

MANP policy MARL 17: Conserving the Scenic Beauty of the AONB seeks to prevent harmful development proposals outside the defined Marlborough development boundary.

This document defines two important natural features that form part of the wider southern landscape setting of the MANP area and are a highly visible part of the surrounding North Wessex Downs AONB and provides supporting evidence to prevent encroachment of undesirable development:

- *the Northwest facing escarpment from Pantawick along the edge of the plateau to the Mildenhall and Axford parish boundary at Stitchcombe including Three Cornered Meadow*
- *the North facing escarpment from Granham Hill to the settlement boundary at West Manton.*

The north-west and north facing escarpment, from Pantawick in the west to the Mildenhall and Axford parish boundary at Stitchcombe in the east, defines the edge of the Savernake plateau and Forest and provides a natural and historic southern landscape setting for Marlborough and Mildenhall. This land which rises steeply above the River Kennet Valley is a continuous green elevated sweep forming a natural divide between the developed settlements of Marlborough and Mildenhall and the ancient Savernake Forest. This escarpment is within the North Wessex Downs Area of Outstanding Nature Beauty adjoining the World Heritage Site of Avebury and other historic sites. Although the whole escarpment is afforded protection through its AONB status (see appendix 1), one section has already been offered for possible development involving land known locally as Three Cornered Meadow. This meadow is part of the section of the escarpment that runs from the A346 in the west at Postern Hill to the A4 in the east and provides a natural buffer between Savernake Forest and the southern edge of the built environment of Marlborough.

A second north facing escarpment, from Granham Hill (A345 Pewsey Road) to the settlement boundary at West Manton, is also part of the North Wessex Downs AONB and closer to the wider setting of the Avebury World Heritage Site. At its eastern end the escarpment is the southern landscape setting for the Marlborough College grounds with the Marlborough Mound which is an important archaeological monument together with listed buildings and gardens.

Both escarpments are important parts of the green infrastructure of the MANP area and provide public access to a biodiverse and historic landscape and recreational opportunities from its many footpaths, bridleways and rights of way. The Pantawick to Stitchcombe escarpment is about 2.5 miles in length and the escarpment from Granham Hill to the Settlement boundary at West Manton is just over a mile.

This report seeks to provide technical evidence to support the MANP Policy MARL17 to prevent undesirable development on valued green spaces and preserve both escarpments from development that will damage the landscape settings of Marlborough, the villages of Mildenhall and Manton, Savernake Forest, Marlborough College and the wider landscape setting of the World Heritage Site of Avebury.

The main problem encountered by development on the North Wessex Downs AONB is illustrated by the current Marleberg Grange development, to the west of the A346 at Postern Hill, on the lower flank of the Pantawick to Stitchcombe escarpment at this location. Planning guidance keeps the roof line below the 160m AOD Contour and the existing 20 metre wide southern tree belt protects views from the north, north- west and west viewpoints. The land on the edge of the escarpment from Pantawick to Stitchcombe, specifically east of the A346, is narrower and steeper than that at the Marleberg Grange development and as a result is more visible in the AONB landscape from the north, north- west and east of Marlborough. The land on which the Salisbury Road Business Park is built, to the north of the escarpment, has been lowered during development and the roof lines of the buildings are more in line with the 150m AOB Contour and as such the development does not encroach on the escarpment and is not visible from the northern aspects of the town.

This report will present technical evidence arising from:

- the Wiltshire Council Strategic Planning Report for Marleberg Grange (<https://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTUvMDIwMjYvT1VULDY5MzU4NQ==>)
- the North Wessex Downs AONB 2019–2024 Management Plan
- comments and guidance from other stakeholders
- Stonehenge and Avebury WHS Management Plan 2015 (part 2)
- Wiltshire Council Core Strategy

In the **Wiltshire Council Report to the Strategic Planning Committee dated 10th February 2016 - Land West of Salisbury Road, Marlborough (Marleberg Grange) Wiltshire** - paragraph 9.1 Principle of Development (Page 9) sets out the intention to:

Create development that relates well to the town, ensuring minimal impact upon Marlborough's rich built, historic and landscape assets (WCS, p248).

Within the same document (page 11) under Landscaping & Visual Impact the following is recorded:

The supporting text to Core Policy 51 highlights that when determining proposals in AONBs great weight will have to be given to conserving the landscape and scenic beauty in accordance with paragraphs 115 and 116 of the NPPF. The NPPF states that AONBs have the highest status of protection in relation to landscape and scenic beauty and the presumption in favour of sustainable development does not apply within these areas'. Paragraph 116 outlines that 'planning permission should be refused for major developments in these areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

The document continues 'The Council's Landscape and Design Officer carried out a detailed assessment of the proposed development and originally objected to the application'. It was noted that 'the application proposes the introduction of built development which is located too far up the southern slope of the application site's western field. The resulting landscape and visual effects are

considered to generate unacceptable and unnecessary harm to landscape character and visual receptors within the nationally designated North Wessex Downs AONB’.

The North Wessex Downs AONB Unit also objected to the original plans for the proposed development on the grounds that ‘it would fail to conserve and enhance the natural beauty of this nationally protected landscape, contrary to the purposes for which the area is designated and the statutory duty of regard placed upon the local planning authority under s. 85 of the Countryside and Rights of Way Act 2000’. This view was also shared by Natural England who considered that ‘the proposed development would have a significant adverse effect on the AONB’. ...

In response to these objections a section of the proposed development on the land that rises to the south in the west of the site was removed to ensure that it did not exceed the 160m AOD contour, this being the elevation ‘at which glimpsed or partial views of buildings could otherwise have been possible from a number of viewpoints’.

