at this stage?</b>	<ul style="list-style-type: none"> <li>The likely significant effects associated with <b>the Submission version of the plan</b></li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing <b>the Submission version of the plan</b></li> </ul>
<b>What happens next?</b>	<ul style="list-style-type: none"> <li>The next steps for plan making/SA process.</li> </ul>

<sup>4</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>5</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

## 2. Local Plan context and vision for the MANP

- 2.1 The Marlborough Area Neighbourhood Plan (MANP) is being prepared in the context of the Wiltshire Core Strategy.<sup>6</sup> The Wiltshire Core Strategy was adopted in January 2015 and sets out a framework for how future development across Wiltshire will be planned and delivered in the period to 2026.
- 2.2 The MANP is also being prepared in the context of the Wiltshire Housing Site Allocations Plan (HSAP), which was adopted in August 2019. In accordance with the Core Strategy, the HSAP identifies new sites for housing, to provide surety of delivery over the plan period to 2026.
- 2.3 Consideration will also be given to the review of the Wiltshire Local Plan, which will provide the strategic context for development up to 2036 and determine the level and direction for future growth; in line with the revised NPPF and current practice. It will include the allocation of a range of sites to meet the identified need for homes and jobs, a review of existing development management policies, and strategic guidance for the preparation of neighbourhood plans.

### Policy context

#### Wiltshire Core Strategy (2015)

- 2.4 In the context of the Neighbourhood Plan area, Marlborough is designated as a 'Market Town' within Policy 1 'Settlement Strategy' of the Core Strategy. The 'Principle Settlements' of Wiltshire – Chippenham, Trowbridge and Salisbury - have been identified by Policy 1 as strategically important centres where new development will be primarily focused, but new development is also expected in the Market Towns, Local Service Centres and Large and Small Villages.
- 2.5 Within the Core Strategy, Market Towns are defined as '*settlements that have the ability to support sustainable patterns of living in Wiltshire through their current level of facilities, services and employment opportunities*'. The Market Towns are also identified as having potential for significant housing and employment development which will help sustain and enhance their services and facilities.
- 2.6 Policy 2 'Delivery Strategy' of the Core Strategy states that at least 178 ha of new employment land and 42,000 new homes will be delivered across Wiltshire between 2006 and 2026. This policy allocates 220 of these dwellings to Salisbury Road in Marlborough, which is defined in the Core Strategy as a strategically important site for development.
- 2.7 In accordance with Policy 14 'Spatial Strategy: Marlborough Community Area', there will be approximately 3 ha of new employment land and 920 new homes provided in the Marlborough Community Area. Around 680 of these new homes should occur in Marlborough town, including 220 dwellings at the strategic site identified to the West of Salisbury Road.

#### Wiltshire Housing Site Allocations Plan (HSAP) (2019)

- 2.8 The HSAP (2019) presents proposals and associated policies designed to be in general conformity with the adopted Wiltshire Core Strategy (2015) and national planning policy. It considers sites in relation to the geographic area of Wiltshire (excluding Chippenham which has been dealt with in a separate Development Plan Document (DPD)).

---

<sup>6</sup> Wiltshire Council (2015): 'Wiltshire Core Strategy' [online] available from: <https://pages.wiltshire.gov.uk/adopted-local-plan-jan16-low-res.pdf> [accessed 15/08/19]

- 2.9 The Marlborough Community Topic Paper (2018) forms the evidence for the HSAP, summarising the outcomes of the site selection process in relation to the Marlborough Community Area.<sup>7</sup>
- 2.10 The Topic Paper sets out the settlement strategy in the Marlborough Community Area. The Community Area is divided into Marlborough Market Town and Marlborough Community Area remainder (large and small villages), see **Table 2.1** below.

**Table 2.1: Settlement Strategy in Marlborough Community Area<sup>8</sup>**

Market Town	Marlborough
<b>Large Villages</b>	Aldbourne, Baydon, Broad Hinton, Ramsbury
<b>Small Villages</b>	Avebury / Trussloe, Axford, Beckhampton, Chilton Foliat, East Kennett, Froxfield, Fyfield, Lockeridge, Manton, Ogbourne St George, West Overton, Winterbourne Bassett and Winterbourne Monkton

- 2.11 **Table 2.2** below sets out the residual housing requirement for the Marlborough Market Town and Marlborough Community Area remainder, taking into consideration figures set out in the Marlborough Community Topic Paper (2018) and subsequent Housing Land Supply Statement (HLSS) (2019). The HLSS takes into account completions (2006 – 2018) and developable commitments (2018-2026).

**Table 2.2: Housing Requirement for Marlborough Market Town and Marlborough Community Area Remainder**

Document	Indicative residual housing requirement	
	Marlborough Market Town	Marlborough Community Area Remainder
Marlborough Community Topic Paper (2018)	17	34
HLSS (2019)	0	22

- 2.12 As set out in **Table 2.2**, the residual shortfall for Marlborough Market Town is now 0, with supply providing an excess of 33 dwellings within the town.
- 2.13 In terms of the Marlborough Community Area remainder, **Table 2.2** identifies an indicative requirement of 22 dwellings. However, in light of the significant supply of housing land in the East Wiltshire Housing Market Area (HMA), the Local Plan will not need to allocate additional land to help meet the indicative residual requirement. The priority will lie with local communities to develop a future vision for their local area and address local needs through neighbourhood planning.

<sup>7</sup> Wiltshire Council (2018): 'Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Marlborough' [online] available at: <https://cms.wiltshire.gov.uk/documents/s157772/CATP08aCommunityAreaTopicPaperMarlborough.pdf> [accessed 15/08/19]

<sup>8</sup> Wiltshire Council (2018) Marlborough Community Topic Paper (2018) [online] available at: <<https://cms.wiltshire.gov.uk/documents/s132087/9%20Marlborough%20CATP.pdf>> last accessed [23/03/20]

## Wiltshire Local Plan Review (2019)

- 2.14 Wiltshire Council is reviewing the Wiltshire Core Strategy (2015) to be recast as the Wiltshire Local Plan. The Local Plan will identify land for development for the period to 2036. A review is required as the Government encourages local planning authorities to review their Local Plans every five years, and in order to prepare the review in good time, it is necessary to commence work now.
- 2.15 An initial consultation in November 2017 asked about the issues the Local Plan Review should address in order to plan for the period to 2036. The consultation document is available at:  
<http://www.wiltshire.gov.uk/planning-policy-local-plan-review>
- 2.16 This document has been prepared to stimulate discussion on how the review of the Wiltshire Local Plan should be carried out. At this stage no decisions have yet been made on the future locations for growth and development.
- 2.17 The provisional programme for the Local Plan Review suggests that Regulation 19 Pre-submission consultation will take place in Quarter 4 of 2019; however, this did not occur and it is recognised that there is likely to be changes to the programme.

## Links to the Neighbourhood Plan

- 2.18 Neighbourhood Plans will form part of the development plan for Wiltshire, alongside, but not as a replacement for the Local Plan. The Local Plan seeks to give communities a solid framework within which appropriate community-led planning policy documents, including neighbourhood plans, can be brought forward. Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. As set out above, the WCS and HASP provide a clear overall strategic direction for development in Wiltshire, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.19 The MANP Steering Group are keen to take a proactive approach to development in the Neighbourhood Plan, and despite the lack of residual requirement, seek to provide for additional growth. This is with the combined intention of securing additional community infrastructure (specifically a new school); protecting and enhancing the distinct historic environment, the natural environment, and open spaces; and ultimately supporting the vitality of the MANP area.

## Vision for the MANP

- 2.20 The vision for the MANP, which was established during earlier stages of plan development, is as follows:

*“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 a new medical facility 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.”*

## 3. The Scope of the SA

- 3.1 The SEA Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.<sup>9</sup> These authorities were consulted on the scope of the SA for the MANP in September 2019.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the MANP;
  - Baseline data against which the MANP can be assessed;
  - The key sustainability issues for the MANP; and
  - An ‘SA Framework’ of objectives against which the MANP can be assessed.
- 3.3 Baseline information (including the context review and baseline data) is presented in Appendix A. Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1** below.

**Table 3.1: Consultation responses received on the SA Scoping Report**

Consultation response	How the response was considered and addressed
<b>Natural England</b>	
<b>Charles Routh, Team Leader</b>	
We advise that the scoping report covers the areas of Natural England’s interests satisfactorily. However because of the Plan’s location within an Area of Outstanding Natural Beauty, we would like to use this opportunity to stress that documentation supporting the Neighbourhood Development Plan should set out how the NPPF major development test in para 172 has been met. This will require an Landscape and Visual Impact Assessment (LVIA) of the proposed sites, so that they can not only be compared with each other (which is what is required in the Sustainability Appraisal) but also their absolute impact on the Area of Outstanding Natural Beauty. If the major development test cannot be met, development should not be allocated in the sites proposed.	Comment noted. Steering Group informed. Preliminary Landscape Sensitivity Assessment (2012) has been carried out for all Wiltshire Strategic Housing Land Availability Assessment (SHLAA) sites.
<b>Historic England</b>	
<b>David Stuart, Historic Places Adviser</b>	
In our response to the local authority’s SEA Screening consultation earlier in the summer we highlighted the potential which may exist for proposed site allocations to impact on heritage assets.	Comment noted.
We recommended that the Plan and its supporting evidence draw upon relevant guidance to assist in the assessment and allocation process and we are pleased to note that most of these references are included in section 6. “Historic Environment” of the Scoping Report. However, we also note that reference to our guidance on Site Allocations appears absent and would encourage its inclusion also. Otherwise, there are no additional comments we would wish to make.	Comment noted. Reference to Historic England Site Allocations Guidance added to context review.

<sup>9</sup> In-line with Article 6(3).of the SA Directive, these consultation bodies were selected because *‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme’.*



Consultation response	How the response was considered and addressed
<b>Environment Agency</b> <b>Richard Jenkins, Planning Adviser</b>	
We are in overall agreement with the objectives set and criteria that has been outlined in the report. We advise that Section 7, Page 52, SA Objective: Use and Manage water in a sustainable way, should also include groundwater as well as surface water.	Comment noted. SA Objective updated.

## Key sustainability issues

3.4 Drawing on the review of the sustainability context and baseline, the SA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SA. These issues are as follows, presented by nine SA themes.

### Air quality

- The Marlborough AQMA is located within the Neighbourhood Plan area and was designated for exceedances in NO<sub>2</sub>.
- In addition to the Marlborough AQMA, there are seven other AQMA's within the wider Wiltshire area; however, none of these are within close proximity to the Neighbourhood plan area.
- Traffic and congestion arising from planned new development within and surrounding the area have the potential to increase emissions and reduce air quality in the Neighbourhood Plan Area
- HGV's are likely to continue to be a significant contributor to atmospheric pollution within the MANP area.

### Biodiversity

- There are no European designated sites within the Neighbourhood Plan area.
- The following three SSSI's are located within the Neighbourhood Plan area: Savernake Forest SSSI, River Kennet SSSI, and Fyfield Downs SSSI.
- There are some areas of the Neighbourhood Plan area which are situated in SSSI IRZ's for residential and/or rural-residential developments.
- A number of CWS are located within the Neighbourhood Plan area.
- There are a range of Biodiversity Action Plan Priority Habitats within and surrounding the Neighbourhood Plan area.

### Climate change

- The total CO<sub>2</sub> emissions per capita within Wiltshire are greater than the regional and national totals, however the percentage reduction of emissions within Wiltshire between 2005 and 2016 were greater than the average reductions in the South West of England and the whole of England.
- The majority of the Neighbourhood Plan area is located within Flood Zone 1, showing that there is a <0.1% chance (1 in 1000) of river flooding in any given year. However, the areas immediately adjacent to the River Kennet and the River Og are located within Flood Zone 3 where there is a 1% (1 in 100) or greater chance of flooding happening each year.
- In terms of surface water flooding, the areas immediately surrounding the River Kennet and River Og are classified as having medium-to-high risk.

- The MANP should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies and by diverting development to areas of lower flood risk in accordance with the NPPF.

## Landscape

- The Neighbourhood Plan area lies within the North Wessex Downs AONB which is recognised as a nationally designated landscape.
- The whole of the Neighbourhood Plan area lies within the '116 Berkshire and Marlborough Downs' NCA which is identified as vast arable fields which stretch across sparsely settled, rolling Chalk hills.
- There are three landscape character types identified in the Wiltshire Landscape Character Assessment that overlap with the Neighbourhood Plan area boundary: Marlborough Downs, Savernake Plateau and Kennet Valley.
- The potential effects of development proposed through the MANP may have implications for the overall character and appearance of the landscape in the future.

## Historic environment

- The Neighbourhood Plan area contains three Grade 1, 12 Grade II\*, and 321 Grade II nationally designated listed buildings.
- There are 30 scheduled monuments located within the Neighbourhood Plan area, seven of which are deemed to be 'at risk' according to the 2018 Heritage at Risk Register.
- There are three conservation areas within the Neighbourhood Plan area, namely: Manton Conservation Area, Marlborough Conservation Area and Mildenhall Conservation Area. A Conservation Area Statement has been produced for all three Conservation Areas (June, 2003).
- The Stonehenge, Avebury and Associated Sites world heritage site is situated adjacent to the north west boundary of the Neighbourhood Plan area, with a small section present in Preshute Parish.
- Following a high-level review of the HER for Wiltshire and Swindon, there are 1078 records within a 3000m radius of Marlborough (which covers the majority of the Neighbourhood Plan area) including a variety of archaeological sites, historic buildings and landscapes dating from the Neolithic period to the present day.
- Development has the potential to affect the significance of heritage assets and their settings, both positively and negatively.

## Land, soil and water resources

- There is a lack of evidence to ascertain agricultural land quality for the whole of the Neighbourhood Plan area. National provisional quality datasets indicate that the majority of land within the Neighbourhood Plan area is Grade 3 with small areas of Grade 2 land, and as part of a precautionary approach it is noted that there is the potential for loss of 'best and most versatile') agricultural land.
- Small areas of SPZ 1, SPZ 2 and SPZ 3 are present within the Neighbourhood Plan area.
- The Neighbourhood Plan area is within the 'Berkshire Downs' Groundwater NVZ.
- The Neighbourhood Plan area is located within the 'Kennet' catchment area which contains 33 waterbodies, all of which have 'good' chemical status and 29 of which have either 'moderate' or 'good' ecological status.

## Population and community

- The population of the Neighbourhood Plan area increased at a slower rate between 2001 and 2011 than the Wiltshire, the South West of England and England averages.

- Generally, there is a higher proportion of elderly (aged 60+) and young (aged 0-24) residents and a lower proportion of working age (25-59) residents within the neighbourhood plan, compared to authority, regional and national averages.
- There are low levels of household deprivation within MANP area.
- The Neighbourhood Plan area falls within seven LSOAs: 'Wiltshire 12B', 'Wiltshire 024A', 'Wiltshire 019A', 'Wiltshire 019C', 'Wiltshire 019D' and 'Wiltshire 019E' (which are within the top 40% least deprived LSOA's in the country), and 'Wiltshire 019B', (which is within the top 40% most deprived LSOA's in the country).
- Marlborough College is located at the west end of Marlborough High Street providing independent boarding and day school for pupils aged 13 to 18.
- Demand for school places is high, three state schools located within the MANP area.
- Access to health facilities in the MANP area is good, with four dental surgeries present.
- A lower proportion of residents own their homes outright or with a mortgage, compared to the averages for Wiltshire, the South West of England and England.
- The Neighbourhood Plan area has a highly qualified working population, with a higher percentage of residents having a Level 4 qualification and above, in comparison to authority, regional and national averages.

## Health and wellbeing

- A higher percentage of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', compared to authority, regional and national averages.
- The proportion of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' is lower than the totals the South West of England and the whole of England.
- Wiltshire has a high life and health life expectancy, and low levels of deprivation, unhealthy lifestyles, crime, and unemployment.
- There are high rates of mental health illnesses among young people within Wiltshire.
- Cancer remains the biggest cause of all and premature mortality in Wiltshire.
- Some specific populations in Wiltshire are at risk of ill-health due to lifestyle choices.

## Transportation

- The A4 and A346 are the main roads running through the MANP area.
- The Ridgeway National Trail and National Cycle Network Routes 403 and 482 run through the MANP area.
- The nearest rail stations to the Neighbourhood Plan area are located in Great Bedwyn and Swindon.
- There are a number of bus services providing residents with regular access to close by towns and villages; however, evening bus services for rural areas need improving.
- There is a relatively high level of car ownership and a strong reliance on private vehicles within the MANP area.

## SA Framework

3.5 The issues were then translated into an ‘SA Framework’. This SA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SA framework for the MANP is presented below in **Table 3.1**.

**Table 3.1: SA Framework for the Marlborough Area Neighbourhood Plan**

SA theme	SA objective	Assessment questions
<b>Air quality</b>	Improve air quality in the Neighbourhood Plan area and minimise and/or mitigate all sources of environmental pollution	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the key objectives within the Wiltshire Local Transport Plan, to encourage more sustainable transport?</li> <li>• Enable sustainable transport infrastructure enhancements?</li> <li>• Reduce the need to travel outside of the Neighbourhood Plan area?</li> <li>• Implement measures (such as appropriate planting and provision of green infrastructure) which will help support air quality in the Neighbourhood Plan area?</li> </ul>
<b>Biodiversity &amp; geodiversity</b>	Protect and enhance all biodiversity and geodiversity	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the status of the nationally designated sites within and/or adjacent to the Neighbourhood Plan area boundary, including Savernake Forest SSSI, River Kennet SSSI, and Fyfield Down SSSI?</li> <li>• Protect and enhance priority habitats and species?</li> <li>• Protect and enhance locally designated sites?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to multifunctional green infrastructure networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
<b>Climate change</b>	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water runoff, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>
<b>Landscape and</b>	Protect and enhance the character and	<p>Will the option/proposal help to:</p>

SA theme	SA objective	Assessment questions
	quality of landscapes and villagescapes.	<ul style="list-style-type: none"> <li>• Conserve and enhance the quality and integrity of the North Wessex Downs AONB and its setting?</li> <li>• Support landscape character of the landscape character areas covering the Neighbourhood Plan area?</li> <li>• Conserve and enhance local diversity and character?</li> <li>• Conserve the capacity for landscape features to accommodate new development through considerate planning?</li> <li>• Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?</li> </ul>
<b>Historic environment</b>	Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the site and setting of the World Heritage Site?</li> <li>• Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the environment?</li> <li>• Conserve and enhance archaeological remains, including historic landscapes?</li> <li>• Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?</li> </ul>
<b>Land, soil and water resources</b>	Ensure the efficient use of land	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the use of previously developed land?</li> <li>• Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land?</li> <li>• Protect the integrity of mineral safeguarding areas?</li> </ul>
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste produced?</li> <li>• Support the minimisation, reuse and recycling of waste?</li> <li>• Maximise opportunities for local management of waste to minimise export of waste to areas outside?</li> <li>• Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>
	Use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Minimise water consumption?</li> <li>• Protect surface and ground water resources?</li> </ul>

SA theme	SA objective	Assessment questions
<b>Population and community</b>	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing residents?</li> <li>• Improve the availability and accessibility of key local facilities?</li> </ul>
	Reduce deprivation and promote a more inclusive and self-contained community.	
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes?</li> <li>• Support enhancements to the current housing stock?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> <li>• Support a reduction in the proportion of second homes?</li> </ul>
<b>Health and wellbeing</b>	Improve the health and wellbeing residents within the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?</li> <li>• Promote the use of healthier modes of travel?</li> <li>• Improve access to the countryside for recreational use?</li> <li>• Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?</li> </ul>
<b>Transportation</b>	Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the key objectives within the Wiltshire Local Transport Plan (LTP3) to encourage more sustainable transport?</li> <li>• Enable sustainable transport infrastructure enhancements?</li> <li>• Facilitate the maintenance and expansion of community-driven schemes such as the community bus service?</li> <li>• Facilitate home and remote working?</li> </ul>

SA theme	SA objective	Assessment questions
		<ul style="list-style-type: none"><li>• Improve road safety?</li><li>• Reduce the impact on residents from the road network?</li></ul>

## 4. What has plan making / SA involved to this point?

### Introduction

- 4.1 In accordance with the SEA Regulations the SA Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives/ an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making/ SA up to this point is told within this part of the SA Report. Specifically, this section explains how preparation of the current version of the MANP has been informed by an assessment of alternative locations for non-strategic scale development in the MANP area.

### Developing the reasonable alternatives

- 4.3 The following sections therefore describe how the SA process to date has informed the preferred development strategy for the MANP area. As the delivery of new housing development through the MANP is what is most likely to have a significant effect on SA objectives, it was determined that this issue should be the primary focus of the consideration of alternatives through the SA process. Case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process/ report that is focused and accessible.
- 4.4 The potential sites and spatial strategy options (packages of sites) for delivering development in line with the MANP objectives, will directly or indirectly influence the topic areas identified above and the Parish Council's preferred approach.

### Local planning framework

- 4.5 As discussed in **Section 2.1**, the MANP is being prepared in the context of the WCS (2015), the HSAP (2019), and with due consideration of the forthcoming Local Plan Review. Policy 2 'Delivery Strategy' of the WCS identifies a strategically important site for development in Marlborough at Salisbury Road; for 220 dwellings. Policy 14 'Spatial Strategy: Marlborough Community Area', states that there will be approximately 3 ha of new employment land and 920 new homes provided in the Marlborough Community Area. In accordance with Policy 14; around 680 of these new homes should be delivered in Marlborough town, including 220 dwellings at the strategic site identified to the West of Salisbury Road.
- 4.6 The HSAP (2019) presents proposals and associated policies designed to be in general conformity with the adopted Wiltshire Core Strategy (2015) and national planning policy. The Marlborough Community Topic Paper (2018) forms the evidence for the HSAP, summarising the outcomes of the site selection process in relation to the Marlborough Community Area.
- 4.7 The Topic Paper sets out the settlement strategy in the Marlborough Community Area. The Community Area is divided into Marlborough Market Town and Marlborough Community Area remainder (large and small villages) (see **Table 2.1**).
- 4.8 **Table 4.1** below sets out the residual housing requirement for the Marlborough Market Town and Marlborough Community Area remainder, taking into consideration figures set out in the Marlborough Community Topic Paper (2018) and subsequent Housing Land Supply Statement (HLSS) (2019). The HLSS takes into account completions (2006 – 2018) and developable commitments (2018-2026).



**Table 4.1: Housing Requirement for Marlborough Market Town and Marlborough Community Area Remainder**

Document	Indicative residual housing requirement	
	Marlborough Market Town	Marlborough Community Area Remainder
Marlborough Community Topic Paper (2018)	17	34
HLSS (2019)	0	22

- 4.9 As set out above, the residual shortfall for Marlborough Market Town is now 0, with supply providing an excess of 33 dwellings within the town.
- 4.10 In terms of the Marlborough Community Area remainder, **Table 4.1** above identifies an indicative requirement of 22 dwellings. However, in light of the significant supply of housing land in the East Wiltshire Housing Market Area (HMA), the Local Plan will not need to allocate additional land to help meet the indicative residual requirement. The priority will lie with local communities to develop a future vision for their local area and address local needs through neighbourhood planning.
- 4.11 The Steering Group are keen to take a proactive approach to development in the Neighbourhood Plan, and seek to provide additional growth despite the surplus land supply. Consultations with local residents indicate a desire to see more younger people in the Neighbourhood Plan area, to maintain its vibrancy in the face of an otherwise aging population.
- 4.12 In 2016 the Steering Group commissioned Cobweb Consulting to carry out a local housing needs survey to provide a robust piece of evidence to inform Neighbourhood Plan policies.<sup>10</sup> The survey (2017) concludes that there is a requirement for a wide range of different types of housing at different market points, notably affordable housing, to meet current and future requirements. The overall affordable housing needs of the MANP area during the plan period, including Mildenhall, is identified as at least 100 affordable homes.
- 4.13 Taking the above into account along with the objectives of the MANP, alternatives should be explored through the SA to deliver the indicative requirement of 22 dwellings while also helping to meet the identified shortfall of affordable homes and deliver new social infrastructure (in particular a new medical centre).
- 4.14 The first step in establishing reasonable alternatives that can achieve this is to identify and assess site options.

## Site options

- 4.15 Sites potentially in contention for allocation through the Marlborough Neighbourhood Plan were identified by the Town Council, with support from officers of Wiltshire Council and by professional planning consultancy, O'Neill Homer. A Site Assessment Report (November, 2020) has been prepared by O'Neill Homer, which summarises the site assessment process and outcomes that have informed the selection of housing site allocations in the MANP and forms an important part of its published evidence base.
- 4.16 Appendix A of the Site Assessment (Stage 1) provides an appraisal of the suitability of sites available for the potential development of housing, education, and community facilities within the MANP area.<sup>11</sup> 23 potential development sites were identified for assessment through a 'Call for Sites' exercise carried out in November/ December 2018. The 'call' specifically requested land interests to indicate a willingness to exceed the Core Strategy 40% affordable housing

<sup>10</sup> Cobweb Consulting (2017) Marlborough Area Neighbourhood Plan: Housing Needs and Requirements Study 2017

<sup>11</sup> O'Neill Homer (2020) Marlborough Area Neighbourhood Plan Site Assessments Report

policy requirement and/or to provide land to deliver a new medical centre; plus new sports and recreational facilities, new car park and additional cemetery land.

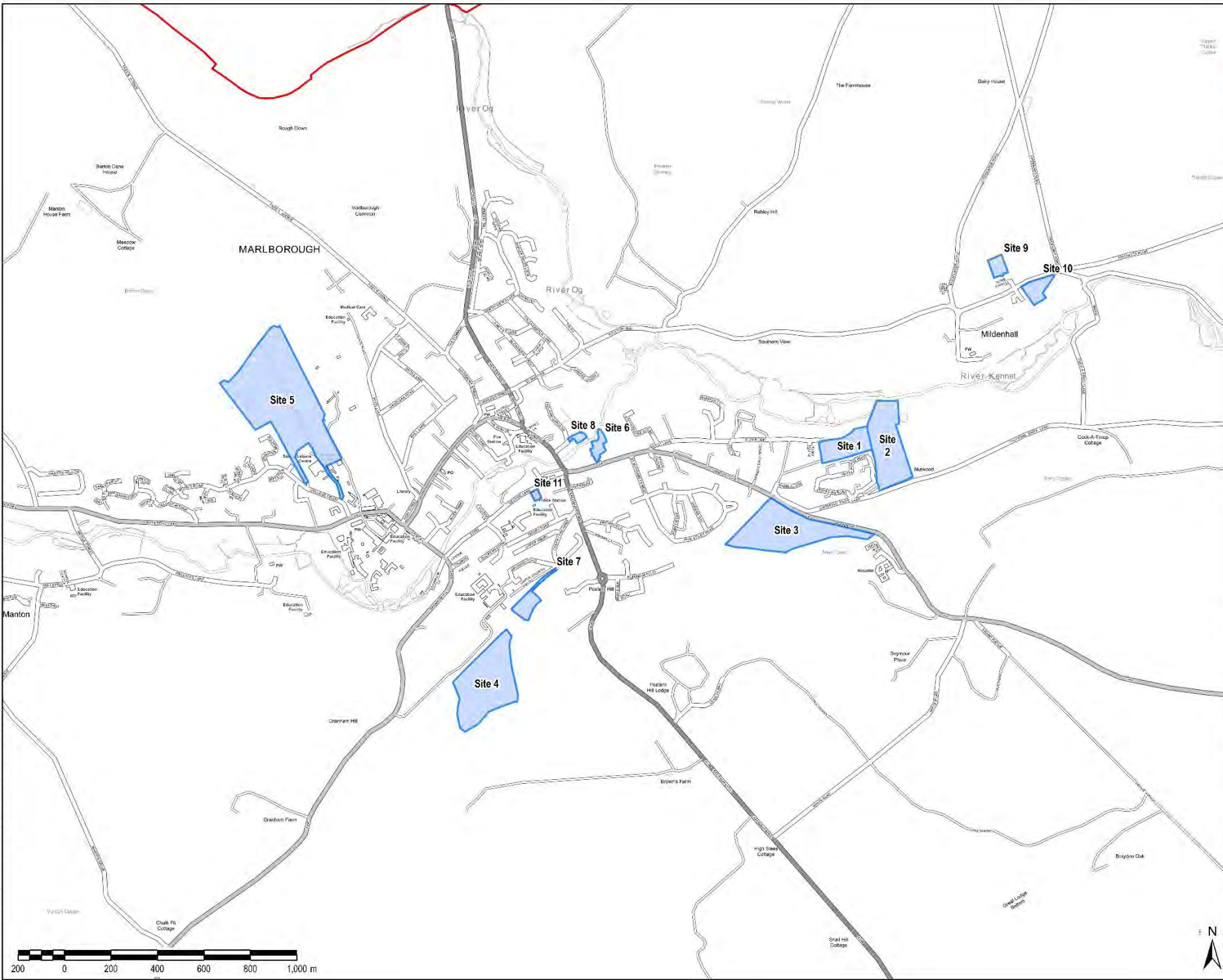
- 4.17 Of the 23 sites considered, the Site Assessment Report disqualifies 15 sites that do not adjoin the defined Marlborough development boundary or Mildenhall built up area. This is justified on the basis that the whole area lies within the North Wessex Downs AONB area and so the landscape is especially sensitive to development.
- 4.18 The findings of the assessment therefore show that nine of the sites considered are suitable for housing and are realistic candidates for consideration through plan-making. These are:
- 1A Elcot 1;
  - 1B Elcot 2;
  - 1C London Road;
  - 1D Salisbury Road;
  - 2 Barton Dene;
  - 3 Pelhams Court;
  - 4A Former Resource Centre;
  - 13 Kelham Gardens (Northdown); and
  - 11 Police Station.
- 4.19 In light of the conclusions of the Site Assessment Report (2020), these nine suitable sites have been further considered and reviewed by the Steering Group for promoting housing development for the purposes of the Neighbourhood Plan.
- 4.20 It is noted that the SA was being carried out alongside the Site Assessment Report, and two of the 15 sites that have now been rejected were previously considered potentially suitable for allocation (Draft Site Assessment Report (July 2019)), and therefore subject to SA. These two sites are:
- 5 Mildenhall Adj Playing Field; and
  - 9 Mildenhall Adj Home Farm Close
- 4.21 In March 2020 the SA process undertook an appraisal of the key environmental constraints present at each of the eleven sites and potential effects that may arise as a result of housing development at these locations (see **Table 4.2** overleaf noting new site refs for the purposes of the SA). The locations of these sites are presented in **Figure 4.1**.

**Table 4.2: Sites considered through the SA process**

<b>Site no.</b>	<b>Name</b>	<b>Site. capacity</b>
1	Land off Elcot Lane	45-50
2	Further Land off Elcot Lane	102
3	Land South of A4, London Road	60
4	Further Land west of Salisbury Road	98
5	Barton Dene	130
6	Pelham Court	20
7	Former Resource Centre	30
8	Land at Kelham Gardens	9 flats
9	Mildenhall land adjacent Home Farm Close	18
10	Mildenhall Adj Playing Field	21
11	Police Station	24

- 4.22 Each of the site options identified in the table above were considered against the SA Framework of objectives and decision-making appraisal questions developed during SA scoping (**Section 3.3**) and the baseline information.
- 4.23 It should be noted that when considering access to community facilities and services, walking distances have been calculated from the edge of the site using google maps.

File Name: I:\004 - Information Systems\60571087\_Neighbourhood Plan\_CRB\_2018\_202202\_Maps\Marlborough Town Council\Fig4.1 - Sites Assessed to SEA.mxd



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

**LEGEND**

- Marlborough Neighbourhood Plan Area
- Site Option

Site 1: Land off Elcot Lane  
 Site 2: Further Land off Elcot Lane  
 Site 3: Land south of A4, London Road  
 Site 4: Further Land West of Salisbury Road  
 Site 5: Barton Deane  
 Site 6: Pelhams Court  
 Site 7: Former Resource Centre, Cherry Orchard  
 Site 8: Land at Kelham Gardens  
 Site 9: Mildenhall land adjacent Home Farm Close  
 Site 10: Mildenhall adjacent Playing Field  
 Site 11: Police Station

---

Copyright  
 Contains Ordnance Survey Data © Crown Copyright and database right 2020

---

Purpose of Issue: **DRAFT**

---

Client: **MARLBOROUGH TOWN COUNCIL**

---

Project Title: **SUSTAINABILITY APPRAISAL FOR THE MARLBOROUGH AREA NEIGHBOURHOOD PLAN**

---

Drawing Title: **INDIVIDUAL SITES ASSESSED THROUGH THE SA**

---

Drawn CN	Checked JW	Approved RC	Date 04/03/2020
AECOM Internal Project No. <b>60571087</b>		Scale @ AS <b>1:15,000</b>	

---

THIS DOCUMENT HAS BEEN PREPARED IN ACCORDANCE WITH THE REQUIREMENTS OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS 2017 AND IS SUBJECT TO THE TERMS AND CONDITIONS OF THE AECOM CLIENT AGREEMENT. IT IS NOT TO BE USED FOR ANY OTHER PURPOSE WITHOUT THE WRITTEN PERMISSION OF AECOM. THE INFORMATION CONTAINED HEREIN IS FOR INFORMATION ONLY AND DOES NOT CONSTITUTE AN OFFER OF ANY FINANCIAL PRODUCT OR SERVICE. AECOM AND ITS AFFILIATED COMPANIES AND EMPLOYEES ACCEPT NO LIABILITY FOR ANY LOSS OR DAMAGE OF ANY KIND ARISING FROM THE USE OF THIS DOCUMENT OR ANY INFORMATION CONTAINED HEREIN.

---

AECOM  
 10000 Wilshire Blvd, Suite 1000  
 Los Angeles, CA 90024, USA  
 Tel: +1 310 412 3000  
 Fax: +1 310 412 3001  
 www.aecom.com

---

Drawn: J2000  
 Date: 04/03/2020

**FIGURE 4.1** Ref: **02**

### Site options method and appraisal findings

- 4.24 The SA process has undertaken an appraisal of the relative sustainability merits and constraints at each of the eleven individual site options. In this context the options have been considered in relation to the SA Framework of objectives developed during scoping (see **Table 3.2**).
- 4.25 The SA process has undertaken an appraisal of the key environmental constraints present at each of the sites set out in **Table 4.2** above, and potential effects that may arise as a result of housing development at these locations.
- 4.26 Each of the site options identified in **Table 4.2** were considered against the SA Framework of objectives and decision-making appraisal questions developed during SA scoping (**Section 3.3**) and the baseline information.
- 4.27 It should be noted that when considering access to community facilities and services, walking distances have been calculated from the edge of the site using google maps.
- 4.28 **Table 4.3** presents summary appraisal findings in relation to the eleven individual site options, with the detailed appraisals presented within **Appendix B**.

