

# COMMENTS RECEIVED IN RESPONSE TO THE DRAFT MARLBOROUGH NEIGHBOURHOOD PLAN CONSULTATION

18 January to 8 March 2021

	Comment
1	<p>13 - Land at Kelham Gardens.</p> <p>This site is deemed unsuitable for development in the SHELAA available on the Wiltshire web site, due to the risk of flooding presumably. How can it be suitable under the neighbourhood plan? Has flood risk assessment or sequential testing been carried out?</p>
2	<p>Many thanks for the opportunity to respond to the Marlborough Area Neighbourhood Plan. May I make one query about something I have not been able to find in the plan:</p> <ul style="list-style-type: none"> <li>• P.14, para 2.26 - There is no reference to the Rabley Wood development of 39 dwellings (40% affordable) which is currently underway.</li> <li>• P.21-28 - Should this section showing future proposals and numbers of dwellings take account of the Rabley Wood development that is already underway?</li> </ul>
3	<p>What happens if there is <b><i>not</i></b> a majority “yes” vote which would have “made” the Neighbourhood Plan 'made'?</p>
4	<p>By accident, I saw your recent post online of a proposal for the Marlborough Neighbourhood Plan.</p> <p>Please could you explain the process you go through in normal times (when there are no Covid restrictions) to communicate such proposals to the residents of Marlborough.</p> <p>Separately, could you explain the process you are now going through to communicate the proposals to Marlborough residents.</p> <p>I live in Marlborough.</p>
5	<p>Thank you for your prompt reply.</p> <p>I have not seen any of the new communication measures you list below and you say have been put in place to communicate with the community.</p> <p>Please can you explicitly answer my questions and take note of my points below:</p> <ul style="list-style-type: none"> <li>• we have not received any leaflet through our door – when will this happen?</li> <li>• we have not received a recent copy of the Marlborough Town &amp; County magazine - when will this be published with the information about MANP?</li> <li>• I have seen no posters posted – I have walked through Manton and I saw nothing and I do not go anywhere else since we are in a national lockdown that asks us to stay at home unless absolutely necessary</li> <li>• If you don't know the web link exists to the MANP site how will you watch the video or attend the zoom calls?</li> </ul> <p>If your engagement and communication to the community is to be sincere and meaningful you cannot open the “consultation” period before people are aware and informed, and potentially close it before people know what is happening. I appreciate Covid complicates things but you need to reflect these extraordinary circumstances and delay the start of consultation until the community can be adequately engaged and extend the consultation period to allow people to manage the complicated situation we all find ourselves in, some facing real risk to health and wellbeing.</p> <p>I would repeat that it was only by accident that I found out about the new MANP and not through any of the means you mention below.</p> <p>I have other points I want to make and ask that I will put into a separate email.</p> <p>I would be grateful for your response to this email.</p>

6	<p>I live at REDACTED.</p> <p>I note on page 23 that the Neighbourhood Plan discusses a proposal to build 50 properties on crown estate land off Elcot Lane and adjacent to the St Johns Park estate. I wish to state that I have no objection to the building of new houses in that area and welcome the Council's proposal for a number of new housing developments in Marlborough, my concern however, lies with the access road to the proposed development being off White Horse Road which I do not believe will accommodate more traffic. Due to limited parking on the estate the majority of households park on the road which results in a single flow of traffic around the estate. I raised the question of lack of adequate parking provision on the St John's Park estate with Wiltshire Council in 2010 and was told that it was to encourage people to use public transport rather than own cars. Recently there has been a large increase in the numbers of delivery vehicles on the estate who quite often have to mount the pavement to get past parked cars (evidence of this can be seen by the damage that has occurred to the kerb edging) I would be very concerned about construction traffic using the estate to access the building site as happened when the St Johns estate was being built although at that time there were no cars parked at the side of the road. I would therefore suggest that a better solution to the problem of an access road through the current St Johns Park estate would be to widen Chopping Knife Lane to the south of the properties that are on White Horse Road ( at the junction of Chopping Knife Lane / White Horse Road) and build an access road to the proposed new development to the east of St Johns Park alongside the current public footpath.</p> <p>I would respectfully request that you give consideration to this matter.</p>
7	<p>Having read the neighbourhood plan and in particular the suggestion under Policy MARL1 and 1 - Land off Elcott Lane, i would make comment that this proposal is not feasible / sustainable. The existing estate where its proposed the access would be off, already struggles to deal with the level of traffic and parking. The current estate is overrun with parking on footpaths creating problems with traffic movement and emergency and refuse collection. Access for another estate would just compound the problem.</p> <p>Furthermore it would destroy an area of outstanding natural beauty, and habitats, and would set a precedent for further development creep in future years into the rest of the adjacent field.</p> <p>The existing Crest site was justified as it was brown field redevelopment of the school....allowing construction on green / agricultural land is poor policy planning.</p>
8	<p>I am a resident in the St. John's estate and live on White Horse Road. I am concerned about the proposed residential development for 50 new homes with the main entrance through White Horse Road. I believe that the infrastructure of the existing road will not support the additional traffic, as it is strained already.</p> <p>Therefore I object to this project going forward</p>
9	<p>These plans were produced and approved in Cherhill. To protect Green Open Spaces, Historic Properties, Natural Hedging, Future Development etc. etc. Then it was discarded and ignored. All that work and money, then no protection at all.</p> <p>This happens across the Country.</p>
10	<p>I am writing to voice the strongest possible objection against the neighbourhood plan proposal to build approximately 50 homes at the bottom of the White Horse Estate. SN8.</p> <p>Further development of the estate would make traffic on the roads unbearable and unsafe. The roads will simply not support further development. Having one access point for so many houses is just not sustainable. In addition this is in an area of outstanding natural beauty, and should be left alone, as an area of beauty for all to enjoy. It is simply not ethical to be developing this location further</p>
11	<p>I wish to register my objection to the proposal to develop the field in front of the White Horse Road estate.</p> <p>The current close knit housing, narrow roads, under estimated parking for residents and volume of traffic along white horse road is a danger to children and other road users. Residents are already breaching conditions that should prevent the parking of commercial vans and lorries. The existing road network on the estate is unable to cope with the requirements of residents. The roads are already littered with all manor of vehicles parked on the roads, across</p>

	<p>pavements, parking on double yellow lines, across driveways and in other ways that would not easily allow for emergency vehicle access. The combination of the current high density living conditions will not cope with any additional traffic that will inevitably lead to increased risk to life and a reduction in the quality of life for existing residents.</p>
12	<p>Just a few points of observation that came to mind while I was looking at the plans for development.</p> <p>Plans for affordable housing :-</p> <p>There have been many initiatives already to provide affordable or social housing (some of which quite old now) that soon become unaffordable within a short time because of market pressures and also home owners extending small properties. Examples such as Rogers Meadow, Rabley Wood, The Mead, Cherry Orchard, Chiminage Close area, The Acres, Cunetio Road, Salisbury Road development flats. Could there not be a scheme to help young people buy within the housing stock that is already built?</p> <p>Building beyond Elcot Lane :-</p> <p>Pushing building development further into this very beautiful valley towards Stitchcombe would be a great shame, especially as Marlborough is within an AONB.</p> <p>There is already pressure to develop green spaces for sport within Marlborough but we also need to leave accessible places to just walk, without the need to always go somewhere in the car.</p>
13	<ol style="list-style-type: none"> <li>1. Conflict between the proposed new developments and facilities for schooling. <ol style="list-style-type: none"> <li>1.1. It is admitted, at 2.12, that St. John's School "...is currently oversubscribed...".</li> <li>1.2. There is nothing in the plan to create additional facilities for secondary schooling in state education.</li> <li>1.3. Despite the total lack of any extra state secondary schooling, the plan proposes approximately 180 new homes. On an average of 2 children per new home 360 extra children will require schooling. Although the need for affordable housing is accepted, how does the council propose to school the additional children that will require education?</li> <li>1.4. If no adequate provision for such schooling is not made, and none is made in the plan, I object to the proposed developments upon the basis that insufficient planning has been made for schooling.</li> </ol> </li> <li>2. Location of new medical centre. <ol style="list-style-type: none"> <li>2.1. The current location of the medical centre is located near the town centre at George Lane. It therefore minimises the need for patients to use a car to attend appointments. This is consistent with seeking to minimise air pollution caused by vehicles with combustion engines.</li> <li>2.2. The location for the proposed new surgery is at Barton Dene, which is outside the town centre. It will consequently require more patients to travel to it by car that will increase air pollution.</li> <li>2.3. The building within George lane car park appears to be used by the Police (despite the fact that the purpose-built police station on George Lane gives the appearance of being unused). Why can't the building within George Lane car park be developed and extended to create a new medical centre within the town centre?</li> <li>2.4. Upon that basis I object to the relocation of the medical centre to Barton Dene.</li> </ol> </li> </ol>
14	<p>I object most strongly to the idea of building on more farmland. Both the Elcot site and the Salisbury road suggestions are prime examples of arable land we need to retain to feed a population post Brexit. These sites should not be considered on that important basis alone. Further to this, we should seriously question the constant demand to concrete over Marlborough-there will always be a demand for housing but the onus is on our council members to question and fight to protect our market Town from urban sprawl. Houses and sites will and do become vacant in due course-we do not need to force the issue.</p>
15	<p>I have also read the Open Spaces report which I can see has been added and would like to point out that Marlborough Youth Football club have 28 teams and not 14 as stated. This could mislead many into believing that we are a far smaller club than we are and that we have sufficient pitches to cater for our size. Also the U17 and U18 teams (2 separate teams) have been placed under MTFC, but are in fact a team under Marlborough Youth Football club and they do</p>

	<p>not have use of the pitch at Elcot lane this season but we hope to negotiate use in future seasons but 5 teams playing on one pitch is a big ask. The U17 and U18s teams unfortunately have travel to play in Burbage due to the lack of pitches in Marlborough, which again highlights the chronic shortage of local pitches for the children of Marlborough and creates barriers to participation, such as travel and additional costs.</p>
16	<p>2.15/p12 Para states: “The community is generally concerned about traffic congestion, parking problems for residents, workers and visitors to the town and high levels of air pollution.”</p> <p>The draft plan addresses this only by proposing an additional car park by the Rugby Club.</p> <p>Whilst the overall plan seems very comprehensive and well researched, there is no response to the issue of traffic congestion. Add to this national policy towards electric vehicles, the whole vital question of traffic management appears to have been ducked.</p> <p>Even if there is a need for further consultation in order to develop traffic management plans, there should be a stated aim within the Neighbourhood Plan to address the issue. Given the evident spatial constraints, consideration may be given to:</p> <ol style="list-style-type: none"> <li>1. Removing parking on George Lane and creating a primary through route along this road including redesign of the London Road/Salisbury Road twin roundabouts;</li> <li>2. Turning Kings Hill into one way uphill only to avoid congestion of traffic coming downhill into the High Street;</li> <li>3. Redesign of the High Street parking to create better pedestrian flow whilst not losing short term free parking (difficult I know, but this is the beating heart of Marlborough, and it must be allowed to prosper); and</li> <li>4. A plan to provide sufficient charging points for electric vehicles within the town and also for bicycle parking – Marlborough should become a trend setter through bold planning.</li> </ol>
17	<p>Due to the fact that most of the area covered by the marlborough map surrounds the River Kennet, proposals should be looked at to avoid the dangers of local flooding. Baring in mind the risk of climate change and increased rain fall over the coming years now is the time to start planning any changes to the river which could affect all our lives in the future.</p>
18	<p>In your publicity for the proposed MMAP, you ask whether there is anything missing. One, very important, item is missing. There is no mention of the road system needed to cope with the current traffic, let alone the additional traffic arising from the additional housing and other new elements envisaged by the MNAP.</p> <p>Currently, Marlborough suffers from frequent blockages because all north/south traffic and all east/west traffic has to pass along the short stretch of London Road and round the roundabout by the war memorial. Sometimes these blockages are caused by roadworks, sometimes by vehicles getting stuck, breaking down or just badly ‘parked’. It has been known to take over three-quarters of an hour to drive from the top of Postern Hill to the roundabout with London Road. Recently, this may have been caused by the roadworks on London Road but there have been numerous similar instances. The situation will only get worse with additional housing in the area.</p> <p>There will be a number of issues concerning the improvement of the road structure. Some may be controversial. But the issue needs to be addressed. I suggest that, as a minimum, there should be a road from the A346 west to the A4 near Manton. This would enable some traffic to avoid the centre of Marlborough.</p> <p>Highways may not be within the direct control of Marlborough Council but there needs to be joined up thinking. To propose a Neighbourhood Plan without dealing such a vital issue as transport is almost a dereliction of duty. Many of the proposals suggested by the MNAP cannot be implemented by Marlborough Council. But, quite rightly, they are still included in the MNAP.</p> <p>The road system is critical to the health (physical and economic) of the Marlborough area. Please include it in the MNAP.</p>

