



Ms Rachel Yeomans
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Wiltshire Council
County Hall
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Wilts BA14 8JN

Action for the River Kennet
PO Box 2919
Manton
MARLBOROUGH
Wilts SN8 4WE

20 August 2014

Dear Rachel

Re: Planning Application 14/01766/OUT & 14/03379/FUL - Land off Rabley Wood View, Marlborough, Residential Development and associated works & Nature Park

ARK has grave concerns about the proposal to drain a substantial area (1.8 ha) of the existing water meadow in the flood plain. As well as their ecological importance - as habitats and their role in reducing pollution (see also Annex) - water meadows act like sponges and fulfil the vital function of absorbing water in periods of substantial rainfall - such as we have had recently. The flooding of Stonebridge Meadow in Marlborough earlier this year demonstrated this well. Drainage such as proposed would severely reduce the capacity of the water meadow to fulfil this function.

In addition, ARK has recently carried out substantial river corridor and habitat improvements to this part of the River Og. These were funded by DEFRA, to improve habitats, reduce erosion and pollution, and in conjunction with Marlborough Council to increase public access. We are concerned that the drainage proposals will adversely impact on these. On both grounds we therefore **object** to this aspect of the Application.

ARK has **concerns** about the scale of the housing development, also identified by Thames Water, namely the additional load it would put on an already overstretched local water supply and sewage system. Recent winters have shown the limitations of the sewage system in periods of heavy rainfall. The Environment Agency has voiced similar concerns.

At the same time, ARK **welcomes** the proposed change of land use to increase public access to the Og water meadows, while hoping that this will be as a nature reserve rather than as a formal park, and would be happy to work with the developers to this end.

Yours sincerely

Dr Geoffrey Findlay
Chairman

<i>Chairman</i>	Geoffrey Findlay, Hope Cottage, Ramsbury, Wiltshire SN8 2PU
<i>Hon. Treasurer</i>	Martin Gibson, Durnsford Mill House, Mildenhall, Wiltshire SN8 2NG
<i>Technical Adviser</i>	John Lawson, March House, Ogbourne St George, Marlborough, Wiltshire, SN8 1SU
<i>Ecological Advisers</i>	Peter Marren, John Hounslow
<i>Committee</i>	Richard Clarke, James Dallas, Sean Dempster, Don Harris, Kevin Light, Dr Rodney Owen-Jones, Sir Nigel Thompson
<i>Director</i>	Charlotte Hitchmough, PO Box 2919, Manton, Marlborough, Wiltshire SN8 4WE



ANNEX TO ARK SUBMISSION on Planning Application 14/01766/OUT & 14/03379/FUL

WETLANDS AND WATER MEADOWS

- Wetlands are one of the most undervalued ecosystems but provide a range of vital services. They filter water, provide food, and offer a unique habitat for many different species. These complex habitats act as giant sponges, soaking up rainfall and slowly releasing it over time. They absorb chemicals, filter pollutants and sediments, break down suspended solids and neutralise harmful bacteria. Regrettably rivers and wetlands have become receptacles for pollution, and have been drained to provide for human use. All environmental organisations are calling for this to be reversed. Climate change almost certainly means that the environment will have to cope with drier summers and more violent storms.
- Water meadows provide value as areas for flood storage and act as sources of seed for the restoration of meadows across the country. They are an important nectar source for pollinating insects such as bumble bees. They are part of a traditional, rural landscape and have a critical role to play in the conservation of our natural heritage.
- Floodplain meadows are rich in wildflowers and are therefore important habitats for butterflies, bees, dragonflies, damselflies and the other invertebrates that rely on pollen, nectar and other invertebrates as a food source.
- Due to their varied hydrology, with soil-water levels changing across the meadow, they also provide niches for specialist insects in both wet and dry areas with features such as ditches, shallow water-filled depressions and seepages, having their own specialist fauna. This diverse and productive insect fauna can support populations of insect eating birds and other animals. Floodplains are also important regulators of the movement of energy and materials through the catchment toward the river and water flowing from surrounding hills and across the floodplain is an important flux.