**Table 4.3: Summary of SA site appraisal findings**

Site	Air quality	Biodiversity	Climate change	Landscape	Historic Env	Land, soil and water resources	Population and community	Health and wellbeing	Transport
Site 1	Red	Blue	Blue	Red	Red	Blue	Green	Red	Blue
Site 2	Red	Blue	Red	Red	Red	Blue	Green	Red	Blue
Site 3	Red	Red	Blue	Red	Blue	Blue	Green	Blue	Blue
Site 4	Red	Red	Blue	Red	Yellow	Red	Green	Red	Blue
Site 5	Red	Blue	Yellow	Red	Red	Blue	Green	Blue	Green
Site 6	Red	Yellow	Red	Green	Green	Blue	Blue	Green	Green
Site 7	Red	Blue	Blue	Yellow	Yellow	Red	Green	Green	Blue
Site 8	Red	Yellow	Red	Green	Green	Green	Green	Green	Green
Site 9	Red	Yellow	Blue	Red	Red	Blue	Green	Blue	Red
Site 10	Red	Yellow	Blue	Red	Red	Blue	Green	Blue	Red
Site 11	Red	Yellow	Yellow	Green	Green	Green	Green	Green	Green

Key	
Likely adverse effect (without mitigation measures)	Red
Likely positive effect	Green
Neutral/no effect	Yellow
Uncertain effects	Blue

- 4.29 Site 11, followed by site 8 perform most positively against the SA themes, with Sites 2, 9 and 10 identified as the least well performing. All sites with the exception of Site 6 perform positively against the Population and community SA theme given the delivery of housing to meet local needs. Site 6 performs as 'uncertain' due to the potential loss of a Wiltshire Core Strategy Principal Employment Site.
- 4.30 All sites perform negatively against the Air quality SA theme, given that development at any site will result in residents travelling within Marlborough AQMA to access services and facilities within the town centre, contributing to air quality issues.
- 4.31 In terms of Climate change, it is recognised that while development at sites alone is not likely to have a significant negative effect on climate change, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre

- capita emissions. Sites 5 and 11 therefore performs as 'neutral' in this respect, with the majority of other sites performing 'uncertain' where access to the town centre is less than satisfactory. Sites 6 and 8 are worst performing against the Climate change SA theme given the risk of flooding at these sites.
- 4.32 In terms of the Health and wellbeing theme, sites 6, 7, 8 and 11 perform positively given their location in terms of Marlborough town centre, health and recreational facilities. Sites 3, 5, 9 and 10 are 'uncertain' where there is good access to either health or recreational facilities, while sites 1, 2 and 4 performs negatively where access is poor to both health and recreational facilities.
- 4.33 In relation to the Transportation theme; positive effects have been concluded for sites 5, 6, 8 and 11 due to their location in terms of access to sustainable transport opportunities, and as the sites are within walking distance of Marlborough town centre. Sites perform less positively where they may still rely on the car to travel to the town centre (sites 1 - 4 and 7). Sites 9 and 10 perform negatively given their location outside of Marlborough Town, in the neighbouring village of Mildenhall. Sites would be reliant on the car for access to Marlborough for all day-to-day services and facilities; given the limited offer in Mildenhall village.
- 4.34 Sites 1-5, 9 and 10 perform negatively against the Landscape SA theme due to potential adverse effects on the character, setting and intrinsic qualities of the North Wessex Downs AONB. Sites 6, 8, and 11, although also within the AONB, are brownfield sites in the built up area, and therefore residual effects are not anticipated to be of significance. Positive effects are concluded for these sites given development would likely improve the site, which currently includes a disused building/ car parking facilities. Similar effects are anticipated for the Historic Environment SA theme, with the potential for positive effects in this respect if high quality design standards were adhered to.
- 4.35 Sites 1, 2, 5, 6, 9 and 10 perform negatively against the Historic Environment SA theme as they are located within/ within close proximity of a designated heritage asset, and there is the potential to lead to adverse effects on distinctiveness and/or setting; for example through impacting on views in/ out of the site. It is also noted that is the potential for positive effects in this respect if high quality design standards were adhered to.
- 4.36 In terms of the land, soil and water resources, uncertainty relates to the evidence base, given recent land classification has not been carried out in this location. Sites 4 and 7 perform negatively where they fall within a Source Protection Zone.
- 4.37 Site 3 and Site 4 perform negatively against the Biodiversity SA theme as it falls within a SSSI IRZ and also includes priority habitat within/ adjacent to the site. All other sites with the exception of sites 6, 8, 9 and 10 perform as 'uncertain' as they fall within a SSSI IRZ and/or have the potential to impact upon priority habitat outside of the site. Sites 6, 8, 9, 10 and 11 perform as 'neutral' where they are brownfield land in the centre of the town, and/ or are not constrained in terms of designated sites, nor priority habitat.

## Establishing reasonable alternatives

- 4.38 Taking O'Neill Homer's preliminary assessment of sites, and the SA of site options (presented above) the group revaluated the sites and determined that:
- Site 2 should be discounted as the site performed least well in both the SA (findings above) and the Community Survey carried out. Site 6 should be discounted due to it currently being protected for employment land through the adopted Core Strategy.
- 4.39 Further to the above, the group also decided not to take forward sites for allocation in Mildenhall (Sites 10 and 11) given their location outside the Marlborough Area, poor performance against the SA objectives, and recent objections from Wiltshire Council.
- 4.40 The following sites were therefore available to take forward and form the basis for establishing alternatives that can deliver the indicative housing requirement of 245 dwellings, address the shortfall in affordable homes and deliver social infrastructure (in particular a new medical centre):

- 1 Land off Elcot Lane
- 3 Land South of A4, London Road
- 4 Further Land west of Salisbury Road
- 5 Barton Dene
- 7 Former Resource Centre
- 8 Land at Kelham Gardens
- 11 Police Station

4.41 The group determined that sites 7, 8 and 11 are appropriate in principle to allocate and should remain constant across the alternatives. This is given they each deliver growth on brownfield sites close to the town centre, have been positively received at informal consultation and perform well through the individual site assessment exercise. However, these three sites collectively only deliver a total of 59 new homes (20 affordable), and so there is a need to explore the allocation of additional sites to meet the remaining shortfall in affordable homes and deliver new social infrastructure, in particular a new medical centre. This will further secure the protection of para. 14 of the NPPF (2019); which states (provided criteria set out at para. 14 (a-d) is met):

*“In situations where the presumption (of sustainable development) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits.”*

4.42 The remaining sites (1, 3, 4 and 5) were considered to be variables. In terms of potential to deliver affordable housing, Sites 1, 3 and 4 have offered 50% affordable homes, Site 5 has offered 40% affordable homes plus 10% for college employees, Sites 7 and 11 have offered 40% affordable homes, and 0 affordable homes have been offered at Site 8 due to viability.

4.43 Three options were identified by the group to meet the shortfall in affordable housing and explore the opportunity to deliver a new medical centre. These are set out below and illustrated in **Figures 4.2 – 4.4**:

**Option A: Sites 1, 5, 7, 8 and 11**

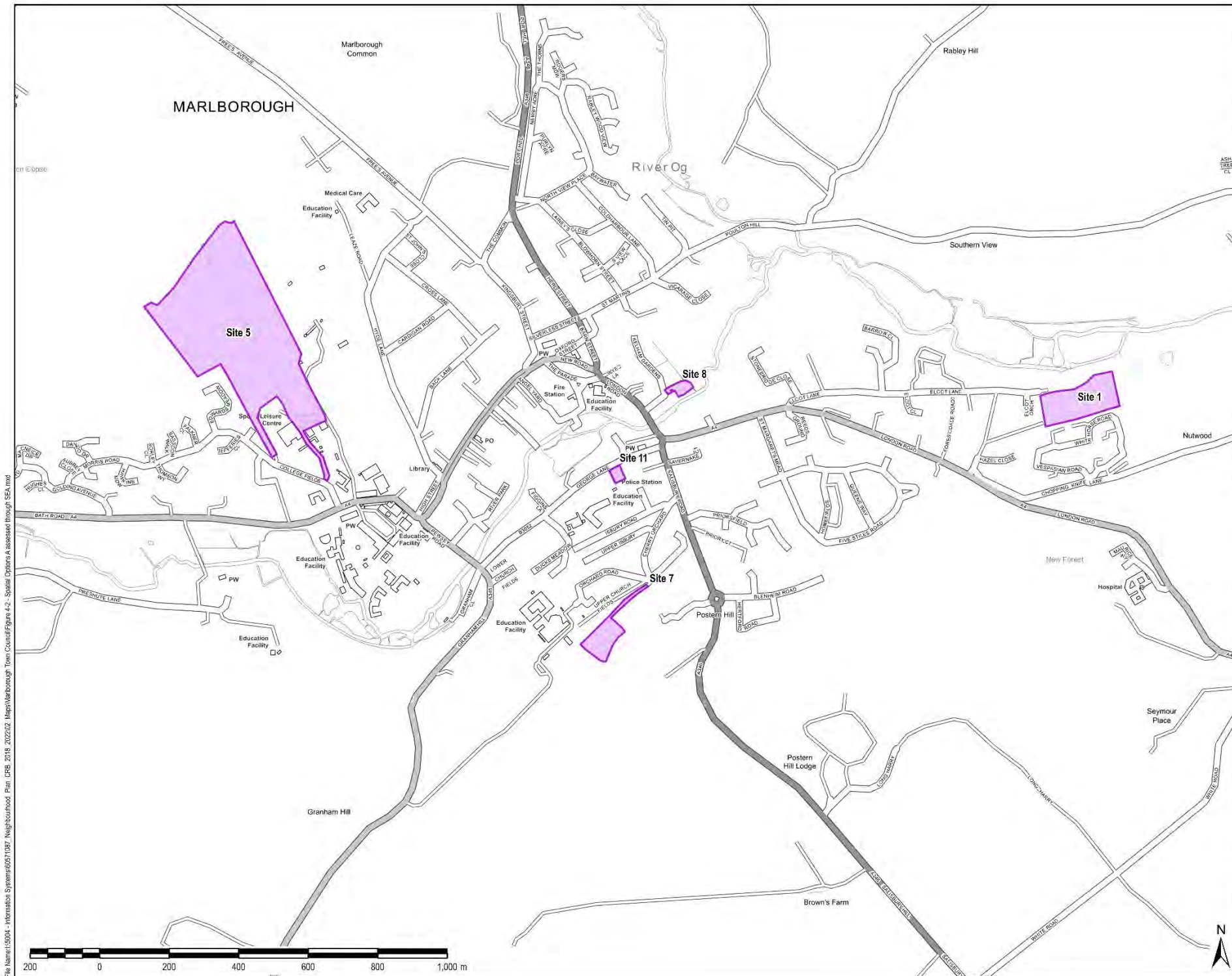
243 dwellings (98 affordable homes plus 13 Marlborough college homes and provision of medical centre at Site 5)

**Option B: Sites 5, 7, 8 and 11**

193 dwellings (86 affordable homes including the 13 Marlborough college homes as such and provision of medical centre at Site 5)

**Option C: Sites 1, 3, 4, 7, 8 and 11**

271 dwellings (125 affordable homes and green space for informal recreation and ecological habitats)



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

**LEGEND**

Option A

- Site 1: Land off Elcot Lane
- Site 5: Barton Deane
- Site 7: Former Resource Centre, Cherry Orchard
- Site 8: Land at Kelham Gardens
- Site 11: Police Station

Copyright:  
Contains Ordnance Survey Data © Crown Copyright and database right 2020

Purpose of issue: **DRAFT**

Client: **MARLBOROUGH TOWN COUNCIL**

Project Title: **SUSTAINABILITY APPRAISAL FOR THE MARLBOROUGH AREA NEIGHBOURHOOD PLAN**

Drawing Title: **SPATIAL OPTION A ASSESSED THROUGH THE SA**

Drawn: <b>GN</b>	Checked: <b>JW</b>	Approved: <b>RC</b>	Date: <b>16/03/2020</b>
ALCOM Internal Project No: <b>60571087</b>		Scale: <b>@ A3 1:10,000</b>	

THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO AND IS SUBJECT TO THE TERMS OF A PROFESSIONAL SERVICES AGREEMENT ENTERED INTO BETWEEN THE CLIENT AND AECOM. IT IS NOT TO BE USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN CONSENT OF AECOM. AECOM ACCEPTS NO LIABILITY FOR ANY LOSS OR DAMAGE, INCLUDING CONSEQUENTIAL DAMAGES, ARISING FROM THE USE OF THIS DOCUMENT.

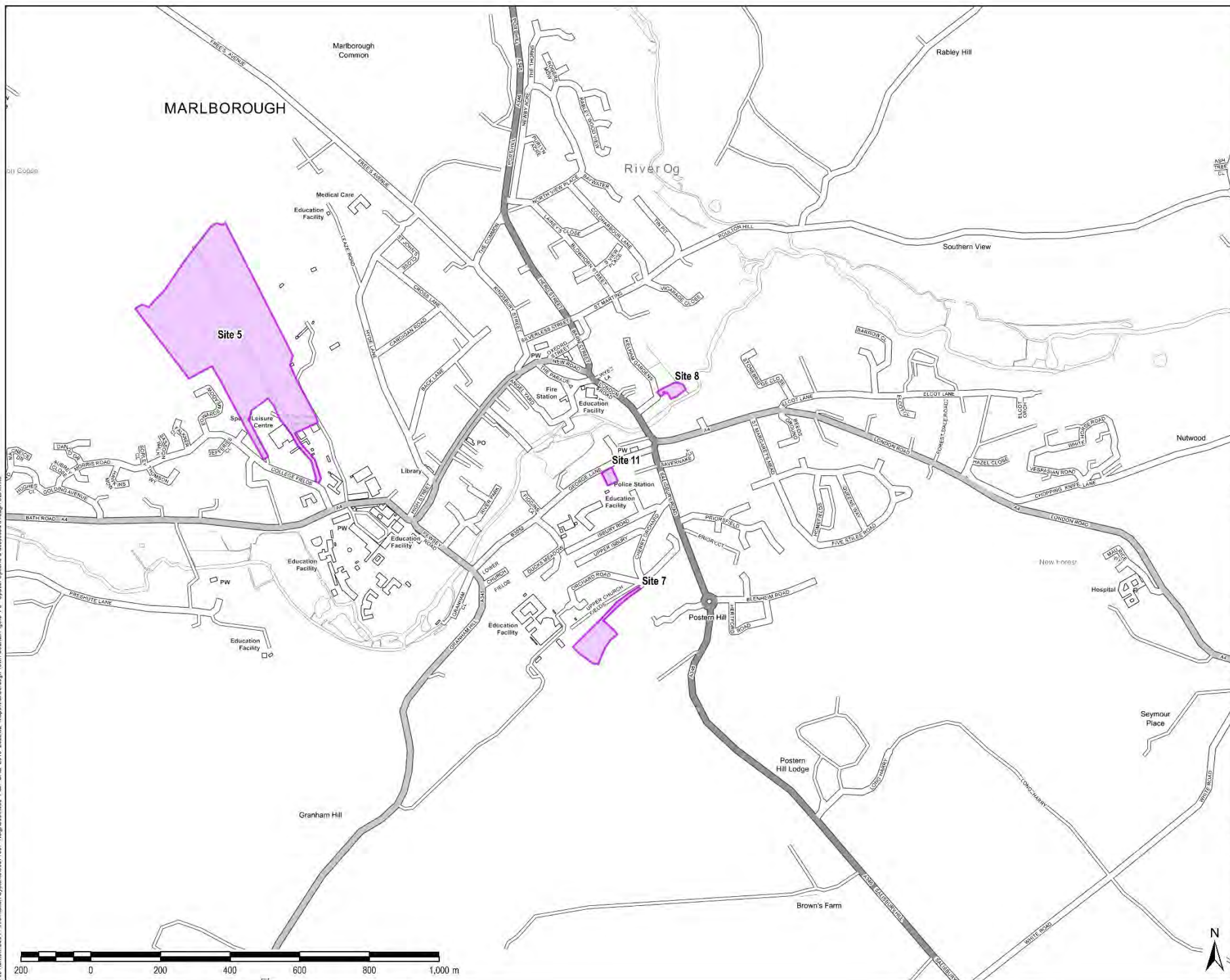
**ALCOM**  
Sustainable  
Development  
Solutions  
Telephone: 01223 733939  
Telephone: 01223 733939  
Fax: 01223 733939  
www.alcom.co.uk



File Name: \\S0004 - Information Systems\60571087\_Neighbourhood\_Plan\_CDRB\_2018\_202202\_Maps\Marlborough\_Town\_Council\Figure 4.2 - Spatial Options A assessed through SEA.mxd







THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

**LEGEND**

- Option B
- Site 5: Barton Deane
- Site 7: Former Resource Centre, Cherry Orchard
- Site 8: Land at Kelham Gardens
- Site 11: Police Station

Copyright  
Contains Ordnance Survey Data © Crown, Copyright and database right 2020

Purpose of Issue: **DRAFT**

Client: **MARLBOROUGH TOWN COUNCIL**

Project Title: **SUSTAINABILITY APPRAISAL FOR THE MARLBOROUGH AREA NEIGHBOURHOOD PLAN**

Drawing Title: **SPATIAL OPTION B ASSESSED THROUGH THE SA**

Drawn CN	Checked JW	Approved RC	Date 16/03/2020
AECOM Internal Project No. 60571087		Scale @ A3 1:10,000	

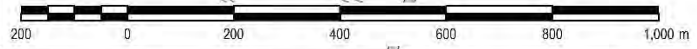
\* THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO A CONTRACT TO PROVIDE SERVICES TO THE CLIENT AND IS NOT TO BE USED FOR ANY OTHER PURPOSE WITHOUT THE WRITTEN PERMISSION OF AECOM. THE CLIENT ACCEPTS FULL RESPONSIBILITY FOR THE ACCURACY AND COMPLETENESS OF THE INFORMATION PROVIDED TO AECOM AND FOR THE RESULTS OF THE SERVICES PROVIDED.

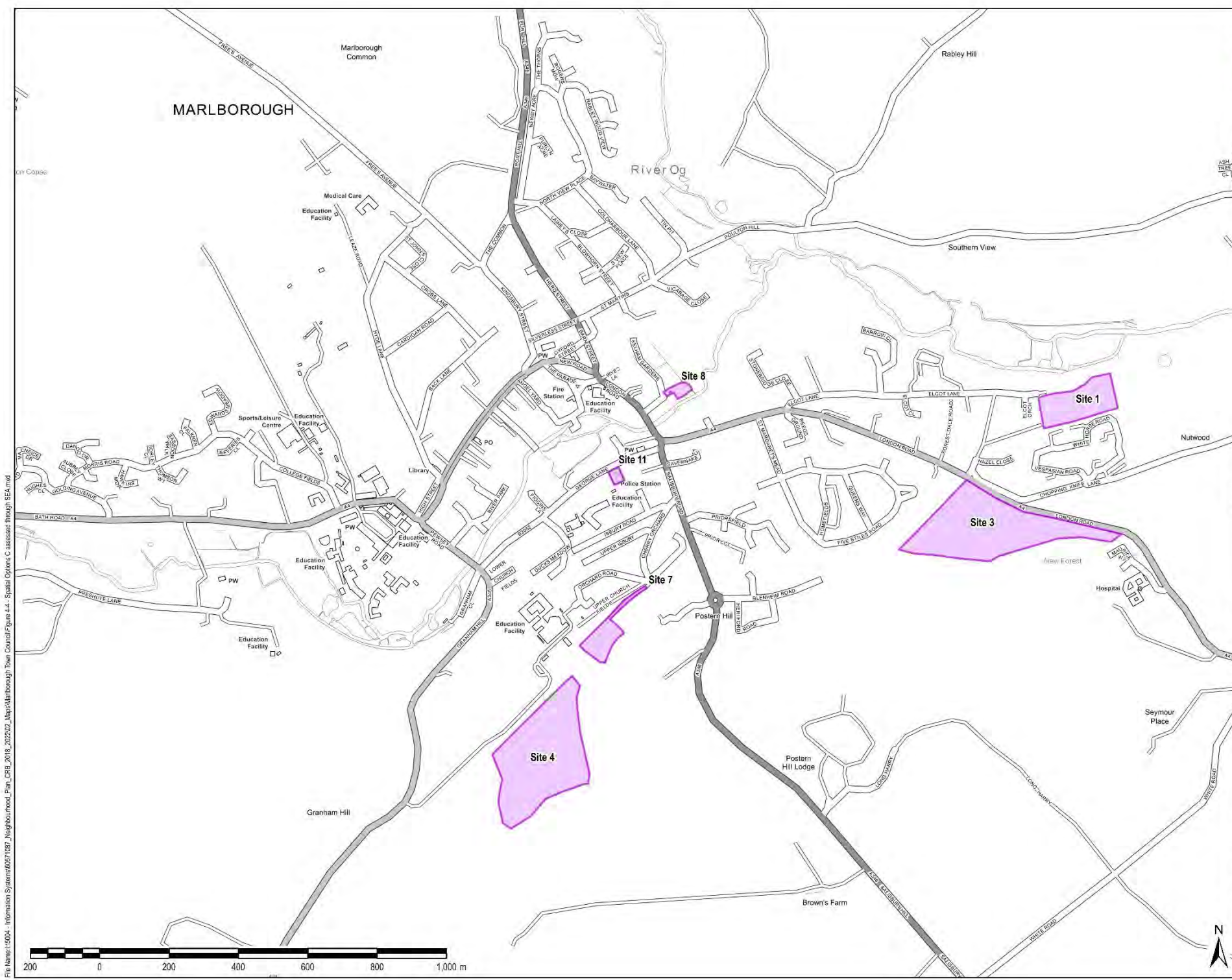
AECOM  
South East  
AECOM Ltd, Basingstoke  
Basingstoke, Hants, UK  
Tel: 01256 343000  
www.aecom.com

**AECOM**

Drawing Number: **FIGURE 4.3**

Rev: **02**





THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

- LEGEND**
- Option C
  - Site 1: Land off Elcot Lane
  - Site 3: Land south of A4, London Road
  - Site 4: Further Land West of Salisbury Road
  - Site 7: Former Resource Centre, Cherry Orchard
  - Site 8: Land at Kelham Gardens
  - Site 11: Police Station

Copyright:  
Contains Ordnance Survey Data © Crown Copyright and database right 2020

Purpose of Issue: **DRAFT**

Client: **MARLBOROUGH TOWN COUNCIL**

Project Title: **SUSTAINABILITY APPRAISAL FOR THE MARLBOROUGH AREA NEIGHBOURHOOD PLAN**

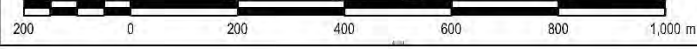
Drawing Title: **SPATIAL OPTION C ASSESSED THROUGH THE SA**

Drawn CN	Checked JW	Approved RC	Date 16/03/2020
ACCOM Internal Project No. 60571087		Scale @ AS 1:10,000	

THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO AND SUBJECT TO THE TERMS OF A PROFESSIONAL SERVICES AGREEMENT BY WHICH THE AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN THAT FOR WHICH IT WAS PREPARED OR FOR WHICH IT WAS PRESENTED AND PROVIDED.

**AECOM**  
 8000 Lakeside Drive  
 Raleigh, NC 27607, USA  
 Tel: +1 919 417 4300  
 Fax: +1 919 417 4301  
 www.aecom.com

File Name: I:\5004 - Information Systems\50571087 - Neighbourhood Plan\_CPB\_2018\_2020\2 - Maps\Marlborough Town Council\Figure 4.4 - Spatial Option C assessor through SEA.mxd



## Appraisal of reasonable alternatives

4.44 The SA process subsequently undertook an appraisal of the relative sustainability merits and constraints at each of the alternative spatial options. In this context the options have been considered in relation to the SA Framework of objectives developed during scoping (see **Table 3.2**).

### Method

- 4.45 For each of the options, the appraisal examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 4.46 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). Considering this, there is a need to make certain assumptions regarding how options will be implemented 'on the ground' and what the effect on certain receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 4.47 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.
- 4.48 Finally, it is important to note that effects are predicted considering the criteria presented within Regulation 12. So, for example, account is taken of the duration, frequency and reversibility of effects.

## Alternatives appraisal findings

4.49 **Table 4.4** presents summary appraisal findings in relation to the three options, with more detailed appraisal findings presented within **Appendix C**.

**Table 4.4: Summary alternatives appraisal findings**

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
<b>Air quality</b>			
Rank of preference	2	1	3
Significant effect?	No	No	No
<b>Biodiversity</b>			
Rank of preference	2	1	3
Significant effect?	No	No	No
<b>Climate change</b>			
Rank of preference	2	1	3
Significant effect?	No	No	No

<sup>12</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
<b>Landscape</b>			
Rank of preference	2	1	3
Significant effect?	Yes – Negative	Yes – Negative	Yes – Negative
<b>Historic environment</b>			
Rank of preference	3	2	1
Significant effect?	Uncertain	Uncertain	Uncertain
<b>Land, soil and water resources</b>			
Rank of preference	2	1	3
Significant effect?	Yes – Negative	Yes – Negative	Yes – Negative
<b>Population and community</b>			
Rank of preference	1	2	3
Significant effect?	Yes – Positive	Yes – Positive	Yes – Positive
<b>Health and wellbeing</b>			
Rank of preference	2	1	3
Significant effect?	Yes – Positive	Yes – Positive	No
<b>Transportation</b>			
Rank of preference	2	1	3
Significant effect?	No	No	No

**Summary findings:**

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the MANP.

The appraisal has highlighted the potential for **positive effects** as a result of development at all options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the MANP. **Option C** performs most positively in this respect given it will deliver the highest level of growth.
- **Options A and B** will deliver a new medical centre to meet social infrastructure needs.

Alongside this, further option specific minor positive effects are identified including:

- **Option B** will provide good access to the town centre, green space and recreational opportunities. It also has the greatest potential to support active travel and reduce congestion on the local road network.

The appraisal has highlighted the potential for **negative effects** as a result of development at all options, which are summarised as follows:

- **All options** will increase pressures on the road network, congestion, emissions and air quality within and surrounding Marlborough AQMA. **Option C** performs most negatively in this respect given it will lead to the greatest increase in vehicular use within the AQMA.
- **All options** will result in the potential loss of greenfield land, with the potential for loss of BMV agricultural land if found to be Grade 3a.

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
----------	-------------------------------------	----------------------------------	--

- **All options** would lead to greenfield development within the North Wessex Downs AONB, with the potential for significant long term negative effects on character, setting and intrinsic qualities. Mitigation is unlikely to significantly reduce the extent of these negative effects given that options would lead to development in previously undeveloped areas, where low capacity for change is identified (notably Sites 1 and 5).
- **All options** have the potential to impact upon the local townscape and setting of the Marlborough Area, with low capacity for change identified. **Options A and B** are also constrained by local heritage assets, with the potential for adverse effect on setting of the Marlborough Conservation Area and Grade II Listed Buildings (**Option A** only).

Alongside this, further option specific constraints are identified including:

- **Option C** may increase recreational and disturbance pressures related to designated biodiversity sites;
- Potential for habitat loss and/ or fragmentation affecting the national forest inventory woodland located in the corner of Site 5 included under **Options A and B**.
- Site 4 within **Option C** performs negatively as it falls within a Source Protection Zone (SPZ).
- **Option C** directs growth to sites less well connected to the town centre, services and facilities.

## Developing the preferred approach

4.50 In June 2020, the Steering Group set out the following reasons for selection and rejection of Spatial Options A - C:

- Option A is selected as the preferred approach for the MANP, given the ability to meet the affordable housing shortfall and indicative housing requirement figure, whilst delivering essential social infrastructure within the town.
- Option B is rejected because it does not meet the affordable housing shortfall and indicative housing requirement figure.
- Option C is rejected because it does not deliver essential social infrastructure within the town and even if the provision of land for a medical centre could be secured it is not as well located as Site 5 for this purpose.

## Revised reasonable alternatives appraisal - November 2020

4.51 Since June 2020 the situation in terms of the availability and capacity of sites options for consideration through the emerging Marlborough Area Neighbourhood Plan has changed. Notably:

- It became clear that future of the Police Station would be resolved before the MANP had reached its final stages and the Steering Group agreed that it would no longer be considered for allocation.
- Wiltshire Council confirmed that the developable area of Cherry Orchard had to be reduced by half to take account of a restrictive covenant, thereby reducing its capacity to 15 homes.
- While the Steering Group had agreed that its preferred option would be to allocate the Barton Dene, Elcot Lane, Cherry Orchard and Kelham Gardens sites of Option A, it has become clear that neither Wiltshire Council nor Preshute Parish Council would support the MANP if it included the allocation of Land at Barton Deane for 130 dwellings. With the decision of Preshute Parish Council to withdraw from the MANP in July 2020, the options had to be revisited (to remove the part of the Barton Dene site that extends into Preshute Parish and to lower the total number of homes).

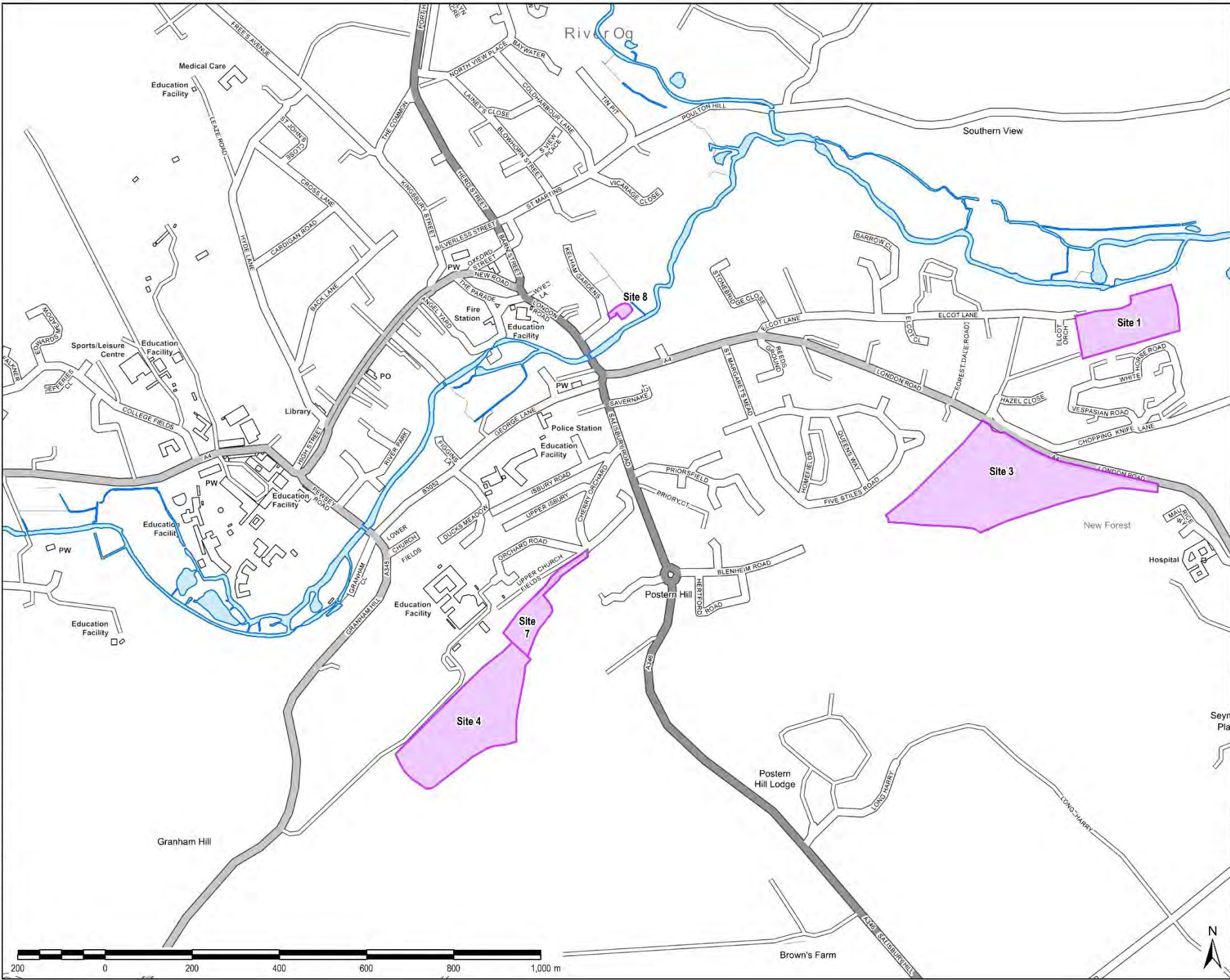
## Re-establishing reasonable alternatives

- 4.52 In terms of reasonable alternative Spatial Options A – C assessed above, Options A and B were no longer feasible due to the loss of the main part of the Barton Dene site (now lying outside the MANP boundary). With Option C also ruled out (as would deliver too many houses in total and would not provide an opportunity to relocate the medical centre (see [Section 4.50](#) above)), new options had to be formulated. These new options had to take into account the much smaller Barton Dene site (now 40 homes), and the agreement of the Crown Estate to halve the developable area of the West of Salisbury Road site (now only 50 homes) in light of landscape impacts identified through the SA (see [Appendix B](#)).
- 4.53 The Land West of Salisbury Road site also has the ability to resolve the restrictive covenant at the adjoining Cherry Orchard site, resulting in the original site capacity of 30 homes being reinstated. It is however currently unknown whether this would also be the case for the Land South of the A4 site (noting that both sites are under the same ownership).
- 4.54 The Site Options Assessment report was produced by O'Neill Homer and sets out how the group arrived at three new reasonable alternatives options. The Site Options Assessment states that the Kelham Gardens and Cherry Orchard sites are held constant under all options as they are brownfield sites (totalling between 25 and 40 homes). The remaining options are therefore combinations of the new Barton Dene (40 homes), Elcot Lane (50), Rear of Salisbury Road (50) and South of A4 (60) sites. To reflect Wiltshire Council's advice, it was considered that an option leading to a total of homes greater than original Option A (205) would not be reasonable. In which case, the new Option D includes only three of the four sites, delivering 200 homes as the high growth option.
- 4.55 Community consultations indicated that Barton Dene and Elcot Lane were more favoured than the other two sites, and therefore the new Option E and Option F include both of these sites. The variable sites between Option E and Option F are therefore Salisbury Road (50) and South of A4 (60). The three new options are set out below in [Table 4.5](#), and illustrated in [Figures 4.5 – 4.7](#):

**Table 4.5 November 2020 Reasonable alternative spatial options**

Site	November 2020 Spatial Options		
	Option D	Option E	Option F
	Capacity	Capacity	Capacity
1. Land off Elcot Lane	50	50	50
3. Land South of A4, London Road	60		60
4. Further Land West of Salisbury Road	50	50	
5. Barton Dene		40	40
7. Former Resource Centre	30	30	15 - 30
8. Land at Kelham Gardens	10	10	10
<b>Total dwellings delivered during plan period</b>	<b>200</b>	<b>180</b>	<b>175 - 190</b>
<b>Affordable homes</b>	<b>96</b>	<b>86</b>	<b>85 - 91</b>
Other uses	<i>Public open space. Covenant at FRC resolved</i>	<i>Public open space. Covenant at FRC resolved. Medical centre at Barton Dene</i>	<i>Public open space. Resolution of covenant at FRC uncertain.</i>

File Name: \\UKBS-FFL\0011400 - Information Services\504 - Information Systems\507\1087 - Neighbourhood Plan - CDS - 2018 - 20202 - Marlborough Town Council\Figures 4-5 - Spatial Option D assessed through SEA.mxd



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

**LEGEND**

- Surface Water (OS Open Data)
- Option D

Site 1: Land off Elcot Lane  
 Site 3: Land south of A4, London Road  
 Site 4: Further Land West of Salisbury Road  
 Site 7: Former Resource Centre, Cherry Orchard  
 Site 8: Land at Kelham Gardens

Copyright  
 Contains Ordnance Survey Data © Crown Copyright and database right 2020

Purpose of Issue: **DRAFT**

Client: **MARLBOROUGH TOWN COUNCIL**

Project Title: **SUSTAINABILITY APPRAISAL FOR THE MARLBOROUGH AREA NEIGHBOURHOOD PLAN**

Drawing Title: **SPATIAL OPTION D ASSESSED THROUGH THE SA**

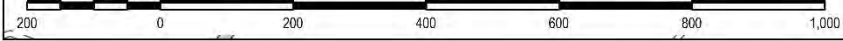
Drawn CN	Checked JW	Approved RC	Date 03/12/2020
AECOM Internal Project No. 60571087		Scale @A3 1:8,000	

THE INFORMATION CONTAINED HEREIN IS FOR THE USE OF THE CLIENT ONLY. AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN THAT AUTHORIZED BY THE CLIENT. THIS DOCUMENT IS THE PROPERTY OF AECOM AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM.