19	<ul style="list-style-type: none"> <li>• The Plan provides good context and recommendations on some of the specific issues we need to address in Marlborough (viz Affordable Housing, Cemetery, etc etc) but to my mind doesn't set a clear vision of how we see Marlborough evolving as a town in the next 15 years.</li> <li>• Before going further we shouldn't lock this to 15 years (2036). The world is moving rapidly – we're becoming digital. This will change all aspects of how we run our lives...we should reflect on this in setting our strategy and plan.</li> <li>• We should start by defining what our objectives are for the Town at a 'macro' level... eg community size, mix, diversity , age profile etc, then articulate what services and facilities we need to be able to offer to meet the needs of this community and address the gaps from where we are today.</li> <li>• For 'services' we need to consider what is 'sacred' and what we can change or develop – what is controllable and what is not.</li> <li>• Most of the specific recommendations in the Plan are 'incremental' rather than transformational for the town. In a way, they are 'no-brainers'. As important to me is what is missing from the Plan and to my mind there are a number of significant elements missing – a consideration of risk (in its different guises), the environment and sustainability in particular.</li> <li>• The single largest gap in this Plan is traffic management in/around Marlborough. There is little mention of this problem and to conceive that a 15 year 'plan' should ignore this issue will make the plan largely irrelevant to the community.</li> <li>• Traffic management is probably the single biggest challenge we face as a community, impacting health, safety, the environment and the sustainability of our town.</li> <li>• The Plan needs to specify the current problems we face and the options we have to mitigate.</li> <li>• We cannot continue to have traffic streaming through from Swindon to Salisbury and along the High Street at current levels. We need some radical thinking on this; to consider all options and a recommendation needs to be incorporated into this Plan with funding and timescales defined</li> </ul>
20	<p>Since this plan involves building in an Area of Outstanding Natural Beauty, I am only prepared to support this on the basis that the scheme will provide a significant amount of affordable housing. This is an essential feature of the scheme and must not be compromised in any way.</p> <p>However, I do have concerns about parking and access for emergency vehicles. The Crest Nicholson development (where my house is located) does not have adequate parking - either on or off road. This new scheme needs to do a much better job of providing proper provision for parking.</p>
21	<p>The team that worked on the MANP are to be thanked for the hours/weeks/months/years of work that have clearly been applied in creating the plan that we now see. It is a credit to their efforts!</p> <p>My comments are as follows;</p> <p>Salisbury Road development – an extra 50 homes</p> <p>This existing development appears to have followed in the footsteps of so many in that it has narrow spine roads which are populated by cars parked on the road or road/pavement. Whilst planners would like to think residents walk or ride bikes, that is not the case and the car remains the number one means of transport. So, adding 50 extra homes at the far end of the existing estate with, presumably, the same spine road forming the means of access, will, I suggest, cause problems to existing and future residents. I have no solution to the problem but it should be recognised for all the developments planned for the town, cars will not disappear overnight. They need parking in either designated spaces or garages. Can the Steering Group build something into their recommendations that all future houses planned with the MANP make allowances for car parking?</p> <p>Maps</p> <p>A general comment – the quality of the maps and plans included within the various documents is very poor and it makes reading and understanding them with any degree of accuracy almost impossible. Can the quality be improved immediately so that residents wanting to comment can see what they are commenting on?</p> <p>Town Centre Development</p> <p>The segregation of the Town Centre for future development is to be applauded as is the informed view that ground floors or central properties can be used for a broad range of commercial, business and service facilities. The pandemic has seen the retail sector destroyed in many places (and potentially beyond</p>

	<p>recovery) which means we need the flexibility to allow town centres to develop in to hubs that are not just retail shops, but centres for the community. As retail moves more and more to an on-line necessity, the MANP recognises that future businesses may not simply be vendors of goods which is to be applauded.</p>
22	<p>I have spoken to REDACTED by phone and email regarding my concerns about pre submission planning and nowhere in your planning do i see anything about the council sorting out the problems about traffic chaos in Marlborough in fact your planning only seems to make it worse,more housing businesses and leisure facilities, which in turn means more cars and heavy goods vehicles, this all contributes to damaged drains and manholes which you the council have to keep repairing and people like me having to pay higher council tax each year to pay for the repairs. People of Marlborough would like to see the council alleviate the traffic chaos by doing one of three things 1 give marlborough a bypass 2 a congestion charge for using Marlborough as a thoroughfare 3 Get traffic diverted to go around Marlborough. There is one other important factor Marlborough has a very high traffic pollution problem and i think the council should take this very seriously.</p>
23	<p>Can you please refer me to the definition of 'Areas of Special Quality' and how these came to be selected? Policy MAR11 I look forward to hearing from you</p>
24	<p>I've been looking at the Plan, and would like clarification on policy re traffic on the A346. I live on Herd St, and the volume and speed of the traffic is intolerable in terms of noise, pollution and air quality. I live in a listed building which the Council quite rightly expects me to treat with care, however it is being shaken to pieces by the traffic. Double standards? Air Quality was highlighted in 2011, coincidentally the year I bought my house, I can only point out that no progress has been made at all, indeed the issue is now considerably worse. Will this road ever be de-primed? And why does the 20mph speed limit in the town not applied to Herd St? There are no traffic calming measures on our street.</p> <p>One other point I'd like to make to the Consultation- in my opinion there are FAR too many retirement homes in the town. If we want a thriving population, the town has to be affordable to the young and those wishing to raise a family here. Genuinely affordable housing should be a priority.</p> <p>Many thanks for listening to my views.</p>
25	<p>On perusing the draft neighbourhood plan for Marlborough I was surprised to see the plot in Kelham Gardens as a possible building site as it has no access unless it goes over our land. The gas works only has permission to access the gasworks for upkeep and the gateway is not wide enough for a road. (The existing gates are actually larger than the actual access)</p> <p>It would be interesting to hear from anyone who has put this site forward as a plot?</p>
26	<p>I write to you with my concerns about the proposed new housing development in the field in front of White Horse Road on the St John's Development. The estate currently struggles with enough parking, with the majority of cars parking along the roadside, causing many problems. Further development of our estate will push traffic and parking issues beyond bearable and access for emergency vehicles would become impossible.</p> <p>In addition to this, this is an area of outstanding natural beauty and we enjoy the field for daily family walks. To think another 50 houses could be built there is very upsetting and disappointing.</p> <p>I ask you to reconsider your planning application taking the above concerns into consideration please.</p>
27	<p>I am writing to express my objections to the proposed development of the field off White Horse Road.</p> <p>As a resident of White Horse Road I cannot believe that this has been a properly considered option, given the already nightmare access issues on the road due to multiple car households and a narrow and very windy road!</p> <p>Why is it that the Council is trying to develop so many AONB areas that are the very thing that make Marlborough so special? The Minal Valley is an</p>

	<p>important archeological site as well as a natural habitat for birds and wildlife and we should be protecting it for future generations, not developing it purely for profit.</p> <p>I understand the need for more houses but surely there are more brownfield sites that have better access and put far less pressure on existing roads and neighbourhoods?</p> <p>Another huge concern for me is that the planned growth in housing (and therefore residents), will place an even greater pressure on the local medical centre which is significantly overstretched already. Growing the town needs to be done in conjunction with a growth of services, not before!</p>
28	<p>In relation to the MANP and the public consultation; I would like to see a single map with all the proposed developments included. I think this would be a really useful way of being able to understand the extent of proposed development in and around Marlborough.</p>
29	<p>Dear Sirs,</p> <p>After watching your video I have several comments to make.</p> <p>I have lived in Marlborough for a relatively short time, since 2017 on the High Street but have seen significant changes.</p> <p>The parking situation is getting worse. The provision of just 60 spaces is not worth mentioning. Without parking visitors from short or long distances will not come, therefore cutting spending on the High Street.</p> <p>It would seem to me that a few of the local businesses use the only parking spaces so they don't have to walk far, thus robbing yet more spaces.</p> <p>Pollution is significant from the amount of heavy goods vehicles coming through the centre of town and as these get bigger and heavier they cause more damage to the historic buildings which were not built to withstand such stresses, they are being shaken to pieces!</p> <p>A long term plan for taking traffic away from the centre needs to be thought about now.</p> <p>The medical services provided by the only doctors surgery are shockingly bad. The old police station would be much better as a proper medical centre with the space for more doctors and parking. With such an elderly population no more over 55 housing should be granted. This too is more of a strain on the medical practice. I personally feel that there should be incentives offered for another medical practice to open so that healthy competition could start.</p> <p>There are four dental practices!</p> <p>The pavements are in a shockingly bad state of repair and should be addressed at the earliest.</p> <p>In this lock down time of social distancing, some places have spread out onto the pavements with little regard to the elderly, disabled and young families with push chairs. This should be more closely monitored.</p> <p>If Marlborough's High street dies it will become a sad, dead place.</p> <p>It would be nice if Marlborough College could let the town use more of its sporting facilities.</p> <p>Affordable housing should be included, but as it's such an expensive town, it's going to be difficult to provide this along with all the infrastructure needed.</p> <p>All this said, I feel privileged to live here and think that Marlborough has an enormous amount to offer but very careful calculations have to be made to preserve that.</p>
30	<p>We would like to raise concerns about some aspects of the proposed Neighbourhood Plan for Marlborough.</p> <p>The development of a new large car park by the rugby club seems contrary to national commitments to reduce carbon emissions and impossible to justify in the current climate. Instead of encouraging people to drive into a market town, the focus should be on improving the public transport services and cycling routes which at present are very poor. The proposal is disappointing and appears backward thinking in current times.</p> <p>The proposal to build a new larger medical centre does not take into account the changes to medical care brought about by the Covid pandemic, and the proposal now needs to be robustly reviewed in light of the changes to healthcare over the last 12 months. As NHS workers it is clear to us that services will not return to the previous model and it is very likely that the need for consultation space will reduce, with many primary care contacts continuing to be provided remotely.</p> <p>Thank you for your consideration</p>

31

Hi, I would like to comment on the plan to concrete over the fields between Marlborough and Minal. My suggestions are

- Looking at White Horse Road and Vespasian Road at present after say 18.00 in the evening they are car-dumps. As the planners made the roads so small cars are dumped on pavements.
- Travel from Chopping Knife Lane down to Cuneteo Gardens after 18.00 and the concept of a single-track road becomes self-evident. Checking the situation [ when things get back to normal ] at 10.30 or 14.30 will be a simple waste of time and effort and will produce a false reading.
- ‘ Affordable housing ’ generates just as many cars as ‘ non-affordable housing ’ meaning another few acres of concrete will generate for 50 houses, but will generate maybe 100 [ or maybe more ] cars and the dreaded white-vans.
- An additional 100 -à 150 traffic movements per day will be generated on the tiny [ what are effectively ] single-track roads.
- ‘ Single-track ’ because although some houses have two garages [ which are usually full of junk moved from house to house ] people dump their cars on the road. This is because even if there is a designated car parking space for ONE vehicle it means an extra 3 yards walking to get to the car - so it’s easier to dump it on the road somewhere , anywhere and not necessarily outside your own property.
- On more than one occasion when going to work in the early morning along Vespasian Road I have had to weave between cars, negotiating a gap through which it would have been impossible to take a fire engine and possibly just OK to squeeze an emergency ambulance between. If the gap finally gets just too small, the vehicle is simply dumped / abandoned on the pavement instead.
- It is illegal to park on or near corners – or at least it was when I took my driving test. That is of course ignored to create the single-track roads. As there is no enforcement.....who cares?
- Extra movements will be created along the single-track Chopping Knife Lane between Minal and Marlborough . Cars already ‘ shoot ’ along this popular walking and cycling destination. Drivers get very upset if they have to slow down to avoid hitting cyclists.
- One question would also be ‘ why do we want another 100 cars joining the [ normally ] clogged traffic in Marlborough. We have a 20 mph speed limit which, for lack of enforcement is largely ignored.
- 100 extra vehicles per day exiting and entering the A4 will also cause issues given the 30 mph speed limit is very largely ignored – even by 40 tonne trucks and buses anxious to get as much momentum as they can before they hit the Savernake hill.
- As I walk the dog down to Marlborough on the A4 I see an increasing number of vehicles overtaking those who are ‘ stupid ’ enough to obey the speed limit. Vans and old cars driven by youths seem to be the biggest offenders.
- Those coming down the hill into the 30 limit also very largely ignore that, save for the odd occasion when the dwindling number of Police are around.
- Average-speed cameras between the Roebuck and Barnfield would, I reckon, soon pay for themselves.
- The 20 mph speed limit along Chopping Knife Lane is very largely ignored. If I drive at 20 and have a vehicle behind me they’ll often close right up on my tail because I have the temerity to obey the speed limit.
- If there is a walkway through from Elcott Lane one can easily foresee some cars being dumped at the tile factory until such time as the Crown Estate also turns that site into more houses.