In the same Wiltshire Council report for Marleberg Grange (page 12) it states:

Based on the information submitted it is considered that a suitably worded planning condition stating that built development must not exceed ‘the existing 160m AOD contour’ in line with the submitted ‘Vertical and horizontal landscape parameters plan’ (Fig. 7) & ‘Land Use and Building Height Parameters Plan’ (Fig. 8) should prove effective in minimising and controlling the visual impacts of the proposed development within any subsequent detailed ‘Reserved Matters’ application proposal. This combined with the addition of the 20 metre wide southern tree belt and other ecological parameters will both constrain and restrict built development further south.

These revisions and additions to the application proposal should give the Council the necessary comfort and control to ensure that development will not result in harm to wider landscape character or be visible from important visual receptors. The revised masterplan layout (Fig. 3) also increases the stand-off to Savernake Forest, which better conserves the visual and physical setting to the forest and removes the urban influence of new built form on the higher land from longer distance visual receptors i.e. Marlborough Common (north), from further afield (north-west) and also from the college road junction (west).

The **AONB** Unit’s response is detailed in page 13:

The AONB unit accepts that the revised proposals would reduce the likely impact compared with the earlier submission, however they feel that “the landscape justification for the revised proposals remains fundamentally flawed because it implies that localised impact on landscape character and special qualities is not significant if (as is claimed) development does not compromise the wider landscape. Every part of the AONB enjoys the same protected status. Inevitably, development of the allocated site will result in major negative impact on the designated landscape. The objective should be to confine this visual impact to as small a part of the AONB as possible. The key to this is heights, and specifically the contours above which development will or will not be visible from a wider area”. It is therefore recommended that any development and associated lighting should not extend

beyond the 150m AOD contour line as development above is “very likely to give rise to unacceptable impacts on the wider protected landscape”.

The AONB Unit submitted this strong objection to the Marleberg Grange development:

‘ extending the proposed built development edge south of the 150m contour will adversely affect the rural elevated character of the AONB southern valley slopes and setting to the forest and undermine the enclosed and otherwise self contained nature of this allocated development site’.

In page 18 of the same report to the Strategic Planning Committee **Historic England** responded:

Historic England identified the key heritage assets which the development (Marleberg Grange) may affect within their consultation response which included the Marlborough town centre and the Conservation Area, Tottenham House and Savernake Forest (a Grade II* registered Historic Park and Garden). Historic England concluded that “the impacts of this development on the registered Park of Savernake Forest will have some impact on its setting, this is borne out by the proximity of the development to the edge of the Forest and how this is read in distant views from the hills on the north side of the town. The impact will be particularly exaggerated at night when the night glow from the additional lights in this part of the landscape will impact upon the dark skies that surround the Park and contribute to its rural setting.”

The green infrastructure and rich natural environment of the area is of great value. The Kennet Local Plan is still influential today and has been adopted into the Wiltshire Core Strategy which is now part of the developing Wiltshire Local Plan. The Kennet Local Plan Marlborough Central Area Map shows part of the escarpment in question to be:

- An area of minimum change and Landscape Setting (NR 10)
- Site of Special Scientific Interest (NR2)
- Area of High Ecological Value (NR3)

The Pantawick to Stitchcombe escarpment is also part of the landscape setting of Savernake Forest and therefore the setting of the registered Historic Park and Garden of Tottenham House.

The European Landscape Convention promotes landscape protection. It states:

The principal pressure on the landscape arising from new development is erosion of the separate identity, character, visual and functional amenity of settlements and their setting, and impacts on the open countryside. Another challenge is to allow for appropriate development while having full regard to the conservation and enhancement objectives of the most highly valued landscapes including the Areas of Outstanding Natural Beauty..... and Avebury World Heritage Site (WHS).

Whilst not within the specific World Heritage Site of Avebury, areas of the North Wessex Downs including both escarpments are part of the continuous and indivisible landscape of the WHS. It can be seen from as far away as Overton Hill (five miles away) and Oldbury Castle (nine miles away). Any development here would infringe on the long view from those sites and continue the built environment of Marlborough into an area that can be seen for many miles and from local vista views within the town itself.

The Wiltshire Council Core Strategy - strategic Objective 5 - encourages the protection and enhancement of the natural, historic and built environment.

Ecological Constraints Notes from Wiltshire Council's Economic Development and Planning Department includes:

Land south of London Road (Three Cornered Meadow) would likely not be developable, since it lies mainly within Postern Hill Chalk County Wildlife Site and loss of this local wildlife site would be contrary to Wiltshire core Policy 50.

To summarise, this report presents strong evidence that any development on the escarpments will cause loss of community amenity value and visual harm to:

- Savernake Forest
- the Historic Park and Garden of Tottenham House
- the landscape setting of Marlborough College including the Marlborough Mound, Park and Garden of special historic value and listed buildings
- the Marlborough and Manton Conservation Areas
- the small village status of Manton and Mildenhall
- the environmentally sensitive areas of SSSI, Minimum Change and High Ecological Value
- the County Wildlife Site status, historic and archaeological sites
- the wider North Wessex Downs Area of Natural Beauty and the landscape setting of Avebury WHS.

Consequently, it is proposed that the Marlborough Area Neighbourhood Plan Policy MARL 17 should state that:

No built development should exceed the 150 metre AOD contour on both the north and northwest facing escarpment from Pantawick in the west to the Mildenhall and Axford parish boundary at Stitchcombe in the east and the north facing escarpment from Granham Hill in the east to the settlement boundary at West Manton in the west.

Appendix

National Planning Policy Framework - policy on AONBs

115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.