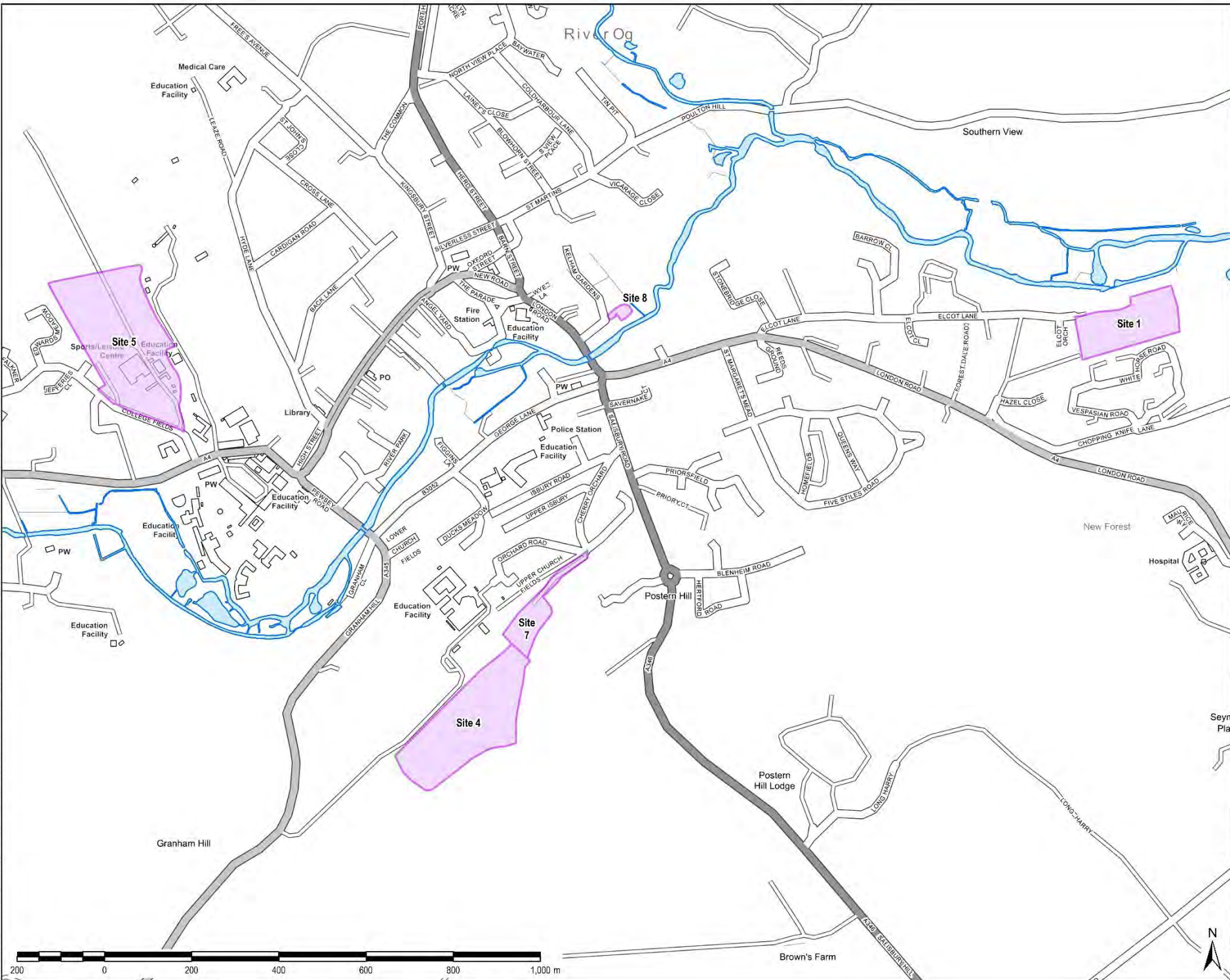
AECOM  
 1000 West 10th Street  
 Calgary, Alberta T2C 2E9  
 Canada  
 Phone: (403) 243-7200  
 Fax: (403) 243-7201  
 www.aecom.com

Drawing Number: **FIGURE 4.5**

Sheet: **01**



File Name: \\UBAS\FE\W001\4400 - Management Services\504 - Information Systems\60571087 - Neighbourhood Plan\_CFB\_2019\_202202\_Maps\Marlborough Town Council\Figure 4.6 - Spatial Options E assessed through SEA.mxd



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF THE ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

**LEGEND**

- Surface Water (OS Open Data)
- Option E

Site 1: Land off Elcot Lane  
 Site 4: Further Land West of Salisbury Road  
 Site 5: Barton Deane  
 Site 7: Former Resource Centre, Cherry Orchard  
 Site 8: Land at Kelham Gardens

Copyright  
 Contains Ordnance Survey Data © Crown Copyright and database right 2020

Purpose of Issue: **DRAFT**

Client: **MARLBOROUGH TOWN COUNCIL**

Project Title: **SUSTAINABILITY APPRAISAL FOR THE MARLBOROUGH AREA NEIGHBOURHOOD PLAN**

Drawing Title: **SPATIAL OPTION E ASSESSED THROUGH THE SA**

Drawn: CN	Checked: JW	Approved: RC	Date: 03/12/2020
ALCOM Internal Project No.: 60571087		Scale: @A3	1:8,000

THE INFORMATION IN THIS DOCUMENT IS PROVIDED AS IS AND IS SUBJECT TO THE TERMS OF ANY AGREEMENT OR CONTRACT WHICH MAY BE IN PLACE BETWEEN YOU AND THE INFORMATION PROVIDER. THE INFORMATION IS NOT TO BE USED FOR ANY OTHER PURPOSE WITHOUT THE WRITTEN PERMISSION OF THE INFORMATION PROVIDER.

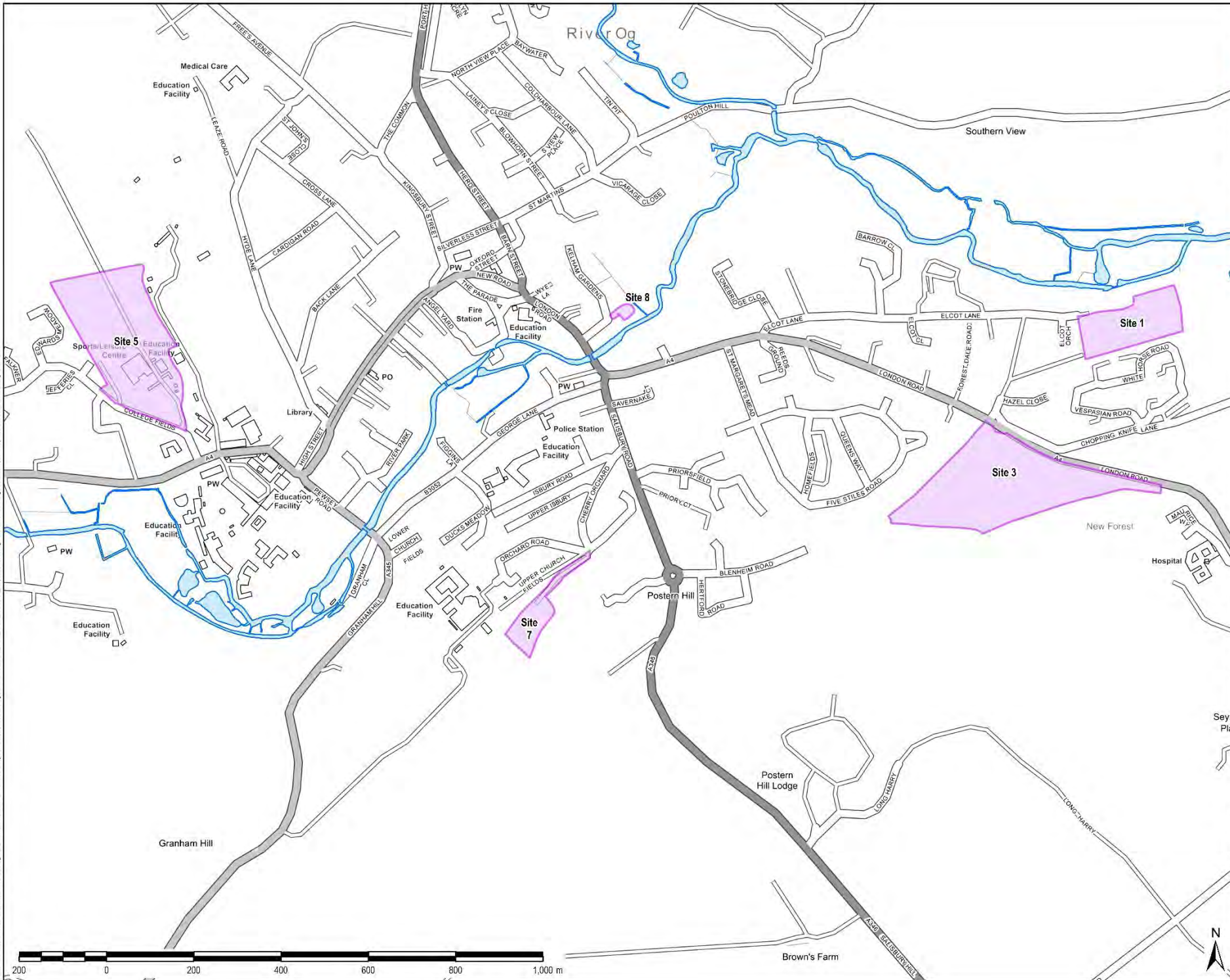
AECOM  
 1000 West 10th Street  
 Suite 1000  
 Calgary, Alberta T2P 1B6  
 Canada  
 Tel: +1 403 243 7000  
 www.aecom.com

Scale: 1:8,000  
 Drawing Number: **FIGURE 4.6**

Sheet: **01**



File Name: \\UK\SAS\FFU\00114400 - Management Services\5004 - Information Systems\60571087 - Neighbourhood Plan - CRZ 2018 2022\20 - Maps\Marlborough Town Council\Figures 4.7 - Spatial Options F assessed through SEA.mxd



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

- LEGEND**
- Surface Water (OS Open Data)
  - Option F
- Site 1: Land off Elcot Lane  
 Site 3: Land south of A4, London Road  
 Site 5: Barton Deane  
 Site 7: Former Resource Centre, Cherry Orchard  
 Site 8: Land at Kelham Gardens

Copyright  
 Contains Ordnance Survey Data © Crown Copyright and database right 2020

Purpose of Issue **DRAFT**

Client **MARLBOROUGH TOWN COUNCIL**

Project Title  
**SUSTAINABILITY APPRAISAL FOR THE MARLBOROUGH AREA NEIGHBOURHOOD PLAN**

Drawing Title  
**SPATIAL OPTION F ASSESSED THROUGH THE SA**

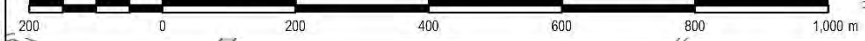
Drawn CN	Checked JW	Approved RC	Date 03/12/2020
AECOM Internal Project No. 60571087		Scale @ A3 1:8,000	

IF A DOCUMENT HAS BEEN PREPARED PURSUANT TO AND IS SUBJECT TO THE TERMS OF A PROFESSIONAL APPOINTMENT BY ITS CLIENT, IT IS THE PROPERTY OF THE CLIENT AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF THE CLIENT.

AECOM  
 300 Brookside  
 Hampshire, RG21 7TP  
 Telephone: 01256 333000  
 Fax: 01256 313131  
 www.aecom.com

**AECOM**

Drawing Number **FIGURE 4.7** 01



## Method

- 4.56 As set out for Options A – C above, the appraisal examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 4.57 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). Considering this, there is a need to make certain assumptions regarding how options will be implemented ‘on the ground’ and what the effect on certain receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a ‘significant effect’ this is made explicit in the appraisal text.
- 4.58 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’. Numbers are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.
- 4.59 Finally, it is important to note that effects are predicted considering the criteria presented within Regulation 13. So, for example, account is taken of the duration, frequency and reversibility of effects.

## Revised alternatives appraisal findings

- 4.60 **Table 4.6** presents summary appraisal findings in relation to the three new options, with more detailed appraisal findings presented within **Appendix D**.

**Table 4.6: Summary alternatives appraisal findings**

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7, and 8
<b>Air quality</b>			
Rank of preference	=	=	=
Significant effect?	No	No	No
<b>Biodiversity</b>			
Rank of preference	2	1	1
Significant effect?	No	No	No
<b>Climate change</b>			
Rank of preference	3	1	2
Significant effect?	No	No	No
<b>Landscape</b>			
Rank of preference	3	1	2
Significant effect?	Yes – Negative	Yes – Negative	Yes - Negative
<b>Historic environment</b>			
Rank of preference	1	2	2

<sup>13</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7, and 8
Significant effect?	No	Uncertain	Uncertain
<b>Land, soil and water resources</b>			
Rank of preference	3	1	2
Significant effect?	Yes – Negative	Yes – Negative	Yes - Negative
<b>Population and community</b>			
Rank of preference	3	1	2
Significant effect?	Yes – Positive	Yes – Positive	Yes – Positive
<b>Health and wellbeing</b>			
Rank of preference	3	2	1
Significant effect?	No	Yes – Positive	Yes – Positive
<b>Transportation</b>			
Rank of preference	2	1	1
Significant effect?	No	No	No

### Summary findings:

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the MANP.

The appraisal has highlighted the potential for **positive effects** as a result of development at all options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the MANP. **Option D** performs most positively in this respect given it will deliver the highest level of growth.
- **Options E and F** will deliver a new medical centre to meet social infrastructure needs.
- Through **Option E** the allocation of Site 4 would resolve the restrictive covenant at adjoining Site 7, improving pedestrian and cycling connectivity between Salisbury Road and the town centre. It is uncertain whether these benefits could be delivered through **Option F** and the allocation of Site 3.

The appraisal has highlighted the potential for **negative effects** as a result of development at all options, which are summarised as follows:

- **All options** will result in residents travelling by private vehicle within Marlborough AQMA to access services and facilities given poor accessibility to and frequency of public transport, contributing to localised air quality issues.
- **All options** may increase recreational/ disturbance pressures related to nationally and locally designated biodiversity sites
- **All options** will result in the potential loss of greenfield land, with the potential for loss of BMV agricultural land if found to be Grade 3a.
- **All options** would lead to greenfield development within the North Wessex Downs AONB, with the potential for significant long term negative effects on character, setting and intrinsic qualities. Mitigation is unlikely to significantly reduce the extent of these negative effects given that options would lead to development in previously undeveloped areas, where low capacity for change is identified (notably Site 1 (**all options**)).
- **All options** have the potential to impact upon the local townscape and setting of the Marlborough Area, with low capacity for change identified. **Options E** and **Option F** are also constrained by

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7, and 8
----------	-------------------------------------	-------------------------------------	-------------------------------------

---

local heritage assets, with the potential for adverse effect on setting of the Marlborough Conservation Area and Grade II Listed Buildings.

- Site 4 within **Option D** and **Option E** perform negatively as it falls within a Source Protection Zone (SPZ).

## Finalising the preferred approach

4.61 The Steering Group set out the following reasons for selection and rejection of Spatial Options D - F:

- Option 3 falls short of delivering essential social infrastructure within the town and even if the provision of land for a medical centre could be secured it is not as well located as Site E.
- Option 4 is selected as the preferred approach for the MANP given the ability to deliver social infrastructure in reasonably close proximity and relative distance to the town centre as well as contributing to the affordable housing shortfall and indicative housing requirement.
- Option 5 falls short of delivering additional benefits secured at Site D in terms of connecting to the town centre and whilst there may be other potential merits, with the more
- favoured Site A in reasonably close proximity and the relative distance to the town centre being considerably greater, there was no obvious, compelling reason to consider this in further detail. Nor has the landowner itself expressed a keenness to continue to promote Site C above its other Site D.

## Appraisal of the Neighbourhood Plan

In March 2020 AECOM appraised an initial draft of the Pre-Submission Regulation 14 Neighbourhood Plan, providing the following **four recommendations**:

1. That Policy MARL1 support biodiversity enhancements/ net gain at Land off Elcot Road. New development could promote ecological connectivity between the site and the River Kennett SSSI; extending the Neighbourhood Plan area's valued green infrastructure network.
  2. Encourage positive measures in new housing development to address climate change. This may include the addition of a new policy, which places an emphasis on high quality design within new development. A design led policy could ensure development proposals, where possible, realise opportunities for integrated renewable energy technologies, rainwater harvesting, water efficiency measures, and integrated vehicle electric charging points. Specifically, the Draft MANP could seek to incentivise a shift away from petrol/diesel vehicles, in order to support sustainable travel in the MANP area in line with national and local climate change commitments.
  3. Provide recognition to the presence of the Stonehenge, Avebury and Associated Sites WHS within the Neighbourhood Plan area, identifying potential indirect effects that may occur through the delivery of the MANP.
  4. Policy provisions are extended to capture the need for archaeological investigation where appropriate
- 4.62 The Steering Group subsequently updated the draft Neighbourhood Plan in response to the recommendations proposed through the SA Report.
- 4.63 In June 2020 AECOM appraised a second draft of the Pre-Submission Regulation 14 Neighbourhood Plan, providing the following **single recommendation**:
- Encourage a shift away from petrol/diesel vehicles to increase sustainable travel in the MANP area, in line with national and local climate change commitments. For example, the inclusion of a policy criteria that requires new development to deliver or contribute to electric vehicle charging points would strengthen the MANP's approach to climate change mitigation.
- 4.64 The Steering Group subsequently updated the draft Neighbourhood Plan in light of the changes to evidence and site availability/ capacity, which in turn altered the overall spatial strategy (as set out in **Section 4.51** above).

## Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

- 4.65 To support the implementation of the vision for the Neighbourhood Plan discussed in **Section 3.19**, the current version of the MANP puts forward 21 policies to guide development in the Neighbourhood Plan area.
- 4.66 The policies, which were developed following extensive community consultation and evidence gathering, are set out in **Table 4.7** overleaf.

**Table 4.7: Marlborough Area Neighbourhood Plan policies**

<b>Policy title</b>	
<b>MARL1</b>	Delivering Affordable Homes in Marlborough
<b>MARL2</b>	Managing Change at George Lane, Marlborough
<b>MARL3</b>	Encouraging Affordable Homes in Mildenhall
<b>MARL4</b>	Meeting Local Housing Needs
<b>MARL5</b>	Supporting a Thriving Town Centre
<b>MARL6</b>	Using Scarce Employment Land Efficiently
<b>MARL7</b>	Improving Public Parking
<b>MARL8</b>	Delivering New Cemetery Land
<b>MARL9</b>	Protecting & Supporting Community Facilities
<b>MARL10</b>	Enhancing Marlborough Conservation Area
<b>MARL11</b>	Enhancing Marlborough's Areas of Special Quality
<b>MARL12</b>	Enhancing Manton Conservation Area
<b>MARL13</b>	Enhancing Mildenhall Conservation Area
<b>MARL14</b>	Protecting Local Heritage Assets
<b>MARL15</b>	Protecting and Improving Green Infrastructure
<b>MARL16</b>	Protecting Local Green Spaces
<b>MARL17</b>	Protecting Valued Community Open Spaces
<b>MARL18</b>	Conserving the Scenic Beauty of the AONB
<b>MARL19</b>	Achieving Dark Skies
<b>MARL20</b>	Climate Change Mitigation – New Buildings
<b>MARL21</b>	Climate Change Mitigation – Carbon Sink Fund

## 5. What are the appraisal findings at this current stage?

### Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current Regulation 14 version of the MANP. This chapter presents:
- An appraisal of the current version of the MANP under the nine SA theme headings; and
  - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### Appraisal method

- 5.2 The appraisal is structured under the nine SA themes taken forward for the purposes of the SA and that are linked to the SA objectives, see **Table 3.2**.
- 5.3 For each theme ‘significant effects’ of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect ‘characteristics’ are described within the appraisal as appropriate.
- 5.4 Every effort is made to identify/ evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

## Appraisal of the Neighbourhood Plan

### Air quality

- 5.5 As stated in the 2018 Air Quality Annual Status Report (ASR)<sup>14</sup> the Marlborough AQMA covers the whole town of Marlborough and continues to report exceedances in the annual mean objective concentration of NO<sub>2</sub>. The MANP allocates five sites, all wholly within the AQMA, delivering a total of approximately 170 homes. New development at these sites has the potential to increase traffic and congestion in the AQMA; particularly given that public transport use is likely to remain low compared with private car use. This has the potential to increase levels of NO<sub>2</sub> and decrease air quality in and around Marlborough town.
- 5.6 Policy MARL1 (Delivering Affordable Homes in Marlborough) seeks to mitigate against potential adverse effects, stating that *“for all site allocations, in addition to any required traffic management, highway or landscaping works to mitigate the effects of the scheme on the designated Marlborough Air Quality Management Area, proposals will be required to make an appropriate financial contribution towards the green transport initiatives in the town.”* This supports aims and objectives contained within the Wiltshire Core Strategy, along with those set out within the Marlborough Community Air Quality Action Plan (2016).<sup>15</sup>

<sup>14</sup> Wiltshire Council (2018): ‘2018 Air Quality Annual Status Report (ASR)’ [online] available at: <http://www.wiltshireairquality.org.uk/assets/documents/council-reports/Wiltshire%20Annual%20Status%20Report%202018.pdf> [accessed 13/09/19]

<sup>15</sup> Marlborough Town Council (2016) Marlborough Community Air Quality Action Plan [online] available at: [https://www.transitionmarlborough.org/tiki-download\\_file.php?fileId=647](https://www.transitionmarlborough.org/tiki-download_file.php?fileId=647) [accessed 11/03/20]

- 5.7 In terms of the Draft MANP site allocations, Land at Kelham Gardens and Land at Barton Dene are well located within/ adjacent to the main built up area, maximising accessibility to local services and facilities in the town centre and supporting active travel. However, Land off Elcot Lane, Land off Cherry Orchard, and Land Rear of Salisbury Road are less well located, with residents likely to utilise the A4 London Road to travel in to the town centre by car.
- 5.8 The scale of growth proposed through the Draft MANP is unlikely to deliver any significant improvements in terms of sustainable transport access but may support the viability and vitality of the existing services to some degree. Land at Barton Dene is allocated for 40 homes and a medical centre to serve the town. In line with Policy MARL1 (Delivering Affordable Homes in Marlborough) *“the land for the medical centre will be located in a convenient position within the site for users”*.
- 5.9 Policy MARL1 also requires that the layout of the largest and less well connected site allocation (Land Rear of Salisbury Road (50 homes)) *“provide footpath and cycleway connectivity through to the adjoining Cherry Orchard site”*. This will lead to improvement of pedestrian and cycling connectivity between Salisbury Road and the town centre. The importance of this connectivity is replicated through the requirements for Land off Cherry Orchard. Policy MARL1 requires that *“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.”* Improved accessibility which facilitates the use of active travel for shorter journeys may encourage a level of modal shift within the Neighbourhood Plan area; and subsequently within Marlborough AQMA.
- 5.10 However, the location of sites on the edge of the settlement distant from the town centre may limit the effectiveness if the measures discussed above. Specifically, residents are likely to continue to use the private vehicle to utilise the A435 and A346 roads. These roads extend east and west of the two sites, providing access to extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment). This could lead to minor negative effects on local air quality.
- 5.11 Outside of the site allocations, the wider Draft MANP framework provides an opportunity to improve public realm and the movement of pedestrians; notably protecting and enhancing the area’s most valued open spaces and improving connectivity through policies MARL15 – MARL17. Policy MARL15 (Protecting and Improving Green Infrastructure) identifies woodland as a key component of the local green infrastructure network. Its protection and enhancement will likely encourage more scenic routes and active travel opportunities, and potentially carbon sequestration within the MANP area, with the potential for minor indirect positive effects on air quality
- 5.12 Policy MARL7 (Improving Public Parking) seeks to allocate land adjacent to Marlborough Rugby Club for public car parking. This aims to enhance access to the town centre for residents and visitors, and address existing capacity issues at peak times. In addition to reducing congestion levels, limiting the need for on-street parking will likely improve road safety, which may support increased levels of active travel within and around the town centre.
- 5.13 While positive effects are identified in relation to Policy MARL7, it is recommended that the Draft MANP could further address congestion in the town; for example, through incentivising and enabling a modal shift away from high emission vehicles. While it is recognised that the most desirable form of modal shift is towards active travel (i.e. walking and cycling) rather than alternative models of private vehicle, it is nonetheless considered that requiring new development to deliver or contribute to electric vehicle charging points would strengthen the MANP. In addition to addressing air quality issues locally, this would contribute positively towards meeting the UK and Wiltshire’s commitment to achieving net zero carbon emissions by 2050 and 2030 respectively.<sup>16,17</sup> Furthermore, it is noted that a ban on selling new

---

<sup>16</sup> In June 2019 legislation passed to commit the UK to a legally binding target of net zero emissions by 2050 <https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>

<sup>17</sup> In February 2019 Wiltshire Council resolved to acknowledge that there is a climate emergency and seek to make the county of Wiltshire carbon neutral by 2030 <http://www.wiltshire.gov.uk/green-economy-climate-emergency>



petrol, diesel or hybrid cars in the UK will be brought forward from 2040 to 2035 at the latest, under government plans.<sup>18</sup>

- 5.14 Overall, whilst growth is supported by relatively good accessibility, and the Draft MANP seeks to improve active travel opportunities, it cannot be overlooked that the MANP allocates 170 new homes within a designated AQMA. Additionally, given the lacking sustainable transport opportunities present (notably bus and rail services), it is considered that existing trends which indicate a reliance on the private vehicle are likely to continue with the potential for residual **minor long-term negative effects** for air quality.

## Biodiversity

- 5.15 There are no European designated sites within or in close proximity to the Neighbourhood Plan area. In terms of nationally designated sites, three Special Sites of Scientific Interest (SSSI) fall partially within the Neighbourhood Plan area. These are:
- Savernake Forest SSSI;
  - River Kennet SSSI; and
  - Fyfield Downs SSSI.
- 5.16 A significant proportion of the MANP area also falls within the associated SSSI Impact Risk Zones (IRZs) where any residential development will require further consultation with Natural England. In terms of the Draft MANP site allocations, Land off Elcot Lane is located 60m from the River Kennet SSSI, and within a SSSI Impact Risk Zone (IRZ) for residential development of ten units or more; and Land Rear of Salisbury Road is located 300m from Savernake Forest SSSI, falling with a SSSI Impact Risk Zone (IRZ) for residential development of ten or more houses outside existing settlements/urban areas. As both sites are allocated for residential dwellings at a level above that specified by the IRZ, there is the potential for growth to have impacts on the SSSI. This is recognised by the housing allocations policy (MARL1) which seeks to limit potential effects on designated sites in association with the requirements of Wiltshire Local Plan (Core Policy 50 'Biodiversity' and Core Policy 52 on 'Green Infrastructure'). In line with Policy MARL1 *"a biodiversity strategy shall demonstrate how the proposal will avoid any harmful effects on the River Kennet SSSI and County Wildlife Site and promotes ecological connectivity in accordance with Neighbourhood Plan Policy MARL15"*.
- 5.17 In relation to Land Rear of Salisbury Road, it is recognised through the Draft MANP that there is a dismantled railway located adjacent to Land Rear of Salisbury Road (and Land off Cherry Orchard), which includes an area of Priority Habitat Deciduous Woodland and National Forest Inventory Broadleaved Woodland. Biodiversity present at the sites and along the dismantled railway may be of value, providing ecological connectivity with the Savernake Forest SSSI. For proposals at Land Rear of Salisbury Road, Policy MARL1 states that, *"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."* Similar requirements are set through Policy MARL1 for Land off Cherry Orchard.
- 5.18 Land rear of Salisbury Road and Land off Elcot Lane are located adjacent to a County Wildlife Site (CWS), while Land at Barton Dene is within 650m of a CWS. As set out above, Policy MARL1 reflects the need for development to consider the presence of locally designated sites, avoiding potential negative effects. Notably the requirement for a biodiversity strategy at all sites will likely limit adverse effects as a result of new development and promote enhancements such as net gain where possible. In line with Policy MARL1 Land Rear of Salisbury Road is required to *"connect with the corridor to its north as part of demonstrating its proposals to deliver a biodiversity net gain"*, leading to positive effects through extending and improving the area's valued green infrastructure network.

<sup>18</sup> Department for Transport and Office for Low Emission Vehicles (2020) Consultation on ending the sale of new petrol, diesel and hybrid cars and vans [online] available at: <<https://www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans>> last accessed [23/03/20]

- 5.19 More broadly, biodiversity assets are protected and enhanced through the Draft MANP policies which seek to maintain and where possible enhance the highly valued, natural environment. A Green Infrastructure Network has been designated through the MANP for the purpose of promoting ecological connectivity through the town and neighbouring parishes. In line with Policy MARL15 (Protecting and Improving Green Infrastructure) 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 layouts, landscaping schemes and public open space provisions*”. The combined approach of green infrastructure development with an embedded principle for biodiversity ‘net gain’ is considered to significantly contribute to biodiversity objectives with the potential for significant long-term positive effects.
- 5.20 Similarly, Policy MARL16 (Protecting Local Green Spaces) and Policy MARL17 (Protecting Valued Community Open Spaces) could also have potential for positive effects by virtue of protecting multifunctional green space present within the MANP area. Whilst the main policy intent relates to recreation and amenity, there are likely to be secondary effects in relation to biodiversity by virtue of maintaining natural spaces for wildlife.
- 5.21 Overall, the Draft MANP is predicted to have a residual **uncertain long term minor positive effect** on biodiversity through the delivery of plan policies; notably defining a network of green infrastructure assets in and around the neighbourhood plan area is predicted to improve local biodiversity, connectivity and deliver net-gain. The uncertainty in relation to the significance of effects is likely to be dependent on the implementation of proposed measures and growth proposed through the Draft MANP.

## Climate change

- 5.22 The climate change SA objectives have a dual focus of reducing the contribution of the Neighbourhood Plan area to climate change and supporting resilience to the potential effects of climate change, particularly flooding. In practice, development plans can contribute to mitigating the effects of climate change by minimising greenhouse gas emissions from the built environment. Adapting to the effects of climate change includes ensuring development is directed away from areas at greatest risk of flooding, limiting effects of extreme weather and reducing urban heat island effects.
- 5.23 Within the MANP area, highest flood risk areas are those located immediately adjacent to the River Kennet and the River Og; which flow west-east and north-east through the town respectively. In terms of the site allocations, only Land at Kelham Gardens is constrained by fluvial flood risk. The northern extent of the site is located within Flood Zones 2 and 3, which are areas with a high risk to flooding.
- 5.24 The MANP seeks to ensure that the flood constraints are fully considered in development, as they exist now and in light of expected changes as a result of climate change. Site allocation policy MARL1 (Delivering Affordable Homes in Marlborough) therefore states that (in terms of Land at Kelham Gardens) “*the developable area shall not include land that lies in Flood Zones 2 or 3 and the flood risk assessment shall demonstrate how surface water flooding will be managed within the site*”. Given the specific policy requirement set out, alongside the provisions of the Wiltshire Core Strategy and the NPPF (2019), no overall significant effects are anticipated in relation to flooding.
- 5.25 Well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Enabling and providing for green infrastructure within the MANP area is therefore a key way in which the Neighbourhood Plan can help to promote climate change adaptation measures. Policy MARL21 (Climate Change Mitigation – Carbon Sink Fund) recognises this, and requires that all proposals for new buildings, including those that are part of redevelopment schemes, invest in the Marlborough Area Carbon Sink Fund<sup>19</sup> in proportion to their size (as measured by sq.m. gross internal floorspace area). It applies to all buildings of any land use type as every new building will have a carbon footprint that will need to be mitigated. As set out in Policy MARL21, the Fund *will be used to “invest in the*

---

<sup>19</sup> The Fund will be set up in the absence of a district-level carbon offsetting fund.

*improvement, extension and maintenance of those existing and new woodlands of the Green Infrastructure Network of Policy MARL15 that function as a carbon sink.”*

- 5.26 Policy MARL21 complements Wiltshire Core Strategy climate change mitigation policies, and is supplemented by MANP policies MARL15 (Protecting and Improving Green Infrastructure), Policy MARL16 (Protecting Local Green Spaces), and Policy MARL17 (Protecting Valued Community Open Spaces). These policies will also lead to positive effects through the delivery of multi-functional benefits including assisting carbon sequestration and promoting walking and cycling through the attractive public realm. Alongside Policy MARL21, these policies are intended as local actions aimed at tackling climate change.
- 5.27 The domestic sector is a contributing factor which can be influenced by plan policies, and in line with national and local targets, the Draft MANP seeks to reduce emissions, contributing positively towards Wiltshire’s commitment to achieving carbon neutrality by 2030.<sup>20,21</sup> In this context, in addition to Policy MARL21 (Climate Change Mitigation – Carbon Sink Fund) discussed above, Policy MARL20 (Climate Change Mitigation – New Buildings) seeks to improve the energy performance of new buildings where possible. Policy MARL20 seeks to incentivise the Passivhaus standard, recognising that achieving this standard will make the most significant contribution to mitigating climate change that the Neighbourhood Plan can deliver. In line with Policy MARL20 *“On development schemes where it is proposed that at least 50% of the building units will be certified to a Passivhaus standard, development proposals will not be required to [among other criteria] [...] Calculate carbon emissions from any other part of the development.”* While it is recognised that there is uncertainty around energy standards, in light of the Future Homes Standard consultation (2019)<sup>22</sup>, the MANP nonetheless leads to positive effects through offering landowners and developers with a clear incentive to increase energy efficiency in buildings.
- 5.28 Overall, it is recognised that climate change is a global issue, and that the scale of the development proposed through the Draft MANP is not anticipated to lead to significant effects. Nonetheless, the Draft MANP policy framework supports local and national climate change targets, and is therefore predicted to have a residual **neutral effect** with an element of uncertainty on climate change.

## Landscape

- 5.29 The Neighbourhood Plan area has a rich valued landscape, falling entirely within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). In terms of the Draft MANP site allocations, as highlighted in the site appraisal presented in Chapter 4, greenfield sites Land off Elcot Lane, Land rear of Salisbury Road, and Land at Barton Dene have the potential to lead to adverse effects on the character, setting and intrinsic qualities of the AONB. This is reiterated through the Preliminary Landscape Sensitivity Assessment (2012) carried out, which concludes for Land off Elcot Lane that *“development would not conserve the special qualities or natural beauty of the AONB and the site should not be taken forward as part of the SHLAA.”* This relates to the sites topography, being highly visible from the open countryside to the east.
- 5.30 In terms of Land at Barton Dene, the Sensitivity Assessment concludes that *“development would be detrimental to the special qualities and natural beauty of the AONB...”* It is however noted that the capacity of the site has been significantly reduced since this assessment, with a proposed capacity of 40 homes to be delivered on the edge of the existing settlement, rather than 130 homes. Policy MARL1 seeks to mitigate against potential adverse effects where possible, requiring that *“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.”*

<sup>20</sup> In June 2019 legislation passed to commit the UK to a legally binding target of net zero emissions by 2050

<https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>

<sup>21</sup> In February 2019 Wiltshire Council resolved to acknowledge that there is a climate emergency and seek to make the county of Wiltshire carbon neutral by 2030 <http://www.wiltshire.gov.uk/green-economy-climate-emergency>

<sup>22</sup> Ministry of Housing, Communities and Local Government (2019) The Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings [gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings](http://gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings)

- 5.31 Land rear of Salisbury Road was not assessed through the Sensitivity Assessment. The site is an open arable land parcel, located outside of the settlement boundary and wholly within the North Wessex Downs AONB. It is therefore considered that development would negatively impact upon the AONB, its special qualities; including views and setting. It is however noted that the site adjoins a Wiltshire Core Strategy strategic allocation at Land off Salisbury Road for 220 homes. Furthermore, existing dense vegetation lining the site boundaries would likely provide some screening in terms of impact on views. As set out for Land at Barton Deane above, Policy MARL1 seeks to mitigate the potential for adverse effects on landscape where possible, specifically requiring that the scenic beauty of the AONB, is persevered. Policy MARL1 sets out similar criteria for Land at Elcot Lane, with a landscape buffer required to the sites eastern boundary, given the open countryside present.
- 5.32 Although the nature and significance of the residual effects will ultimately be determined by the design, layout and screening of the development, it is appropriate to identify the potential for negative effects on landscape through the allocation of these sites within Policy MARL1.
- 5.33 The other two site allocations (Land at Cherry Orchard and Land at Kelham Gardens) hold little inherent landscape sensitivity. Both sites are small and predominately brownfield, supporting development which responds positively to its built environment. The sites are well screened and development will be unlikely to alter the landscape context of the town. Depending on design and layout, the redevelopment of centrally located brownfield sites could result in positive effects on the local townscape. Consideration is also given in this respect to the change of use of the Health Centre site on George Lane. In line with Policy MARL2 (Managing Change in George Lane, Marlborough) *“Proposals to redevelop the site will be supported provided the scheme is of a density and building height that reflect the suburban character of George Lane.”*
- 5.34 In terms of development in the wider Neighbourhood Plan area, in line with Policy MARL3 (Encouraging Affordable Homes in Mildenhall), proposals to deliver a Rural Exception Site will only be supported provided *“the layout and form of housing shall be designed in such a way as to minimise the visual effect of development on the AONB and, where appropriate to the location, shall include the provision of a significant landscape buffer to its boundaries with the open countryside.”*
- 5.35 The policies of the Draft MANP have a close focus on the protection and enhancement of the intrinsic qualities of the landscape in the area. In direct recognition of the presence of the AONB, impacts on landscape character will be limited through Policy MARL18 (Conserving the Scenic Beauty of the AONB) which focuses primarily on development proposals outside the defined Marlborough development boundary and of the built up areas of Manton and Mildenhall. The policy states that development of this type *“will only be supported if it can be demonstrated they will not undermine the landscape and special scenic beauty of the Area of Outstanding Natural Beauty and they have had full regard to [...] specific characteristics of the following landscapes [Marlborough Downs, Kennet Valley, and Savernake Plateau.”*
- 5.36 These three landscapes form part of larger Landscape Character Areas (LCA) identified at the Wiltshire and North Wessex AONB scales. Policy MARL18 is therefore likely to lead to long term positive effects through identifying the specific features of the North Wessex Downs AONB landscape across the MANP area that are especially valued, and ensuring that development will not cause undue harm to these features. Providing protection to the landscape and scenic beauty of the AONB in this regard reinforces the provisions of the AONB Management Plan.
- 5.37 Policy MARL18 is further supplemented by Policy MARL19 (Achieving Dark Skies), which recognises dark skies as a special quality of the AONB and one of its most important features. In line with Policy MARL18 *“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.”*
- 5.38 Green Infrastructure within the MANP is noted for its contribution to the landscape character, and as such the green infrastructure improvements and new green spaces proposed through the Draft MANP (Policies MARL15 - MARL17) are likely to enhance local character with the potential for minor long-term positive effects.