Probably the worst ‘ offence ’ of all would be the turning of what is a magnificent vista and an area used by hundreds of people very week into concrete, creating more pollution, blocking the vista and putting onto the site tightly-packed crummy houses which do nothing to enhance the life-balance of those in Marlborough.

The bigger question would be ‘ why does the pleasingly compact town of Marlborough need more inhabitants? ’. We don’t need more supermarkets. We don’t need EVEN MORE coffee shops – especially those who open without planning permission and say to the Council ( a la Clint Eastwood ) “ take us to



Court if you feel lucky punk “ . We don't need more posh-frock shops which close when the new rate demands hit the mat.

Who is it who lives IN MARLBOROUGH who considers there is a need to increase the population, the traffic, the pollution and the pressure on school places ?  
One assumes not those who will be living in the newly created car-dump?

A resident of Minal told me [ this is a first-hand account from a Christian gentleman] he applied to erect some affordable housing in the village but was ‘ told by the Tory County Councillor ‘ you need not apply, you won't get it ‘ . If the result of the “ consultation “ has, like the Minal example already been decided by those who do not actually live here then.....please ignore all the above.

32 PRE-SUBMISSION MARLBOROUGH AREA NEIGHBOURHOOD PLAN (MANP) open letter from sports clubs

As Chairs of the major sports clubs in Marlborough we are submitting a joint communication regarding the Pre-Submission MANP which was recently issued for public consultation.

In the video introduction to the MANP the Chair of the Steering Committee states that “it’s very important that we introduce our young people to sport at an early age and give them the facilities to participate”. The MANP web site further suggest one of its aims is to meet the needs of the community for “sports facilities”.

However, the 70 pages of the MANP references “sport” only once and that is, ironically, in the context of the Steering Committee having received “clear direction of what was important [including] improvement of local sports facilities”. In addition, on 18th January 2021, the Full Town Council meeting resolved “to increasing sporting facilities where possible”.

We note the consultation exercise undertaken with a limited number of local sports clubs whose feedback is included in the Steering Group Working Document entitled “Open Spaces in MANP Parishes”. It is interesting to read of the club’s plans for future expansion but disappointing to read the conclusions in the report. “Following.... initial public consultations... the call for land ...was not fruitful in identifying suitable land for improving local sports facilities. The cooperation between clubs and other organisations in sharing facilities is, at present, the only way forward.”

Whilst local landowners have not been forthcoming with offers of land, we do not believe this should be the end of the matter as far as the MANP is concerned, for three reasons:

1. There are two obvious sports proposals currently being considered by the Town Council, notably a request for an additional training area on the Common and a new sports facility at St John’s Academy. Both these proposals were discussed at the Full Town Council Meeting of 18th January 2021. We believe both should be referenced and supported in the MANP.

2. We also note that a number of Policies contained within the Plan talk about “protecting” assets and facilities within the town – MARL9,15,16,17 refer. We are of the view that the MANP should add to these policies with the addition of one to be called “Protecting and enhancing sporting facilities”. Preserving the sport facilities we have now is equally as important as the other assets the MANP now rightly seeks to protect.

3. Regardless of land being available, we are disappointed that the MANP sees cooperation between clubs as the only way forward. For us, the MANP is as much about the Town Council showing clear leadership as it is about how many houses will be built in the town. By omitting sports facilities from its myriad of policies, we believe the Town Council is abrogating its’ leadership role in local sports. We suggest that the addition of a sports policy would recognise the importance of sports to the Town, whereas the omission of such a policy would relegate sports to a position of secondary importance which we are certain is not the intention.

We would urge the MANP Steering Committee to recognise the important role sports clubs play in the physical and mental well-being of the local community – as highlighted by the current pandemic

- and to be more ambitious in their plans for the Town’s sporting community through to 2036.

We believe the draft MANP is weakened by the omission of any plans for sport, but we would be happy to redress this by working closely and speedily with members of the Steering Group to help formulate a sports policy we believe is essential if the MANP strategy is to deliver on the objectives the Plan seeks to achieve.

Yours sincerely (as Chairs of the following Marlborough sports clubs)

Stuart Slater Roger Wheeler Glenn Blankley Paul Warren Jamie Hughes  
Youth Football Tennis Golf Junior Athletics Football

Jamie Tunmore

Chris Jones

Gary Sharp

Simon Wells

Cricket Hockey Rugby Marlborough Sports Forum

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2.14 This section acknowledges that the main transport routes through Marlborough are the A4 road which runs east/ west from London to Bath and the A346 which runs north/south connecting the south coast ports and the A303 arterial route to the M4 motorway and beyond to the Midlands and the North of the country. Despite the increase in housing that the plan proposes there is no mention of any improvement to the already inadequate road infrastructure (Viz Herd Hill reputed to be one of the most polluted roads in the country).

2.19 This section acknowledges the inadequacy of current car park facilities. The only proposal for additional parking space is unsuitably located at the Rugby Club a long way from the Town Centre and not near any facilities that visitors are likely to want to visit – apart from the Rugby Club itself. Access to the Rugby Club car park is only through a narrow road from Free’s Avenue (the north-eastern end of Hyde Lane), or by Hyde Lane coming up beside the College playing fields, and then by a very narrow access leading to St Luke’s Court which is already used for car parking. These access routes are narrow. No mention is made of the need to improve them nor of the further resultant encroachment on the Common.

2.20 This section acknowledges that “Marlborough is now mostly a dormitory town”. The plan does not contain any proposals that are likely to create additional employment in the town. Conversely the additional housing / population will only serve to increase the amount of commuting from Marlborough to areas providing employment e.g. Swindon, Salisbury or Newbury (not exhaustive).

3.4 Core Policy 1 “Directs significant development that will increase jobs and homes in the town to help sustain, and where necessary enhance, services and facilities to the town”. The plan presents no evidence that the proposals will increase jobs in the town.

Core Policy 14 “Sets the community area housing requirement figure of 920 new homes, with 680 directed to the town of Marlborough”. Without any evidence of the creation of new employment the influx of population will only lead to a dramatic increase in commuting and will perpetuate Marlborough’s function as a “Dormitory Town”. The resultant increase in commuting will contribute to carbon emissions and congestion on the already inadequate road network.

No mention is made anywhere in the plan for proposals to increase the capacity of schools to accommodate the influx of children that will inevitably result from the provision of extra housing.

4.1 / Policy MARL 7 “Improving Public Parking

Para 4.1 States “Open spaces are valued and should be protected from harmful development” / refers to “Maintenance and improvement of existing green spaces” & “Lack of parking for visitors and workers”.

MARL 7 states “Improving Public Parking.

A: The Neighbourhood Plan allocates land adjacent to Marlborough Rugby Club .... For an informal public car parking space.

B: Proposals to establish additional public car parking spaces to serve the town centre at other suitable locations in the town will be encouraged”

The proposal acknowledges that the land adjacent to the Rugby Club is a ten minute walk from the Town Centre. Many visitors will be unwilling to walk for ten minutes and will take their business elsewhere or will e.g. continue to double park on the High Street outside Waitrose.

There is no proposal for any additional open space to be added to compensate for the loss of space on the Common resulting from the expansion of the

current informal car park at the Rugby Club, nor, for that matter from the authorisation of an additional Rugby pitch on the Common or the expansion of the Cemetery onto land between the existing cemetery and Frees Avenue.

Consideration should be given to developing the existing car park behind Waitrose into a low-level multi-storey (e.g. two storey) car park. This has the merit:

- Of being in a space already used for car parking
- Does not destroy an existing green space
- Of being adjacent to the Town Centre i.e. where visitors to the Town Centre want to be
- Could generate extra income from parking fees

i.e. as referred to in para 5.2, and as opposed to the proposal to expand the Rugby Club car park, has the merits of:

“Maintaining and enhancing the Town Centre as a successful service centre”....

“Protecting and enhancing the area’s most valued open spaces”

5.2 and Policy MARL 10

Para 5.2 refers to “Conserving and enhancing our special heritage assets”... Policy MARL 10 refers to “Enhancing Marlborough Conservation Area.

Development proposals should sustain and enhance the special architectural and historic significance of the designated Marlborough Conservation Area and its setting.”

The present parking facilities in the High Street with parking on both sides and down the centre of the road, detract from the “Special Heritage asset” that is our High Street. A bold move would be to widen both the north and south side pavements at the east end of the High Street (from approximately opposite Waitrose and in the direction of the Town Hall). Parking in the centre of the street in this area to be deleted, and cafes, pubs encouraged to put tables and chairs on the widened pavements in the style often seen in French villages and towns (enhanced by planters and gazebos for weather protection). Road safety would be improved by accommodating the market on the widened pavement rather than in the centre of the road. Increased car parking provided by a low-rise two storey car park behind Waitrose would accommodate the vehicles displaced from the High Street.

There are in the town still a small number of Victorian era cast-iron lampposts. There are (not necessarily an exhaustive list) two on Kingsbury Hill, one on The Common, and one on one of the alleys leading from the High Street up to Cross Lane. These all lie within either the Conservation Area or the newly designated ASQ’s. All are in a sorry state with chipped paint showing multi-coloured undercoats and rust. The lamp fittings have been replaced at some time in the past with incongruous, inappropriate and insensitive modern fittings. A coat of paint and retro-fitting with more appropriate and historically correct (modern) lamp fittings would enhance their appearance immeasurably. (French villages always seem able to source appropriate reproduction fittings. Why can’t we?) This would be a small but not insignificant contribution to “conserving and enhancing our special heritage assets. In due course this policy could be extended to replacing the other modern lampposts on Kingsbury Hill and elsewhere with reproduction Victorian lampposts more suitable to the setting.

3. Land at Barton Dene. Provision of a new medical centre to serve the town.

Whilst an enlarged medical centre may be warranted, no mention is made in the proposal of the provision of parking facilities. Many patients – including the elderly and infirm – will need to be transported by vehicle to the medical centre. It would make no sense to have a new facility, which is further from the town centre, without providing any parking facilities.