- 5.39 Overall, the Draft MANP policies are likely to ensure high-quality design in development proposals which supports or enhances landscape and townscape character and local identity. This builds upon Wiltshire Core Strategy policies, the provisions of the AONB Management Plan, and the NPPF (2019). However, an overall loss of previously undeveloped land within this sensitive landscape (anticipated as a result of sites allocated through MARL1) is ultimately considered likely to have a **residual minor negative effect in the long-term**. It is noted that sensitive design and layout are likely to minimise the significance of any negative residual effects, but this is uncertain at this stage.

## Historic Environment

- 5.40 The heritage of the MANP area includes the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS), three Conservation Areas (Manton Conservation Area, Marlborough Conservation Area and Mildenhall Conservation Area), listed buildings (including three Grade I, twelve Grade II\* and 321 Grade II), one Registered Park and Garden, archaeology (either scheduled monuments or non-designated remains), and many locally cherished buildings and sites. The Draft MANP recognises the sensitivity and vulnerability of the historic environment by considering its capacity to accommodate change. It is recognised that the setting of a heritage asset can play an important role in terms of its significance, which is an important issue for the MANP.
- 5.41 In this context, it is recognised that the WHS is situated adjacent to the north west boundary of the Neighbourhood Plan area, with only a small section present in Preshute Parish. Given the location of the WHS distant from the built up area of Marlborough, it is considered that development proposed through the Draft MANP is unlikely to impact upon its setting. Nonetheless, Policy MARL14 (Protecting Local Heritage Assets) seeks to ensure the integrity of the WHS and its historic setting is maintained; supporting development 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.”* Higher level planning policy includes the NPPF (2019), Wiltshire Core Strategy, and WHS Management Plan (2015) in this respect.
- 5.42 Policies MARL10 - MARL14 seek to establish robust standards for development proposals, reflecting the national and local importance of the Marlborough Area’s historic assets and environment. Policies are underpinned by the aims and objectives of the Conservation Area Statements (2003) and the Marlborough Town Character Study (2020), and will contribute positively towards providing the strongest possible protection and enhancement measures for the heritage assets and townscape qualities in the MANP area.<sup>23,24,25,26</sup>
- 5.43 In addition to designated assets discussed above, Policy MARL11 (Enhancing Marlborough Areas of Special Quality) identifies four Areas of Special Quality (ASQ) by way of their local architectural and/ or historic interest. ASQs are identified through the Townscape Study (2020). In accordance with Policy MARL11, 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.
- 5.44 In terms of the allocations within the Draft MANP, as highlighted in the site appraisals presented in Chapter 4 and in Appendix B, Land at Elcot Lane and Land at Barton Dene are located within close proximity of a designated heritage asset. Both sites are within 50m of Grade II Listed Buildings, while Land at Barton Dene is further constrained by Marlborough Conservation Area; located close to the site. Development at these sites therefore has the potential to impact on the setting of these important heritage features, notably affecting views to and from the Conservation Area and Listed Buildings.
- 5.45 Policy MARL1 (Delivering Affordable Homes in Marlborough) seeks to address potential adverse effects, requiring that, for proposals at Land at Barton Dene, *“the layout and form of housing shall be designed in such a way as to [...] sustain and enhance the setting of Barton Farm House, Barton Farm Stables”*. In terms of Land at Elcot Lane, Policy MARL1 requires

---

<sup>23</sup> Kennet District Council (2003) Mildenhall Conservation Area Statement

<sup>24</sup> Kennet District Council (2003) Manton Conservation Area Statement

<sup>25</sup> Kennet District Council (2003) Marlborough Conservation Area Statement

<sup>26</sup> Marlborough Town Council (2020) Marlborough Town Centre Character Study

that *“the layout and form of housing shall be designed in such a way as to sustain and enhance the setting of Elcot Mill House and Elcot Mill Stables heritage assets.”* Acknowledging the importance of these heritage assets and the need to ensure their protection will likely sufficiently mitigate against any residual adverse effects in this respect. This is in accordance with the objectives of the Conservation Area Statements (2004) and Marlborough town centre Character Study (2020).

- 5.46 Policy MARL1 further recognises archaeological potential in the Plan area, ensuring investigations are carried out where appropriate. Archaeological investigations will be required *“in accordance with existing development plan policies and, where applicable, the design of schemes should respond to any finds.”* This is further reiterated through Policy MARL14 (Protecting Local Heritage Assets).
- 5.47 Land rear of Salisbury Road is not constrained by heritage assets, although as a greenfield site on the edge of the settlement, has the potential to impact upon the historic character and setting of the AONB; as identified under the Landscape SA theme above. Requirements set out under Policy MARL1 seek to mitigate the potential for adverse effects in this respect where possible; requiring that the form of housing *“reflect the land contours”*.
- 5.48 The other site allocations (Land at Cherry Orchard and Land at Kelham Gardens) hold little inherent sensitivity in terms of the historic environment. Both sites are small and predominately brownfield, supporting development which responds positively to its built environment. Depending on design and layout, the redevelopment of centrally located brownfield sites could result in positive effects on the local townscape, including through preserving and enhancing the local distinction of the Neighbourhood Plan area. Positive effects in this respect may also result from the change of use of the Health Centre site on George Lane. In line with Policy MARL2 (Managing Change at George Lane, Marlborough) *“Proposals to redevelop the site will be supported provided the scheme is of a density and building height that reflect the suburban character of George Lane.”*
- 5.49 High quality design is also promoted through Policy MARL5 (Supporting a Thriving Town Centre), which states that all 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.”* Specifically, proposals must *“positively address the townscape through good design that enhances the external appearance of buildings.”*
- 5.50 There is potential for indirect positive effects from policies MARL14 - 17. Although these policies are not primarily heritage-focussed, they could lead to residual positive effects on historic character and townscape by establishing protection in principle for local green infrastructure. Notably, a number of the ‘Valued Community Open Spaces’ are designated for their contribution to the historic character of their immediate settings.
- 5.51 Overall, it is considered that the Draft MANP, alongside the higher-level policy suite, provides a robust framework for the protection and enhancement of the historic environment. However, careful consideration will need to be given to designated heritage assets (namely the multiple Conservation Areas present) in the design and layout of any new development. The potential for **minor long term negative effects** are therefore predicted at this stage due to the sensitivity of the historic environment. It should be noted that there is an element of uncertainty at this stage and that the sensitive design and layout of development may help to reduce the significance of any residual negative effects.

## Land, soil and water resources

- 5.52 Policy MARL1 (Delivering Affordable Homes in Marlborough) allocates greenfield land for development at Land Rear of Salisbury Road, Land off Elcot Lane, and (partially greenfield) Land at Barton Dene and Land at Cherry Orchard. As set out in **Chapter 4** of this report, it is recognised that the Draft MANP allocations largely reflect the available land for development within the Marlborough Area, and that the potential for brownfield development has been maximised in this respect. Land at Kelham Gardens is a wholly brownfield site, while Land at

Cherry Orchard and Land at Barton Deane are partially brownfield. Ultimately however, the loss of greenfield land will lead to long-term minor negative effects in relation to this theme.

- 5.53 Directing growth to greenfield sites may also lead to loss of agricultural land. At this stage there is uncertainty with regard to the quality of the agricultural land given recent land classification has not been carried out in this location; however, DEFRA's Magic Map identifies Land off Elcot Lane, Land Rear of Salisbury Road, Land at Barton Dene, and part of Land at Cherry Orchard, as containing Grade 3 agricultural land. Grade 3 land has potential to be 'best and most versatile' land (though detailed a survey would be required to establish whether the land is Grade 3a or 3b). There is therefore the potential for an uncertain negative effect as a result of Policy MARL1.
- 5.54 In terms of water resources, it is noted that Groundwater Source Protection Zones (SPZs) 1, 2 and 3 are present within the Neighbourhood Plan area. SPZs have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. In terms of the site allocations set out in Policy MARL1 (Delivering Affordable Homes in Marlborough) Land rear of Salisbury Road falls within two Groundwater Source Protection Zones; Zone 1 (Inner Protection Zone) and Zone 2 (Outer Protection Zone). Additionally, a small area of Land at Cherry Orchard (the southern extent) is located within SPZ 1 (Inner Protection Zone). It is however considered that higher level planning policy (NPPF (2019) and the WCS (2015)) should ensure that development proposed at the site does not result in residual negative effects in this respect.
- 5.55 The Draft MANP's focus on supporting biodiversity and facilitating enhancements to green infrastructure provision in the Neighbourhood Plan area will support the quality of land and water resources. This will promote the ability of natural processes to support soil and water quality. Key policies in this regard includes policies MARL15-17.
- 5.56 Overall, the Draft MANP is predicted to have a **long term minor negative effect** in relation to this SA theme due to the loss of greenfield and agricultural land. The presence of best and most versatile agricultural land at the sites is uncertain at this stage and if present could result in a residual negative effect of greater significance.

## Population and community

- 5.57 The quantum and distribution of growth proposed through Policy MARL1 (Delivering Affordable Housing in Marlborough) performs positively in relation to the SA objective to provide a mix of types and tenures of housing. A key consideration is meeting the housing needs of the Plan area, and together with Policies MARL2 and MARL3, Policy MARL1 will enable the delivery of more than 150 affordable homes in the MANP area. This will lead to significant long term positive effects through meeting the identified need figure of at least 100 affordable homes<sup>27</sup>, and meeting the Draft MANP's overriding objective of "*supporting younger people in the village to maintain its vibrancy in the face of an otherwise aging population*".
- 5.58 Additionally, by allocating growth at variably sized sites throughout the Marlborough Area, Policy MARL1 achieves a broad distribution of growth, delivering new homes at a range of locations. The proposed quantum of homes, and focus on two and three bedroom homes suited to first time buyers and downsizers, will help ensure a good mix of different dwelling types, meeting a range of housing needs within the community.
- 5.59 In terms of the individual site allocations, Policy MARL1 details the Neighbourhood Plan's approach to ensuring a provision of affordable housing to meet local need in the Marlborough Area. Notably, at Land at Barton Dene (40 homes), the housing scheme shall comprise a tenure mix of 40% affordable housing in addition to 10% private rented housing for occupancy only by qualifying employees of Marlborough College. This will add to the College's existing stock, which in practice substituting for affordable housing demand in the town. Further positive effects anticipated through maximising the number of affordable homes at Land at Elcot Lane

---

<sup>27</sup> Cobweb Consultants (2017) Marlborough Area Neighbourhood Plan: Housing Needs and Requirements study 2017

- (50 homes) and Land Rear of Salisbury Road (50 homes); delivering 50% rather than the standard 40%.
- 5.60 Policy MARL3 (Encouraging Affordable Homes in Mildenhall) and Policy MARL4 (Meeting Local Housing Needs) further seek to ensure that new development will meet the needs of the existing and future population of the town. Policy MARL3 sets out the town council's support for a Rural Exception Site affordable housing scheme in Mildenhall, while Policy MARL4 requires that proposals for windfall housing be two or three bedroom, and resisting specialist accommodation. This will contribute positively towards addressing affordability issues in the town, supporting levels of self-containment and addressing the high levels of in-commuting from lower cost housing areas such as Swindon.
- 5.61 Positive effects are anticipated through the redevelopment of the Health Centre site on George Lane to the south of the town centre. Policy MARL2 (Managing Change at George Lane) supports the change of use and redevelopment of the site, given the Health Centre will become surplus to requirements with the relocation of its services to the site proposed in Policy MARL1. The delivery of housing on this previously developed town centre site, in addition to those set out in Policy MARL1, will lead to positive effects through regeneration, supporting positive growth in sustainable locations.
- 5.62 Not all of the sites allocated through Policy MARL1 are sustainably located. New residents at Land at Elcot Lane and Land Rear of Salisbury Road are likely to rely on the private vehicle for access to the town centre, existing services, facilities, employment areas and transport connections, with the potential for minor negative effects.
- 5.63 Policy MARL1 does however include the provision of new community facilities, in the form of a Medical Centre, at Land at Barton Dene. Additionally new parking and new cemetery land will be delivered through Policy MARL7 (Improving Public Parking) and Policy MARL 8 (Delivering New Cemetery Land). The potential for enhanced community provisions is considered likely to lead to long-term positive effects, supporting the vitality of the town. In terms of existing community assets, Policy MARL9 (Protecting and Supporting Community Facilities) defines properties valued as community facilities and affords them protection. This will lead to positive effects through ensuring that the long-term potential value of land in community use is not lost.
- 5.64 Sustaining and strengthening Marlborough town centre is a key objective of the Draft MANP. Policy MARL5 (Supporting a Thriving Town Centre) sets criteria for any future uses, defining primary and secondary frontages and identifying potential opportunities for redevelopment within the town centre's boundary. This builds upon Wiltshire Core Strategy Policy 35 (Existing Employment Sites), in terms of retaining defined Principal Employment Areas in Market Towns and encouraging their intensification in support of vibrant and competitive town centres.
- 5.65 In line with Policy MARL6 (Using Scarce Employment Land Efficiently), support will be given for the intensification of existing sites and reuse of suitable land in another use for job creation. This will lead to positive effects in terms of addressing local employment needs, and subsequently supporting economic growth of the town. It is recognised that the town is constrained by the AONB and considerable heritage assets, which can be a constraint to a town's economic vitality. However, an attractive local environment can also draw visitors to the environment, enabling the growth of the tourism sector locally. To this effect, Policy MARL5 (Supporting a Thriving Town Centre) 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*". This is a key objective of the Draft MANP, aligning with Wiltshire Core Strategy Policy 39 (Tourism Development).
- 5.66 Overall, the Draft MANP is predicted to have a **significant long-term positive effect** for local communities. This is through the combined delivery of new housing (notably the delivery of significant affordable housing), new community infrastructure, protection of existing infrastructure, redevelopment of town centre sites, and support for intensification of existing employment sites; to meet identified local needs.



## Health and Wellbeing

- 5.67 The health and wellbeing of residents will be supported by the Draft MANP policies which support a high quality public realm, local distinctiveness and landscape/ townscape character. This has been discussed to some extent under the 'Landscape' and 'Historic Environment' SA themes above. In this context maintaining and enhancing the attractiveness of the Neighbourhood Plan area will positively affect residents' quality of life, contributing to the satisfaction of residents with their neighbourhood as a place to live.
- 5.68 Policies MARL10 - 19 are all noteworthy in this respect. Policy MARL11 (Enhancing Marlborough Areas of Special Quality) identifies four Areas of Special Quality, and requires that development "*demonstrate that they have paid full regard to the following characteristics that contribute to the significance of its local architectural and historic interest*", supporting a high quality living environment.
- 5.69 Policies MARL15 - MARL17 are important in terms of meeting the Draft MANP objective of '*protecting and enhancing the area's most valued open spaces and improving connectivity*'. Policy MARL15 designates a Green Infrastructure Network for the purpose of promoting sustainable movement and ecological connectivity through the town and neighbouring parishes.
- 5.70 Sustainable movement is also a key consideration for development sites; with Policy MARL1 requiring that the layout of sites retain public bridleways and footpaths. Notably, the layout of Land off Elcot Lane is required to "*retain public rights of way MARL20, MARL21 and MARL 37 PRES32 through and on the boundary of the site and shall ensure this footpath network continues to connect to public right of way MILD19*". This is anticipated to lead to positive effects, supporting accessibility and opportunities for leisure, recreation and active travel.
- 5.71 Policy MARL1 also requires that the layout of the largest and less well connected site allocation (Land Rear of Salisbury Road (50 homes)) "*provide footpath and cycleway connectivity through to the adjoining Cherry Orchard site*". This will lead to improvement of pedestrian and cycling connectivity between Salisbury Road and the town centre. The importance of this connectivity is replicated through the requirements for Land off Cherry Orchard. Policy MARL1 requires that, "*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.*" Improved accessibility which facilitates the use of active travel for shorter journeys may encourage a level of modal shift within the Neighbourhood Plan area; supporting healthy lifestyles.
- 5.72 However the location of sites on the edge of the settlement distant from the town centre may limit the effectiveness of the measures discussed above. Specifically, residents are likely to continue to use the private vehicle to utilise the A435 and A346 roads. These roads extend east and west of the two sites, providing access to extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment).
- 5.73 As discussed above under the 'Population and Community' SA theme, it is considered that the Draft MANP will support health indicators relating to housing by providing high-quality new homes that meet identified local housing needs. Affordable housing evidence (Cobweb Consultants 2017) has underpinned policy directions at the allocated sites to deliver an appropriate mix of housing types and tenures, including "*approximately 115 affordable and dedicated College-employee homes with a focus on two and three bedroom homes suited to first time buyers and downsizers.*"<sup>28</sup> Policy MARL4 (Meeting Local Housing Needs) identifies the local needs, specifying the focus on smaller household and family housing in the town and discouraging proposals for any form of housing intended for older people.
- 5.74 In line with specific requirements of Policy MARL1, housing is also required to be of sensitive design, that responds to heritage settings, and the delivery of green infrastructure, landscape buffers, and additional community facilities. Notably, the allocation of Barton Dene through Policy MARL1 will enable the existing health centre for the town to relocate from its constrained site on George Lane to a new site that is also close to the town centre and accessible by public

<sup>28</sup> Cobweb Consultants (2017) Marlborough Area Neighbourhood Plan: Housing Needs and Requirements study 2017

transport. As a result, significant long-term positive effects are anticipated for health in respect of new high-quality and appropriate housing and community infrastructure delivery.

- 5.75 Overall it is considered that the Draft MANP is likely to have residual **significant long term positive effects** in relation to the Health and Wellbeing SA theme, notably through the delivery of health infrastructure, a plan-area wide green infrastructure network, and the homes that people need, to support healthy communities.

## Transportation

- 5.76 Without a train station within walking distance, the plan area relies principally on bus transport as its main sustainable transport connection. Services currently connect residents with close-by towns and villages, including Swindon, Tidworth and Ramsbury; however, it is noted that cuts have been increasingly made to services, with more proposed in the near future. The scale of growth proposed through the Draft MANP is unlikely to deliver any significant improvements in terms of sustainable transport access but may support the viability and vitality of the existing services to some degree.
- 5.77 Whilst strategic interventions are outside of the scope of the Draft MANP, it can identify localised improvements that can support active travel opportunities and local connectivity. The site allocation policy (MARL1) seeks to protect and enhance pedestrian and cycle access, retaining existing Public Rights of Way at the site level, and delivering new routes and amenity areas to improve connectivity where possible. Sites in close proximity to the centre of the town will clearly support sustainable access to services, while growth directed at Land at Elcot Lane, Land Rear of Salisbury Road and Land at Cherry Orchard, on the outskirts of the town, are less likely to encourage a modal shift and active travel.
- 5.78 The Draft MANP seeks to address this issue where possible. As discussed under the 'Air Quality' SA theme, Policy MARL1 requires that the layout of Land Rear of Salisbury Road *"provide footpath and cycleway connectivity through to the adjoining Cherry Orchard site"*. This will lead to improvement of pedestrian and cycling connectivity between Salisbury Road and the town centre. The importance of this connectivity is replicated through the requirements for Land off Cherry Orchard. Policy MARL1 requires that *"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."* Improved accessibility which facilitates the use of active travel for shorter journeys may encourage a level of modal shift within the Neighbourhood Plan area; supporting healthy lifestyles.
- 5.79 However despite specific policy requirements in place, the location of sites on the edge of the settlement distant from the town centre may limit the potential for positive effects overall. Specifically, residents are likely to continue to use the private vehicle to utilise the A435 and A346 roads. These roads extend east and west of the two sites, providing access to extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment). New development may therefore increase traffic and congestion in the town centre, despite *"traffic management"* and *"highway work"* eluded to through Policy MARL1.
- 5.80 Policy MARL15 (Protecting and Improving Green Infrastructure) is considered to have a minor positive effect in relation to transportation on the basis that enhancements to the green infrastructure and active travel network can play an important role in encouraging more journeys to be made on foot or by bicycle. Policy MARL5 (Supporting a Thriving Town Centre) also supports active travel through the delivery of infrastructure such as cycle facilities, and seeks to ensure resident accessibility within the town. Specifically *"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"*.
- 5.81 A key consideration for the Neighbourhood Plan has been town centre car parking. Policy MARL7 (Improving Public Parking) seeks to allocate land adjacent to St Luke's Court for public car parking. This aims to enhance access to the town centre for residents and visitors, and address existing capacity issues at peak times. In addition to reducing congestion levels,

limiting the need for on-street parking will likely improve road safety, which may support increased levels of active travel within and around the town centre. However, as set out under the 'Air Quality' SA theme, it is recommended that the Draft MANP could seek to incentivise a shift away from petrol/ diesel vehicles, in order to support sustainable travel in the MANP area in line with national and local climate change commitments.

- 5.82 Overall, given the location of new development, and the likelihood that unsustainable trends will continue in the absence of significant improvements to the accessibility of sustainable transport, **minor long-term negative effects** in relation to transportation are anticipated overall.

## Conclusions and recommendations

- 5.83 Overall at this stage, the SA predicts the likelihood for both positive and negative effects arising from plan implementation. The new high-quality housing, community infrastructure development and green infrastructure enhancements are likely to bring about significant benefits for communities, resident health and wellbeing and biodiversity. Aspects of the Draft MANP that significantly contribute to positive outcomes include:

- A growth strategy that meets identified housing needs, underpinned by evidence that provides appropriate guidance for the right mix of homes to meet local needs; with an emphasis on affordable housing delivery.
- The provision of new community infrastructure (medical centre), protection of existing community infrastructure, and support for intensification of existing employment sites; to meet identified local needs and address capacity issues.
- The designation of a Green Infrastructure Network for the purpose of promoting sustainable movement and ecological connectivity through the town and neighbouring parishes.

- 5.84 Minor positive effects are also anticipated through the requirement for biodiversity strategies alongside development. Strategies will set out how proposals will mitigate against adverse effects and promote enhancements, including habitat corridors (such as the former railway line), to deliver biodiversity net gain.

- 5.85 The aspects of the Draft MANP that contribute to negative outcomes relate to the permanent loss of greenfield/ agricultural land. This is anticipated as a result of four of the five site allocations proposed through the Draft MANP. It is however noted that there is some uncertainty in terms of the quality of the agricultural land.

- 5.86 Minor long-term negative effects are also anticipated with regards to air quality, landscape/ townscape, the historic environment, and transportation. In terms of air quality and transportation, these effects predominantly relate to a likely overall increase in private vehicle use in the MANP area. All growth proposed will be located within the Marlborough Air Quality Management Area, with potential for increased localised congestion, heightened levels of NO<sub>2</sub>, and an overall adverse effect on air quality. Active/ sustainable travel is supported through policy requirements for developing green infrastructure networks, maintenance and enhancement of footpaths and bridleways, and an improved streetscape in the town centre. However, the level of growth proposed is unlikely to improve access or frequency of sustainable transport modes. Additionally, the location of housing sites on the outskirts of the town are likely to result in continued reliance on the car for travel.

- 5.87 Minor negative effects are predicted for the Landscape SA theme due to the presence of the AONB, and the overall loss of previously undeveloped land within this sensitive landscape. Similarly, for the Historic Environment SA theme, potential adverse effects relate to impact on the setting of heritage assets, including the Marlborough Conservation Area; which is one of three Conservation Areas present within the Plan area, reflecting the town's rich heritage. It is however recognised that sensitive design and layout are likely to minimise the significance of any negative residual effects, but this is uncertain at this stage.

5.88 In terms of the Climate Change SA theme a key issue is flood risk. Site allocation Land at Kelham Gardens is located partially within a high flood risk area; however, it is considered on balance that the policy mitigation and the provisions of the NPPF (2019) should minimise the potential for negative effects. From a mitigation perspective, the MANP performs positively in terms of incentivising the Passivhaus standard, to minimise the energy demand of buildings; and requiring development proposals to make a financial contribution to the Marlborough Area Carbon Sink Fund, which will be invested into the area's Green Infrastructure Network. In light of these local actions aimed at tackling climate change, neutral effects are anticipated overall.

5.89 **One recommendation** is made through the appraisal as follows:

- Encourage a shift away from petrol/diesel vehicles to increase sustainable travel in the MANP area, in line with national and local climate change commitments. For example, the inclusion of a policy criteria that requires new development to deliver or contribute to electric vehicle charging points would strengthen the MANP's approach to climate change mitigation.

## 6. Next steps

- 6.1 Subsequent to the current consultation on the Draft MANP, the plan will be updated by the MANP Steering Group to reflect comments received. This SA Report will be updated to reflect the changes made to the plan.
- 6.2 The MANP and SA Report will then be submitted to Wiltshire Council for their consideration. Wiltshire Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the MANP meeting legal requirements and its compatibility with the Wiltshire Core Strategy (2015), Wiltshire Housing Site Allocations Plan (2019), and forthcoming Wiltshire Local Plan Review.
- 6.3 If the subsequent Independent Examination is favourable, the MANP will be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the MANP, then the Neighbourhood Plan will be 'made'. Once made, the MANP will become part of the Development Plan for the Marlborough Area.

# Appendix A Context review and baseline

## Air quality

### Context review

Key messages from the National Planning Policy Framework (NPPF) include:

- *'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible, these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'*
- *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.'*
- *'New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.'*

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>29</sup> sets out policies and goals to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25-year plan directly relate to the air quality theme.

Wiltshire Council is required to monitor air quality across the district under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

The following policies in the Wiltshire Core Strategy directly relate to the air quality theme:

- Core Policy 55: Air Quality
- Core Policy 52: Green Infrastructure
- Core Policy 60: Sustainable Transport

### Summary of current baseline

As of August 2019, there is one AQMA within the Neighbourhood Plan area: Marlborough AQMA which is designated for exceedances in the annual mean concentration of 40µg/m<sup>3</sup> for nitrogen dioxide (NO<sub>2</sub>). As stated in the 2018 Air Quality Annual Status Report (ASR)<sup>30</sup>, the Marlborough AQMA covers the whole town of Marlborough and continues to report exceedances in the annual

<sup>29</sup> HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment' [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [accessed 15/08/19]

<sup>30</sup> Wiltshire Council (2018): '2018 Air Quality Annual Status Report (ASR)' [online] available at: <http://www.wiltshireairquality.org.uk/assets/documents/council-reports/Wiltshire%20Annual%20Status%20Report%202018.pdf> [accessed 13/09/19]

mean objective concentration of NO<sub>2</sub>. Wiltshire Council currently undertakes air quality monitoring at the following sites within the Marlborough AQMA, all of which fall within the Neighbourhood Plan area:

- Herd Street, Marlborough
- High Street, Marlborough
- Barn Street, Marlborough
- Salisbury Road, Marlborough
- War memorial, Marlborough
- London Road, Marlborough

In addition to the Marlborough AQMA, there are seven other AQMA's within Wiltshire also declared due to their exceedances in annual mean concentrations of NO<sub>2</sub>. However, none of these AQMA's are situated in close proximity to the Neighbourhood Plan area.

## Summary of future baseline

Implementation of the aims and objectives contained within the Wiltshire Core Strategy, along with the policies in the Local Transport Plan, present opportunities to improve air quality within both the Neighbourhood Plan area and the wider district. It is also recognised that the MANP itself provides an opportunity to improve public realm and the movement of pedestrians, through the MANP policy framework.

However, future development within and around the Neighbourhood Plan area has the potential to increase traffic and congestion; particularly given that public transport use is likely to remain low compared with private car use. This has the potential to increase levels of NO<sub>2</sub> and decrease air quality in and around Marlborough.

## Biodiversity

### Context review

At the European level, the EU Biodiversity Strategy was adopted in May 2011 in order to deliver an established new Europe-wide target to *'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'*.<sup>31</sup>

Key messages from the National Planning Policy Framework (NPPF) include:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities').
- Plan positively for 'green infrastructure' as part of planning for 'ecological networks'.
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

---

<sup>31</sup> European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: [http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP\\_resolution\\_april2012.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf)

The Natural Environment White Paper (NEWP) sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:<sup>32</sup>

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.<sup>33</sup>

The recently published 25 Year Environment Plan<sup>34</sup> sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation and improve social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:

- Using and managing land sustainably;
- Recovering nature and enhancing the beauty of landscapes;
- Connecting people with the environment to improve health and wellbeing;
- Increasing resource efficiency, and reducing pollution and waste;
- Securing clean, productive and biologically diverse seas and oceans; and
- Protecting and improving the global environment.

In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the biodiversity and geodiversity theme.

The 2008 Biodiversity Action Plan (BAP)<sup>35</sup> for Wiltshire has the following vision: *'Wiltshire - a place where people make space for wildlife. Where biodiversity is second nature to everyone, valued by all for its beauty, wildness and an important resource for future generations. A landscape where wildlife has space to move and people have room to breathe, helping Wiltshire to flourish in a changing climate'*. The BAP includes a Generic Action Plan, ten Habitat Action Plans, one Habitat Informative Note and one Species Action Plan, all of which contain a number of objectives, targets and actions for the whole of Wiltshire.

---

<sup>32</sup> Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>>

<sup>33</sup> DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>>

<sup>34</sup> HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment' [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [accessed 15/08/19]

<sup>35</sup> Wiltshire Wildlife Trust: (2008) 'Wiltshire Biodiversity Action Plan 2008' [online] available at: <http://www.wiltshire.gov.uk/biodiversity-wiltshire-action-plan.pdf> [accessed 15/08/19]



The existing BAP for Wiltshire has been supplemented with a new Landscape Scale BAP<sup>36</sup> which identifies Landscape Biodiversity Areas to deliver more integrated, landscape scale conservation for the county.

The following policies in the Wiltshire Core Strategy directly relate to the biodiversity theme:

- Core Policy 50: Biodiversity and Geodiversity
- Core Policy 52: Green Infrastructure

## Summary of current baseline

### European designated sites

There are no European designated sites within or in close proximity to the Neighbourhood Plan area.

### Nationally designated sites

There are three Special Sites of Scientific Interest (SSSI) within the Neighbourhood Plan area, as detailed below:

Savernake Forest SSSI is located in South East of the Neighbourhood Plan area, within Savernake Parish. It was notified in October 1988 and is approximately 915.6 ha in size. Based on the most recent condition assessment, 95.14% of the SSSI is classified as 'Unfavourable - Recovering', 3.65% of the SSSI is classified as 'Unfavourable – No change', and 1.20% of the SSSI is classified as 'Unfavourable - Declining'. The citation statement for the SSSI states<sup>37</sup>:

*“Savernake Forest is an extensive area of ancient woodland with over one thousand years of documented history. One of the largest woods in Wiltshire, it harbours an outstanding lichen flora and a wide variety of other plants, including species with nationally restricted distributions. The rich invertebrate fauna of the Forest includes several rare insects, mainly flies and beetles associated with deadwood, as well as nationally scarce moths and butterflies and an uncommon snail. In addition the site supports a diverse assemblage of birds and an exceptional range of fungi.”*

Part of the River Kennet SSSI flows through the east of the Neighbourhood Plan area, within Mildenhall Parish. It has a total size of 111.07 hectares and was notified in November 1995. Based on the most recent condition assessment, 100% of the SSSI is classified as 'Unfavourable – No change'. This site is also one of England's oldest National Nature Reserve. The citation statement for the SSSI states<sup>38</sup>:

*“The River Kennet has a catchment dominated by chalk with the majority of the river bed being lined by gravels. The Kennet below Newbury traverses Tertiary sands and gravels, London Clay and silt, thus showing a downstream transition from the chalk to a lowland clay river. As well as having a long history of being managed as a chalk stream predominantly for trout, the Kennet has been further modified by the construction of the Kennet and Avon Canal. In some places the canal joins with the river to form a single channel. There are also many carriers and channels formerly associated with water meadow systems. The river flows through substantial undisturbed areas of marshy grassland, wet woodland and reed beds.”*

The Fyfield Down SSSI is adjacent to the North West boundary of Neighbourhood Plan area, with a small section of the SSSI present within Preshute Parish. Based on the most recent condition assessment, 83.66% of the SSSI is classified as 'Unfavourable - Recovering' and 17.34% of the SSSI is classified as 'Favourable'. Notified in April 1986, the Fyfield Downs SSSI has an area of approximately 327.36 ha. The citation statement for the SSSI states<sup>39</sup>:

<sup>36</sup> Wiltshire Wildlife Trust (2012): 'A landscape-scale framework for conservation in Wiltshire and Swindon' [online] available at: <http://www.wiltshire.gov.uk/corestrategydocument?directory=Studies%2C%20Surveys%20and%20Assessments&filerref=130> [last accessed 15/08/19]

<sup>37</sup> Natural England (no date): 'Savernake Forest SSSI' [online] <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1001972> [last accessed 15/08/19]

<sup>38</sup> Natural England (no date): 'River Kennet SSSI' [online] available at: <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S2000164> [last accessed 15/08/19]

<sup>39</sup> Natural England (no date): 'Fyfield Down SSSI' [online] available at: <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1001301> [last accessed 15/08/19]

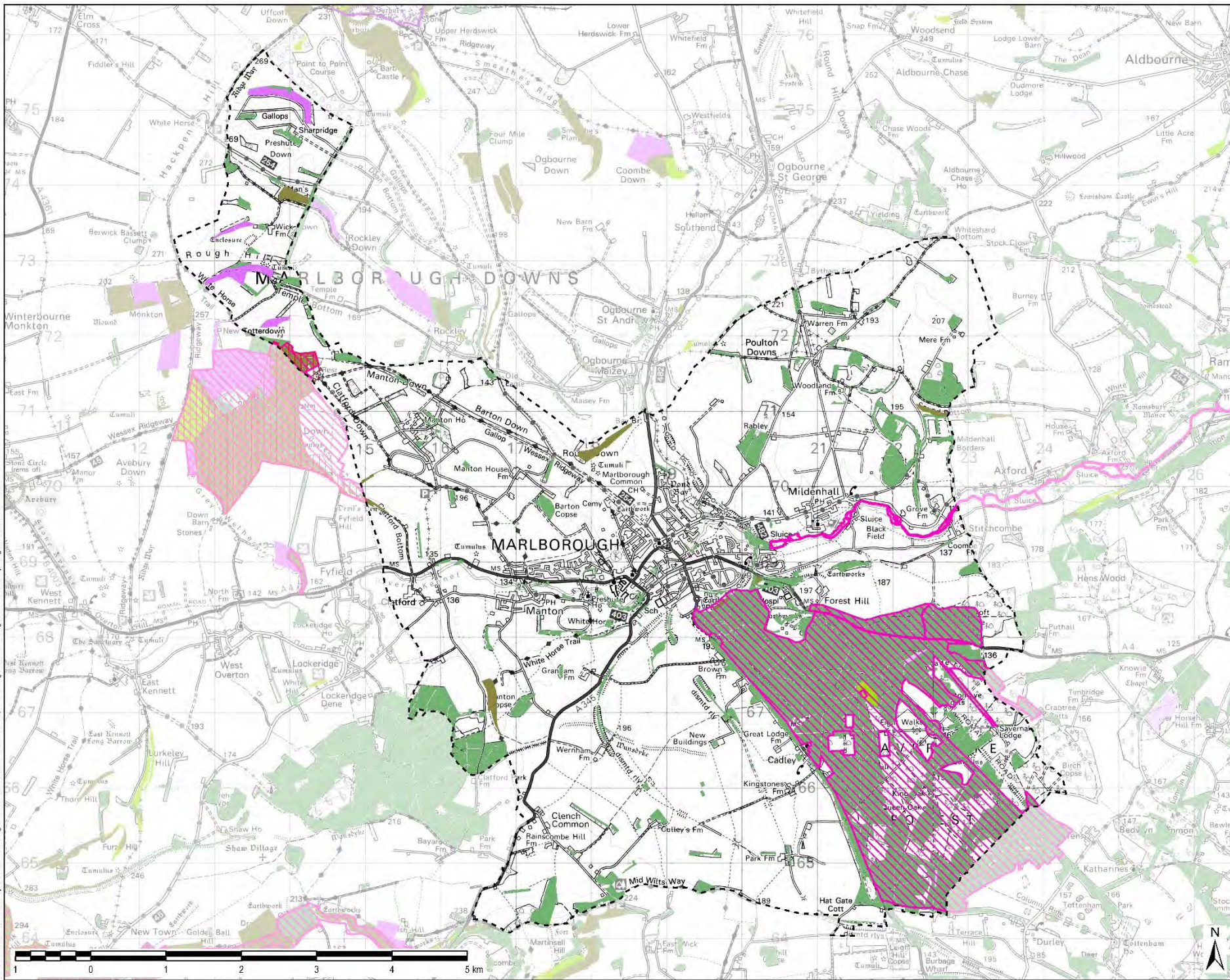
*“This site is notified for both its geomorphological and biological interest. Geomorphologically, Fyfield Down displays the best assemblage of sarsen stones in Britain and also shows periglacial features of considerable importance. The sarsen stones support a nationally important lichen flora, which is of outstanding biological interest. Moreover it is considered one of the best examples of this lichen community in north-west Europe. The sarsens are set within semi-natural grassland and scrub of botanical interest.”*

SSSI Impact Risk Zones (IRZs) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSI's. In this context, significant areas of the Neighbourhood Plan area surrounding the Savernake Forest, River Kennet and Fyfield Down SSSI's are located within an IRZ for residential and/or rural-residential developments. This applies to residential development of 50 to 100 units or more, and rural residential development (outside of existing settlements/ urban areas) of 10 to 50 units or more.

### **Locally designated sites**

County Wildlife Sites (CWS) are areas of land within Wiltshire with recognised importance for wildlife, which fall outside the legal protection of the Sites of Special Scientific Interest (SSSI) system. To date, the Wildlife Sites Project at the Wiltshire Wildlife Trust (WWT) has identified around 1500 CWS in Wiltshire, with a total area of approximately 21,000ha. These CWS form a vital network of high-quality habitats of county level importance which are outside of statutory protection. There are a number of CWS located throughout the Neighbourhood Plan area.

There are a range of Biodiversity Action Plan Priority Habitats within and surrounding the Neighbourhood Plan area. The habitats include: lowland calcareous grassland, good quality semi-improved grassland, lowland meadows, lowland heathland, deciduous woodland, and wood pasture and parkland.



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

**LEGEND**

- Marlborough Neighbourhood Plan Area
- ▨ National Nature Reserve (NNR)
- ▨ Local Nature Reserve (LNR)
- ▨ Special Area of Conservation (SAC)
- ▨ Site of Special Scientific Interest (SSSI)

**Biodiversity Action Plan Priority Habitats**

- ▨ Deciduous Woodland
- ▨ Good Quality Semi-improved Grassland
- ▨ Grassland
- ▨ Lowland Calcareous Grassland
- ▨ Lowland Heathland
- ▨ Lowland Meadows
- ▨ Traditional Orchard

Copyright  
 Contains Ordnance Survey Data © Crown Copyright and database right 2019  
 Reproduced from Ordnance Survey digital map data © Crown copyright 2019. All rights reserved. Licence number 0100031673  
 © Natural England material is reproduced with the permission of Natural England 2019  
 © Natural England copyright. Contains Ordnance Survey data © Crown Copyright and database right 2019. NB This national dataset is "indicative" not "definitive". Definitive information can only be provided by individual local authorities and you should refer directly to their information for all purposes that require the most up to date and complete dataset

Purpose of Issue: **DRAFT**

Client: **MARLBOROUGH TOWN COUNCIL**

Project Title: **SA FOR THE MARLBOROUGH NEIGHBOURHOOD PLAN**

Drawing Title: **BIODIVERSITY DESIGNATIONS AND HABITATS**

Drawn	Checked	Approved	Date
CN	JW	RP	22/08/2019

AECOM Internal Project No. **60571087** Scale @ **A3**  
 1:46,308

AECOM  
 South House, Basingstoke  
 Hants, RG24 0BA  
 Tel: 01256 343000  
 Fax: 01256 343001  
 www.aecom.com

**AECOM**

Drawing Number: **FIGURE 3.1** Rev: **01**

## Summary of future baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, with the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised both within the Neighbourhood Plan area and in the surrounding areas.

CWS act as wildlife corridors and have the potential to be impacted by new development which can remove the connection between habitats for species such as birds. Ecological sites can also be impacted by poor air and water quality. Factors such as noise and lighting can also disturb vulnerable species.

## Climate change

### Context review

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below<sup>40</sup>:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

The UK Climate Change Act<sup>41</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

- 2050 Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.

<sup>40</sup> GOV.UK (2017): 'UK Climate Change Risk Assessment Report January 2017' [online] available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017> [accessed 15/08/19]

<sup>41</sup> GOV.UK (2008): 'Climate Change Act 2008' [online] available from: <http://www.legislation.gov.uk/ukpga/2008/27/contents> [accessed 15/08/19]

- Carbon Budgets. The Act requires the Government to set legally binding ‘carbon budgets’. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK’s long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets and report to Parliament on progress made in reducing greenhouse gas emissions.
- The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy (page 42).

Key messages from the National Planning Policy Framework (NPPF) include:

One of the three overarching objectives of the NPPF is an environmental objective to ‘contribute to protecting and enhancing our natural, built and historic environment’ including by ‘mitigating and adapting to climate change’ and ‘moving to a low carbon economy.’ *‘The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.’*

*‘Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.’*

*‘Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.’*

*‘Direct development away from areas at highest risk of flooding (whether existing or future). ‘Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.’*

The Flood and Water Management Act<sup>43</sup> highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS)<sup>44</sup>.

<sup>42</sup> Committee on Climate Change (2017): ‘UK Adaptation Policy’ [online] available at: <https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/> [accessed 15/08/19]

<sup>43</sup> Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> [accessed 15/08/19]

<sup>44</sup> N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

Further guidance is provided in the document 'Planning for SuDS'.<sup>45</sup> This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

At the local level, the Climate Change Adaptation Action Plan<sup>46</sup> produced by Wiltshire Council sets out the following five key aims for addressing climate risks in the authority:

- Wiltshire residents have adapted to the challenges of climate change and are supported by health and social care systems.
- Wiltshire businesses are prepared for the risks from a changing climate.
- Wiltshire balances the needs of fragile ecosystems with demand for resources for development.
- Wiltshire Council has effective plans, policies and resources in place to respond to severe weather events.
- New infrastructure is planned and designed to account for the projected changes in climate.

The Local Flood Risk Management Strategy for Wiltshire<sup>47</sup> has an overarching vision of '*working together to manage local flood risk in Wiltshire.*' A number of strategic measures are identified to address the following five objectives:

- Improve knowledge regarding flood risk;
- Improve protection from flooding;
- Improve resilience to flooding;
- Improve the environment; and
- Impact communications about flooding issues.

The following policies in the Wiltshire Core Strategy directly relate to the climate change theme:

- Core Policy 41: Sustainable Construction and Low Carbon Energy
- Core Policy 42: Standalone Renewable Energy Installations
- Core Policy 52: Green Infrastructure
- Core Policy 60: Sustainable Transport
- Core Policy 67: Flood Risk
- Core Policy 68: Water Resources

## Summary of current baseline

### Contribution to climate change

**Table A.1 Carbon dioxide emissions and sources, plus emissions per capita, 2005-2016<sup>48</sup>**

	Industrial and Commercial (t CO <sub>2</sub> )	Domestic (t CO <sub>2</sub> )	Transport (t CO <sub>2</sub> )	Total (t CO <sub>2</sub> )
<b>Wiltshire</b>				
2005	4.0	2.6	3.1	9.5

<sup>45</sup> CIRIA (2010) 'Planning for SuDs – making it happen' [online] available at:

[http://www.ciria.org/Resources/Free\\_publications/Planning\\_for\\_SuDS\\_ma.aspx](http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx) [accessed 15/08/19]

<sup>46</sup> Wiltshire Council (2016) 'Wiltshire Council – Climate Change Adaptation Action Plan' [online] available at:

<http://www.wiltshire.gov.uk/green-economy-climate-change> [last accessed 15/08/19]

<sup>47</sup> Wiltshire Council (2015) 'Wiltshire Local Flood Risk Management Strategy' [online] available at:

<http://www.wiltshire.gov.uk/comm-local-flood-risk-management-strategy.pdf> [last accessed 15/08/19]

<sup>48</sup> Department of Energy and Climate Change (2018) '2005 to 2016 UK local and regional CO<sub>2</sub> emissions – data tables' [online] available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016> [accessed 15/08/19]

	<b>Industrial and Commercial (t CO<sub>2</sub>)</b>	<b>Domestic (t CO<sub>2</sub>)</b>	<b>Transport (t CO<sub>2</sub>)</b>	<b>Total (t CO<sub>2</sub>)</b>
2006	4.5	2.6	3.0	9.9
2007	4.4	2.5	3.0	9.7
2008	4.1	2.4	2.9	9.2
2009	2.6	2.2	2.7	7.4
2010	2.7	2.4	2.7	7.6
2011	2.4	2.0	2.6	6.9
2012	2.4	2.2	2.6	7.0
2013	2.3	2.1	2.6	6.8
2014	2.2	1.8	2.5	6.3
2015	1.9	1.7	2.7	6.0
2016	1.7	1.6	2.7	5.7
<b>South West</b>				
2005	3.1	2.5	2.4	7.9
2006	3.1	2.5	2.4	7.9
2007	3.0	2.3	2.4	7.6
2008	2.8	2.3	2.3	7.3
2009	2.4	2.1	2.2	6.6
2010	2.4	2.3	2.2	6.7
2011	2.2	1.9	2.1	6.1
2012	2.3	2.1	2.1	6.4
2013	2.2	2.0	2.1	6.1
2014	2.0	1.7	2.1	5.6
2015	1.8	1.6	2.1	5.3
2016	1.6	1.5	2.2	5.0
<b>England</b>				
2005	3.8	2.5	2.3	8.5
2006	3.8	2.5	2.2	8.4
2007	3.6	2.4	2.2	8.1
2008	3.5	2.4	2.1	7.8
2009	3.0	2.1	2.0	7.0

	Industrial and Commercial (t CO <sub>2</sub> )	Domestic (t CO <sub>2</sub> )	Transport (t CO <sub>2</sub> )	Total (t CO <sub>2</sub> )
2010	3.0	2.3	2.0	7.2
2011	2.7	2.0	1.9	6.5
2012	2.9	2.1	1.9	6.8
2013	2.8	2.0	1.9	6.6
2014	2.4	1.7	1.9	5.9
2015	2.3	1.6	1.9	5.7
2016	1.9	1.5	1.9	5.3

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that Wiltshire has broadly higher per capita emissions than the South West of England and England since 2005 (**Table 4A1**). However, Wiltshire has seen a 40.5% reduction in the percentage of total emissions per capita between 2005 and 2016, higher than the reductions for the South West of England (36.4%) and England (37.6%).

### Potential effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team<sup>49</sup>. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50<sup>th</sup> percentile) for the South West of England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows<sup>50</sup>:

- The central estimate of increase in annual mean temperatures of between 2°C and 3°C; and
- The central estimate of change in annual mean precipitation of +10 to +20% in winter and -10% to -30% in summer.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;
- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100-year floods;

<sup>49</sup> The data was released on 26<sup>th</sup> November 2018: Available at: <http://ukclimateprojections.metoffice.gov.uk/> [accessed 15/08/19]

<sup>50</sup> Met Office (2018): 'Land Projection Maps: Probabilistic Projections' [online map] available from: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps> [accessed 15/08/19]



- Changes in insurance provisions for flood damage;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;
- Increased difficulty of food preparation, handling and storage due to higher temperatures;
- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

### **Flood risk**

The areas at highest risk of flooding in the Neighbourhood Plan area are areas immediately adjacent to the River Kennet and the River Og, a tributary of the River Kennet. The River Kennet flows west-east through the Neighbourhood Plan area, and the River Og flows from the North of the Neighbourhood Plan area, meeting the River Kennet on the eastern outskirts of Marlborough. The areas surrounding the watercourses are in Flood Zone 3, representing areas that have a 1% (1 in 100) or greater annual flood risk.

Surface water flooding is also a risk within the Neighbourhood Plan area. Medium-to-high surface water flood risk is associated with areas immediately surrounding the River Kennet and River Og.

### **Summary of future baseline**

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.

With an increase in precipitation and peak river flow allowances associated with climate change, the River Kennet and River Or may put residents, property and development at high risk of flooding.

A Critical Drainage Area (CDA) is a discrete geographic area where multiple and interlinked sources of flood risk cause flooding in one or more Local Flood Risk Zones (LFRZ) during severe weather, impacting people, property and/or local infrastructure. Wiltshire Council may wish to designate their own CDAs (in the absence of any designations from the Environment Agency) within the Neighbourhood Plan area in the future, for reasons such as surface water capacity issues.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

## **Landscape**

### **Policy context**

Key messages from the National Planning Policy Framework (NPPF) include:

*‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.’*

*Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.’*

*Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).’*

*‘Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*

*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*

*remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*

The policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the landscape theme.

At the local level, the North Wessex Downs Area of Outstanding Natural Beauty (AONB) Management Plan<sup>51</sup> sets out the objectives for the area, from the period of 2014 to 2019. The vision for the North Wessex AONB is ‘*vast dramatic, undeveloped and distinct chalk downlands with nationally significant areas of semi-natural chalk grassland, contrasting with well-wooded plateaux, arable lands and intimate and secluded valleys, all rich in biodiversity and cultural heritage; a national landscape that stands apart from the increasing urban pressures that surround it; when people live, work and relax; and where visitors are welcomed and contribute to a vibrant rural economy*’. The AONB management plan aims to:

- Support a viable rural economy, so as to provide resources for those who manage the area’s landscapes;
- Outline the principles of responses to development that may affect the beauty and tranquillity of the North Wessex Downs;
- Identify priorities for resources, including staff and money, that will maximise conservation and minimise damage; and
- Inform people about the unique landscapes of the area and how best to enjoy these landscapes and support their conservation

It is noted that every five years the AONB Management Plan is reviewed. The North Wessex Downs Council of Partners published a Consultation Draft AONB Management Plan for the period 2019-24 in August 2018.<sup>52</sup> The Council of Partners have taken a ‘light touch’ approach to the review of the Management Plan that was adopted for the period 2014 – 2019 (as discussed above). The draft Management Plan sets the agenda and priorities for actions during the next five years, to conserve

<sup>51</sup> North Wessex Downs AONB (2014): ‘North Wessex Downs AONB Management Plan 2014-19’ [online] available at: [http://www.northwessexdowns.org.uk/uploads/File\\_Management/NWD\\_Docs/About\\_Us/Management\\_Plan/NWD\\_AONB\\_Management\\_Plan\\_2014-19.pdf](http://www.northwessexdowns.org.uk/uploads/File_Management/NWD_Docs/About_Us/Management_Plan/NWD_AONB_Management_Plan_2014-19.pdf) [last accessed 15/08/19]

<sup>52</sup> North Wessex Downs AONB (2018) The North Wessex Downs Area of Outstanding Natural Beauty Management Plan 2019-2024 Consultation Draft [online] available at: [http://www.northwessexdowns.org.uk/uploads/File\\_Management/NWD\\_Docs/ManagementPlan/Consultation-Draft-Final.pdf](http://www.northwessexdowns.org.uk/uploads/File_Management/NWD_Docs/ManagementPlan/Consultation-Draft-Final.pdf) [last accessed 19/08/19]

and to enhance the natural beauty of the AONB. The draft is currently being modified in the light of comments and views received during consultation (which ended November 2018).

The following policies in the Wiltshire Core Strategy directly relate to the landscape theme:

- Core Policy 51: Landscape
- Core Policy 52: Green Infrastructure
- Core Policy 57: Ensuring High Quality Design and Place Shaping

## Summary of current baseline

### Designated sites

Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England, Wales and Northern Ireland are conserved and enhanced. The primary purpose of the AONB designation is to conserve and enhance the natural beauty of the area, as confirmed by Section 82 of the Countryside and Right of Way Act 2000 (CRoW Act).

Designated in August 1972, the North Wessex Downs AONB covers approximately 1730 sq km of diverse landscape including a number of chalk habitats and a rich mosaic of woodland, pasture, heath and common land. The entirety of the Neighbourhood Plan area falls within the North Wessex AONB. The following list of special qualities define the unique characteristics for which the North Wessex AONB is designated as a nationally important protected landscape:

**Landscape Character:** Open Downland; Downland with Woodland; Wooded Plateau; Downs Plain and Scarp; Vales; River Valleys; and Lowland Mosaic.

**Land Management:** Agricultural Management; Varied Field Patterns; Hedgerows and Field Boundaries; Forestry Activity; and Equestrian Activity.

**Biodiversity:** Chalk Grassland; Arable Habitats; Broadleaved Woodland; Chalk Streams and Rivers; and Wetland Habitats.

**Historic Environment:** Neolithic and Bronze Age Monuments; Iron Age, Roman and Post-Roman; Medieval and Post-Medieval; Country Houses and Parks; and Post-Medieval Infrastructure.

**Natural Resources:** Geological Resources; Soil Types; River Gravel Beds; River Channels; Clean Air; and Clean Natural Water.

**Development:** Remoteness and Tranquillity; Distinctive Architectural Styles; Sparse Road Network; and Traditional Economy.

**Communities:** Disperse Population; Economic Activity; Influence of Armed Forces; Good Access to Wider Area; Well Resources Farming Industry; Strong Sense of Identity; and Affinity with the Landscape.

**Leisure and Tourism:** Cultural Landscape; Historical Attractions; Picturesque Market Towns; Rich Archaeology; Country Homes; Rights of Way Network; and Centre for Antiques.

Despite the relatively low population density, there are development pressures on the North Wessex Downs. Notably this is due to its location in close proximity to London. There is a need to manage these pressures with sensitivity both within and in the setting of the AONB in order to maintain a balance in promoting economic and social viability whilst retaining the character of the North Wessex Downs. Communities need to be economically viable and have adequate housing, amenities and facilities. However, the primary purpose of designation needs to be paramount when considering such issues.<sup>53</sup>

---

<sup>53</sup> North Wessex Downs AONB (2018) The North Wessex Downs Area of Outstanding Natural Beauty Management Plan 2019-2024 Consultation Draft [online] available at: <http://www.northwessexdowns.org.uk/about-us/management-plan-review.html> last accessed 19/08/19

## National Character Areas

The MANP area lies within the National Character Area (NCA): 116 Berkshire and Marlborough Downs. The Berkshire and Marlborough Downs NCA<sup>54</sup> is predominately identified as vast arable fields which stretch across sparsely settled, rolling Chalk hills.

## Landscape character

At the local level, the Wiltshire Landscape Character Assessment<sup>55</sup> describes the variations in character between different areas and types of landscape in the county. The following three landscape character types identified in the Wiltshire Landscape Character Assessment overlap with the Neighbourhood Plan area boundary:

- 1B: Marlborough Downs
- 2A: Savernake Plateau
- 5A: Kennet Valley

## Summary of future baseline

New development has the potential to lead to incremental but small changes in landscape and villagescape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

In the absence of the plan, inappropriate development within the open countryside or countryside setting could place increased pressure on valued landscapes/ townscapes and their settings; notably the North Wessex Downs AONB. This may negatively impact upon the landscape features which contribute to the distinctive character and setting of the LCAs which define the Neighbourhood Plan area.

## Historic Environment

### Policy context

Key messages from the National Planning Policy Framework (NPPF) include:

- *Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.*
- *Plans should set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.*
- *‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.’*

The policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the historic environment theme.

The Government’s Statement on the Historic Environment for England<sup>56</sup> sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to

<sup>54</sup> Natural England (2015): ‘Berkshire and Marlborough Downs’ [online] available at: <http://publications.naturalengland.org.uk/publication/4822422297509888?category=587130> [last accessed 15/08/19]

<sup>55</sup> Wiltshire Council (2005): ‘Wiltshire Landscape Character Assessment’ [online] available at: <http://www.wiltshire.gov.uk/planning-landscape-conservation> [last accessed 15/08/10]

<sup>56</sup> HM Government (2010): ‘The Government’s Statement on the Historic Environment for England’ [online] available from: [http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference\\_library/publications/6763.aspx](http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx) [accessed 15/08/19]

recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016)<sup>57</sup> outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of Conservation Areas.

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)<sup>58</sup> provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2<sup>nd</sup> Edition) (December 2017)<sup>59</sup> provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)<sup>60</sup> outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SA process and Historic England's role in neighbourhood planning.

The Historic Environment and Site Allocations in Local Plans – Advice Note 3 (2015) provides advice to all those involved in the site allocation process, to help ensure that the historic environment plays a positive role in allocating sites for development.<sup>61</sup> It offers advice on evidence gathering and site

<sup>57</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management: Advice Note 1' [online] available from: <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/> [accessed 15/08/19]

<sup>58</sup> Historic England (2016): 'SA and SEA: Advice Note 8' [online] available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> [accessed 15/08/19]

<sup>59</sup> Historic England (2017): 'Setting of Heritage Assets: 2<sup>nd</sup> Edition' [online] available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [accessed 15/08/19]

<sup>60</sup> Historic England (2018): 'Neighbourhood Planning and the Historic Environment' [online] available at: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/> [accessed 15/08/19]

<sup>61</sup> Historic England (2015) The Historic Environment and Site Allocations in Local Plans [online] available at: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

allocation policies, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.

At the local level, the Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan<sup>62</sup> sets out the following key priorities for the site from 2015 to 2021:

- Protect buried archaeology from ploughing and enhance the setting of sites and monuments by maintaining and extending permanent wildlife-rich grassland and managing woodland and scrub;
- Protect monuments from damage by burrowing animals;
- Reduce the dominance and negative impact of roads and traffic and ensure any improvements to the A303 support this;
- Improve the interpretation and enhance the visitor experience of the wider landscape. Ensure any development is consistent with the protection and, where appropriate, enhancement of the monuments and their settings and the wider WHS landscape and its setting;
- Spread the economic benefits related to the WHS to the community and wider county;
- Encourage local community engagement with the WHS; and
- Encourage sustainable archaeological research and education to improve and communicate the understanding of the WHS.

The following policies in the Wiltshire Core Strategy directly relate to the historic environment theme:

- Core Policy 57: Ensuring High Quality Design and Place Shaping
- Core Policy 58: Ensuring the Conservation of the Historic Environment
- Core Policy 59: The Stonehenge, Avebury and Associated Sites World Heritage Site and its Setting

## Summary of current baseline

### Historic evolution and character of Marlborough

Marlborough is a site of historic significance and has traces of human activity since the late Neolithic period. Located within the vicinity of the Stonehenge and Avebury World Heritage Site, Marlborough was occupied from the late Neolithic period, through the Bronze age, the Iron age, and later was a Saxon settlement that expanded westward until the Norman Conquest. The area is rich with historic artefacts, including bowl barrows, Romano-British kilns, historic market towns and much more. Marlborough was a strategic point between Bath and London during the 18th and early 19th centuries where there were many inns, trades and retailers servicing the road that connected the two cities. Marlborough has a rich and historic built environment that is recognised by the World Heritage Site, scheduled monument, and various listed buildings present.

### Designated heritage assets

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains a significant number of designated heritage assets, as set out below.

### World Heritage Site

The Stonehenge, Avebury and Associated Sites World Heritage Site (WHS) is situated adjacent to the north west boundary of the Neighbourhood Plan area, with a small section present in Preshute Parish. According to English heritage<sup>63</sup>, the site is an important WHS due to “*the massive Henge, containing the largest prehistoric stone circle in the world, and Silbury Hill, the largest prehistoric mound in*

---

<sup>62</sup> Stonehenge and Avebury WHS Steering Committees (2015): ‘Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan 2015’ [online] available at: <http://www.stonehengeandaveburywhs.org/management-of-whs/stonehenge-and-avebury-whs-management-plan-2015/> [last accessed 15/08/19]

<sup>63</sup> Historic England (2019): ‘Stonehenge, Avebury and Associated Sites’ [online] available at: <https://historicengland.org.uk/listing/the-list/list-entry/1000097> [accessed 15/08/19]

*Europe, demonstrate the outstanding engineering skills which were used to create masterpieces of earthen and megalithic architecture.”*

Despite the relatively low population density, there are a number of development pressures on the Stonehenge, Avebury and Associated Sites World Heritage Site. The most recent Management Plan for the WHS summarises these pressures into the following themes: conservation; visitor management and sustainable tourism; interpretation, learning and community engagement; roads and traffic; research; management, liaison and monitoring.

### Listed buildings

There are three Grade 1, 12 Grade II\*, and 321 Grade II nationally designated listed buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.

### Scheduled monuments

Scheduled Monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England<sup>64</sup>, there are 30 Scheduled Monuments within the Neighbourhood Plan area.

### Conservation Areas

Conservation Areas are designated because of their special architectural and historic interest. Conservation Area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England<sup>65</sup>. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area and can be developed into a Management Plan.

There are three Conservation Areas within the Neighbourhood Plan Areas, as listed below:

- Manton Conservation Area, located in the centre of Marlborough Parish.
- Marlborough Conservation Area, located in the west of Marlborough Parish.
- Mildenhall Conservation Area, located in the middle of Mildenhall Parish.

Conservation Area Statements have been produced for all three Conservation Areas (June, 2003).<sup>66,67,68</sup> The purpose of a Conservation Areas Statement is to identify and record those special qualities of a village that make up its architectural and historic character. This is important for providing a sound basis for local plan policies and development control decisions as well as for the formulation of proposals for the preservation or enhancement of the character or appearance of an area.

### Heritage at Risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, Scheduled Monuments, historic parks and gardens, registered battlefields, wreck sites and Conservation Areas deemed to be 'at risk'. According to the 2018 Heritage at Risk Register, there are seven designated heritage assets in the Neighbourhood Plan area are at risk.<sup>69</sup>

It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether the 321 Grade II listed buildings within the Neighbourhood Plan area are at risk.

---

<sup>64</sup> 'Historic England (2019): 'National Heritage List for England' [online] available at: <http://list.historicengland.org.uk> [accessed 15/08/19]

<sup>65</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1' [online] available at: <https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/> [accessed 15/08/19]

<sup>66</sup> Kennet District Council (2003) Manton Conservation Area Statement

<sup>67</sup> Kennet District Council (2003) Marlborough Conservation Area Statement

<sup>68</sup> Kennet District Council (2003) Mildenhall Conservation Area Statement

<sup>69</sup> Historic England (2018): 'Heritage at Risk Register' [online] available at: <https://historicengland.org.uk/advice/heritage-at-risk/> [accessed 15/08/19]

## Locally important heritage features

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities.

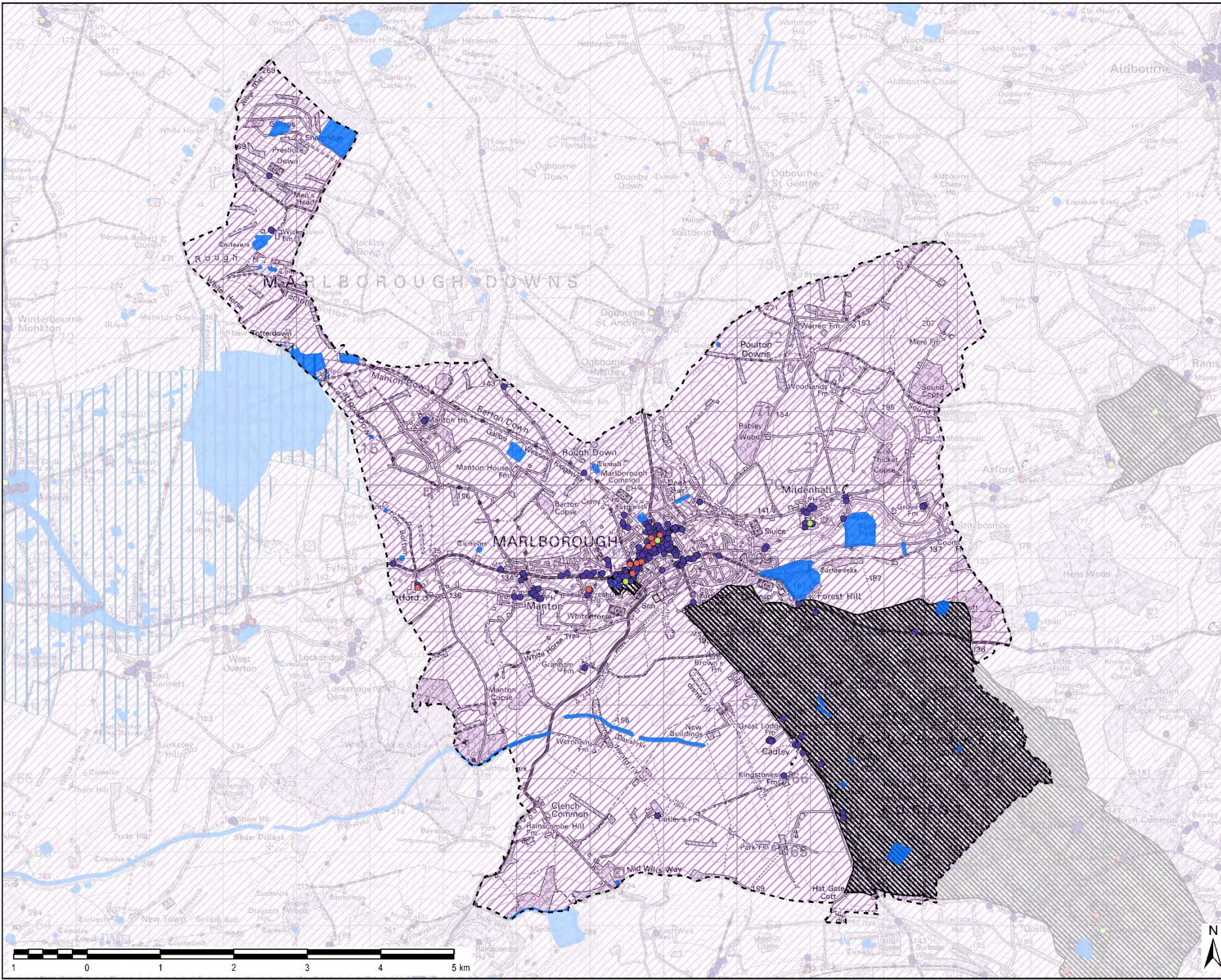
Following a high-level review of the Historic Environment Record (HER) for Wiltshire and Swindon<sup>70</sup>, there are 1078 records within a 3000m radius of Marlborough (which covers the majority of the Neighbourhood Plan area), including a variety of archaeological sites, historic buildings and landscapes dating from the Neolithic period to the present day (e.g. mounds, ditches, barns, mills and wells).

---

<sup>70</sup> Wiltshire Council (2019): 'Wiltshire and Swindon Historic Environment Record' [online] available at: <https://services.wiltshire.gov.uk/HistoryEnvRecord/Home/Index> [last accessed 15/08/19]



File Name: I:\004 - Information Systems\2571087\_Neighbourhood Plan\_C58\_2019\_202202\_Maps\Marlborough Town Council\Figure 5-1 - Historic Environment and Landscape Designations.mxd



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT.

**LEGEND**

- Marlborough Neighbourhood Plan Area
- Record of Scheduled Monument
- Registered Parks and Garden
- World Heritage Site
- North Wessex Downs Area of Outstanding Natural Beauty

**Listed Building**

- Grade I
- Grade II\*
- Grade II

Copyright  
Contains Ordnance Survey Data © Crown Copyright and database right 2019  
Reproduced from Ordnance Survey digital map data © Crown copyright 2019. All rights reserved. Licence number 0100031673  
© Natural England material is reproduced with the permission of Natural England 2019  
© Historic England 2019. Contains Ordnance Survey data © Crown copyright and database right 2019 The Historic England GIS Data contained in this material was obtained on 22/08/2019

Purpose of Issue: **DRAFT**

Client: **MARLBOROUGH TOWN COUNCIL**

Project Title: **SA FOR THE MARLBOROUGH NEIGHBOURHOOD PLAN**

Drawing Title: **HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS**

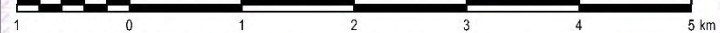
Drawn: CN	Checked: JW	Approved: RP	Date: 22/08/2019
ALCOM Internal Project No: 60571087		Scale @ A3: 1:47,500	

THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO AND SUBJECT TO THE TERMS OF PROPOSALS SUBMITTED BY ITS CLIENT. AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN THAT FOR THE ORIGINAL CLIENT OR FOR OTHER CLIENTS EXPRESSLY ASKED TO DO SO. AECOM IS NOT RESPONSIBLE FOR THE ACCURACY OF ANY INFORMATION PROVIDED TO AECOM FOR WHICH IT HAS NOT PROVIDED THE ORIGINAL SOURCE.

AECOM  
25 Abchurch Lane, London EC4N 3DF  
Tel: +44 (0)20 7592 9000  
Fax: +44 (0)20 7592 9001  
aecom.com

Drawing Number: **FIGURE 5.1**

Rev: **01**



## Summary of future baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It should be noted, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

New development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' heritage significance.

## Land, soil and water resources

### Policy context

The EU's Soil Thematic Strategy<sup>71</sup> presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances;
- Ensure the progressive reduction of groundwater pollution; and
- Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.

Key messages from the NPPF include:

- 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'

---

<sup>71</sup> European Commission (2006): 'Soil Thematic Policy' [online] available at: [http://ec.europa.eu/environment/soil/three\\_en.htm](http://ec.europa.eu/environment/soil/three_en.htm) [accessed 15/08/19]

- ‘Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.’
- Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

The government has produced a separate plan that specifically deals with planning policy in relation to waste management<sup>72</sup>; this should be read in conjunction with the NPPF.

Along with the policies contained within Chapter 1 ‘Using and managing land sustainably’ and Chapter 4 ‘Increasing resource efficiency, and reducing pollution and waste’, Goal 2 ‘Clean and plentiful water’, Goal 5 ‘Using resources from nature more sustainably and efficiently’ and Goal 8 ‘Minimising waste’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Land, Soil and Water Resources theme.

Other key documents at the national level include ‘Safeguarding our Soils: A Strategy for England’<sup>73</sup>, which sets out a vision for soil use in England, and the ‘Water White Paper’<sup>74</sup>, which sets out the Government’s vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England<sup>75</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

In terms of waste management, the Government Review of Waste Policy in England<sup>76</sup> recognises that environmental benefits and economic growth can result from a more sustainable approach to the use of materials.

The National Waste Management Plan<sup>77</sup> provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive<sup>78</sup>. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

The following policies in the Wiltshire Core Strategy directly relate to the land, soil and water resources theme:

- Core Policy 56: Contaminated Land
- Core Policy 68: Water Resources

---

<sup>72</sup> Department for Communities and Local Government (2014): ‘National Planning Policy for Waste’ available at: <https://www.gov.uk/government/publications/national-planning-policy-for-waste> [accessed 15/08/19]

<sup>73</sup> Defra (2009): ‘Safeguarding our Soils: A strategy for England’ [online] available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england> [accessed 15/08/19]

<sup>74</sup> Defra (2011): ‘Water for life (The Water White Paper)’ [online] available from: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf> [accessed 15/08/19]

<sup>75</sup> Defra (2011): ‘Government Review of Waste Policy in England’ [online] available from: <http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf> [accessed 15/08/19]

<sup>76</sup> DEFRA (2011): ‘Government Review of Waste Policy in England’, [online] available from: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69401/pb13540-waste-policy-review110614.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-waste-policy-review110614.pdf) [accessed 15/08/19]

<sup>77</sup> DEFRA (2013): ‘Waste Management Plan for England’ [online] available from: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/265810/pb14100-waste-management-plan-20131213.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf) [accessed 15/08/19]

<sup>78</sup> Directive 2008/98/EC

## Summary of current baseline

### Soil resource

The Agricultural Land Classification (ALC) classifies land into size grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

In terms of the location of the best and most versatile agricultural land, no detailed classification of the Neighbourhood Plan area has been undertaken to date. As such, there is a need to rely on the national 'Provisional Agricultural Land Quality' dataset.

The Provisional Agricultural Land Quality dataset<sup>79</sup> shows that the Neighbourhood Plan area is underlain by various agricultural land grades. The majority of the Neighbourhood Plan area is covered by Grade 3 agricultural land, with small areas of Grade 2 agricultural land located within each of the four parishes. A small area of Grade 4 agricultural land is also present within Mildenhall Parish and a large section on non-agricultural land is located in the south of the Neighbourhood Plan area, covering the eastern half of Savernake Parish.

However, without the subset grading (3a or 3b) it is not possible to tell at this stage whether all of the Grade 3 agricultural land is considered to be 'best and most versatile'. It is also important to note that the national dataset is of very low resolution and may not necessarily provide an accurate reflection of the agricultural land quality within the Neighbourhood Plan area.

### Water resources

The main watercourse flowing through the Neighbourhood Plan area is the River Kennet, which flows west-east through the centre of the Neighbourhood Plan area. The River Kennet is the largest tributary of the River Thames, making it one of the most important chalk streams in England. Additionally, the River Og, a tributary of the River Kennet flows north-south through the Neighbourhood Plan area, until it reaches the River Kennet in the centre of the Neighbourhood Plan area, at Marlborough.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. As of August 2019, SPZ 1, 2 and 3 are present within the Neighbourhood plan. Areas of SPZ 3 (Total Catchment) are situated in the north west of Savernake Parish and adjacent to the western boundary of Preshute Parish. There is a section of SPZ 2 (Outer Zone) adjacent to the northern boundary of Savernake Parish. Finally, small areas of SPZ 1 (Inner zone) are located next to the southern boundary of Marlborough Parish and adjacent to the western boundary of Preshute Parish boundary.

The EU Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. These areas are designated as Nitrate Vulnerable Zones (NVZs) and, as such, are recognised as being at risk from agricultural nitrate pollution. Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. In this regard, the Neighbourhood Plan area is within the 'Berkshire Downs' Groundwater NVZ. However, it is useful to note that as the Neighbourhood Plan is likely to allocate land for residential development and potential employment areas, such uses are not considered to increase the risk of pollution to the NVZ.