34	<p>P19: “Improved access to the countryside through enhancing the existing network of rights of way, footpaths and cycle ways and new public open spaces” is listed as one of the key issues that local people wished the Plan to address. We welcome this and strongly support it. Policies MARL15 &amp; MARL16 do indeed deal with the need for more public open space. However, apart from a brief mention of “off-street footpaths/cycleways” in MARL15, there is no policy to reflect the importance of improving the rights of way network. This is a significant omission which should be rectified, either through a new policy or by expanding the scope of MARL15. For example, there is a clear need for off-road links between the Chiseldon to Marlborough Railway Path and the town centre to be improved, particularly at the southern end, including better signage.</p> <p>Housing developers should be expected to make a contribution to network improvements either financially or through off-site works.</p> <p>MARL 1 23 Land off Elcot Lane. We welcome the reference to retention of the PRoWs. The need for compliance with para 7.8 of DEFRA Circular 1/09 (avoiding re-routing of RoWs along the footway of estate roads) should be added. There are minor errors in path numbering: MARL37 should be MILD37 and PRES32 should be deleted.</p> <p>24 Land rear of Salisbury Road. Footpath MARL36 runs close to the south-western boundary of this site. Descending on this footpath offers good views over the town but it has a dangerous exit point on the A345 Granham Hill. We would like any development on this site to make provision for a link to this footpath, to provide both a route into the countryside for new residents and a safer route into the town for other footpath users.</p> <p>25 Land at Barton Dene. Bridleway MARL43 runs through this site and part of bridleway PRES32 runs along the northern edge. As with the land off Elcot Lane, the policy should include the need to retain these PRoWs and for Circular 1/09 to be complied with.</p>
35	<p>We are writing to express our objections in relation to the MANP produced in January 2021. We List these concerns/objections below.</p> <ul style="list-style-type: none"> <li>• Wonderful vistas that are currently enjoyed by St Johns Park will be permanently and irreparably damaged.</li> <li>• We do not believe there are any exceptional circumstances to warrant building on an AONB.</li> <li>• There is already restricted vehicle access to site, with the amount of additional cars parked on the side of the road, due to lack of parking.</li> <li>• Impact on biodiversity, wildlife, bird and river habitats (page 47 section 5.54, 5.56 &amp; 5.57 of main doc)</li> <li>• There will be additional run off created from a new development, which will impact the biodiversity and level of pollution into the water course and water meadows.</li> <li>• The river runs at less than 50m from the end of the narrow part of the field being considered for development. Which will cause issue for people trying to insure their homes.</li> <li>• A 2012 study rejected the site for housing development.</li> </ul> <ul style="list-style-type: none"> <li>• We would challenge SA site assessment impact ratings marked as “Uncertain effects” for biodiversity, climate change and land,soil &amp; water resources – even after mitigations these will be detrimental.</li> <li>• The Plan appears to be reactive and opportunistic and not strategic, in so much as wherever we can get land to build rather than where we want to build for Marlborough over the long term.</li> <li>• The document: “Supporting Statement on Housing Proposals (January 2021)” has already identified that the objective of “Affordable housing” will not be met. “Affordable in planning terms will rarely mean genuine affordability when compared with local incomes”.</li> <li>• The Community requested, preservation of Countryside (page 19 of main doc) -specifically: “Open spaces are valued and should be protected from harmful development” and “Maintenance and improvement of existing green spaces” and Conservation and Heritage - specifically: “Protecting local areas of outstanding natural beauty, specifically the Rivers Kennet and Og and their associated water meadows”</li> <li>• MANP vision statement (page 21 main doc): “The landscape and its easy accessibility together with the protection of the natural and historic environment</li> </ul>

	<p>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”</p> <ul style="list-style-type: none"> <li>• Saved Policy HH10 – identifies an Area of Minimum Change along the River Kennet through the town (page 17 main doc).</li> <li>• Why did Preshute parish council withdraw – is this Preshute gaming the system to avoid building on Barton Dene site?</li> <li>• If the proposal or part of the proposal is voted against during the May 2021 Referendum, will the proposal or part of the proposal be dropped?</li> <li>• How effective was the recent housing development off Salisbury Road in providing affordable housing (page 14 main doc)? Where is the study to show what lessons were learnt from prior housing developments in Marlborough if they did not meet the affordable housing needs of the community as appears to be the case? More development following the patterns and approaches of the past will again fail to meet the local needs and simply draw more people into Marlborough from elsewhere, creating even greater strain on local infrastructure, services and amenities.</li> <li>• The local infrastructure we don’t believe is robust enough to cope with another 180 houses, with St Johns already nearing (if not already) capacity. The local doctors surgery already struggles to give people appointments within a week. The roads, are poorly maintained and the additional traffic will not help with that.</li> <li>• The countryside is a finite resource, we should be using as a last resort for development. We should be avoiding green field sites and favouring brownfield sites often with old buildings that stand empty and underdeveloped, and are therefore crying out for redevelopment.</li> <li>• Decarbonising and adapting the UKs housing stock is critical for meeting legally binding emissions targets by 2050 and preparing for the impacts of climate change, has this been factored in?</li> <li>• Are the homes that could potentially be built zero carbon to adhere to code level 6? The total carbon footprint of building a new house is nearly 56 tonnes. Therefore, to build a new house would emit the same level of carbon dioxide as nearly 5 UK residents.</li> </ul>
36	<p>I have read the Marlborough Neighbourhood plan and have concern at the need for the stated quantity of house developments in an already, overcrowded town. I felt this when the college tried to leverage the space between College Fields and Barton Park. Certainly, a small number of ‘only’ affordable houses (say 50) for young individuals to ‘get on to’ the housing market would be beneficial but anymore I feel are un-necessary. There has been plenty of house building already for the area and I can see no significant industrial growth of any type in the town (which would necessitate building more homes) or in fact the ability to be able to accommodate such industry. The town car parks are full, heavy lorries come through the town, too many in my view, which must impact the air quality in the town and area. Further, I see no benefit in building a new doctor’s surgery. Why can’t the current surgery be extended, to include the Pharmacy, there is after all a large car park metres away. Car park at the rugby club? Do not have a real view on this but seems a long way from the town. Council would be better placed adding toilets for visitors and reducing parking fees to encourage more visitors for our shopkeepers and paying for the installation of road side Diesel trackers on the entry roads to Marlborough for lorries and an additional charging regime for these large vehicles, many of whom just take a short cut through the town!</p>
37	<p>Marlborough is constrained by its environment making any development difficult so the MANP team have done an excellent job in the circumstances. The loss of Preshute is a big disappointment as the green field site behind Barton Park and College fields remains uncertain although access to this site would be difficult.</p> <p>1. Major priority for the town is healthcare. The proposed new medical centre does not have parking so where will the staff and doctors park? The age profile of the town means that people will need to attend with carers who will need to park somewhere. Priority is a site with parking such as the old police station or extending the current site and providing parking permits for staff in the public car park. Also why not site the new medical centre by the Rugby club which will then have car parking on site and take away from the town centre. Clever design should enable a “drive through” enabling older people to be dropped off and picked up later.</p>

	<p>2. The proposed car park by the Rugby club will also suffer the same consequences. The walk down Kingsbury street is steep and will only suit mobile visitors and not the majority of visitors from outlying villages who shop in Marlborough.</p> <p>3. Much of the affordable housing let by Aster in Mildenhall and at St Johns has not been used for local people. Instead people from other areas have been allowed to move here including in some cases people with criminal activity. Therefore we do not need more houses beyond the existing commitments of 440.</p> <p>4. Could some of the affordable housing be reserved for key workers such as recently qualified doctors and nurses who are badly needed in the town but who find it difficult to find somewhere to leave in the early years of their careers?</p>
38	<p>Following your pamphlet that arrived through my letter box I wish to make my following points that I believe to be relevant.</p> <p>I have lived here for only 4 1/2 years and love every minute of it here in this special market town of Marlborough BUT the town does have its issues. I believe the first problem to be addressed is our Surgery. We keep having more housing for retirees (I am one of them) but to receive help or get an appointment at our surgery is near impossible. Although I have had a flu jab for the last few years I didn't receive a letter, the receptionist would not even discuss the matter and the Pharmacy had run out of vaccines in October. Do you really believe it acceptable that to go to Morrisson's SUPERMARKET in Devizes to be the answer. I don't. That is only one of the problems. Those who are lucky enough to be with Ramsbury or Burbage have non of the problems that we do. I respect our NHS to the hilt but the Surgery is an utter disgrace.</p> <p>Secondly, at your meeting in The town hall, probably now 2 years ago, the parking survey stated Marlborough was one of the worst towns in the country for parking. The survey had been conducted during a heatwave and the normal number of people shopping would not have been near the normal capacity of shoppers in the town. It was stated the problem would be addressed but nothing has been done and there has never been any mention of any improvement to permit parking for residents which I believe should be looked at. I am lucky and have a parking space but neighbours and friends who pay for a permit at times are then unable to park once leaving their space especially on market days and around Christmas.</p> <p>Your mention of the new rugby pitch..... I don't think anyone would object to add any extra opportunities for activities as we are all so spoilt having The Common to enjoy in many different ways but don't you honestly think one should get the priorities in the right order. We need to protect our town and high street and to bring as many outsiders in as possible not put them off before they've started to part with their pennies.</p> <p>And, please, can the Wiltshire town Council at least try and help, on our behalf, with the problems of our surgery here.</p>
39	<p>With regards to the land 'rear of Salisbury Road' (see map below). I can see that the access is showing through the new Marleberg Grange housing estate.</p> <p>I realise that this is just at the 'proposal stage' but I would like to strongly object to this access point because not far from the access point shown on the map is the old railway tunnel. The tunnel is a massive hibernation site for many bat species. Also, the old railway line, which you plan to put a road through is an important commuting route and foraging area for the bats. To say I was surprised to see this access point was an understatement, considering this has all been looked into on the Marleberg Grange planning application by the Senior Ecologist. To further develop this area and destroy the old railway line, that is frequently enjoyed by many walkers as well as the bats, dormice and other wildlife would be appalling. With the dormice being another protected species. May I ask why access would not be from the Pewsey Road/Granham Hill (A345)?</p> <p>I would also like to point out that the roads through the Marleberg Grange estate are rather narrow and the main access route showing on a tight bend. I believe this is totally unsuitable as the roads are not designed to deal with traffic to and from a further 50 or so houses.</p> <p>I look forward to your response.</p>



40	<p>I have read the Neighbourhood Plan with interest having been a resident of Marlborough for the last 10 years and the local area for 10 years before that. I live on the St Johns Park development in the town.</p> <p>In general I think that the plan has sound principles and objectives. I agree that we do need to ensure that there is more affordable housing to avoid the town turning into a retirement theme park for the well off. However, the current infrastructure of schools, roads, parking and medical facilities is insufficient for current needs, let along the vast increase in residents that will come from the hundreds of new houses that are proposed in the plan. Schools are all vastly oversubscribed and it currently takes about 3 weeks to get seen by a doctor at the medical centre. The Plan talks about these facilities being increased/renewed, but by how much, where, and by when? Where will the money come from in the post COVID recession that will take years to pass? None of these issues are addressed by the plan. We should therefore not be building any further significant housing until firm, fully funded plans are in place to meet current needs and meet increased demand.</p> <p>I want to give my views specifically on the proposal to build 50 houses off Elcot Lane (Page 3 of the Plan). As a resident of the existing development, I can tell you that the proposed access road to the new section is narrow, clogged with parked cars, has blind corners, is twisty and impassable in icy/snowy weather due to the slope. To think that this road (and its eventual exit out onto the A4 at Chopping Knife Lane) are to be the sole access/egress to the new development is frankly very worrying from a public safety perspective. More cars (assuming 2 per household..100 extra) and delivery vans will be coming in and out every day, posing a threat to pedestrians, children using the playpark, and other drivers. The road infrastructure here is simply not good enough to support additional use, let alone provide the safe access for every construction vehicle during the build period, which will be noisy and intrusive for locals.</p> <p>So in conclusion my views are yes to building more housing, but only if facilities are already in place to support it, and place the houses in sites where transport/parking/access are not major issues.</p> <p>I would welcome the opportunity to meet anyone from the council to discuss the specific issues around the Elcot Lane development as this becomes near to consideration.</p>
41	<p>Medical Centre - to work well this should be in the centre of Marlborough with parking immediately adjacent. Either by expanding the existing site, or by converting the police station. The police station would be ideal, as it has parking, and would need relatively little conversion work. That parking would free up some spaces from the pay and display next to the Kennet which are currently used by people visiting the medical centre. The police station would also be spacious enough to allow other medical services to be provided in the one building.</p> <p>Putting a medical centre in Barton Dene would have the following disadvantages;</p> <ul style="list-style-type: none"> <li>- Not central</li> <li>- Poor access, and with a lot more traffic in and out than housing requires</li> <li>- Nowhere to park anywhere close</li> </ul> <p>Barton Dene and the connected sites (565, 3526b, 3626a) all suffer from a significant access issue, requiring a road to be driven through the college. As this valley runs NW to SW it would have only a small profile from across the Kennet Valley. It could therefore be used for a small number of houses with larger gardens without requiring a significant upgrade to the access, or causing air quality issues that a larger development would involve. Clearly this then puts pressure on other sites to pick up the affordable housing numbers.</p> <p>The land at College Fields (3622, 3326) has major access issues, and is at the top of the hill. The existing houses stop where their ridgelines remain below the top of the hill, and some are dug into the hillside to achieve this. Opening this area to development effectively ends Marlborough as a town built sympathetically into the Kennet valley and makes it a blot on the horizon viewable for miles around, particularly from the Ridgeway.</p>

MA1, 660, and 661 my only observation is that a good amount of space should be included around properties, and the temptation to cram in as many as possible should be avoided. 660 and 661 should perhaps have a new playpark and recreation area down by the river, to create a more attractive place to live. Parking on the Common is not a great solution due to the access issue, maybe a small number of free spaces with 3 hour parking might be provided. As noted above, the police station idea would provide some spaces. The issue that this is really bringing up is that the topography and location of Marlborough really do allow it to easily grow significantly. To grow more either requires a significant upgrade in the connecting roads, or a wholesale abandonment of the planning approach for the area and the construction of a large industrial and office development.