### Water quality

Marlborough is located within the Thames River Basin District, with the Neighbourhood Plan area falling under the 'Kennet and Trib' Management Catchment and the 'Kennet' Operational Catchment. There are 33 waterbodies located within the Kennet Operational Catchment area<sup>80</sup>

<sup>79</sup> Natural England (2018): 'Agricultural Land Classification map Eastern Region' (ALC008), [online] available at: <http://publications.naturalengland.org.uk/publication/127056?category=5954148537204736> [accessed 15/08/19]

<sup>80</sup> Environment Agency (2019): 'Kennet' [online] available at: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3242> [accessed 15/08/19]

Based on the most recently completed water quality assessments undertaken in 2016, the Environment Agency's Catchment Data Explorer classifies all 33 waterbodies in Kennet catchment as having 'Good' chemical status and 29 of the 33 waterbodies as having 'Moderate' or 'Good' ecological status. The 'reasons for not achieving good status' (RNAGs) are primarily attributed to the following activities: sewage discharge, land drainage, ecological discontinuity, drought, groundwater drainage, poor nutrient management and livestock.

## Summary of future baseline

Future development has the potential to affect water quality through diffuse pollution, waste water discharges, water runoff, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.

In the absence of a detailed Agricultural Land Classification assessment for Marlborough, it remains uncertain whether new development in the Neighbourhood Plan area will lead to losses of higher quality (best and most versatile) agricultural land.

## Population and community

### Policy context

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'
- To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>81</sup> warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

The following policies in the Wiltshire Core Strategy directly relate to the population and community theme:

- Core Policy 1: Settlement Strategy
- Core Policy 3: Infrastructure Requirements
- Core Policy 14: Spatial Strategy for the Marlborough Community Area
- Core Policy 34: Additional Employment Land
- Core Policy 35: Existing Employment Land
- Core Policy 36: Economic Regeneration
- Core Policy 38: Retail and Leisure
- Core Policy 39: Tourism Development
- Core Policy 43: Providing Affordable Homes
- Core Policy 44: Rural Exception Sites
- Core Policy 45: Meeting Wiltshire's Housing Needs
- Core Policy 46: Meeting the Needs of Wiltshire's Vulnerable and Older People
- Core Policy 47: Meeting the Needs of Gypsies and Travellers
- Core Policy 48L: Supporting Rural Life
- Core Policy 49: Protection of Rural Services and Community Facilities

## Summary of current baseline

### Population

The population of the MANP area increased 5.6% in the decade from 2001, with an observed population change lower than the observed increases for Wiltshire, the South West of England and England as a whole. Approximately 2% of the population of Wiltshire live within the boundaries of the Neighbourhood Plan area.

### Age structure

Generally, there is a higher proportion of Marlborough Area residents within the 60+ age category in comparison to the percentages for Wiltshire and the whole of England. In terms of younger residents (aged 0-15 and 16-24), the Neighbourhood Plan area has a higher percentage of residents within this age category (31.7%), in comparison to the totals for Wiltshire (29.5%), the South West of England (28.8%), and the whole of England (30.8%).

With regard to the working age categories (25-44 and 45-59), the total for the Neighbourhood Plan area (42.3%) is lower than the total for Wiltshire (45.8%), the South West of England (44.7%) and England (46.9%).

---

<sup>81</sup> Select Committee on Public Service and Demographic Change (2013): 'Ready for Ageing?' [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> [accessed 15/08/2019]

## Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarised below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health or has a long-term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

A lower percentage of households in the Neighbourhood Plan area (48.7%) are deprived in at least 1 dimension, in comparison to the totals for Wiltshire (50.2%), the South West of England (55.2%) and the whole of England (57.4%). Out of the 48.7% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in either one or two dimensions, similar to the authority, regional and national trends.

## Index of Multiple Deprivation (IMD)

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  - 'Geographical Barriers': relating to the physical proximity of local services.
  - 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  - 'Indoors Living Environment' measures the quality of housing.
  - 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)<sup>82</sup> are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

The Neighbourhood Plan area falls within seven LSOAs: 'Wiltshire 12B' and 'Wiltshire 024A' (which include the majority of the rural areas within the Neighbourhood Plan area) and 'Wiltshire 019A', 'Wiltshire 019B', 'Wiltshire 019C', 'Wiltshire 019D' and 'Wiltshire 019E' (which comprise most of Marlborough town). With the exception of 'Wiltshire 019B' which falls within the top 40% most deprived LSOA's in England, all of the remaining LSOA's within the Neighbourhood Plan area are among the top 40% least deprived LSOA's in England. There are noticeable differences between the deprivation levels of the seven LSOA's within the Neighbourhood Plan area, particularly with regard to: education, skills and training; barriers to housing and services; and living environment deprivation

### Local service offer

Marlborough is the economic and social heart of the MANP area. 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. The wide range of shops and services is sufficient to meet day-to day needs of local residents.

### Education

The west end of Marlborough High Street is dominated by Marlborough College, a co-educational independent boarding and day school for pupils aged 13 to 18 school founded in 1843. The College is established on over 280 acres of an attractive landscape of downland and water-meadows.

State education within Marlborough is provided by the following:

- St John's School;
- Marlborough St Mary's CEVC Primary School; and
- Preshute CoE Primary School

It is recognised that there is a great demand for school places within the Neighbourhood Plan area, with schools oversubscribed.

### Health services

In Marlborough there is one medical practice (the Marlborough Medical Practice) and four dental surgeries. Situated just outside Marlborough is the Savernake Community Hospital. Originally a Victorian cottage hospital, it has been up-dated 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.

### Housing tenure

Within the Neighbourhood Plan area, 59.3% of residents either own their home outright or with a mortgage, lower than the district (67.5%), regional (67.4%) and national (63.3%) trends. There are more residents within socially rented accommodation in the Neighbourhood Plan area in comparison to the authority, regional and national totals. Additionally, the percentage of residents living rent free within the Neighbourhood Plan area (3.8%) is higher than the totals for Wiltshire (1.6%), South West of England (1.4%) and England (1.3%).

---

<sup>82</sup> DCLG (2015): Indices of Deprivation Explorer', [online] available at: <<http://dclgapps.communities.gov.uk/imd/idmap.html>> [accessed 15/08/19]



## Education

Based on the 2011 census data, 18.3% of residents in the Neighbourhood Plan area have no qualifications (Figure 8.2), lower than the totals for the South West of England (20.7%) and England (22.5%). Comparatively, a higher percentage of residents in the Neighbourhood Plan area have a Level 4 qualification and above (34.3%) in comparison to Wiltshire (29.5%), the South West of England (27.4%) and England (27.4%). Therefore, it can be concluded that the Neighbourhood Plan area has a highly qualified working population.

## Employment

Regarding employment within the Neighbourhood Plan area, the following three occupation categories support the most residents:

- Professional occupations (21.4%)
- Managers, directors, senior officials (14.3%)
- Skilled trades occupations (12.2%);

Overall, 47.8% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, higher than the totals for Wiltshire (41.5%), the South West of England (41.0%), and the whole of England (39.7%).

30.2% of residents within the Neighbourhood Plan area are currently economically inactive, which is higher than the figures for Wiltshire (26.2%) and the South West of England (29.7%), but in line with the total for the whole of England (30.0%).

## Summary of future baseline

As the population of the Neighbourhood Plan area continues to increase and age, this could potentially negatively impact upon the future vitality of the local community and economy of certain parts of the Neighbourhood Plan area, whilst also placing additional pressures on existing services and facilities.

The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

## Health and wellbeing

### Policy context

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; ‘support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.’
- ‘Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.’
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.

- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

In relation to other key national messages regarding health, 'Fair Society, Healthy Lives' ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The Wiltshire Health and Wellbeing Joint Strategic Needs Assessment (JSNA) provides a summary of the current and future health and wellbeing needs of the people in Wiltshire. This document is broken up into the following themes:

- Demography and overarching indicators;
- Burden of ill health and premature mortality;
- Health behaviours and improvement services;
- Health protection; and
- Wider determinants.

In addition to the JSNA, Wiltshire have also produced two supplementary Joint Strategic Needs Assessments: one for younger people and another for older people within Wiltshire,

The following policies in the Wiltshire Core Strategy directly relate to the health and wellbeing theme:

- Policy 38: Retail and Leisure
- Policy 46: Meeting the Needs of Wiltshire's Vulnerable and Older People
- Core Policy 58: Supporting Rural Life
- Core Policy 49: Protection of Rural Services and Community Facilities
- Core Policy 51: Landscape
- Core Policy 52: Green Infrastructure
- Core Policy 55: Air Quality
- Core Policy 60: Sustainable Transport
- Core Policy 66: Strategic Transport Network
- Core Policy 68: Water Resources

## Summary of current baseline

### Wiltshire Health and Wellbeing Joint Strategic Needs Assessment (JSNA)

Key findings from the most recently published Wiltshire Health and Wellbeing JSNA are provided below:

- The health of residents within Wiltshire is generally very good compared to national averages.
- Wiltshire has a higher life expectancy and health life expectancy, compared to the averages for the whole of England.
- Levels of deprivation, unhealthy lifestyles, crime, and unemployment are very low within Wiltshire.

- Inequalities due to deprivation exist within Wiltshire, as the most deprived 20% of areas have repeatedly poorer outcomes than the least 20% deprived.
- Though vaccination rates in Wiltshire are often higher than the national average figure there are still certain areas where the target percentage is not being met (including flu vaccinations for 65 and over, 2nd dose MMR and HPV vaccinations).
- The percentage of women screened for cervical cancer has been declining.
- Some specific populations in Wiltshire are at risk of ill-health due to lifestyle choices.

### Health indicators and deprivation

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing.

85.3% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', higher than the totals for Wiltshire (83.8%), the South West of England (81.4%) and England (81.4%). Similarly, the number of residents in the Neighbourhood Plan area considering themselves to have 'bad health' or 'very bad health' is 3.5%, lower than the authority (4.1%), regional (5.2) and national (5.4%) totals.

- 1.1 Based on the 2011 census data, the total number of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' is lower than the authority, regional and national trends. Overall, 84.9% of residents within the Neighbourhood Plan area report that their activities are not limited, which is higher than the total for Wiltshire (84.0%), the South West of England (81.6%) and the whole of England (82.4%).

### Summary of future baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a higher percentage of residents reporting 'good' or 'very good' health compared to regional and national trends, and a low percentage of residents reporting that their activities are limited in some way.

An ageing population within the Neighbourhood Plan area might place future pressures on health services in the area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing over the long term.

Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

Rates of mental health illnesses among young people within Wiltshire are high and likely to continue increasing in the future.

## Transportation

### Policy context

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

Key messages from the NPPF include:

- 'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- The potential impacts of development on transport networks can be addressed
- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised
- Opportunities to promote walking, cycling and public transport use are identified and pursued

- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account
- Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'
- 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, Wiltshire's third Local Transport Plan 2011-2026 (LTP3)<sup>83</sup> has a long term vision '*to develop a transport system which helps support economic growth across Wiltshire's communities, giving choice and opportunity for people to safely access essential services. Transport solutions will be sensitive to the built and natural environment, with a particular emphasis on the need to reduce carbon emissions*'. The plan identifies the following five challenges in delivering a sustainable transport system for the area:

- A largely rural county with many historic towns and villages;
- Relatively high car ownership levels and small, isolated pockets of access deprivation;
- The changing climate and the prospect of 'peak oil';
- Significantly lower funding for transport; and
- Increasingly elderly population.

In order to address these challenges, LTP3 sets out a number of strategic objects to help achieve the following five goals:

- Support economic growth;
- Reduce carbon emissions;
- Contribute to better safety, security and health;
- Promote equality of opportunity; and
- Improve quality of life and a healthy natural environment.

The following policies in the Wiltshire Core Strategy directly relate to the transportation theme:

- Core Policy 60: Sustainable Transport;
- Core Policy 61: Transport and Development;
- Core Policy 62: Development Impacts on the Transport Network
- Core Policy 63: Transport Strategies
- Core Policy 66: Strategic Transport Network

## Summary of current baseline

### Rail network

There are no longer any rail links located within the MANP area. The nearest rail station is located in Great Bedwyn. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury. Additionally, Swindon station, which serves as a major hub for trains to London, Wales and the south west, is situated approximately 20km away from the Neighbourhood Plan area.

---

<sup>83</sup> Wiltshire Council (2011): 'Wiltshire Local Transport Plan 2011-2026' [online] available at: <http://www.wiltshire.gov.uk/ltp3-strategy.pdf> [last accessed 15/08/19]

## Bus network

There are a number of bus services providing residents with regular access to close by towns and villages, including Swindon, Tidworth, Ludgershall, Wanborough, Aldbourne, Burbage and Ramsbury. However, in the 2012 Marlborough Area Plan, evening bus services for rural areas were recognised as needing improvement. Despite this, further cuts have been made to bus services within the Neighbourhood Plan area since 2012, with more proposed in the near future.

## Road network and congestion

The main roads running through MANP area are the A4 road which runs east/west, providing residents with access to London, Reading, Bath and Bristol; and the A346 which runs north/south connecting residents to Burbage, Ludgershall, Collingbourne Ducis and the M4 motorway running from London to Wales. The A346 is heavily used by vehicles, with local knowledge indicating that HGVs are an increasing issue along this road.

Additionally, there is a network of smaller country roads and lanes which pass through the Neighbourhood Plan area, connecting residents to nearby settlements.

## Cycle and footpath network

The Ridgeway National Trail runs through the Neighbourhood Plan area. This trail is 87 miles long, running through the North Wessex Downs AONB and the Chilterns AONB, from West Kennett to Ivinghoe Beacon.

The following two National Cycle Network Routes run through the MANP area:

- National Route 403, which runs from Semington to Great Bedwyn through Melksham, Chippenham, Calne, Avebury and Marlborough; and
- National Route 482, which runs from Chiseldon to Marlborough.

## Availability of cars and vans

Based on the 2011 census data, 82.6% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals for the South West of England (81.1%) and England (74.0%) but lower than the total for Wiltshire (85.2%). The total percentage of households in the Neighbourhood Plan area with access to two or more cars or vans (40.0%) is higher than the regional (37.6%) and national percentage (32.0%), but lower than the authority percentage (43.9%).

## Travel to work

The most popular mode of transport to work in the Neighbourhood Plan area is driving via a car or van (37.3%) which is lower than the totals for Wiltshire (45.6%), and the South West of England (41.4%), but lower than the total for the whole of England (37.0%). Comparatively, a lower percentage of economically active residents in the Neighbourhood Plan area commute to work via cycling or using the bus, minibus or coach in comparison to the authority, regional and national trends.

The total percentage of the working population in the Neighbourhood Plan area choosing to walk to work (15.6%) is higher than the total for Wiltshire (9.2%), the South West of England (9.0%), and England (7.0%). Similarly, a greater proportion of economically active residents within the MANP area work from their homes (6.5%), compared to authority (5.1%), regional (4.6%) and national (3.0%) percentages.

## Summary of future baseline

New development has the potential to increase traffic and lead to additional congestion issues within the Neighbourhood Plan area. Additionally, public transport use is likely to remain low compared with private car use given the lack of public transport options.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by the LTP3, there will be a continuing need for development to be situated in accessible locations.

Given the scale of development likely to come forward through the Neighbourhood Plan area, it is unlikely that this development will contribute to any significant improvements in public transport provision.

## Appendix B Site options appraisal

This appendix presents the detailed findings of the appraisal of 11 individual site options within the Marlborough Area, as established within **Section 4.14** of the main report. These are set out in **Table AB.1** below.

**Table AB.1 Sites considered through the SA process**

Site no.	Name	Site. capacity
1	Land off Elcot Lane	45-50
2	Further Land off Elcot Lane	102
3	Land South of A4, London Road	60
4	Further Land west of Salisbury Road	98
5	Barton Dene	130
6	Pelham Court	20
7	Former Resource Centre	30
8	Land at Kelham Gardens	9 flats
9	Mildenhall land adjacent Home Farm Close	18
10	Mildenhall Adj Playing Field	21
11	Police Station	24

The locations of these sites are presented in **Figure 4.1** of this SA Report.

### Method

Each of the site options identified in **Table A.1** were considered against the SA Framework of objectives and decision-making appraisal questions developed during SA scoping (**Section 3.3**) and the baseline information.

It should be noted that when considering access to community facilities and services, walking distances have been calculated from the edge of the site using google maps.

**Tables AB.2 - AB.12** overleaf present this appraisal and provide an indication of each site's sustainability performance in relation to the nine SA themes.

Summary findings are presented in **Section 4.29** of the main report.

**Table AB.2 Site 1 Land off Elcot Lane**

SA theme	Commentary, Site 1, Land off Elcot Lane
Air quality	<p>The site is located within the Marlborough AQMA and the delivery of new homes would likely lead to increased vehicular use within the AQMA, resulting in heightened levels of NO<sub>2</sub>, and an overall adverse effect on air quality.</p>
Biodiversity	<p>There are no significant biodiversity constraints present on the site. The site is within 60m of the River Kennett Site of Special Scientific Interest (SSSI) and Chopping Knife Lane County Wildlife Site (CWS) lies just north of the site. The site is within a SSSI Impact Risk Zone (IRZ) for residential development of ten units or more. It is therefore considered that the delivery of 45-50 new dwellings may lead to adverse effects on the designated biodiversity sites, for example through recreational activity, pollution, and disturbance during construction.</p> <p>In terms of habitats, the site is greenfield, with trees and hedgerows located along the site boundaries which may hold some biodiversity value. There is no Priority Habitat within or within close proximity to the site.</p> <p>Uncertain effects predicted at this stage, as the nature and significance of effects will be dependent on the precise quantum of growth.</p>
Climate change	<p>Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from per capita emissions. While this site does have good access to local bus routes, national cycle routes, and PRoW, the site is not well located in terms of access to Marlborough town centre and its amenities/ services, and therefore may be reliant on the car for travel.</p> <p>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of flooding.</p> <p>Taking the above into account, while there is no flood risk at the site, the site has limited access to services and facilities. The predicted effects on climate change are therefore considered to be uncertain at this stage.</p>
Landscape	<p>The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the River Valleys Landscape Type.</p> <p>The site forms part of the Kennet Valley Landscape Character Area and the River Kennet itself, located north of the site, is considered an important landscape feature. The site is however bound to the south and west by existing residential development, and would therefore be relatively contained, with the area of residential development to the south creating a relatively defined edge to this part of the settlement.</p> <p>A Preliminary Landscape Sensitivity Assessment (2012) has been carried out for all Wiltshire Strategic Housing Land Availability Assessment (SHLAA) sites within the AONB. The Assessment states that <i>“the site is highly visible from the open countryside to the east”</i>, concluding that <i>“development would not conserve the special qualities or natural beauty of the AONB and the site should not be taken forward as part of the SHLAA.”</i></p> <p>Given the findings of the Landscape Sensitivity Assessment and the location of the site within the AONB, residual negative effects are anticipated.</p>
Historic environment	<p>The sensitivity of the historic landscape has been characterised to some extent through the Landscape Sensitivity Assessment (2012), and as such, the findings discussed under the Landscape SA Theme are also applicable for this SA Theme.</p> <p>In terms of heritage assets, there are two Grade II Listed Buildings within 50m of the site (Elcot Mill House and Stables at Elcot Mill) to the north. It is considered that development has the potential to adversely impact on the setting of these important features, notably affecting views to and from the Listed Buildings.</p>
Land, soil and water resources	<p>It is not possible to confirm if development at this site would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available.</p> <p>The site is greenfield and does not perform positively in terms of promoting the use of previously developed land.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>

SA theme	Commentary, Site 1, Land off Elcot Lane	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located adjacent to existing residential development and is therefore expected to positively integrate with the local community. The site however does not have good access to services and facilities focused in the town centre; notably Marlborough High Street is approximately 1.6km walking distance from the site. The site has poor access to schools, being over 800m from Marlborough C of E Primary School (1.1km from the site), and more than 1.6km from a secondary school. Marlborough College and St Johns' School are both located on the other side of Marlborough, 2.3km and 2.6km from the site respectively, which fall within the 'satisfactory' threshold.</p> <p>The site is also over 800m from open space/ recreation facilities; Marlborough Skate Park is 1.1km from the site, Marlborough Recreational Ground is 1.3km from the site, and Marlborough Football Club is 1km from the site.</p> <p>The site is therefore not considered to be well located to services/ facilities in the town centre and other community infrastructure..</p> <p>It is noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements. However, this is uncertain at this stage.</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in the MANP area. Issues in terms of accessibility should nonetheless be a key consideration for the site.</p>	
Health and Wellbeing	<p>The site has poor access to local health services, being over 800m from a GP surgery/ hospital/ pharmacy. The site is 1.4km from Marlborough Medical Practice and 1km from Savernake Hospital.</p> <p>The site is also over 800m from open space/ recreation facilities; Marlborough Skate Park is 1.1km from the site, Marlborough Recreational Ground is 1.3km from the site, and Marlborough Football Club is 1km from the site. There is however a CWS located immediately to the south of the site which may provide recreational opportunities.</p> <p>Negative effects are concluded against this SA theme given the relatively limited access to health and recreational facilities.</p>	
Transportation	<p>In terms of public transport, the nearest rail station is located in Great Bedwyn, approximately 10km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site has good access to other sustainable transport modes; being within 400m of a bus stop on London Road. Services at this location include the 20, 620, X20 and X22 which connect residents with neighbouring centres including Swindon, Great Bedywn and Hungerford.</p> <p>Chiseldon and Marlborough Railway Path is 150m south of the site, which coincides with the following two National Cycle Network Routes which run through the MANP area:</p> <ul style="list-style-type: none"> <li>• National Route 403, which runs from Semington to Great Bedwyn through Melksham, Chippenham, Calne, Avebury and Marlborough; and</li> <li>• National Route 482, which runs from Chiseldon to Marlborough.</li> </ul> <p>There are also two Public Rights of Way (PRoW) crossing the site.</p> <p>Nonetheless, given the location of the site on the outskirts of the settlement, residents are likely to utilise the A4 London Road to travel in to the town centre by car. The A4 extends throughout the MANP area and runs south of the site, i.e. for access to the extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment).</p> <p>Taking the above into account, positive and negative effects are predicted given the site has reasonable access to sustainable modes of travel; but is distant from the town centre. Uncertain effects are therefore anticipated overall against this SA theme.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects



**Table AB.3 Site 2 Elcot 2**

SA theme	Commentary, Site 2, Further land off Elcot Lane
Air quality	<p>The western extent of the site is located within the Marlborough AQMA with the exception of a small area to the south west of the town. The delivery of new homes within/ adjacent to the AQMA would likely lead to increased vehicular use within the AQMA, resulting in heightened levels of NO<sub>2</sub>, and an overall adverse effect on air quality.</p>
Biodiversity	<p>There are no significant biodiversity constraints present on the site. The site is within 60m of the River Kennett Site of Special Scientific Interest (SSSI) and County Wildlife Sites (CWSs) lie to the north and south of the site. The site is within a SSSI Impact Risk Zone (IRZ) for residential development of ten units or more. It is therefore considered that the delivery of 102 dwellings may lead to adverse effects on the designated biodiversity sites, for example through recreational activity, pollution, and disturbance during construction.</p> <p>In terms of habitats, the site is greenfield, with trees and hedgerows located along the site boundaries which may hold some biodiversity value. There is Priority Habitat Deciduous Woodland and Broadleaved Woodland 120m south of the site, spanning both sides of the A4 London Road. Uncertain effects predicted at this stage, as the nature and significance of effects will be dependent on the precise quantum of growth.</p>
Climate change	<p>Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. While this site does have good access to local bus routes, national cycle routes, and PRoW, the site is not well located in terms of access to Marlborough town centre and its amenities/ services, and therefore may be reliant on the car for travel.</p> <p>In relation to adapting to the effects of climate change, the north of the site is located within Flood Zones 2 and 3, which is of high risk of flooding. Taking the distance to services/ facilities into account and the area of high flood risk present in the north of the site, it is considered that there is the potential for a n adverse effect in terms of climate change.</p>
Landscape	<p>The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the River Valleys Landscape Type.</p> <p>The site forms part of the Kennet Valley Landscape Character Area and the River Kennet itself, located north of the site, is considered an important landscape feature. The site a large open field located beyond the settlement boundary, bound to the west only by existing residential development. Development would therefore result in substantial expansion of the settlement into the open countryside, impacting upon the wider characteristics of the AONB.</p> <p>A Preliminary Landscape Sensitivity Assessment (2012) has been carried out for all Wiltshire Strategic Housing Land Availability Assessment (SHLAA) sites within the AONB. The Assessment states that <i>“the site is highly visible, in particular from the downland to the south and east and also from the northern side of the river valley.”</i> Development would therefore be <i>“highly visible, having a substantial impact on the character and quality of these views.”</i> The assessment concludes that <i>“development would be detrimental to special qualities and natural beauty of the AONB and the site should not be taken forward as part of the SHLAA.”</i></p>
Historic environment	<p>The sensitivity of the historic landscape has been characterised to some extent through Landscape Sensitivity Assessment (2012), and as such, the findings discussed under the Landscape SA Theme are also applicable for this SA Theme.</p> <p>In terms of heritage assets present at the site, there is a Grade II Listed Building within the site boundary (Stables at Elcot Mill), and another adjacent to the site boundary (Elcot Mill House). It is considered that development has the potential to impact on the intrinsic qualities and setting of these important features, notably affecting views to and from the Listed Buildings.</p>
Land, soil and water resources	<p>It is not possible to confirm if an allocation at this site will lead to a loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3 land. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available.</p> <p>The site is also greenfield and therefore does not perform positively in terms of promoting the use of previously developed land.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>



SA theme	Commentary, Site 2, Further land off Elcot Lane	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located outside of the settlement boundary, and is therefore likely to be somewhat isolated from the local community. The site is distant from the services and facilities focused in the centre of the town; notably Marlborough High Street is approximately 1.6km from the site.</p> <p>The site has poor access to schools, being over 800m from Marlborough C of E Primary School (1.1km from the site), and more than 1.6km from a secondary school. Marlborough College and St Johns' School are both located on the other side of Marlborough, 2.3km and 2.6km from the site respectively, which fall within the 'satisfactory' threshold.</p> <p>The site is also over 800m from open space/ recreation facilities; Marlborough Skate Park is 1.1km from the site, Marlborough Recreational Ground is 1.3km from the site, and Marlborough Football Club is 1km from the site.</p> <p>It is noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements. However, this is uncertain at this stage.</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in the MANP area. Issues in terms of accessibility should nonetheless be a key consideration for the site.</p>	
Health and Wellbeing	<p>The site has poor access to local health services, being over 800m from a GP surgery/ hospital/ pharmacy. The site is 1.4km from Marlborough Medical Practice and 1km from Saverlake Hospital.</p> <p>The site is also over 800m from open space/ recreation facilities; Marlborough Skate Park is 1.1km from the site, Marlborough Recreational Ground is 1.3km from the site, Marlborough Cricket and Hockey Club is 1.3km from the site, and Marlborough Football Club is 1km from the site. There is however a CWS located immediately to the south of the site which may provide recreational opportunities.</p> <p>Negative effects are concluded against this SA theme given the relatively limited access to health and recreational facilities.</p>	
Transportation	<p>In terms of public transport, the nearest rail station is located in Great Bedwyn, approximately 10km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site has good access to other sustainable transport modes, being within 400m of a bus stop on London Road. Services at this location include the 20, 620, X20 and X22 which connect residents with neighbouring centres including Swindon, Great Bedwyn and Hungerford.</p> <p>Chiseldon and Marlborough Railway Path is 150m south of the site, which coincides with the following two National Cycle Network Routes which run through the MANP area:</p> <ul style="list-style-type: none"> <li>• National Route 403, which runs from Semington to Great Bedwyn through Melksham, Chippenham, Calne, Avebury and Marlborough; and</li> <li>• National Route 482, which runs from Chiseldon to Marlborough.</li> </ul> <p>There are numerous PRow extending throughout the site and along the site boundaries. Nonetheless, given the location of the site on the outskirts of the settlement, residents are likely to utilise the A4 London Road to travel in to the town centre by car. The A4 extends throughout the MANP area and runs south of the site, i.e. for access to the extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment).</p> <p>Taking the above into account, positive and negative effects are predicted given the site has reasonable access to sustainable modes of travel; but is distant from the town centre. Uncertain effects are therefore anticipated overall against this SA theme.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table AB.4 Site 3 Land south of A4, London Road**

SA theme	Commentary, Site 3, Land South of A40 London Road	
Air quality	The site is located within the Marlborough AQMA and the delivery of new homes would likely lead to increased vehicular use within the AQMA, resulting in heightened levels of NO <sub>2</sub> , and an overall adverse effect on air quality.	
Biodiversity	<p>The site lies adjacent to Savernake Forest Site of Special Scientific Interest (SSSI) (located along the southern site boundary). The site is within a SSSI Impact Risk Zone (IRZ) for residential development of ten units or more. 60 new dwellings at the site therefore has the potential to adversely impact upon these designated sites, valued habitats, and any associated species; either through direct loss, or as a result of increased recreational activity, disturbance during construction, and congestion along the road network (notably the London Road A4) resulting in increased levels of atmospheric pollution.</p> <p>Part of the site includes Priority Habitats; Lowland Calcereous Grassland, Deciduous Woodland and Broadleaved Woodland. These habitats form part of Postern Hill Chalk County Wildlife Site (CWS). These habitats are likely to act as wildlife corridors, aiding ecological connectivity in the area; notably between the site and Savernake Forest.</p> <p>Taking the above into account it is considered that there is the potential for an adverse effect on biodiversity.</p>	
Climate change	<p>Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. While this site does have good access to local bus routes, national cycle routes, and PRoW, the site is not well located in terms of access to Marlborough town centre and its amenities/ services, and therefore may be reliant on the car for travel.</p> <p>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of flooding.</p> <p>Taking the above into account, the predicted effects on climate change are considered to be uncertain at this stage.</p>	
Landscape	<p>The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the Wooded Plateau Landscape Type.</p> <p>The site is lies outside the settlement boundary but adjoins it and would extend existing built form south of London Road into the countryside. The site includes areas of open greenfield arable land, and also wooded areas, coinciding with a CWS, and adjoining Savernake Forest SSSI. The site is steeply sloping, with potential for adverse visual impacts on the wider AONB. It is however noted that the dense vegetation present across the site and along site boundaries (notably woodland) will provide a level of screening. Nonetheless it is considered that development would not be in keeping with the surrounding landscape, notably Savernake Forest. Additionally, the delivery of 102 homes at this location may set precedent for further development south of the London Road, which currently contains the built form; providing a defined boundary to growth.</p>	
Historic environment	<p>In terms of heritage assets present, the site lies within the setting of Camp on Forest Hill Scheduled Monument; located on the other site of London Road, to the north. This designated archaeological site is principally vulnerable to ploughing and in terms of its condition, is identified as having 'extensive significant problems'.<sup>84</sup> It is considered that development has the potential to adversely impact on the important feature through works/ disturbance. Any development should seek to preserve the site while meeting development needs; ensuring that damage to the monument is avoided. Overall, development at the site would not affect views to or from any designated heritage assets but may affect the wider historic environment. This however is dependent on the precise scale, layout and design of development.</p>	

<sup>84</sup> Historic England (2019) Camp on Forest Hill, Mildenhall / Savernake / Marlborough - Wiltshire (UA) Site Details [online] available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/45182>

SA theme	Commentary, Site 3, Land South of A40 London Road
Land, soil and water resources	<p>It is not possible to confirm if development at this site would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available.</p> <p>The site is greenfield and does not perform positively in terms of promoting the use of previously developed land.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is detached from the main settlement by the A4 London Road, and is therefore not expected to positively integrate with the local community. The site is also relatively distant from the services and facilities focused in the centre of the town; notably Marlborough High Street is approximately 2.3km from the site.</p> <p>The site has poor access to schools, being over 800m from Marlborough C of E Primary School (1.6km from the site), and more than 1.6km from a secondary school. Marlborough College is 2.1km from the site, and St Johns' School is 2.4km from the site, which fall within the 'satisfactory' threshold</p> <p>The site is within 400m of open space/ recreational facilities; Marlborough Cricket and Hockey Club is 120m south of the site, and Severnake Forest is located adjacent to the site (although the entrance is 2.4km from the site), which provides recreational and camping opportunities.</p> <p>The site is therefore considered to be reasonably well located in terms of local community infrastructure; albeit with limited access to services/ facilities and the settlement itself.</p> <p>It is noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements; however, this is uncertain at this stage.</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in the MANP area. Where issues exist in terms of accessibility, these should be a key consideration for the site.</p>
Health and Wellbeing	<p>The site has poor access to local health services, being over 800m from a GP surgery/ hospital/ pharmacy. The site is 1.4km from Marlborough Medical Practice and within 1km of wider health facilities located at Savernake Hospital.</p> <p>The site is within 400m of open space/ recreational facilities; Marlborough Cricket and Hockey Club is 120m south of the site, and Severnake Forest is located adjacent to the site (although the entrance is 2.4km from the site), which provides recreational and camping opportunities.</p> <p>Uncertain effects are concluded overall against this SA theme given the site has poor access to health services but good access to open space/ recreational facilities and opportunities. .</p>

SA theme	Commentary, Site 3, Land South of A40 London Road	
Transportation	<p>In terms of public transport, the nearest rail station is located in Great Bedwyn, approximately 9.5km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site has reasonable access to other sustainable transport modes; being adjacent to a bus stop on London Road. Services at this location include the 20, 620, X20 and X22 which connect residents with neighbouring centres including Swindon, Great Bedywn and Hungerford.</p> <p>There is a PRoW crossing the site, and Chiseldon and Marlborough Railway Path is located just north of the site, which coincides with the following two National Cycle Network Routes which run through the MANP area:</p> <ul style="list-style-type: none"> <li>• National Route 403, which runs from Semington to Great Bedwyn through Melksham, Chippenham, Calne, Avebury and Marlborough; and</li> <li>• National Route 482, which runs from Chiseldon to Marlborough.</li> </ul> <p>Nonetheless, given the location of the site on the outskirts of the settlement, residents are likely to utilise the A4 London Road to travel in to the town centre by car. The A4 extends throughout the MANP area and runs adjacent to the site, i.e. for access to the extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment).</p> <p>Taking the above into account, positive and negative effects are predicted given the site has reasonable access to sustainable modes of travel; but is distant from the town centre. Uncertain effects are therefore anticipated overall against this SA theme.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table AB.5 Site 4 Further land west of Salisbury Road**

SA theme	Commentary, Site 4, Further land west of Salisbury Road
Air quality	<p>The site is located within the Marlborough AQMA and the delivery of new homes would likely lead to increased vehicular use within the AQMA, resulting in heightened levels of NO<sub>2</sub>, and an overall adverse effect on air quality</p>
Biodiversity	<p>The site is within 300m of Severnake Forest SSSI, falling with a SSSI Impact Risk Zone (IRZ) for residential development of ten or more houses outside existing settlements/urban areas. It is therefore considered that the delivery of 98 dwellings outside of the settlement boundary may lead to adverse effects on the designated biodiversity site. The site also adjoins a County Wildlife Site (CWS), to the south, which includes Priority Habitat Deciduous Woodland and Broadleaved Woodland. These habitats are likely to act as wildlife corridors, aiding ecological connectivity in the area; notably between the site and Savernake Forest. It is considered that the delivery of 98 new homes has the potential to adversely impact upon these designated sites, valued habitats, and any associated species; either through direct loss, or as a result of increased recreational activity, disturbance during construction, and congestion along the road network (notably the London Road A4) resulting in increased levels of atmospheric pollution.</p> <p>Priority Habitat Deciduous Woodland and Broadleaved Woodland is also present to the east of the site, coinciding with the northern end of a disused railway tunnel, which WC (following a screening request) have stated <i>“is a nationally important winter hibernation site for Natterer’s (and other) bats. Although not designated, the tunnel meets the criteria for SSSI status. Further housing in this area is discouraged due to the need to avoid disturbance of bats and loss of key flight routes into and out of the tunnel.”</i></p> <p>Uncertain effects predicted at this stage, as the nature and significance of effects will be dependent on the precise quantum of growth.</p>
Climate change	<p>Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. While this site does have good access to local bus routes and PRow, the site is not well located in terms of access to Marlborough town centre and its amenities/ services, and therefore may be reliant on the car for travel.</p> <p>In relation to adapting to the effects of climate change, the north of the site is located within Flood Zone 1, which is of low risk of flooding.</p> <p>Taking the above into account, the predicted effects on climate change are considered to be uncertain at this stage.</p>
Landscape	<p>The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the Wooded Plateau Landscape Type.</p> <p>The site is an open arable land parcel, located outside of the settlement boundary, and is not well connected to existing built form. It is however noted that the site adjoins a Wiltshire Core Strategy strategic allocation at Land off Salisbury Road for 220 homes.</p> <p>The delivery of 96 homes at the site would result in the expansion of the settlement into the open countryside, impacting upon the wider characteristics of the AONB.</p> <p>Development at the site would also likely set precedent for further growth into the open AONB landscape, with the potential for long term negative effects on character and the special qualities of the AONB, including setting and views. It is recognised that existing dense vegetation lining the site boundaries (notably to the east and south) would provide some screening in terms of impact on views; however, given the importance of the landscape designation at this location it is considered that there is still the potential for adverse effects.</p>
Historic environment	<p>In terms of heritage assets present at the site, the site is not considered to be constrained, with no heritage assets located within or within close proximity to the site.</p>
Land, soil and water resources	<p>It is not possible to confirm if development at this site would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available.</p> <p>The site falls within two Groundwater Source Protection Zones; Zone 1 (Inner Protection Zone) and Zone 2 (Outer Protection Zone). As a result, it is considered that there is the potential for an adverse effect.</p>