We would like to highlight the following points with regard to this proposal: -

Policy MARL1: Delivering Affordable Homes in Marlborough

1. There is no requirement for additional houses as the present proposed projects fulfil the local requirements and targets set.

3: Land at Barton Dene

1. Page 25 This development would be building on a green field site and contrary to the established principle of using brown field sites.

The map on page 25 used to illustrate this proposed development is misleading. There is an area on the map which is outlined, but it is not specified as to what it is. From our knowledge, it is an area that was set aside temporarily for construction traffic to use for the duration of the build of Dancy House. Indeed, it still has the signs for the use of Feltham Construction traffic parking at its entrance.

Marlborough College agreed when the planning was granted for Dancy House that this particular area would be returned to its original state i.e. green field. This has not happened and it is now left as an eye sore in a beautiful natural area.

This is disappointing and is misleading as it gives the impression of being a brown field site. There should be no outline on the map as nothing existed on the field before this temporary parking site.

2. The most concerning part of this proposal is the question of access to this land. It is noted that this has not been addressed within this neighbourhood plan. All the other proposals within policy Mar1 have clear details on the main highways access. It is glaring in its omission from the College Fields/Barton Dene proposal and is most concerning to local residents.

Our concern is that any access to this land would increase the volume of traffic, would increase congestion, noise and air pollution. The College Fields/Barton Park estate roads are not designed and were never intended for such an increase in traffic and this would raise serious road safety concerns.

Why has the important point of access to this parcel of land been omitted?

How can local residents form a view when we do not have the full information?

This rings alarm bells when things are not transparent.

Continued on next page

3. On the question of a new medical centre, the land at Barton Dene is not accessible to the majority of the patients which would use it. It is a wholly inappropriate location. College Fields is already busy with a narrow and twisty estate road used by local residents, the public visiting the Marlborough Leisure Centre, Marlborough College staff, pupils and visiting parents, and the children's nursery. Not to mention high levels of road side parking by people working in the town.

It appears that no parking spaces are proposed for the new medical centre. Obviously, parking would have to be provided so what consideration has been given to this?

It is more sensible, financially more viable and environmentally preferable to improve the existing medical centre, which has close access to the Skurry's George Lane car park. An improved medical centre on the current site could also incorporate the adjacent pharmacy. It would be inappropriate to develop the current medical centre site for even more unnecessary housing.

If it is deemed essential to have a new medical centre then the Police Station site would be an ideal location. It is centrally located with ample room for parking and close to the existing medical centre which has served the town well over the years.

The Police Station site would be easily accessible to all patients who need to visit.

Unless the funding for a new medical centre is in place and ensured then no development of any kind should take place at all at Barton Dene. It is one thing to offer a piece of land at reasonable terms, but an entirely different matter to have that offer taken up by the appropriate body who will guarantee the funding.

Policy MARL7:

Improving Public Parking

1. Page 34 Due to environmental and air quality concerns, it seems strange to be encouraging the use of private vehicles by providing more and more parking spaces around the town. This is contrary to having a greener, cleaner, more sustainable future. There are air pollution limits which we are in parts of the town already exceeding.

Walking, cycling and the use of public transport should all be encouraged rather than trying to provide more car parking.

	<p>Marlborough Tennis Club is disappointed that the draft Neighbourhood Plan contains no objectives or policies for protecting and developing sports facilities in the Town. We find that omission remarkable given the growing recognition of the role that sports can play in maintaining and improving the physical and mental well-being of the community.</p> <p>The Club wants to play an active role in encouraging people from all walks of life, of all ages, sexes and abilities to participate in tennis and would welcome the support of the Town Council - through the Neighbourhood Plan – in reinforcing that intention with clear policies that recognise the importance of tennis as part of the local sporting landscape.</p> <p>We note that the Plan has an ambition to grow the number of houses within the Town by a significant number, a move that will inevitably lead to increased pressures on local services including the sports facilities within the Town. Whilst the Tennis Club’s facilities at the Golf Club are still relatively new, we have seen membership and court bookings grow rapidly and we have plans to grow the community’s involvement in tennis even further, so that optimum use can be made of our existing 6 courts. Adding more households to the Town will inevitably lead to even more tennis playing families who we will be pleased to welcome.</p> <p>Whilst the Club in its current home is in its infancy and we have no immediate plans to grow the number of courts, we have a view that our future requirements (unspecified by date but probably well before 2036) may need to include an expanded pavilion, Padel tennis development, and short tennis courts for walking tennis and junior coaching/playing. For now, we certainly want to protect what we have created and we would want the Neighbourhood Plan to recognise and support the future expansion of our facilities.</p> <p>We note that one of the Plan’s supporting documents (referencing the consultation with some local sports clubs) records the specific plans for more and better facilities that many local clubs wish to pursue. Whilst there are no defined future plans for the Tennis Club for now, we would wish to see a Plan that protects what we have and recognises that expansion may be a necessity in the future as demand increases.</p> <p>Yours faithfully, Marlborough Tennis</p>
43	<p>to whom it may concern: with a lack of roads and despite proposed paths the different parts of Marlborough are becoming more and more remote from each other; they mainly access each other by going into the centre of town by car; maybe I missed it but a more adventurous plan could link the areas; for example, access from Five Stiles Road area to Tesco’s/business park was promised and is badly needed; access from StJohn’s area and the west side of town could be achieved. Several families living in the new estate opposite Tesco’s have enrolled children at Burbage because it’s quicker and easier to get them to school there than going to St Mary’s! Maybe the residents of the proposed houses at Elcot Lane will choose to send children to Ramsbury! I think this is worth a harder look. It is a shame to have Marlborough divided in this way.</p>

44

Please consider my comments below in relation to the MANP Consultation, which relate entirely to the proposed housing development at the land off Elcot Lane:

Proposed Housing Development off Elcot Lane

I strongly object to this proposed development which I believe will be detrimental to Marlborough for a few key reasons as follows:

- Unique Area of Natural Beauty

The open field that currently exists on the site is enjoyed by many residents both in the immediate area, and in the wider community around Marlborough and Mildenhall. This is from both the perspective of the view and landscape, and also as a very well used walking route. It should be seen as a strategically important site of natural beauty. The proximity to the edge of town makes this area a significant asset in terms of natural beauty, and is enjoyed by many walkers and local residents on a daily basis. Removing this will feel like an act of vandalism, and it cannot be replaced or compensated for. The other sites under consideration at Barton Dene and Salisbury Road in particular do not have anything like the same impact on the environment.

- Contradiction with Stated Aims

On page 19 of the MANP document it states that 'open spaces are valued and should be protected from harmful development', and on page 21 it states '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'. I fear that the council has perhaps not appreciated the value of this particular open space to residents nearby, and to people in the wider area. It is not 'just a field', and its contribution to the environment is considerable, both in terms of the landscape and also in supporting nature. Removing it would directly contradict the stated aims of the MANP. In addition to build upon areas of outstanding natural beauty and greenfield areas should require 'exceptional circumstances', and there are no such exceptional circumstances described to support this development.

- Biodiversity

This proposed development would have a significant impact on wildlife, bird and river habitats along the river Kennet valley. The local woodland habitats and the River Kennet wildlife would both be significantly impacted by a development on this site. In addition to birds of prey, slow worm, vipers, grass snakes, field mice and bats are all observed in this area, and would be impacted hugely by a new housing development on the site.

- Traffic Impact

The proposed access route to the site does not appear to be feasible. The proposed access road is a very steep and narrow road leading down from Chopping Knife lane that already becomes very congested with local residential traffic and the increasing number of delivery drivers. The consequences of using this road as the access route to the new development for 50+ houses would be severe both in terms of safety for residents and also traffic congestion, pollution and inconvenience. I understand from the Zoom consultation meeting in February that the council does not take this into consideration at this stage and instead leaves this to a different assessment subsequently. However, having looked back at previous housing development assessments a few years ago for Marlborough, I noticed that similar concerns were raised at the time about access to this potential site, back when the current site at Salisbury Road was chosen. The same issues would be in play now, so I think this really needs to be considered as a serious issue of feasibility now, rather than deferring it

- Lack of Facilities to Support Development at this Site

Unlike the area at Salisbury Road, which has a range of local amenities and facilities in the business park opposite the site, there are no amenities at this end of the town to support a further development at the site off Elcot Lane. All shops and facilities involve a drive, and adding 50+ houses to the area will further result in the need for more people to drive to other parts of the town, increasing traffic in the town in general and associated pollution.

I trust that my views will be taken into consideration. Please could you confirm that you have received this submission, and that it will be added to the feedback for review.

45	<p>I have read the Neighbourhood plan and whilst it covers improvements in a great many areas, it is unfortunately lacking when it comes to the provision of further sporting and recreational facilities.</p> <p>There is also no mention of two recent proposals for expanding opportunities at the common and at St John's school.</p> <p>Youth sports in Marlborough have grown immensely in the past 5 years and this has in turn put a strain on the already limited facilities in Marlborough and I feel it is essential this is address in the MANP given it is setting out the next 15 years of planning in Marlborough.</p> <p>The lack of facilities in Marlborough will only push families out of Marlborough to other towns who do have these facilities and change the demographic of the town further.</p> <p>I have a few questions that I hope could be answered:</p> <ol style="list-style-type: none"> <li>1) Could any of the sites discounted have been considered solely for sporting sites with a clubhouse?</li> <li>2) Whilst the MANP does not have the remit to buy land for sport &amp; recreation, what could Marlborough Town Council do to help identify and support a project like this?</li> <li>3) What support via funding, grants, loans are available from Wiltshire County Council for projects like this?</li> <li>4) The second Elcot lane site was discounted for housing but could a sporting complex be sited there or at least a number of pitches or does the report mean that now changes should be made to that site?</li> <li>5) Would the Town Council consider putting together a working group to address the lack of recreation and sporting facilities in Marlborough?</li> </ol>
46	<p>p.14 / 2.26</p> <p>There is no reference to the Rabley Wood development of 39 dwellings (40% affordable) which is currently underway.</p> <p>p.21-28</p> <p>Should this section showing future proposals and numbers of dwellings take account of the Rabley Wood development that is already underway?</p> <p>p.45 MARL17</p> <p>Protecting Valued Community Open Spaces: There is no reference to the Rabley Wood play area, which indicates the Rabley Wood development was taken into account.</p> <p>39 dwellings could provide homes for between 75-150+ persons. This needs to be factored into the calculations for all amenities and other provision such as school spaces.</p> <p>I wrote to the Town Hall on 20 January 2021 with regard to this omission from the plan, but it does not appear to have been rectified as yet.</p>
47	<p><b>RESPONDING FOR MARLBOROUGH YOUTH FOOTBALL CLUB</b></p> <p>We are disappointed to see a lack of any planning around improving and protecting existing sporting facilities in the Marlborough Area.</p> <p>There have been two recent proposals for expanding opportunities and neither of these is mentioned in any way.</p> <p>Youth sports in Marlborough have grown immensely in the past 5 years and this has in turn put a strain on the already limited facilities in Marlborough.</p> <p>At Marlborough Youth FC we have over 430 players and 28 teams running from U6s to U18s with both mixed and girls teams.</p> <p>The challenges we have as a club are almost solely due to the lack of access to pitches for training and matches and this means a number of our players have to play outside of Marlborough in order to play or train. We currently have to use Burbage, Great Bedwyn, Pewsey &amp; Hungerford for training and matches.</p> <p>Travelling long distances reduces participation due to family commitments, cost and access to transport.</p> <p>Whilst the consultation is centred on housing for Marlborough, could any of the sites have been considered solely for sporting sites with a clubhouse?</p> <p>Was this even considered, or was the remit solely for housing plus sporting options?</p> <p>What options are there for the council to look at land purchase for only sporting facilities?</p> <p>Is the town council able to assist with identifying land that clubs could buy with assistance from grants and self-funding?</p> <p>We would be happy to help investigate alternative options for improving sport in Marlborough.</p>

48	<p><b>Need for Affordable Housing</b></p> <p>The basic logic followed is that housing in Marlborough is more expensive than the national average with a linked higher ratio to average earnings. This then extends to an assumption that there is a greater need for affordable housing. However this is not supported by the survey material that indicated that only a limited number of people responded that they would have needs for affordable housing. To get round this a response is made that the take up of responses from the less well-off was likely to be disproportionately low such to invalidate the results. So then it became a desktop exercise. The consequence of this is uncertainty about how effectively the numbers reflect reality and whether they provide a sufficient base upon which to enact a radical scheme as is proposed.</p> <p>The problem that Marlborough faces is that it is a dormitory town with very few opportunities for employment particularly lower skilled workers. The largest employers are the college and schools. A reference is made to the college wanting better availability of affordable housing for its staff. However this begs the question of what is the likely take up and how balanced is this input when viewed against the financial reward of a new housing development. Would a better use of existing brown field sites be as sites of business development rather than housing so as to create employment?</p> <p>I believe that the council has a need to determine both where those, for whom affordable housing is to be built, come from and where they are to be employed. If the answer to the first is that it will attract new people to the town, then I would not support the council unless they have evidence from employers that there is a need. If the answer to the second is that they would need to travel to Swindon, Newbury or Devizes then the council is encouraging greater use of cars with associated environmental pollution.</p>
	<p><b>Concerning Policy MARL1: 2 : Land Rear of Salisbury Road</b></p> <ol style="list-style-type: none"> <li>1. If development is to be permitted in this area, I strongly believe it should be reserved for any future expansion of St John's School and NOT housing.</li> <li>2. The suggestion that the development should have main highway access to Salisbury Road via the new Marleberg Grange scheme seems totally inappropriate. The narrow roads were never sized for this additional traffic (100+ cars) and it would have a detrimental effect on residents living at Marleberg Grange. Surely a much more sensible approach would be to route all traffic onto the A345 Granham Hill.</li> <li>3. However, I would support connection of footpaths/cycleways for those wishing to access Marlborough High Street and Marlborough Business Park.</li> <li>4. A huge amount of care has been taken to ensure the landscape and scenic beauty is not compromised at Marleberg Grange, in particular, the Ecological Wildlife Area at the rear of the site. I would not support any future development that compromised this area.</li> </ol>



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At last night's Consultation Meeting I asked a question related to the Medical Centre and in response Councillor Hall asked that I confirm the points I made in writing, so here goes!

There is very little detail in the Neighbourhood Plan about the need for a new medical centre. Indeed in Councillor Hall's presentation and in his answer to questions there was more information shared than is disclosed in the written plan. I believe that is a serious omission for the Plan itself, given how important the Medical Centre is to the community.

I have read the Plan, the supporting documents and the Steering Group minutes and can only find a handful of short and passing mentions of the need for a new, improved, larger Medical Centre.

- MARL1 tells us that the new location will be at College Fields but does not tell us how that conclusion was reached; there is a reference to the current site being constrained when it is feasible for the car park there to be used to accommodate an expansion of the current building – no reason is given for why that is not a possibility.
- MARL 2 mentions “emerging” proposals to relocate to Barton Dene, suggesting this is a very late addition to the Plan (and which may explain the lack of detail).
- There is talk of “encouraging” the local Medical teams to relocate to Barton Dene which again suggests this is an ongoing and yet to be concluded discussion.
- The Cobweb Consulting document suggests that residents want an improved facility with more parking. On the first Zoom consultation Councillor Hall said there would be no parking and yet last night he said the Medical Centre would share the Leisure Centre car park. Which answer is right? One again this smells of a policy still being developed and solutions being created on the hoof. Hardly strategic.
- In the SG meeting minutes there are references to a meeting with Doctor Hook and the need for an Impact Assessment to be carried out. There is no evidence in the Plan of what the outcome of the consultation was nor is there an impact assessment.

From everything I have read it seems a lot of assumptions have been made about the needs for and a future location of a new Medical Centre without any justification being presented in the Plan. Being frank, it does give the appearance of a last minute decision (or one that has yet to be made), with the Barton Dene solution looking like a compromise that the medical teams are being ushered reluctantly towards. Barton Dene smacks of a financially driven solution rather than anything strategic and if that is the case, fine, this is the real world, but lets understand why that is the case. The proposed location is by no means central, is unlikely to be welcomed by residents to the east of the town, the exact position is as yet unclear (somewhere north of the leisure centre??), and it will be difficult to access for residents living in anywhere other than College Fields and Barton Park. Is there or is there not car parking and if it is the Leisure Centre car park that will be used, are there enough spaces? Are more to be added? The Plan tells us nothing.

Can I suggest a more comprehensive Policy should be created and presented:

1. There should be an impact assessment that details how the rest of the Plan impacts on the need for medical facilities through to 2036. Recent housing expansion has focused on homes for elderly residents which adds pressure to local medical facilities and yet future housing focuses on the needs of younger people and families with their medical needs being considerably reduced.
2. An assessment of whether the current facilities meet the future needs of the community. If they do or don't then present the evidence. It must be there somewhere – if isn't, then the current Plan is based on nothing more than an assumption.
3. Details of any consultation with medical teams – what is their view on the next 15 years and can they manage where they are now? What is it they want? I

don't see that anywhere in any documents. You have consulted with residents and I am sure you have consulted with doctors so what did they say?  
4. Reference the Cobweb Consulting report and what residents have asked for. Important that any solution meets those needs. Car parking was one such requirement.

5. What site options have been considered and why have other options been dismissed?

6. If the current Medical Centre site is not able to be developed for a larger building, why is it suitable for redeveloping for additional housing? There are more than enough car parking spaces near by the current location so building in to the current car park is surely an option? If it is not, then explain why. Money??

7. If Barton Dene is an option then show us clearly where the site is relative to the Leisure Centre and the proposed new housing – any description at the moment is vague at best. Is it the only option?

8. Explain the current transport routes in to the proposed site and acknowledge that improvements may be needed. Do current bus routes make for an easy journey?

For me, the strategy for a Medical Centre requires its own Policy rather than squeezing it in alongside other policies. If housing is a top priority, then this is not far behind. This is an emotive subject - whether the solution is expanding the current building or moving its location, there will be critics of both. Having a Plan that details how the solution was arrived at will save the Town Council from a lot of grief I am sure!!!

I look forward to reading the second draft of the Plan .

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1. Housing Development Site – Land off Elcot Lane. I strongly object to the proposal to develop the field below the St John’s Park housing estate off Elcot Lane.

o The field forms an integral part of the wonderful countryside vista along the Kennet valley that is enjoyed by many Marlborough & Mildenhall residents. These views would be detrimentally impacted by any further development along the valley. We will erode permanently one of the most valued assets of Marlborough town, and the very asset the MANP purports to want to preserve and enhance.

o The site is “highly visible in particular from the South and East and from the North side of the river valley. Development would be highly visible and would have a significant impact on the character and quality of these views” (page 27 of the ‘MANP Site Assessment Report’) even after mitigations were attempted.

o The alternative sites of Barton Dene, Salisbury Rd and Land south of the A4 (London Rd) are well screened from a landscape perspective and do not detrimentally impact outstanding views and vistas. Choosing these sites should be the priority to conserve the beauty of our landscape.

o Development would have a devastating impact on the setting of grade II listed Elcot Mill, bringing it into the town rather than its current setting outside town. Elcot Mill currently forms part of the unique historic landscape of our countryside asset.

o Development would similarly negatively impact the setting of Mildenhall Hall as a landmark within the countryside.

o The field at the end of Elcot Lane provides a close point for people who live in Marlborough to access the countryside and these outstanding views.

o Its development would have a serious detrimental impact on biodiversity, wildlife & bird and river habitats along the river Kennet valley – introducing far greater intensities of noise pollution, air pollution, water pollution and run off, and human impact on wildlife.

o Slow worm, viper, grass snake, field mice and bats have all been observed on St John’s Park housing estate, and birds of prey and waterfowl are frequently observed over the field.

o It abuts the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat.

o This is a greenfield site in the AONB. There are no “exceptional circumstances” provided to support this development, a requirement demanded for development in the AONB. The AONB is a county and national asset that once spoilt with housing development is lost forever, for the current generation and all future generations – they are a finite and limited resource.

o The Marlborough community identified as a key priority (page 19 of the main MANP document) the preservation of Countryside (specifically: “Open spaces are valued and should be protected from harmful development” and “Maintenance and improvement of existing green spaces”). The MANP main document (page 21) states the vision is that “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”. Development of land off Elcot Lane is in direct contradiction to these stated goals.

o There is no suitable road access to the site. Elcot Lane has only single lane access after the railway bridge, which itself has a conservation order on it – it is not possible to widen the road at that point. There are 170 houses packed in high density on the St John’s Park estate. White Horse Road and Chopping Knife Lane as the access to White Horse Road are both reduced to a single lane throughout day and night because parking is so tight and both roads are used to park vehicles. Along its length, White Horse Road has many tight bends purposefully to slow traffic and driving visibility is poor.

2. Housing Development Sites – Barton Dene and Preshute parish council withdrawal.

Sections 1.7 and 6.8 of the ‘MANP Site Assessment Report’ (page 5) notes that the withdrawal of Preshute parish council at a late stage of the process negatively impacted the option of proposing a significantly larger development site at Barton Dene. Securing the best outcomes for the contiguous expansion of Marlborough town cannot be allowed to be thwarted by historical parish boundaries (set a century or more earlier) and by what appears to be

self-interest from Preshute council to limit development to the west of town. From a Marlborough town development perspective and from a Wiltshire Council perspective this essentially arbitrary segregation results in sub-optimal outcomes for our town. For Preshute not to participate is wrong – Preshute Parish Council and residents enjoy all the benefits of Marlborough town but makes no housing development contribution to the needs of the town. This issue needs to be raised to Wiltshire Council in the MANP document so they can consider a larger Barton Dene development that may fulfil all or very many of the housing development requirements for Marlborough through to end 2036.

### 3. Traffic and Air Pollution – A346 de-priming.

Sections 2.14 to 2.17 (page 12) of the main MANP document note the high pollution levels along key highways in Marlborough particularly along London Road, Herd Street and Salisbury Road and the high density of HGV traffic passing along the A346 through Marlborough. We need concrete action to limit HGV and other commercial goods through traffic passing along the A346 through Marlborough and not just talk about frameworks and agreements. The “long term aim of de-prime the A338/A346” mentioned in section 2.16 needs to be translated into specific steps that lead to this outcome within the timescale of this 2016-2036 plan.

### 4. Affordable Housing – lessons learnt?

Sections 2.24 and 2.25 (page 13-14) of the main MANP document state “the gradual deterioration of affordability has left many residents experiencing difficulty gaining access to the housing market, especially given the low household-based income of certain areas.” Previous recent housing development in Marlborough have clearly not met the sustainable ‘affordable housing’ requirement. Given this, where is the study and evidence to show what lessons have been learnt from prior housing developments in Marlborough? For instance, how effective was the recent housing development off Salisbury Road in providing genuinely affordable housing for local residents on low pay? More development following the patterns and approaches of the past will again fail to meet the local needs and simply draw more people into Marlborough from elsewhere, creating even greater strain on local infrastructure, services and amenities.

### 5. Affordable Housing – ensuring genuine affordable housing delivery?

Section 6 on page 1 of the supplementary document entitled ‘Supporting Statement on Housing Proposals (January 2021)’ states that “Addressing affordable housing is one of the local community’s biggest concerns about the future of the MANP area”. This section says the intent of the MANP in building affordable housing is to address “our high house prices that are driving away younger, economically active, people” and that local “employers are concerned their staff, especially those on lower pay grades, are not able to afford housing in the town”. I see no criteria, nor information in the MANP proposal to provide assurance on how those houses that are built as affordable housing will be affordable to this target group of people. If they are not then this objective will not be met. The MANP proposal should not progress until this matter is clearly detailed in the policy statements of the plan – what criteria will be applied to ensure successful delivery of affordable housing in the sense of it being affordable to local employees on low wages.

### 6. Affordable Housing – tick-box exercise?

Furthermore, section 8 on page 2 of supplementary document ‘Supporting Statement on Housing Proposals (January 2021)’ concedes that the objective of ‘affordable housing’ will not be met, stating “affordable in planning terms will rarely mean genuine affordability when compared with local incomes”. This admission fundamentally undermines one of the most important stated objectives of the MANP plan. Before the MANP plan is progressed further, this issue needs to be addressed in the proposal.

7. St Peter's School site

The old St Peter's school site development needs to be included in the development plans and needs to include an affordable housing target of 40% minimum, aligned with Core Policy 43. All developments in Marlborough need to adhere to the same standards.