SA theme	Commentary, Site 4, Further land west of Salisbury Road	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located outside of the settlement boundary, and is therefore likely to be somewhat isolated from the local community. However, it is noted that the site adjoins a Wiltshire Core Strategy strategic allocation at Land off Salisbury Road for 220 homes.</p> <p>The site is distant from the services and facilities focused in the centre of the town; notably Marlborough High Street is approximately 1.6km from the site.</p> <p>The site has reasonable access to schools; while over 800m from Marlborough C of E Primary School (1.3km), St Johns School is adjacent to the site (100m north). Marlborough College is 1.6km from the site, which falls within the 1.6km 'positive' threshold</p> <p>The site is over 800m from open space/ recreation facilities; Marlborough Recreation Ground is 1km from the site, and Severnake Forest is located adjacent to the site (although the entrance is 2.4km from the site).</p> <p>The site is therefore not considered to be particularly well located in terms of local community infrastructure, services/ facilities, and the settlement itself.</p> <p>It is noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements; however, this is uncertain at this stage.</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in the MANP area. Issues in terms of accessibility should nonetheless be a key consideration for the site.</p>	
Health and Wellbeing	<p>The site has poor access to local health services, being over 800m from a GP surgery/ hospital/ pharmacy. The site is 1.5km from Marlborough Medical Practice and 3km from wider health facilities located at Savernake Hospital.</p> <p>The site is also over 800m from open space/ recreation facilities; Marlborough Recreational Ground is 1km from the site, and Severnake Forest is located adjacent to the site (although the entrance is 2.4km from the site), which provides recreational and camping opportunities.</p> <p>Negative effects are concluded against this SA theme given the relatively limited access to health and recreational facilities.</p>	
Transportation	<p>In terms of public transport, the nearest rail station is located in Great Bedwyn, approximately 11.5km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site has good access to other sustainable transport modes; being adjacent to a bus stop on Orchard Road. Services at this location include the 20, 620, X5 and 48 which connect residents with neighbouring centres including Swindon, Calne, Salisbury and Hungerford.</p> <p>The site is not located in close proximity to either of the National Cycle Network Routes which run through the MANP area. There is however a Public Right of Way (PRoW) extending along the southwestern site boundary.</p> <p>The site is not well located in terms of access to Marlborough town centre, with residents likely to utilise the A4 London Road/ Bath Road which connects to the A346 and A345 surrounding the site on the outskirts of the main settlement. The A4 extends throughout the MANP area, providing access to the extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment).</p> <p>Taking the above into account, positive and negative effects are predicted given the site has reasonable access to sustainable modes of travel; but is distant from the town centre. Uncertain effects are therefore anticipated overall against this SA theme.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table AB.6 Site 5 Barton Dene**



SA theme	Commentary, Site 5, Barton Dene	
Air quality	The western extent of the site is located within the Marlborough AQMA and the delivery of new homes would likely lead to increased vehicular use within the AQMA, resulting in heightened levels of NO <sub>2</sub> , and an overall adverse effect on air quality.	Red
Biodiversity	In terms of biodiversity constraints on site; there is an area of National Forest Inventory Woodland (young trees) located in the north east corner of the site, which is part of a larger area of woodland extending north of the site. There is also a County Wildlife Site (CWS) 400m north west of the site, which consists of Ancient and Semi-Natural Woodland (Barton Copse), Priority Habitat Deciduous Woodland, and National Forest Broadleaved Woodland. These habitats are likely to act as wildlife corridors, aiding ecological connectivity in the area. A large proportion of the site itself is scrubland, with patches of dense scrub, trees, and hedgerows, and further vegetation lining the site boundaries and edges of field parcels. The delivery of 130 new homes has the potential to adversely impact upon the CWS, valued habitats, and any associated species; through direct loss/damage, or as a result of increased recreational activity, and disturbance during construction. Uncertain effects predicted at this stage, as the nature and significance of effects will be dependent on the precise quantum of growth.	Blue
Climate change	Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment (within 600m of the town centre) and public transport will help to reduce contributions from pre capita emissions. In relation to adapting to the effects of climate change, the north of the site is located within Flood Zone 1, which is of low risk of flooding. Taking the distance to the town centre and low flood risk into account, it is considered that there is likely to be a neutral effect.	Yellow
Landscape	<p>The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the Marlborough Downs Landscape Character Area.</p> <p>The site is made up of an open arable land parcel to the north, with scrubland parcels to the east and south of the site, and there is also a single dwelling located within the site along the eastern boundary. The site adjoins existing built form to the south and partially to the west; however, the arable land parcel to the north is notably detached from the settlement and surrounded by open landscape. The delivery of 130 homes at the site would result in the expansion of the settlement into the open countryside, impacting upon the wider characteristics of the AONB. Development at the site would also likely set precedent for further growth into the open AONB landscape, with the potential for long term negative effects on character and the special qualities of the AONB, including setting and views.</p> <p>A Preliminary Landscape Sensitivity Assessment (2012) has been carried out for all Wiltshire Strategic Housing Land Availability Assessment (SHLAA) sites within the AONB. An assessment has been undertaken for the southernmost land parcel within the site, adjacent to the existing settlement. The Assessment identifies that <i>“this parcel is an informal open space which is a community asset.”</i> <i>“Development would result in a loss of an area of informal open space and extend into open countryside.”</i> The assessment concludes that <i>“development would be detrimental to the special qualities and natural beauty of the AONB and the site should not be taken forward as part of the SHLAA.”</i></p>	Red
Historic environment	In terms of heritage assets present at the site, the site is in close proximity to Marlborough Conservation Area, located to the south of the site along Bath Road. There is also a Grade II Listed Building (Barton Farm Stables) located 50m south of the site. Development at the site has the potential to impact on the setting of these important features, notably affecting views to and from the Conservation Area and Listed Building. However, it is recognised that given the urban environment (built form, roads, and vegetation) at the south of the site along College Fields/ Bath Road, the potential for adverse effects is likely to be reduced; with views screened to some extent. Despite this, it is predicted that there is the potential for an adverse effect on the historic environment.	Red
Land, soil and water resources	<p>It is not possible to confirm if development at this site would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	Blue



SA theme	Commentary, Site 5, Barton Dene	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located outside of the settlement boundary; however, it is adjacent to existing development to the south and partially to the east. It is considered that development will be relatively well connected to the local community, with potential for a level of disconnect where the site extends into the open landscape to the north. The site has good access to the services and facilities focused in the centre of the town; notably Marlborough High Street is approximately 600m from the site.</p> <p>The site has reasonable access to schools; while over 800m from Marlborough C of E Primary School (1.3km from the site) Marlborough College is 0.5km from the site; however, this is an independent school. St Johns School 2.2km from the site, which is within the 3.9km 'satisfactory' threshold</p> <p>In terms of access to sport/ recreation, it is recognised that the southern section of the site (closest to the existing settlement) is open green space. However, this is private land and is not available for the public to use.</p> <p>The site has good access to open space/ recreation facilities otherwise, with Marlborough Leisure Centre located adjacent to the site. Further to this, Marlborough Recreation Ground, Marlborough Rugby Football Club, and Manton Play Park are over 800m from the site (all 1.8km from the site).</p> <p>It is noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements; however, this is uncertain at this stage.</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in the MANP area.</p>	
Health and Wellbeing	<p>The site has poor access to local health services, being over 800m from a GP surgery/ hospital/ pharmacy. The site is 1.1km from the Marlborough Medical Practice and 3.2km from Savernake Hospital.</p> <p>In terms of access to sport/ recreation, it is recognised that the southern section of the site (closest to the existing settlement) is open green space. However, this is private land and is not available for the public to use.</p> <p>The site has good access to open space/ recreation facilities otherwise, with Marlborough Leisure Centre located adjacent to the site. Further to this, Marlborough Recreation Ground, Marlborough Rugby Football Club, and Manton Play Park are over 800m from the site (all 1.8km from the site).</p> <p>Uncertain effects are concluded overall against this SA theme given the site has poor access to health services but good access to open space/ recreational facilities and opportunities.</p>	
Transportation	<p>In terms of public transport, the nearest rail station is located in Great Bedwyn, approximately 12km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>In terms of promoting sustainable travel, the site is well located in terms of access to Marlborough town centre and its amenities/ services.</p> <p>The site has reasonable access to other sustainable transport modes; being within 400m of a bus stop on College Fields. Services includes the number 42, X76 and X22 which connect residents with neighbouring centres including Calne, Coombe Park, and Hungerford.</p> <p>A PRoW running along the southern boundary of the site connects with the Wessex Ridgeway, which subsequently adjoins the 254 National Cycle Route, providing residents with opportunities for walking and cycling. A PRoW also runs along the western site boundary and connects with the White Horse Trail.</p> <p>Overall, positive effects are anticipated against this SA theme, given the site enables the uptake of active travel, reducing the reliance on the car.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table AB.7 Site 6 Pelham Court**

SA theme	Commentary, Site 6, Pelham Court	
Air quality	The site is located within the Marlborough AQMA. While it is considered that this site is a sustainable location for development, it inevitably will lead to increased car use within the AQMA, resulting in heightened levels of NO <sub>2</sub> , and an overall adverse effect on air quality.	Red
Biodiversity	<p>There are no significant biodiversity constraints present on the site. The site is 1km west of the River Kennett Site of Special Scientific Interest (SSSI) and a County Wildlife Site (CWS) adjoins the site to the north. The site is not within a SSSI Impact Risk Zone (IRZ) for residential development.</p> <p>In terms of habitats present on the site, there are small areas of dense scrub and hedges scattered throughout the site and along site boundaries, which may hold some biodiversity value. There is no Priority Habitat within the site, however there is an area of Priority Habitat Deciduous Woodland and National Forest Inventory Broadleaved Woodland and Felled Woodland to the north, adjoining the CWS. Biodiversity present at the site and to the north may provide ecological connectivity with the River Kennet SSSI. It is recognised that the site is wholly brownfield. located within the urban town centre, currently in use as an employment site. Taking the above into consideration, significant residual effects are not anticipated against this SA Theme.</p>	Yellow
Climate change	Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. Given this site performs positively in this respect, neutral effects are anticipated overall. In relation to adapting to the effects of climate change, the northern extent of the site is located within Flood Zones 2 and 3, which is of high risk of flooding.	Red
Landscape	<p>The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the River Valleys Landscape Type.</p> <p>The site is currently in use as an employment site and includes associated car parking facilities. The site is bound to the east, west and south by existing housing/ employment, and dense vegetation lines the site to the north, providing a level of screening against the CWS. It is considered that the redevelopment of the site for 20 dwellings would be in keeping with the existing built development present at the site. Given the brownfield nature of the site and its current use, development will likely lead to positive effects against the Landscape SA Theme. The significance of effects will be dependent on the precise scale, layout and design of development</p>	Green
Historic environment	In terms of heritage assets present at the site, there are five Grade II Listed Buildings within 50m of the site, to the south. The site is also in close proximity to Marlborough Conservation Area, located 150m west. It is considered that new development has the potential to impact on the setting of these important features. However, it is recognised that given the urban environment (built form, roads, and vegetation) at the west, east, and south of the site within Pelham Court and along London Road, the potential for adverse effects is likely to be reduced; with views screened to some extent. Given the site is brownfield and in use as an employment site/ car parking, it is considered that residual positive effects are likely; if high quality design standards were adhered to which maintain and enhance the Conservation Area's special qualities, distinctiveness and setting.	Green
Land, soil and water resources	<p>It is not possible to confirm if development at this site would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available.</p> <p>The site is previously developed land and therefore performs positively in terms of promoting the use of previously developed land.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>	Blue

SA theme	Commentary, Site 6, Pelham Court	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located adjacent to existing residential development within the settlement boundary and is therefore expected to positively integrate with the local community. The site has good access to the services and facilities focused in the town centre; notably Marlborough High Street is approximately 600m from the site, with residents able to access by foot.</p> <p>The site has good access to schools, Marlborough C of E Primary School is 0.6km from the site, St Johns' School is 1.1km from the site and Marlborough College is 1.3km from the site.</p> <p>The site is within 800m of open space/ recreational facilities; Marlborough Recreational Ground is 300m from the site and Marlborough Football Club is 500m from the site; providing residents with access to sport and recreational facilities. Stonebridge Wild Reserve is also 500m from the site.</p> <p>The site is therefore considered to be well located in terms of local community infrastructure, services/ facilities, and the settlement itself. Development also has the potential to contribute to improved facilities through Section 106 and CIL agreements. This is uncertain at this stage.</p> <p>It is however noted that the site is designated in the Wiltshire Core Strategy as a Principal Employment Area, and that a change in use to residential may lead to negative effects in terms of access to employment.</p> <p>Overall, uncertain effects are anticipated against this SA theme, as while the delivery of housing at the site will lead to positive effects in terms of meeting local need, the loss of a Principal Employment Area would lead to negative effects; contradicting with Core Policy 14 (Spatial Strategy: Marlborough Area) and Core Policy 35 (Marlborough Business Park, Pelham Court Site, and Wagon Yard).</p>	
Health and Wellbeing	<p>The site has good access to local health services, being within 800m from a GP surgery/ hospital/ pharmacy. Marlborough Medical Practice is within 600m of the site and Savernake Hospital is 1.6km from the site.</p> <p>The site is within 800m of open space/ recreation facilities; Marlborough Recreational Ground is 300m from the site and Marlborough Football Club is 500m from the site; providing residents with access to sport and recreational facilities. Stonebridge Wild Reserve is also 500m from the site and there is a CWS located immediately to the south of the site which provides recreational opportunities.</p> <p>Positive effects are predicted against this SA theme given the site is well located in terms of access to health and recreational facilities.</p>	
Transportation	<p>In terms of public transport, the nearest rail station is located in Great Bedwyn, approximately 10.5km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site supports the uptake of sustainable travel, given it is well located in terms of access to Marlborough town centre and its amenities/ services, with access achievable by foot. Additionally, a bus stop immediately adjoins the site along London Road, with services including the 20, 217, 620, X20, X22 which circulates throughout Marlborough, while also connecting residents with neighbouring centres such as Swindon, Great Bedwyn and Hungerford.</p> <p>A PRoW running along the northern boundary of the site connects with the Chiseldon and Marlborough Railway Path, which subsequently adjoins the 482 National Cycle Route, providing residents with opportunities for walking and cycling.</p> <p>Overall, positive effects are anticipated against this SA theme, given the site enables the uptake of active travel, reducing the reliance on the car.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects



**Table AB.8 Site 7 Former Resource Centre**

SA theme	Commentary, Site 7, Former Resource Centre	
Air quality	The site is located within the Marlborough AQMA and the delivery of new homes would likely lead to increased vehicular use within the AQMA, resulting in heightened levels of NO <sub>2</sub> , and an overall adverse effect on air quality	Red
Biodiversity	<p>There are no significant biodiversity constraints present on the site. The site is 260m north of the Savernake Forest Site of Special Scientific Interest (SSSI). The site is not within a SSSI Impact Risk Zone (IRZ) for residential development.</p> <p>In terms of habitats present on the site, there are small areas of dense scrub and hedges scattered throughout the site and along site boundaries, which may hold some biodiversity value. There is no Priority Habitat within the site, however there is a dismantled railway located adjacent to the site to the south, which includes an area of Priority Habitat Deciduous Woodland and National Forest Inventory Broadleaved Woodland. Biodiversity present at the site and along the dismantled railway may be of biodiversity value, providing ecological connectivity with the Savernake Forest SSSI. Development has the potential to adversely impact these habitat and associated species through disturbance and through pollution during construction. However, this is uncertain at this stage.</p>	Blue
Climate change	<p>Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. While this site does have good access to local bus routes, national cycle routes, and PRoW, the site is not particularly well located in terms of access to Marlborough town centre and its amenities/ services, and therefore may be reliant on the car for travel to some extent. Effects on climate change are therefore likely to be uncertain in this respect, given positive or negative effects cannot be concluded at this stage.</p> <p>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1 which is of low risk of flooding.</p>	Blue
Landscape	<p>The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the River Valleys Landscape Type.</p> <p>The site is previously developed, and currently includes the Resource Centre and associated buildings, with some areas of dense vegetation also present. The site is within the settlement boundary and surrounded by built form to the north and west, with open arable landscape to the south and east. Development would likely be in keeping with existing development, and it is considered that the dense trees located south/ east of the site would act as a firm boundary to further development into the open landscape. It is also recognised that the dense vegetation lining the site would likely provide a level of screening, reducing potential for adverse visual effects on the wider AONB.</p>	Yellow
Historic environment	In terms of heritage assets present at the site, the site is not considered to be constrained, with no heritage assets located within or within close proximity to the site.	Yellow
Land, soil and water resources	<p>It is not possible to confirm if development at this site would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available.</p> <p>The site is previously developed land and therefore performs positively in terms of promoting the use of previously developed land.</p> <p>A small area of the site (the southern extent) is located within Groundwater Source Protection Zone 1 (Inner Protection Zone). As a result, it is considered that there is the potential for an adverse effect.</p>	Red

SA theme	Commentary, Site 7, Former Resource Centre	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located adjacent to existing residential development within the settlement boundary and is therefore expected to positively integrate with the local community. The site has poor access to the services and facilities focused in the centre of the town; notably Marlborough High Street is approximately 1.1km from the site.</p> <p>The site has good access to schools, being within 800m of Marlborough C of E Primary School and St Johns School (both 600m from the site); additionally, Marlborough College is 1.4km from the site.</p> <p>The site is also within 800m of open space/ recreation facilities; with Marlborough Recreational Ground located 300m from the site. Furthermore, Marlborough Football Club is 1.1km from the site, and Severnake Forest is 1.8km from the site, which provides recreational and camping opportunities.</p> <p>The site is considered to be reasonably well located in terms of local community infrastructure, services/ facilities, and the settlement itself. It is noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements; however, this is uncertain at this stage.</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in the MANP area. Issues in terms of access to the town centre should nonetheless be a key consideration for the site.</p>	
Health and Wellbeing	<p>The site has good access to local health services, being 800m from a GP surgery/ hospital/ pharmacy. The site is within 800m of Marlborough Medical Practice, and within 2.3km of Savernake Hospital.</p> <p>The site is also within 800m of open space/ recreation facilities; with Marlborough Recreational Ground within 300m of the site. Additionally, Marlborough Football Club is 1.1km from the site, and Severnake Forest is 1.8km from the site, which provides recreational and camping opportunities.</p> <p>Positive effects are concluded against this SA theme given the site has good access to health and recreational facilities.</p>	
Transportation	<p>In terms of public transport, the nearest rail station is located in Great Bedwyn, approximately 11.5km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site has good access to other sustainable transport modes, being within 400m of a bus stop along Salisbury Road, with services including the 19, 22, and 80 which circulates throughout Marlborough, while also connecting residents with neighbouring centres such as Swindon. Additionally, a PRoW crosses the site connecting with the Wansdyke Path, providing residents with opportunities for walking and wider recreation.</p> <p>The site is not well located in terms of access to the town centre, with residents likely to utilise the A4 London Road to travel in to the town centre by car. The A4 connects to the A435 and A346 which run and west of the site, extending throughout the MANP area providing access to extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment).</p> <p>Taking the above into account, positive and negative effects are predicted given the site has reasonable access to sustainable modes of travel; but is distant from the town centre. Uncertain effects are therefore anticipated overall against this SA theme.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table AB.9 Site 8, Land at Kelham Gardens**

SA theme	Commentary, Site 8, Land at Kelham Gardens	
Air quality	The site is located within the Marlborough AQMA. While it is considered that this site is a sustainable location for development, it inevitably will lead to increased car use within the AQMA, resulting in heightened levels of NO <sub>2</sub> , and an overall adverse effect on air quality.	Red
Biodiversity	<p>There are no significant biodiversity constraints present on the site. The site is within 800m of Savernake Forest Site of Special Scientific Interest (SSSI); however, it is not within a SSSI Impact Risk Zone (IRZ) for residential development.</p> <p>In terms of habitats present on the site, the site is predominately brownfield, with areas of dense scrub and trees along the site boundaries, which may hold some biodiversity value. There is no Priority Habitat within the site; however, adjacent to the site to the north east there is an area of Priority Habitat Deciduous Woodland, National Forest Inventory Broadleaved Woodland, and National Forest Inventory Felled Woodland.</p> <p>Taking the above into consideration, given this is a brownfield site within the urban town centre, significant residual effects are not anticipated against this SA theme.</p>	Yellow
Climate change	Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. The site performs positively in this respect. In relation to adapting to the effects of climate change, the northern extent of the site is located within Flood Zones 2 and 3, which is of high risk to flooding. As a result, there is the potential for an adverse effect.	Red
Landscape	<p>The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the River Valleys Landscape Type.</p> <p>The site is previously developed, and is currently vacant, with a disused building located to the south of the site. The site is within the settlement boundary and is relatively enclosed by dense trees to the north, east and west. There is an industrial site to the east and residential development to the west, and the site adjoins London Road to the south. It is therefore considered that development would be in keeping with existing built form, and that the dense trees located north of the site would act as a firm boundary to further development. This is also likely to provide a level of screening for the site, reducing the potential for any residual adverse effects on views given the sites location within the AONB. Given the presence of the disused building at the site, it is considered that development will likely lead to positive effects against the Landscape SA Theme. The significance of effects will be dependent on the precise scale, layout and design of development.</p>	Light Green
Historic environment	<p>In terms of heritage assets present at the site, the site lies approximately 60m north of the Marlborough Conservation Area. It is considered that development has the potential to impact upon the setting of this heritage feature.</p> <p>Given the site is brownfield and includes a disused building, it is considered that residual positive effects are likely; if high quality design standards were adhered to which maintain and enhance the Conservation Area's special qualities, distinctiveness and setting.</p>	Light Green
Land, soil and water resources	<p>The site is brownfield, and is therefore not considered to consist of Best and Most Versatile (Grade 1 - 3a) agricultural land. Given the site is previously developed, it therefore performs positively in terms of promoting the use of previously developed land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	Light Green

SA theme	Commentary, Site 8, Land at Kelham Gardens	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located adjacent to existing residential development within the settlement boundary and is therefore expected to positively integrate with the local community. The site has good access to the services and facilities focused in the centre of the town; notably Marlborough High Street is approximately 500m from the site.</p> <p>The site has good access to schools; Marlborough C of E Primary School is 600m from the site, St John's School is 1.1km from the site, and Marlborough College is 1.3km from the site.</p> <p>The site is also within 800m of open space/ recreation facilities; Marlborough Recreational Ground is 300m from the site and Marlborough Football Club is 800m from the site. Additionally, Severnake Forest is 1.6km from the site, which provides recreational and camping opportunities.</p> <p>The site is therefore considered to be well located in terms of local community infrastructure, services/ facilities, and the settlement itself. It is also noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements; however, this is uncertain at this stage.</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in a sustainable location within the MANP area.</p>	
Health and Wellbeing	<p>The site has good access to local health services, being within 800m from a GP surgery/ hospital/ pharmacy. The site is 600m from the Marlborough Medical Practice and within 1.9km of Saverlake Hospital.</p> <p>The site is also within 800m of open space/ recreation facilities; Marlborough Recreational Ground is 300m from the site and Marlborough Football Club is 800m from the site. Additionally, Severnake Forest is 1.6km from the site, providing recreational and camping opportunities.</p> <p>Overall, the site performs positively against this SA theme given it is well located in terms of access to health and recreational facilities.</p>	
Transportation	<p>In terms of public transport, the nearest rail station is located in Great Bedwyn, approximately 11.5km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site supports the uptake of sustainable travel, being well located in terms of access to Marlborough town centre and its amenities/ services, with access achievable by foot.</p> <p>The site is also within 400m of a bus stop, located along London Road, with services including the 19, 20, 22, 80, 217, X5, X20, X22 which circulates throughout Marlborough, while also connecting residents with neighbouring centres such as Salisbury, Swindon and Hungerford. There is also a PRoW located adjacent to the site, adjoining London Road.</p> <p>Overall, positive effects are anticipated against this SA theme, given the site enables the uptake of active travel, reducing the reliance on the car.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table AB.10 Site 9 Mildenhall land adj Home Farm Close**

SA theme	Commentary, Site 9, Mildenhall land adj Home Farm Close	
Air quality	The site is located approximately 1.8km from Marlborough AQMA. Although outside the AQMA, residents will have to travel in to the AQMA to access services and facilities within Marlborough town centre, contributing to air quality issues. Negative effects are therefore predicted against this SA theme.	Red
Biodiversity	There are no significant biodiversity constraints present on the site. The site is within 300m of the River Kennett Site of Special Scientific Interest (SSSI) and within a SSSI Impact Risk Zone (IRZ) for residential development of 100 units or more. Given the indicative capacity of the site is 18 dwellings, residual adverse effects are not anticipated. In terms of habitats, the site is greenfield, with trees and hedgerows located along the site boundaries which may hold some biodiversity value. There are no Priority Habitats within or within close proximity to the site.	Yellow
Climate change	Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. While this site does have good access to local bus routes, the site is not well located in terms of access to Marlborough town centre and its amenities/ services, and therefore is likely to be reliant on the car for travel. Effects on climate change are therefore uncertain. In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of flooding.	Blue
Landscape	The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the Marlborough Downs Landscape Character Area. The site is located in the village of Mildenhall, extending north of the main road into the open countryside. The site is bound to the south by existing built form, however to the north, east and west are open agricultural field parcels. It is considered that development of the site may set precedent for further growth in these directions. It is also considered that, given the presence of the AONB, development would likely impact on the wider landscape setting and open views. The site is highly visible from the open countryside to the south and west, and it is considered that development may not conserve the special qualities of the AONB.	Red
Historic environment	In terms of heritage assets present at the site, the site adjoins Mildenhall Conservation Area. Development has the potential to adversely impact on the intrinsic qualities of the Conservation Area and its setting. However, given the screening provided by dense scrub/ trees at the south of the site, it is considered that the potential for adverse effects may be lessened to some extent but this is uncertain.	Red
Land, soil and water resources	It is not possible to confirm if development at this site would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available. The site is greenfield and does not perform positively in terms of promoting the use of previously developed land. The site is not located in a Groundwater Source Protection Zone.	Blue



SA theme	Commentary, Site 9, Mildenhall land adj Home Farm Close	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located adjacent to existing residential development and is therefore expected to positively integrate with the local community. The site has good access to the services focused along Mildenhall main road, notably the Village Hall is adjacent to the site. However, the service offer in Mildenhall is limited, with residents likely to travel to Marlborough Town Centre for to meet day-to-day needs.</p> <p>The site has poor access to schools. Residents would be required to travel to Marlborough town for primary and secondary facilities. Marlborough C of E Primary School is located 3.2km from the site, Marlborough College is 3.4km from the site, and St John's School is 3.7km from the site.</p> <p>The site is however within 800m of open space/ recreation facilities; Minal Cricket Club and Sports Field is 300m from the site, and Minal Playground is 1km from the site.</p> <p>It is noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements.; however, this is uncertain at this stage</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in the MANP area. Issues in terms of accessibility to services/ facilities and wider community infrastructure should nonetheless be a key consideration for the site.</p>	
Health and Wellbeing	<p>The site has poor access to local health services, being over 800m from a GP surgery/ hospital/ pharmacy. The site is 3km from Marlborough Medical Practice and 3.8km from Saverlake Hospital.</p> <p>The site is however within 800m from open space/ recreation facilities; Minal Cricket Club and Sports Field is 300m from the site and Minal Playground is 1km from the site.</p> <p>Uncertain effects are concluded overall against this SA theme given the site has poor access to health services but good access to open space/ recreational facilities and opportunities.</p>	
Transportation	<p>In terms of access to public transport links, the nearest rail station is located in Great Bedwyn, approximately 11km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site is within 400m of a bus stop on the main road. Services at this location include the 48 and 48A which connect residents with neighbouring centres such as Swindon.</p> <p>The site is well located in terms of access to facilities within Mildenhall; however, these are limited, with residents likely to travel to Marlborough town centre for the wider range of facilities/ services on offer. Residents are likely to utilise the A4 London Road to travel in to the town centre by car. The A4 extends throughout the MANP area, connecting Mildenhall with Marlborough town for access the town centre and wider services and facilities (including schools and employment).</p> <p>Overall, given the limited public/ sustainable transport offer, and the likely reliance on the car to access Marlborough Town Centre, negative effects are predicted.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects



**Table AB.11 Site 10 Mildenhall land adj Playing Field**

SA theme	Commentary, Mildenhall land adj Playing Field	
Air quality	The site is located approximately 1.8km from Marlborough AQMA. Although outside the AQMA, residents will have to travel in to the AQMA to access services and facilities within Marlborough town centre, contributing to air quality issues. Negative effects are therefore predicted against this SA theme.	Red
Biodiversity	There are no significant biodiversity constraints present on the site. The site is within 130m of the River Kennett Site of Special Scientific Interest (SSSI). The site is within a SSSI Impact Risk Zone (IRZ) for residential development of 50 units or more. Given the indicative capacity of the site is 21 dwellings, residual adverse effects are not anticipated. In terms of habitats, the site is greenfield, with sparse scrub/ trees located along the site boundaries which may hold some minor biodiversity value. There is no Priority Habitat within or within close proximity to the site.	Yellow
Climate change	Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. While this site does have good access to local bus routes, the site is not well located in terms of access to Marlborough town centre and its amenities/ services, and therefore is likely to be reliant on the car for travel. Effects on climate change are therefore likely to be uncertain in this respect. In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of flooding.	Blue
Landscape	The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the Marlborough Downs Landscape Character Area. The site is located in the village of Mildenhall, extending south of the main road into the open countryside. The site is bound to the north and west by existing built form; however, to the south and east are open agricultural field parcels/ playing fields. While development would be in keeping with the existing development along the main road to the west, development may set precedent for further growth south of the existing built up area. It is also considered that, given the presence of the AONB, development would likely impact on the wider landscape setting and open views. The site is highly visible from the open countryside to the south and east, and it is considered that development may impact upon the special qualities of the AONB.	Red
Historic environment	In terms of heritage assets present at the site, the site is located within the Mildenhall Conservation Area. Development has the potential to negatively impact upon the intrinsic qualities of the Conservation Area and its setting, particularly given the open nature of the site.	Red
Land, soil and water resources	It is not possible to confirm if development at this site would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available. The site is greenfield and does not perform positively in terms of promoting the use of previously developed land. The site is not located in a Groundwater Source Protection Zone.	Blue

SA theme	Commentary, Mildenhall land adj Playing Field	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located adjacent to existing residential development and is therefore expected to positively integrate with the local community. The site has good access to the services focused along Mildenhall main road, notably the Village Hall is within 100m of the site. However, the service offer in Mildenhall is limited, with residents likely to travel to Marlborough Town Centre for to meet day-to-day needs.</p> <p>The site has poor access to schools. Residents would be required to travel to Marlborough town for primary and secondary facilities. Marlborough C of E Primary School is located 3.2km from the site, Marlborough College is 3.4km from the site, and St John's School is 3.7km from the site.</p> <p>The site is however within 800m of open space/ recreation facilities; Minal Cricket Club and Sports Field is adjacent to the site and Minal Playground is 800m from the site. It is noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements; however, this is uncertain at this stage.</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in the MANP area. Issues in terms of accessibility should nonetheless be a key consideration for the site.</p>	
Health and Wellbeing	<p>The site has poor access to local health services, being over 800m from a GP surgery/ hospital/ pharmacy. The site is 3.1km from Marlborough Medical Practice and 3.9km from Savernake Hospital.</p> <p>The site is however within 800m from open space/ recreation facilities; Minal Cricket Club and Sports Field is adjacent to the site and Minal Playground is 800m from the site, providing residents with access to sport and recreational facilities.</p> <p>Uncertain effects are concluded overall against this SA theme given the site has poor access to health services but good access to open space/ recreational facilities and opportunities..</p>	
Transportation	<p>In terms of access to public transport links, the nearest rail station is located in Great Bedwyn, approximately 11km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site is within 400m of a bus stop on the main road. Services at this location include the 48 and 48A which connect residents with neighbouring centres such as Swindon. The site is well located in terms of access to facilities within Mildenhall; however, these are limited, with residents likely to travel to Marlborough town centre for its extensive facilities/ service offer. Residents are likely to utilise the A4 London Road to travel in to the town centre by car. The A4 extends throughout the MANP area, connecting Mildenhall with Marlborough town for access the town centre and wider services and facilities (including schools and employment).</p> <p>Overall, given the limited public/ sustainable transport offer, and the likely reliance on the car to access Marlborough Town Centre, negative effects are predicted.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)	■	Likely positive effect
Neutral/no effect	■	Uncertain effects

**Table AB.11 Site 11, Police Station**

SA theme	Commentary, Site 11, Police Station	
Air quality	The site is located within the Marlborough AQMA. While it is considered that this site is a sustainable location for development, it inevitably will lead to increased car use within the AQMA, resulting in heightened levels of NO <sub>2</sub> , and an overall adverse effect on air quality.	Red
Biodiversity	<p>There are no significant biodiversity constraints present on the site. The site is within 800m of Savernake Forest Site of Special Scientific Interest (SSSI) and is within a SSSI Impact Risk Zone (IRZ) for “residential development of 100 or more houses outside existing settlements/ urban areas”. However given the location of the site within the settlement boundary, and that less than 100 dwellings are to be delivered, potential adverse effects on the SSSI are not anticipated.</p> <p>The site is brownfield, with low-lying managed hedgerows and sparse trees located along the site boundaries which may hold some minor biodiversity value. There is no Priority Habitat within or within close proximity to the site, although it is noted that allotment gardens are located to the south of the site connecting with the primary school. Taking the above into consideration, given this is a brownfield site within the urban town centre, significant residual effects are not anticipated against this SA theme.</p>	Yellow
Climate change	Development at this site alone is not likely to have a significant negative effect on climate change, which is a global issue. However, development located with good access to services/ facilities/ employment and public transport will help to reduce contributions from pre capita emissions. The site performs positively in this respect. In relation to adapting to the effects of climate change, the site is located within Flood Zone 1 which is of low risk of flooding.	Yellow
Landscape	<p>The site is located wholly within the North Wessex Downs Area of Outstanding National Beauty (AONB), within the River Valleys Landscape Type.</p> <p>The site is previously developed, and is currently in use as a Police Station. The site is within the settlement boundary and is surrounded by existing built form to the east and west, and George Lane to the north. It is therefore considered that development would be in keeping with existing built form, and that the allotment gardens to the south of the site would act as a firm boundary to further development. This is also likely to provide a level of screening for the site, reducing the potential for any residual adverse effects on views (i.e. from the school, also south of the site); recognising the sites location within the AONB. Given the presence of the Police Station at the site, it is considered that development has the potential to lead to positive effects against the Landscape SA Theme, particularly if landscape led. The significance of effects will be dependent on the precise scale, layout and design of development.</p>	Light Green
Historic environment	<p>In terms of heritage assets present at the site, the site is 100m south of Marlborough Conservation Area, and therefore has the potential to impact upon the setting of this heritage asset. The site also lies within 100m of six Grade II Listed buildings located along George Lane. It is considered that any potential effects upon the setting of these heritage features may be lessened as a result of the existing built form and allotment space separating the site and the listed buildings; providing a level of screening.</p> <p>Given the site is brownfield and includes the existing Police Station, it is considered that there is the potential for residual positive effects; if high quality design standards were adhered to which maintain and enhance the Conservation Area’s special qualities, distinctiveness and setting.</p>	Light Green
Land, soil and water resources	The site is brownfield, and is therefore not considered to consist of Best and Most Versatile (Grade 1 - 3a) agricultural land. Given the site is previously developed, it therefore performs positively in terms of promoting the use of previously developed land. The site is not located within a Groundwater Source Protection Zone.	Light Green

SA theme	Commentary, Site 11, Police Station	
Population and community	<p>Delivery of residential development at the site will contribute positively towards the local housing needs of the area.</p> <p>The site is located adjacent to existing residential development within the settlement boundary and is therefore expected to positively integrate with the local community. The site has good access to the services and facilities focused in the centre of the town; notably Marlborough High Street is 350m from the site.</p> <p>The site has good access to schools; Marlborough C of E Primary School is located adjacent to the site to the south, St John's School is within 800m of the site, and Marlborough College is 1km from the site.</p> <p>The site is also within 800m of open space/ recreation facilities; Marlborough Recreational Ground is 300m from the site and Marlborough Football Club is 800m from the site. Additionally, Severnake Forest is 1.6km from the site, which provides recreational and camping opportunities.</p> <p>The site is therefore considered to be well located in terms of local community infrastructure, services/ facilities, and the settlement itself. It is also noted that development has the potential to contribute to improved facilities through Section 106 and CIL agreements; however, this is uncertain at this stage.</p> <p>Overall, positive effects are anticipated against this SA theme given the potential for the site to deliver housing in a sustainable location within the MANP area.</p>	
Health and Wellbeing	<p>The site has good access to local health services, being within 800m from a GP surgery/ hospital/ pharmacy. The site is 300m from the Marlborough Medical Practice and within 2km of Saverlake Hospital.</p> <p>The site is also within 800m of open space/ recreation facilities; Marlborough Recreational Ground is 300m from the site and Marlborough Football Club is 800m from the site. Additionally, Severnake Forest is 1.6km from the site, providing recreational and camping opportunities.</p> <p>Overall, the site performs positively against this SA theme given it is well located in terms of access to health and recreational facilities.</p>	
Transportation	<p>In terms of public transport, the nearest rail station is located in Great Bedwyn, approximately 11.5km from the site. Trains from Bedwyn are operated by Great Western Railway to and from London Paddington via Reading and Newbury.</p> <p>The site supports the uptake of sustainable travel, being well located in terms of access to Marlborough town centre and its amenities/ services, with access achievable by foot.</p> <p>The site is also immediately adjacent to a bus stop, with services including the 19, 20, 22, 80, 217, X5, X20, X22 which circulates throughout Marlborough, while also connecting residents with neighbouring centres such as Salisbury, Swindon and Hungerford. There is also a PRow located adjacent to the site, adjoining George Lane.</p> <p>Overall, positive effects are anticipated against this SA theme, given the site enables the uptake of active travel, reducing the reliance on the car.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

# Appendix C Reasonable alternatives appraisal – June 2020

This appendix presents the detailed findings of the initial appraisal of alternative spatial strategy options within the Marlborough Area, as established within **Section 4.35** of this SA Report. These are set out below:

**Option A: Sites 1, 5, 7, 8 and 11**

211 dwellings (98 affordable homes including the 13 Marlborough College homes as such, and the provision of a medical centre at Site 5)

**Option B: Sites 5, 7, 8 and 11**

189 dwellings (86 affordable homes plus 13 Marlborough College homes and the provision of a medical centre at Site 5)

**Option C: Sites 1, 3, 4, 7, 8 and 11**

267 dwellings (124 affordable homes)

The locations of these spatial options are presented in **Figures 4.2 – 4.4** of this SA Report.