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The priority for housing needs to be affordable housing, but there is an environmental and social negative impact if developers then demand they also build more expensive housing. The proposed number of new houses on top of the the 440 already committed is, however, going to put great pressure on the town's infrastructure.

I assume with Wiltshire's declaration of a climate emergency, ALL new build will be to high environmental standards requiring minimum energy - HOW WILL THIS BE ENSURED?

"Policies governing the delivery of growth across Wiltshire need to change to ensure that new development is truly sustainable and resilient to the effects of climate change."

	<p>An increase in housing without new job opportunities is against Wiltshire's Council policy.</p> <p>There is NO point in redeveloping a medical centre without good parking nearby. By developing the present medical centre at least there is a car park adjacent.</p> <p>Can I put in an urgent plea that the NP and Wiltshire Plan should be considered and approved together?</p>
52	<p>I have been pleased to read the Draft Marlborough Neighbourhood Plan 2021-2036. My thanks to all those who have spent time in its development, to ensure that the area is protected and enhanced for the future. My comments, are for Marlborough town only. Comments are headed to the plan's objectives; I hope they are helpful and will be reflected in the final version of the Marlborough Area Neighbourhood Plan.</p> <ul style="list-style-type: none"> <li>• Conserving and enhancing heritage and landscape assets</li> <li>• I find the inclusion of and expansion of Areas of Special Quality interesting and curious. While I understand the intention, it is hard not to escape the observation that they relate to some of the most desirable and expensive properties in the town. Why these specific areas of the town are singled out for protection is hard to see. There are of course other areas of lower cost housing which show the development of the town and different architectural styles, examples in the towns developments in the 1920's, 1950's and 1960's. These areas need protection to ensure that they remain good places to live. However, original architecture is often depleted by unsympathetic house extensions and gardens converted to park cars; this is an unintended causality of the Wiltshire planning framework that requires extra parking to be provided when houses are extended. There should be a clearer expectation that the Town Council will comment unfavourably where the Wiltshire Design Guide has not been followed. In general, all extensions should normally reflect/respect the design of the original building, and have regard to the character and layout of the area and the amenities enjoyed by your neighbours.</li> <li>• Delivering affordable housing and Delivering a range of housing to encourage low-income groups to live in the town</li> <li>• The proposal to use a number of smaller sites over another large estate is commendable as this tends to mix house styles and creates better integration into the fabric of the town. The current large estate on the Salisbury Road for instance is creating a new suburb with its houses shops hotel.</li> <li>• The mix of market priced and affordable properties on the same developments also enables integration.</li> <li>• The plan does not indicate the type of housing only the minimum bedrooms. In recent developments there has been a tendency to build high density flats as part of affordable housing, not suited to families. As the focus is on two and three bedroomed housing, I would recommend that these homes are built as are houses with outdoor space suitable for growing families. A possible exception of the Kelham Gardens that is close to the town centre and might be more suited to high density for single people or couples.</li> <li>• Future Marlborough development sites regrettably expand the town into green field sites. This creep into the ANOB especially to the east, (extension beyond Elcot Lane) is particularly regrettable. Not only does this push housing out on a remarkably beautiful valley floor but the distance from the town centre is likely to require the use of cars to travel to the centre that is not sustainable for parking. The indicative layout leaves a cul de sac adjacent to the farm land, this could be better used for an additional dwelling and not invite further expansion into the rural fields in the future which would be unsustainable.</li> </ul> <ul style="list-style-type: none"> <li>• Delivering social infrastructure</li> <li>• Increases in housing require increases in social infrastructure the plan does not seem to say anything about our oversubscribed school and how the needs of an increased population can be met.</li> <li>• Encouraging efficient use of employment land &amp;</li> <li>• Securing long term community facilities</li> </ul>

	<ul style="list-style-type: none"> <li>• No comment on this section</li> <li>• Maintaining the Town Centre as successful service centre</li> <li>• The plan is silent on out-of-town shopping. The Salisbury Road Business Park had started to create an embryo out of town shopping centre. Tesco supermarket, Budgens convenience store, a cycle shop relocated to the business park from the town centre but has since ceased trading, there is a tile shop. George Lane similarly has developed more retail space with the conversion of a former garage site to retail. I would recommend the plan includes resisting retail space outside of the town centre.</li> <li>• Promoting the area as an attractive tourist destination</li> <li>• No additional comment</li> <li>• Securing long term community facilities</li> <li>• Protecting open spaces and improving connectivity</li> <li>• This section is most welcome especially following the loss of the much-valued play area at Rabley Wood View.</li> <li>• Proposed housing at Elcot Lane includes landscaping proposals reflecting the rural location. This landscaping must be strengthened as it is a very important rural walking route along the Kennet Valley floor to Ramesbury, Hungerford and beyond. There should be an insistence on retaining a green belt space that is far wider than the statutory 4foot width for foot paths.</li> <li>• Connectivity to the Salisbury business park is extremely poor and dangerous by foot with a pavement that does not allow pedestrian passing in places without stepping into the road. Creating other walkways from the east via an extension of the railway path is very welcome. Additionally, the Salisbury Road pavement should be widened.</li> <li>• The town has limited and very dispersed sports ground facilities. Nothing new has been developed for generations since the creation of the Salisbury Road recreation ground that at the time would have been out of town provision yet the population has grown both in the town and the surrounding villages. The plan needs to be identify up the urgent need to develop good facilities that are not water meadow or The Common.</li> </ul>
53	<p>I couldn't see much about sporting facilities for the town. Any additional space for sport is always welcome for our children. Sports pitches are especially great. My son plays football but I have four young children so any multi sport pitches are very welcome. The mud can be an issue in the winter so an all weather facility would be great.</p> <p>I also wondered if there were any plans for the Recreation Ground play area? It is very run down and it seems lots of other parks have now had attention (Minal, Manton, Cooper's Meadow) which is great. An upgrade of the Recreation Ground to meet the standard of those other parks would be brilliant.</p>
54	<p>MARL9 - properties as community facilities. Repurposing the groundsman complex on the Recreation Ground as "heritage centre, store and archive" to include reading room.</p> <p>MARL17 - green space. Parcel of land in George Lane next to Culvermead Close.</p> <p>The plan needs to highlight the lack of sports areas in the town</p>

55	<p>Marl 9, 16 and 17</p> <p>While all of these areas are very important for the community there is nothing mentioned about any of the sports facilities around the town. As a mother of 2 boys, access to sport is really important for their health and wellbeing. They are both very active.</p> <p>There is no mention of the current sporting facilities that we have around the area. Nor to the fact that the town would greatly benefit from some increased infrastructure around sports facilities. Both of my children play football and we have often visited very good sports facilities in towns of a similar size or smaller to Marlborough with access to 3G pitches etc. This would be a benefit not just for football but many other sports such as hockey, cricket, netball. It allows all weather training etc. It can also provide a real social space for families and young people.</p> <p>Not to mention the benefit from the whole population to access more facilities that encourage good physical and mental health. We are very lucky living here to have so much out door space on our doorsteps. But a little bit of investment in sports would go a long way to improve things for all ages.</p>
56	<p>Thank you for providing Highways England with the opportunity to comment on the pre-submission version of the Marlborough Area Neighbourhood Development Plan. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the M4 which passes to the north of the Plan area.</p> <p>The plan area is bisected by the A346 which provides a direct connection to M4 Junction 15 which experiences congestion at peak times, although currently the subject of an improvement scheme. It is noted that the Plan proposes to allocate 5 housing sites to provide a total of 180 dwellings and that this scale of growth will reflect that identified for Marlborough in the emerging Wiltshire Local Plan Review. Whilst we are generally satisfied that the Plan's proposed policies are unlikely to result in development which would adversely impact on the SRN, we would nonetheless expect any major development coming forward in the area to be supported a suitable assessment of traffic impact. This should consider the operation of the strategic road network in line with national planning practice guidance and DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development, with particular consideration given to M4 junction 15.</p> <p>These comments do not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.</p> <p>Kind regards South West Operations – Assistant Planning Manager (Highways Development Management)</p>



57	<p>Regarding the proposal to build 50 houses to the rear of Salisbury road. Please find my views below for the consultation:</p> <p>The proposal to build an additional 50 houses on this plot has several major draw backs for the Marlborough community and specifically the Merlberg Grange community.</p> <p>The distinct lack of consideration towards the environment is truly disheartening. We live in a rural community who should treasure its landscape. We should be encouraging people to walk and cycle and enjoy nature, instead you are encouraging people to drive and continue to pollute the planet. During COVID, getting out into nature (including the beautiful walk along the railway track) was some of the only solace people could get. Building more houses and additional roads would attack this natural asset and prevent people from getting out into nature. So much wildlife depends on this proposed plot of land and it is awful that council continue to disregard the environment.</p> <p>Please find my additional points condensed below:</p> <ul style="list-style-type: none"> <li>-The main road through the Marleberg Grange estate would become a rat run and - this road has pinch points everywhere and is not large enough for cars to pass in most places. This would cause congestion through the estate.</li> <li>-Existing residents including myself bought our houses without the knowledge that this was going to be a long term plan and become a link road to a new estate. In fact, I have in writing from Redrow that additional houses (past those already granted planning) would not occur.</li> <li>-Extra traffic will be going past the Estate play area and make it dangerous for children</li> <li>-Huge increase in traffic through the estate.</li> <li>-Increased noise pollution to the estate</li> <li>-Increased fume pollution and air quality potentially effected around the estate. This has been proven to cause increased asthma and health conditions.</li> <li>-Finally - there is a more simple solution that would by pass Marleberg Grange, as access can be provided off the A345 alongside the existing St John's school road.</li> </ul> <p>I am fully against this proposed plan for additional housing and new through road. It will negatively affect so many people's lives, health, and mental well being. Children will be put at risk due to the traffic as well as pedestrians. The wildlife in the area would be decimated, not only weakening the ecosystem in the area further but also ensuring that Marlborough loses its appeal to those seeking a beautiful area to live.</p>
58	<p>P16/ Section 3.2</p> <p>Significant transport problems are identified in the consultation responses. Public transport provision seems especially relevant, yet NPPF paragraphs relating to promoting sustainable transport (paragraphs 102 – 111 have not been considered.</p>
59	<p>Policy MARL1, Land Rear of Salisbury Road, p. 24</p> <ol style="list-style-type: none"> <li>1. Access to this plot is shown across the line of the former railway as it approaches the blocked up tunnel. Any development on this site should not prejudice future use of the old railway line as a cycle path (Alternative access could be via plot 4: Land off Cherry Orchard, which abuts the Land to Rear of Salisbury Road.)</li> <li>2. Developer contributions should be required to contribute to safe cycle/pedestrian access into Marlborough and away from the Salisbury Rd. These might include: <ul style="list-style-type: none"> <li>• extending the existing Railway Path to the Tesco car park;</li> <li>• converting MARL30 into a permissive cycle path as a safe way to access Savernake Forest (possibly via Brown's Farm, SAVE3).</li> </ul> </li> </ol>

	<p>Policy MARL15 (p. 43) The Marlborough to Swindon Railway Path should be included in the green infrastructure network. It is an important opportunity for ecological connectivity. In the policies map (p. 63) the section between the A4 and Elcot Lane isn't included, nor is the section north of footpath MILD25. It should be.</p>
60	<p>Page 26/Policy MARL1 Part 4 Delivering Affordable Homes in Marlborough – Developing up to 30 homes accessed via Cherry Orchard. Due to the sole access dependency on Cherry Orchard for this proposed housing, I severely opposed this development.</p> <p>As a current resident on cherry orchard, my experience of the traffic congestion makes it clear that Cherry Orchard could not sustain additional homes. I urge planners to consider developing an additional access route via Orchard road access from A345 (other side of St John's School, enter via west of Marlborough). Reasons being:</p> <ol style="list-style-type: none"><li>1. Cherry Orchard is often only a single lane that cars going up and down the hill have to negotiate. The amount of cars parked on the one side forces cars to often to reverse long stretches to make way (e.g. 20m reverse).</li><li>2. As a key road for the school, cherry orchard is very congested as a school drop-off zone twice a day, creating delays and access issues.</li><li>3. There is already a parking problem at the top of Cherry Orchard hill, with cars parking on the grass verges which looks terrible.</li><li>4. 19 homes were recently developed by Somerset council (16 Flats, 3 houses) which are yet to find residents but these will add to the traffic burden of an already over-congested route.</li><li>5. The 5 way junction at the top of Cherry Orchard is already prone to traffic hazards, as cars park right up on the bend and block sight around the corners. There is safety concern given the high level of footfall with students walking to/from school up Cherry Orchard; the additional homes will only add to the traffic.</li></ol> <p>I understand and support the council's intent to develop more affordable housing to encourage a younger demographic in Marlborough. As a relatively young person (30 years old) that moved to Marlborough a year ago for my job, I would welcome more people of my generation being in Marlborough. I also believe the brownfield site would be an excellent place for additional housing. However it should not be built without investing in the right road infrastructure to support it. The logical additional would be a westerly access point – as well as via Cherry Orchard – that bypasses around the school would be viable. This could also ease the high traffic currently in Cherry Orchard.</p>