## Methodology

For each of the options, the appraisal examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). Considering this, there is a need to make considerable assumptions regarding how options will be implemented 'on the ground' and what the effect on certain receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.

Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.<sup>85</sup> So, for example, account is taken of the duration, frequency and reversibility of effects.

---

<sup>85</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

## Appraisal findings

**Table AC.1 - 9** presents the findings for the SA of the spatial options.

The summary findings of this detailed appraisal are presented in **Section 4.49** of the main report.

**Table AC.1: SA of reasonable alternative spatial options**

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
<b>Air quality</b>			
Rank of preference	2	1	3
Likely significant effect?	No	No	No

### Commentary:

Development under any option will result in residents travelling by private vehicle within Marlborough AQMA to access services and facilities given poor accessibility to and frequency of public transport, contributing to localised air quality issues.

**Option C** performs least positively as it would deliver a higher quantum of growth, which is likely to result in the greatest number of additional vehicles travelling within the AQMA. Lower growth proposed through **Option B** is therefore best performing in this respect. While not significant, all options are predicted to lead to long term minor negative effects against the Air quality SA theme.

<b>Biodiversity</b>			
Rank of preference	2	1	3
Likely significant effect?	No	No	No

### Commentary:

Sites 3 and 4 (**Option C**) are within the Impact Risk Zone (IRZ) of the Savernake Forest SSSI. Site 3 is located adjacent to the SSSI and also includes priority habitat within the boundary of the site, while Site 4 is located within 300m of the SSSI, and adjoins a County Wildlife Site (CWS) to the south, and a disused railway line to the east. Development at Sites 3 and 4 has the potential to impact on the designated sites, through disturbance to habitats and species during construction, and as a result of increased recreational activity in the longer term.

**Option C** and **Option A** also include Site 1, which is within a SSSI IRZ for the River Kennett SSSI, with the potential for residual negative effects as discussed above.

**Option A** and **Option B** include Site 5; development of which has the potential to adversely impact upon national forest inventory woodland located in the corner of the site, and the CWS located 400m north west. Development at this site therefore has the potential for both habitat loss and habitat fragmentation, and long-term minor negative effects in this respect.

In terms of the overall level of growth proposed under the options, it is considered that as this increases, so does the likelihood for negative effects. As **Option B** proposes the lowest level of overall growth it is the best performing in this respect.

It is noted that there is potential for options to deliver residual positive effects against the Biodiversity SA theme. Given the location of options in relation to existing habitats and/ or designated sites there may be opportunity to seek biodiversity net gain or encourage habitat networking.

**Option B** performs more positively overall as it directs the lowest level of growth to locations where there is less potential for impacts on nationally designated sites; although there could be potential for localised effects on the CWS and priority habitat present. This may be through direct loss/ damage, or as a result of increased recreational activity, and disturbance during construction.

None of the options are predicted likely to result in any residual significant effects.

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
----------	-------------------------------------	----------------------------------	--

Climate change			
Rank of preference	<b>2</b>	<b>1</b>	<b>3</b>
Likely significant effect?	<b>No</b>	<b>No</b>	<b>No</b>

**Commentary:**

As explored under the air quality and transportation themes, it is likely that any additional growth will place increased pressures on congestion and capacity on roads within Marlborough town centre (coinciding with Marlborough AQMA). This is inevitably likely to contribute to emissions in the MANP area and negatively affect climate change mitigation to a minor extent. It will therefore be important to support minimalised per capita emissions, including reductions in domestic energy consumption and uptake of renewable sources.

In terms of individual sites, **Option B** is considered to perform most strongly as it focuses growth at sites with good access to services/ facilities/ employment (within 600m of the town centre) and public transport, which will help to reduce contributions from per capita emissions. Sites 1, 3, and 4, featured within **Option A** and **Option C**, are identified as being less accessible by active travel to the town centre, and its amenities/ services, with new residents likely to be reliant on the car for travel.

It is considered that as level of growth increases, so does the potential for significant effects. It is recognised that climate change is a global issue, and in the context of the Neighbourhood Plan area, effects under all options are not likely to be significant. In terms of ranking the options, it is considered that **Option B** will make the smallest contribution to emissions from the built environment, with **Option C** delivering the greatest. It is recognised that climate change is a global issue, and in the context of the Neighbourhood Plan area, effects under all options are not likely to be significant.

From a climate change adaptation perspective, all options perform on a par given the differentiating sites between options (Sites 1, 3, 4 and 5) are located in areas of low risk of flooding.

Overall **Option B** is best performing given the lower level of growth proposed and the sustainable location of sites. **Option C** is worst performing given higher level of growth and poorer accessibility of the additional sites proposed.



SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
----------	-------------------------------------	----------------------------------	--

Landscape			
Rank of preference	2	1	3
Likely significant effect?	Yes – Negative	Yes – Negative	Yes - Negative

**Commentary:**

**All options** perform well through the allocation of sustainable predominately brownfield town centre sites (Sites 7 and 8) within the settlement boundary. However, all variable sites within **Options A to C** (Sites 1, 3, 4 and 5) perform negatively against the Landscape SA theme due to potential adverse effects on the character, setting and intrinsic qualities of the North Wessex Downs AONB. This is reiterated through the Preliminary Landscape Sensitivity Assessment (2012) carried out for all Wiltshire Strategic Housing Land Availability Assessment (SHLAA) sites within the AONB, which includes Sites 1 and 5. The Landscape Sensitivity Assessment concludes for Site 1 that *“development would not conserve the special qualities or natural beauty of the AONB and the site should not be taken forward as part of the SHLAA.”*

In terms of Site 5, given the level of growth proposed (130 homes and a new medical centre) and location of the site detached from the existing settlement, it is concluded that *“development would be detrimental to the special qualities and natural beauty of the AONB...”*. While Sites 3 and 4 were not assessed through the Landscape Sensitivity Assessment, similar residual effects are anticipated as a result of development at the site; notably through expansion of the settlement into the open countryside.

Given the constrained nature of all variable sites, it is considered that all options have the potential to lead to long-term significant negative effects. It is considered that the Option that seeks to deliver the highest level of growth on greenfield sites within the AONB (**Option C**) has the potential to result in a negative effect of greater significance compared to the other options.

**Option B** is therefore best performing as it is the lowest growth option, and includes only Site 1 which has potential for adverse effects on the nationally designated landscape. **Option C**, given the high level of growth proposed on multiple greenfield sites in the AONB, is worst performing of the options.

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
----------	-------------------------------------	----------------------------------	--

Historic environment			
Rank of preference	3	2	1
Likely significant effect?	Uncertain	Uncertain	Uncertain

**Commentary:**

The sensitivity of the historic landscape has been characterised to some extent through the Landscape Sensitivity Assessment (2012), and as such, the findings discussed under the Landscape SA Theme are also applicable for this SA Theme.

Site 1 and Site 5 perform negatively against the Historic Environment SA theme as they are located within/ within close proximity of a designated heritage asset. Both sites are within 50m of Grade II Listed Buildings, while Site 5 (**Option A** and **Option B**) is further constrained by Marlborough Conservation Area which is located close to the site. Development at the sites have the potential to impact on the setting of these important heritage features, notably affecting views to and from the Conservation Area and Listed Buildings. However effects have the potential to be reduced by screening provided by existing built form. In terms of the wider historic environment, it is noted that for Site 1 and Site 5 the sensitivity of the historic landscape has been characterised to some extent through the Landscape Sensitivity Assessment (2012), and as such, the findings discussed under the Landscape SA Theme are also applicable for this SA Theme.

In terms of level of growth, while it is considered that as growth increases so does the potential for significant effects, given Site 3 and 4 within **Option C** do not hold any heritage constraints, it is difficult to identify this as the worst performing option. However, increased growth on greenfield sites in the AONB may lead to adverse effects on local townscape/ wider historic landscape.

Taking the above into consideration, **Option C** is identified as best performing compared to other options. **Option C** directs growth to sites that are less constrained in terms of the historic environment. **Option A** is worst performing as this Option delivers a moderate level of growth to sites constrained by heritage assets; with the potential to impact upon the setting of Marlborough Conservation Area and Grade II Listed Buildings. **Option B** performs more positively than **Option A** as it is less constrained; however, it still performs negatively overall.

It is noted that there is the potential for positive effects on the historic environment through the delivery of predominately brownfield sites 7 and 8 (**all options**) if high quality design standards were adhered to but this is uncertain at this stage.

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
----------	-------------------------------------	----------------------------------	--

Land, soil and water resources			
Rank of preference	2	1	3
Likely significant effect?	Yes – Negative	Yes – Negative	Yes - Negative

**Commentary:**

**All options** seek to deliver a level of growth on brownfield land (site 8 and predominately site 7 within **all options**, and part of Site 5 within **Options E and F**), which will lead to positive effects through the efficient use of land. However all variable sites (Sites 1, 3, 4 and part of Site 5) are greenfield, and therefore all options have the potential to lead to long term negative effects in relation to promoting the use of previously developed land. In terms of differentiating between the Options in this respect, it is considered that as the level of growth increases so does the potential for residual negative effects. **Option C** is therefore worst performing of the options in this respect.

It is not possible to confirm if development at the variable sites (Sites 1, 3, 4 and 5) would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in the Neighbourhood Plan area. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available. As above, it is considered that as the land take increases, so does the potential for significant negative effects.

Site 4 within **Option C** also performs negatively as it falls within a Source Protection Zone (SPZ). However, it is recognised that there is mitigation available through national policy and the WCS to ensure that there are no residual significant effects.

Overall, it is considered that all Options will result in the loss of greenfield and agricultural land; leading to significant negative effects. In terms of ranking the Options, **Option C** performs more poorly compared to the other options as it results in the greatest loss of greenfield/ agricultural land, and seeks to deliver growth within a SPZ. **Option B** performs most positively as the loss of greenfield/ agricultural land is less than that of other options, and **Option B** does not seek to develop within a SPZ. None of the Site Options fall within a Minerals Consultation Area.

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
----------	-------------------------------------	----------------------------------	--

Population and community			
Rank of preference	1	2	3
Likely significant effect?	Yes – Positive	Yes – Positive	Yes – Positive

**Commentary:**

A key consideration for this SA Theme is the delivery of new homes to meet identified housing needs, including the needs of different groups within the community. In particular, higher growth options are likely to include more significant opportunities to deliver affordable housing and address the existing issue of in-commuting. When considering individual sites, a key consideration is Site 5 (featured within **Option A** and **Option B**), given it will include 10% private rented housing for occupancy of employees of Marlborough College. In addition to meeting specialist housing need, positive effects are anticipated through supporting the local economy, increasing levels of self-containment and supporting active/ sustainable travel.

Site 5 also performs positively against this SA theme as it includes the provision of a medical centre. This will contribute towards meeting community infrastructure needs identified for the town. All other variable site options (Site 1, 3 and 4) perform less positively in terms of access to other services and facilities within the town centre. This is given they are not well located in terms of distance to the town centre, and would likely result in a reliance on the private vehicle for travel.

Overall, it is considered that as the option which delivers the highest quantum of development, **Option C** clearly performs well in terms of the delivery of high quality housing which meets the needs of different groups within the community. However, housing growth alone is only one element to consider, and high growth in a poorer location is unlikely to be the best option overall.

Additionally, given the community benefits associated with Site 5, which is absent from **Option C**, it is considered that **Option A** (moderate level of growth) is best performing, followed by **Option B**. While **Option B** is the lowest level of growth, it meets the identified housing need for the area in the most sustainable locations, while also delivering community benefits through Site 5.

Health and wellbeing			
Rank of preference	2	1	3
Likely significant effect?	Yes – Positive	Yes – Positive	No

**Commentary:**

In terms of access to health services, it is recognised that Site 5 (within **Option A** and **Option B**) includes the provision of a medical centre. This will contribute towards meeting community infrastructure needs identified for the town, with the potential for long-term significant positive effects. All other variable site options (Site 1, 3 and 4) perform less positively in terms of access to other services and facilities within the town centre. This is given they are not well located in terms of distance to the town centre, and would likely result in a reliance on the private vehicle for travel.

In terms of access to open space/ recreational facilities, Site 3 (**Option C**) and Site 5 (**Option A** and **Option B**) have good access to open space/ recreation facilities, including Marlborough Recreation Ground and Leisure Centre, while Site 4 (**Option C**) and Site 1 (**Option B** and **Option C**) are over 800m from such amenities.

It is considered that **Option B** is best performing overall given it prioritises growth at sustainable predominately brownfield town centre sites with good access to services, facilities and green space/ recreational opportunities; and will deliver a new medical centre to meet local needs. **Option A** also performs well through the delivery of a new medical centre, however is ranked less positively overall given Site 1 is not well connected to open space/ recreational facilities. **Option C** performs least well as it will not deliver a new medical centre, and directs an increased level of growth to sites which are not well located in terms of the town centre, and open space/ recreational facilities.

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
----------	-------------------------------------	----------------------------------	--

Transportation			
Rank of preference	2	1	3
Likely significant effect?	No	No	No

**Commentary:**

When looking at the variable sites, Site 5 performs most positively against this SA theme as it is within walking distance of Marlborough town centre, and has good access to sustainable transport opportunities. All other variable sites (Sites 1, 3 and 4) perform less positively as they are located on the outskirts of the settlement, with residents likely to utilise the A4 London Road to travel in to the town centre by car. The A4 extends throughout the MANP area and runs south of the site, i.e. for access to the extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment).

It is however noted that all variable sites have good access to a bus stop (connecting residents with neighbouring centres including Swindon, Great Bedywn and Hungerford), and the PRow network.

Overall, it is considered that **Option B** is best performing given it directs growth to sites which will support active travel and reduce congestion on the local road network. **Option A** also performs well through the inclusion of Site 5 and its associated benefits. **Option C** performs less well as it does not include Site 5 and directs growth to sites less well connected to the town centre; its services and facilities.

**Summary:**

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the MANP.

The appraisal has highlighted the potential for **positive effects** as a result of development at all options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the MANP. **Option C** performs most positively in this respect given it will deliver the highest level of growth.
- **Options A and B** will deliver a new medical centre to meet social infrastructure needs.

Alongside this, further option specific minor positive effects are identified including:

- **Option B** will provide good access to the town centre, green space and recreational opportunities. It also has the greatest potential to support active travel and reduce congestion on the local road network.

The appraisal has highlighted the potential for **negative effects** as a result of development at all options, which are summarised as follows:

- **All options** will increase pressures on the road network, congestion, emissions and air quality within and surrounding Marlborough AQMA. **Option C** performs most negatively in this respect given it will lead to the greatest increase in vehicular use within the AQMA.
- **All options** will result in the potential loss of greenfield land, with the potential for loss of BMV agricultural land if found to be Grade 3a.
- **All options** would lead to greenfield development within the North Wessex Downs AONB, with the potential for significant long term negative effects on character, setting and intrinsic qualities. Mitigation is unlikely to significantly reduce the extent of these negative effects given that options would lead to development in previously undeveloped areas, where low capacity for change is identified (notably Sites 1 and 5).
- **All options** have the potential to impact upon the local townscape and setting of the Marlborough Area, with low capacity for change identified. **Options A and B** are also constrained by local

SA theme	Option A Sites 1, 5, 7, 8 and 11	Option B Sites 5, 7, 8 and 11	Option C Sites 1, 3, 4, 7, 8 and 11
----------	-------------------------------------	----------------------------------	--

---

heritage assets, with the potential for adverse effect on setting of the Marlborough Conservation Area and Grade II Listed Buildings (**Option A** only).

Alongside this, further option specific constraints are identified including:

- **Option C** may increase recreational and disturbance pressures related to designated biodiversity sites;
  - Potential for habitat loss and/ or fragmentation affecting the national forest inventory woodland located in the corner of Site 5 included under **Options A and B**.
  - Site 4 within **Option C** performs negatively as it falls within a Source Protection Zone (SPZ).
- Option C** directs growth to sites less well connected to the town centre, services and facilities.

## Appendix D Reasonable alternatives appraisal – November 2020

This appendix presents the detailed findings of the appraisal of three new alternative spatial strategy options within the Marlborough Area, as established within **Section 4.51** of this SA Report. These are set out below:

**Table AD.1 November 2020 Reasonable alternative spatial options**

Site	November 2020 Spatial Options		
	Option D	Option E	Option F
	Capacity	Capacity	Capacity
1. Land off Elcot Lane	50	50	50
3. Land South of A4, London Road	60		60
4. Further Land West of Salisbury Road	50	50	
5. Barton Dene		40	40
7. Former Resource Centre	30	30	15 - 30
8. Land at Kelham Gardens	10	10	10
<b>Total dwellings delivered during plan period</b>	<b>200</b>	<b>180</b>	<b>175 - 190</b>
<b>Affordable homes</b>	<b>96</b>	<b>86</b>	<b>85 - 91</b>
Other uses	<i>Public open space. Covenant at FRC resolved</i>	<i>Public open space. Covenant at FRC resolved. Medical centre at Barton Dene</i>	<i>Public open space. Resolution of covenant at FRC uncertain.</i>

The locations of these spatial options are presented in **Figures 4.5 – 4.7** of this SA Report.

### Methodology

For each of the options, the appraisal examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). Considering this, there is a need to make considerable assumptions regarding how options will be implemented 'on the ground' and what the effect on certain receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers

are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.

Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.<sup>86</sup> So, for example, account is taken of the duration, frequency and reversibility of effects.

## Appraisal findings

**Table AD.1** presents the findings for the SA of the spatial options.

The summary findings of this detailed appraisal are presented in **Section 4.52** of the main report.

**Table AD.1: SA of reasonable alternative spatial options**

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7 and 8
<b>Air quality</b>			
Rank of preference	=	=	=
Likely significant effect?	No	No	No

### Commentary:

Development under any option will result in residents travelling by private vehicle within Marlborough AQMA to access services and facilities given poor accessibility to and frequency of public transport, contributing to localised air quality issues.

No significant differences have been identified between the options in terms of air quality, and therefore all options are equally ranked, with no significant effects identified.

<b>Biodiversity</b>			
Rank of preference	2	1	1
Likely significant effect?	No	No	No

### Commentary:

Site 3 is included in **Options D and F** and is located adjacent to and within the Impact Risk Zone (IRZ) of the Savernake Forest SSSI. It also includes priority habitat within the boundary of the site. Site 4 within **Options D and E** is located within 300m of the Savernake Forest SSSI and is also within an IRZ. Site 4 also adjoins a County Wildlife Site (CWS) to the south, and a disused railway line to the east. Development at Sites 3 and 4 has the potential to impact on the SSSI and CWS through disturbance to habitats and species during construction and as a result of increased recreational activity in the longer term. **All options** include Site 1, which falls within an IRZ for the River Kennett SSSI.

**Options E and F** include Site 5; development of which has the potential to indirectly adversely impact upon the CWS located 650m north west. Habitat fragmentation through recreational disturbance, for example, has the potential to lead to long-term minor negative effects; although it is recognised that the level of growth proposed at the site is low (30 dwellings).

Overall it is difficult to identify any significant difference between the options; however, given that **Options D** includes three sites that are in close proximity to SSSIs, in particular Site 1, it is considered more likely to have a negative effect of significance on biodiversity compared to **Options E and F**. Despite this, none of the options are considered likely to have a significant residual negative effect once mitigation is taken into account. For example, a suitable buffer should be provided between the Savernake Forest SSSI and any development on Site 3.

<sup>86</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.



SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7 and 8
----------	-------------------------------------	-------------------------------------	------------------------------------

### Climate change

Rank of preference	<b>3</b>	<b>1</b>	<b>2</b>
Likely significant effect?	<b>No</b>	<b>No</b>	<b>No</b>

#### Commentary:

As explored under the air quality and transportation themes, it is likely that any additional growth will place increased pressures on congestion and capacity on roads within Marlborough town centre (coinciding with Marlborough AQMA). This is inevitably likely to contribute to emissions in the MANP area and negatively affect climate change mitigation to a minor extent. It will therefore be important to support minimalised per capita emissions, including reductions in domestic energy consumption and uptake of renewable sources.

In terms of individual sites, sites 5, 7 and 8 are considered to have good access to services/ facilities/ employment (within 600m of the town centre) and public transport, which will help to reduce contributions from per capita emissions. Furthermore Site 5 (**Options E and F**) includes the delivery of a new medical centre which will improve accessibility for residents and reduce travel. **Option D** includes sites 1, 3, and 4, which are identified as being less accessible, located relatively distant from services and amenities of the town centre.

However, the allocation of Site 4 through **Options D and E** would resolve the restrictive covenant at adjoining Site 7, improving pedestrian and cycling connectivity between Salisbury Road and the town centre. It is uncertain whether these benefits could be delivered through **Option F** and the allocation of Site 3. It is also noted that Site 4 within **Option E** adjoins a strategic allocation of the Core Strategy at Land off Salisbury Road for 220 homes; and may benefit from any infrastructure delivered as part of this strategic site. However this is also currently uncertain. It is recognised that climate change is a global issue, and in the context of the Neighbourhood Plan area, effects under all options are not likely to be significant

From a climate change adaptation perspective, all options perform on a par given the differentiating sites between options (Sites 3, 4 and 5) are located in areas of low risk of flooding.

Overall **Option D** performs least positively of the options given the inclusion of sites 3 and 4 outside of the settlement boundary with limited accessibility. However it is recognised that the delivery of Site 4 would resolve the restrictive covenant at adjoining Site 7, delivering improved town centre accessibility. **Option E** is therefore best performing as it allocates all sustainably located sites (sites 5, 7, and 8), enabling community infrastructure delivery at Site 5, and addressing covenant issues at Site 7 through the delivery of Site 4. It is uncertain whether these benefits could be delivered through **Option F** and the allocation of Site 3. **Option F** therefore ranks 2<sup>nd</sup> overall at this stage.

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7 and 8
----------	-------------------------------------	-------------------------------------	------------------------------------

Landscape			
Rank of preference	3	1	2
Likely significant effect?	Yes - Negative	Yes - Negative	Yes - Negative

**Commentary:**

**All options** perform well through the allocation of sustainable predominately brownfield town centre sites (Sites 7 and 8) within the settlement boundary. However, all variable sites within options (Sites 3, 4 and 5) perform negatively against the Landscape SA theme due to potential adverse effects on the character, setting and intrinsic qualities of the North Wessex Downs AONB. This is reiterated through the Preliminary Landscape Sensitivity Assessment (2012) carried out for all Wiltshire Strategic Housing Land Availability Assessment (SHLAA) sites within the AONB, which includes Site 5 (**Option E** and **Option F**). The Landscape Sensitivity Assessment concludes for Site 5 that “development would be detrimental to the special qualities and natural beauty of the AONB...”. However, it is noted that the capacity of the site has been significantly reduced since this assessment, delivering now 40 homes on the edge of the existing settlement, rather than 130. While Site 3 (**Option D and F**) and Site 4 (**Option D and E**) were not assessed through the Landscape Sensitivity Assessment, residual negative effects are anticipated as a result of development at the sites; notably through expansion of the settlement into the open countryside and in light of the presence of the AONB.

Given the constrained nature of all variable sites, it is considered that all options have the potential to lead to long-term significant negative effects. It is considered that the Option that seeks to deliver the highest level of growth on greenfield sites within the AONB (**Option D**) has the potential to result in a negative effect of greater significance compared to the other options.

**Option E** is therefore best performing as it delivers the lowest growth on constrained sites (i.e. 50 homes on Site 4 compared to 60 dwellings on Site 3 under **Option F**). **Option D**, given the marginally higher level of growth proposed on multiple greenfield sites in the AONB, is worst performing of the options.

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7 and 8
----------	-------------------------------------	-------------------------------------	------------------------------------

Historic environment			
Rank of preference	1	2	2
Likely significant effect?	No	Uncertain	Uncertain

**Commentary:**

The sensitivity of the historic landscape has been characterised to some extent through the Landscape Sensitivity Assessment (2012), and as such, the findings discussed under the Landscape SA Theme are also applicable for this SA Theme.

In terms of the variable sites (Sites 3, 4, and 5), Site 5 (**Option E** and **Option F**) performs negatively against the Historic Environment SA theme as it is located within 50m of Grade II Listed Buildings. Site 5 is further constrained by Marlborough Conservation Area which is located close to the site. Development at the Site 5 has the potential to impact on the setting of these important heritage features, notably affecting views to and from the Conservation Area and Listed Buildings. However, screening provided by existing built form will help to reduce the potential for significant negative effects.

Taking the above into consideration, **Option D** is identified as best performing compared to the other options. **Option D** directs growth to sites that are less constrained in terms of the historic environment. It is difficult to differentiate between **Option E** and **Option F** as both options are equally constrained by Site 5; with the potential to impact upon the setting of Marlborough Conservation Area and Grade II Listed Buildings.

It is noted that there is the potential for positive effects on the historic environment through the delivery of predominately brownfield sites 7 and 8 (**all options**) if high quality design standards were adhered to but this is uncertain at this stage.

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7 and 8
----------	-------------------------------------	-------------------------------------	------------------------------------

Land, soil and water resources			
Rank of preference	3	1	2
Likely significant effect?	Yes - Negative	Yes - Negative	Yes - Negative

**Commentary:**

**All options** seek to deliver a level of growth on brownfield land (site 8 and predominately site 7 within **all options**, and part of Site 5 within **Options E and F**), which will lead to positive effects through the efficient use of land. However, all variable sites (Sites 3, 4 and part of site 5) are greenfield, and therefore **all options** have the potential to lead to long term negative effects through the loss of greenfield land. In terms of differentiating between the Options in this respect, it is considered that as the level of growth increases so does the potential for residual negative effects. **Option D** is therefore worst performing of the options in this respect.

It is not possible to confirm if development at the variable sites (Sites 3, 4 and 5) would result in the loss of best and most versatile agricultural land as recent land classification has not been carried out in the Neighbourhood Plan area. According to pre-1988 agricultural land classification this land is classified as Grade 3. However, it is uncertain if this is Grade 3a (land that is best and most versatile) or Grade 3b (land that is not). It is also recognised that there is some uncertainty given the evidence available. As above, it is considered that as the land take increases, so does the potential for significant negative effects.

Site 4 within **Option D** and **Option E** also performs negatively as it falls within a Source Protection Zone (SPZ). However, it is recognised that there is mitigation available through national policy and the WCS to ensure that there are no residual significant effects.

Overall, it is considered that all Options will result in the loss of greenfield and agricultural land, leading to significant negative effects. In terms of ranking the Options, **Option E** is best performing as it would result in marginally less greenfield/ agricultural land loss than **Options D and F**. **Option D** is worst performing overall as it also seeks to deliver growth within a SPZ. None of the site options fall within a Minerals Consultation Area.

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7 and 8
----------	-------------------------------------	-------------------------------------	------------------------------------

Population and community			
Rank of preference	3	1	2
Likely significant effect?	Yes – Positive	Yes – Positive	Yes – Positive

**Commentary:**

A key consideration for this SA Theme is the delivery of new homes to meet identified housing needs, including the needs of different groups within the community. In particular, higher growth options are likely to include more significant opportunities to deliver affordable housing and address the existing issue of in-commuting. When considering individual sites, a key consideration is Site 5 (featured within **Option E** and **Option F**), given it will include 10% private rented housing for occupancy of employees of Marlborough College. In addition to meeting specialist housing need, positive effects are anticipated through supporting the local economy, increasing levels of self-containment and supporting active/ sustainable travel.

Site 5 also performs positively against this SA theme as it includes the provision of a medical centre. This will contribute towards meeting community infrastructure needs identified for the town. The two other variable site options (Site 3 and 4) perform less positively in terms of access to other services and facilities within the town centre. This is given they are not well located in terms of distance to the town centre, and would likely result in a reliance on the private vehicle for travel. The allocation of Site 4 however would resolve the restrictive covenant at adjoining Site 7, improving pedestrian and cycling connectivity between Salisbury Road and the town centre. It is uncertain whether these benefits could be delivered through **Option F** and the allocation of Site 3. It is also noted that Site 4 within **Option E** adjoins a strategic allocation of the Core Strategy at Land off Salisbury Road for 220 homes; and may benefit from any infrastructure delivered as part of this strategic site. However this is also currently uncertain.

Overall, it is considered that as the option which delivers the highest quantum of development, **Option D** clearly performs well in terms of the delivery of high quality housing which meets the needs of different groups within the community. However, housing growth alone is only one element to consider, and high growth in a poorer location is unlikely to be the best option overall.

Additionally, given the community benefits associated with Site 5, which is absent from **Option D**, it is considered that **Option E** and is best performing. This is given that it delivers the second highest level of affordable housing, meets housing need for the area in the most sustainable locations, and delivers community benefits through Site 5.

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7 and 8
----------	-------------------------------------	-------------------------------------	------------------------------------

Health and wellbeing			
Rank of preference	<b>3</b>	<b>2</b>	<b>1</b>
Likely significant effect?	<b>No</b>	<b>Yes – Positive</b>	<b>Yes – Positive</b>

**Commentary:**

In terms of access to health services, it is recognised that Site 5 (within **Option E** and **Option F**) includes the provision of a medical centre. This will contribute towards meeting community infrastructure needs identified for the town, with the potential for long-term significant positive effects. The other two variable site options (Site 3 and 4) perform less positively in terms of access to other services and facilities within the town centre. This is given they are not well located in terms of distance to the town centre, and would likely result in a reliance on the private vehicle for travel. The allocation of Site 4 however would resolve the restrictive covenant at adjoining Site 7, improving pedestrian and cycling connectivity between Salisbury Road and the town centre. It is uncertain whether these benefits could be delivered through **Option F** and the allocation of Site 3. It is also noted that Site 4 within **Option E** adjoins a strategic allocation of the Core Strategy at Land off Salisbury Road for 220 homes; and may benefit from any infrastructure delivered as part of this strategic site. However this is also currently uncertain.

In terms of access to open space/ recreational facilities, Site 3 (**Option D** and **Option F**) and Site 5 (**Option E** and **Option F**) have good access to open space/ recreation facilities, including Marlborough Recreation Ground and Leisure Centre, while Site 4 (**Option D** and **Option E**) is over 800m from such amenities.

It is considered that **Options E and F** perform well overall given that sustainable predominately brownfield town centre sites with good access to services and facilities are prioritised; and will deliver a new medical centre to meet local needs. **Option F** is ranked as best performing of the two options as all variable sites have access to green space/ recreational opportunities. **Option D** performs least well as it will not deliver a new medical centre, and directs an increased level of growth to sites which are not well located in terms of the town centre, and open space/ recreational facilities.

SA theme	Option D Sites 1, 3, 4, 7, and 8	Option E Sites 1, 4, 5, 7, and 8	Option F Sites 1, 3, 5, 7 and 8
----------	-------------------------------------	-------------------------------------	------------------------------------

Transportation			
Rank of preference	2	1	1
Likely significant effect?	No	No	No

**Commentary:**

When looking at the variable sites, Site 5 (**Option E** and **Option F**) performs most positively against this SA theme as it is within walking distance of Marlborough town centre, and has good access to sustainable transport opportunities. The other two variable sites (Site 3 and 4) perform less positively as they are located on the outskirts of the settlement, with residents likely to utilise the A4 London Road to travel in to the town centre by car. The A4 extends throughout the MANP area and runs south of the site, i.e. for access to the extensive facilities/ services along the high street, and those in the wider Marlborough area (including schools and employment).

Through **Option E** the allocation of Site 4 however would resolve the restrictive covenant at adjoining Site 7, improving pedestrian and cycling connectivity between Salisbury Road and the town centre. It is uncertain whether these benefits could be delivered through **Option F** and the allocation of Site 3. It is also noted that Site 4 within **Option E** adjoins a strategic allocation of the Core Strategy at Land off Salisbury Road for 220 homes; and may benefit from any infrastructure delivered as part of this strategic site. However this is also currently uncertain.

In terms of access to existing sustainable transport, all variable sites have good access to a bus stop (connecting residents with neighbouring centres including Swindon, Great Bedywn and Hungerford), and the PRoW network.

Overall, it considered that **Option D** performs less well as it does not include Site 5 and directs growth to sites less well connected to the town centre; its services and facilities. It is however difficult to differentiate between **Option E** and **Option F** given both options perform well through the inclusion of Site 5 and its associated benefits; and the exact level of growth to be delivered through **Option F** (i.e. the resolution of the restrictive covenant at Site 7 and associated benefits) is uncertain. Furthermore, any potential benefits from strategic growth adjacent to Site 4 are currently unknown. **Option E** and **Option F** therefore perform on par at this stage.

**Summary:**

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the MANP.

The appraisal has highlighted the potential for **positive effects** as a result of development at all options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the MANP. **Option D** performs most positively in this respect given it will deliver the highest level of growth.
- **Options E and F** will deliver a new medical centre to meet social infrastructure needs.
- Through **Option E** the allocation of Site 4 would resolve the restrictive covenant at adjoining Site 7, improving pedestrian and cycling connectivity between Salisbury Road and the town centre. It is uncertain whether these benefits could be delivered through **Option F** and the allocation of Site 3.

The appraisal has highlighted the potential for **negative effects** as a result of development at all options, which are summarised as follows:

- **All options** will result in residents travelling by private vehicle within Marlborough AQMA to access services and facilities given poor accessibility to and frequency of public transport, contributing to localised air quality issues.
- **All options** may increase recreational/ disturbance pressures related to nationally and locally designated biodiversity sites

- **All options** will result in the potential loss of greenfield land, with the potential for loss of BMV agricultural land if found to be Grade 3a.
- **All options** would lead to greenfield development within the North Wessex Downs AONB, with the potential for significant long term negative effects on character, setting and intrinsic qualities. Mitigation is unlikely to significantly reduce the extent of these negative effects given that options would lead to development in previously undeveloped areas, where low capacity for change is identified (notably Site 1 (**all options**)).
- **All options** have the potential to impact upon the local townscape and setting of the Marlborough Area, with low capacity for change identified. **Options E** and **Option F** are also constrained by local heritage assets, with the potential for adverse effect on setting of the Marlborough Conservation Area and Grade II Listed Buildings.
- Site 4 within **Option D** and **Option E** perform negatively as it falls within a Source Protection Zone (SPZ).