61	<p>I took part in yesterday 's zoom consultation on the Marlborough ANP and as part of my preparation I saw that you have been on the working group (who have in my view done a great job on a hugely complex task).</p> <p>Since leaving Wiltshire Council almost a year ago I have had more time to develop my interests in climate change and biodiversity, My wife (Sandra) and I are interested in the potential that is offered by the land above the Sorley/Sassoon/Faulkner/Edwards cul-de-sacs for more varied habitats.</p> <p>We are aware that a lot of work has previously been done (for example the application to designate it a common) and that you yourself have contributed a lot to community activity relating to the green space.</p> <p>Would it be possible for us to have a (video) meeting to help our understanding of what has been done, or tried, and could be looked at as options and possibilities? We don't want to duplicate or inadvertently hamper existing activities, but we do want to contribute our time and energy.</p>
62	<p>INTRODUCTION</p> <p>The council's premise for additional housing in Marlborough is that it is now a dormitory town. Is this true?</p> <p>GENERAL</p> <p>The following points make the real case for definition of the town as it is and the reasons why it is so unsuitable for further expansion under that spurious definition.</p> <p>North Wessex downs AONB has Marlborough at its heart as a site for tourism rather than destroying it with major settlement plans.</p> <p>In summary, Marlborough is not a dormitory town. As to services in the town, It does not have the roads, schools, shops, doctors and facilities to support, adequately, the existing residents, let alone a large number of new houses. The council need to decide whether it is there for the purpose of helping developers make money or to help the residents of Marlborough have a better standard of living. More houses with less adequate series will not do the latter.</p> <p>TRAFFIC AND POLLUTION</p> <p>Being bound by Marlborough school, the Kennet valley, the golf course and the Savernake forest, efforts to reduce and divert the traffic would be a better use of time than trying to expand the footprint of the town. In the absence of a by pass, traffic pollution and traffic noise will approach dangerous levels in the high street and George Lane. What are the plans for tackling the traffic, this has been a problem without a solution for as long as I can remember? Further dangerous levels of traffic through the town are not in line with the town's ambitions.</p> <p>FACILITIES</p> <ol style="list-style-type: none"> <li>1. Parking in the town is, as all know, totally inadequate.</li> <li>2. The local transport system which is the alternative to driving, is simply not good enough.</li> </ol>

3. St Johns school currently has many more pupils and staff than it was built for. How will it cope with even more pupils.
4. The Kennet and Avon medical centre is being moved for yet more dwellings and moving where? With what access for residents of Marlborough? Including those without a car.
5. Every available plot of land seems to be given up to old people's homes that contribute little to the local economy and use up space for accommodation if needed.
6. There are, and always have been, too many restaurants, clothes shops and smart supermarkets and too few shops where the young and not-so-well-off can buy supplies at a reasonable price.

#### MILDENHALL

1. Light pollution will also increase, particularly in outlying villages like Mildenhall, where I and my family live.
2. Further houses on the old school grounds opposite Mildenhall village will increase light pollution and make traffic even worse. This further encroachment up the Kennet valley and down towards the river Kennet cannot be sensible. And where do those new inhabitants go to shop etc? To Marlborough. And how do they get there, in cars to further increase the traffic and the parking problems.
3. This area is a haven for wildlife and this will disappear as the human population increases. This situation does not fit current and future environmental ambitions and goals.

63

We bought our house on Marleberg Grange in June 2019. Extensive legal searches were done and things were mentioned like the proposed new railway line between Blunsdon and Cricklade. Obviously that doesn't affect us but it was all part of the thorough search. Like others we purchased our property with the knowledge provided by these searches. Nothing was mentioned at all of the future possibility of our estate roads being used for any other purpose other than to serve the estate we live on.

A very good play area has been constructed in a position that means the majority of children using it will need to cross the road which is on the proposed route to the new estate. The road by the play park is on a long raking bend which with increased traffic from the new estate, ( 50 houses potentially 100 cars ), will be a much increased danger to children and a serious safety issue.

When the Marleberg Grange development was being considered there was plenty of concern regarding the amount of traffic spilling out on to the Salisbury Road. Now it is proposed to substantially increase the traffic flow which can't be a good idea.

	<p>I appreciate the need for housing but would it not make more sense to link the proposed estate to the existing school road on to the Pewsey Road which has much less volume of traffic than the Salisbury Road. This would not destroy the old railway line and all of its associated ecology. The least damaging option.</p> <p>The estate roads and various pinch points on them are barely sufficient for the traffic they were designed for. Passing other vehicles in many places is not easy. We do not need more traffic on them and also we do not need the heavy construction traffic that would be used for the new estate. There is a real safety issue here.</p> <p>I am not against the proposed construction of houses on the new site but I strongly object to Marleberg Grange being used for access to it.</p> <p>I am also putting my name to the Community letter being sent to you by Sarah Montague- Smith</p>
64	<p>I believe that before any of these extended housing developments get approved:</p> <ol style="list-style-type: none"> <li>1. More effort should be made to improve the infrastructure in and around Marlborough. Little attempt seems to have been made for residents outside the centre of Marlborough to safely walk, cycle or use regular public transport as their preferred method of access to the town. We should be promoting their needs and wishes in every way possible. There are a lot more vehicles on the roads than necessary with very limited parking within the town. Note: We cannot take the last 'Covid' year as 'the norm' with few businesses in the town running from town premises.</li> <li>2. More houses will increase the need for schools, medical facilities and sporting venues which are fast being impacted by the additional housing that has been and is being built. Infrastructure should take on board the need for residents to exercise and play organised sport.</li> </ol> <p>We ought to be protecting the outstanding landscape surrounding Marlborough so that it can be enjoyed by future generations.</p> <p>I would like to see the Council endeavouring to seek and promote sites within Marlborough that are naturally screened. The developments such as those detailed on Page 23 on the main document and the larger site that was earmarked on Page 12 of the Draft Site Assessment Report will have a very high impact on the area of outstanding natural beauty along the Kennet Valley.</p> <p>May I suggest that, in future, there is a plan in 'simple English' summarising the details of the plan that can be read by those residents who do not have the time or inclination to read through the whole detailed plan. I have found this exercise quite time-consuming and confusing!</p>
65	<p>MARL13</p> <p>With regards to any development within Mildenhall (Minal), I believe that the green areas that currently exist, particularly close to the river and those that protect the view to the river, should continue to be protected for the enjoyment of current residents and future generations, plus the abundant wildlife, such as hunting barn owls. This green land is used extensively by the villagers and walkers pass through from Marlborough towards Axford. The river and sweeping landscape are visible from the road through the village giving uninterrupted views as a whole and enjoyment to all passing through.</p> <p>Traffic through the village is already high, and parking for those using the sports field is non-existent. Cars park along the pavement on the main road through the village, reducing the road to a single lane and causing hazardous conditions, especially for those residents trying to pull out of their drives. For events on the sports field, parking is usually on the sports field itself (not ideal) or in the field next to it as an overflow. These events in Minal are important and bring the whole community together, for example, the village fete, and should be encouraged where possible. It is a unique village.</p> <p>Transport links (one bus) are not frequent, and there are no amenities such as a village shop and the distance into Marlborough is too far for young families to walk. Therefore affordable homes in this area would not be sensible this far away from amenities.</p>

My view is that further development in Mildenhall (Minal) would cause lasting detrimental damage to the feel of the village and the Council should seek and promote alternative sites in Marlborough that are better naturally screened and closer to amenities.

It is not clear what a Rural Exception Site actually is and whether this protects Minal from further development or gives more flexibility to allow development.

Page 18

Plan

Adopted Wiltshire Settlement Boundary Review Map for Marlborough 2020.

C. This plan appears to show the proposed land at Barton Dene outside of the settlement area.

Page 25

MARL1A

MARL2

Land at Barton Dene. What is the significance of the area enclosed by the red line?

C. Comment in regard to 'enhance the setting of Barton Farmhouse and Stables and retaining the Leisure Centre'.

Q. What does 'enhance the setting of Barton Farmhouse and Stables mean?

Q. Is the rest of the land and buildings to be considered for possible re-development?

Q. Will you confirm that the land in question does not incorporate Preshute Bridleway No32?

Marlborough Medical Practice:

Not many people will argue that the Medical practice is in need of an update, in regard to the number of GP appointments that are available, a situation made more acute by the excessive number of retirement complexes.

The Surgery at present is centrally located in the area it serves and accessible by public transport from the High Street and George Lane it is also located next a large carpark and some free parking on George Lane. There are currently 24 parking spaces for staff between the Pharmacy and the Surgery, with 3 disabled and 3 Pharmacy visitor spaces.

C The proposed Barton Dene position for the Medical Practice would appear less convenient for the following reasons.

Q. It would be positioned in the east side of town, access by the majority of patients past the entrance to the College along the Bath Road and then through the narrow roads of College Fields and Barton Dene, both of which are inappropriate for parking due to obstruction and cause safety issues to pedestrians, Pupils and other road users.

Q. Journeys will mainly be by car as there are only 6 buses all day along College Fields. The staff requirements for parking at present number almost 18 places with only 2 disabled spaces, College Fields does not offer much space for parking as it is already parked up to the top of the hill every working, with occasional poor parking restricting or blocking bus and lorry movements.

Q. Classes for the elderly are already run at the Leisure Centre are they to lose these? The Leisure Centre are also at constant odds with town workers and visitors parking there, so I'm sure they would not appreciate hosting surgery parking as well.

Q. What securities have the Town Council secured from the stakeholders in regard to the improved Health Facilities, finance, services, staff and how many years will this undertaking be in place?

Q. There is no comment on Pharmacy provision, will the New Medical Centre provide all prescriptions, or will they continue to only provide for the areas covered at present?

Page 30

MARL4

NPPF Achieving well-designed places, (para. 124) The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.

C. I am not sure where Sewers and Roads fit within this process? 'Add on' development will ultimately over run the original design limits of social infrastructure, Marlborough occupies a valley with a river running through it. Flooding will be more of an issue as areas gain hard surfaces and increased housing require more wastewater to be pumped out of the valley.

Q. Where are the comments in regard sustainable development?

Page 34

MARL7

C. Improving Public Parking: I would support the positioning of this additional parking and encourage those working in the town to use it.

C. The lack of reasonable street lighting in this remote area is a short coming for security and safety reasons, especially in the winter months.

Page 43

MARL15

Protecting and Improving Green Infrastructure; (NPPF para. 104) C. It is very encouraging to see the maintenance and provision for high quality walking and cycling networks.

There does not appear to be evidence for supporting facilities such as cycle parking.

Page 45

MARL17

&

Page 65

MARL17 Plan

C. There is an omission from 'Valued Community Green Spaces' in MANP Informal Consultation July/August 2019 and therefore not included in Neighbourhood Plan Reg 14 consultation. Both the areas below meet the criteria as set out in Open Spaces in MANP Parishes (January 2021) document, both areas being owned and maintained by Wiltshire Council and similar to the Open Spaces Lists pages 1/16 to 4/16 of the same document.

C. Two green areas to be included in to the MANP Regulation 14 Document .

Land at College Fields /opp Falkner Close 51250841N, 01443920W

Land at Edwards Meadow, 51251349N, 01443446W



67	<p>This response had photos. See CGPHOTOS folder  Page 17  Core Policy 43  The case for Marlborough needing all this extra housing is debatable. For instance, of the 80 properties relet between 2016 and 2019, only 19 were taken by local people.  Local facilities – the schools, the Medical Centre, the sewage works, the Leisure Centre, are already stretched to the limit.  Where are the jobs for the extra numbers of residents?</p> <p>MARL1  Page 23  Reasons why this is a particularly unsuitable scheme:</p> <ul style="list-style-type: none"> <li>• It blights the view for the residents of Elcot Orchard, Barnfield and the houses in White Horse Road that overlook it, thus having a significant impact on the value of these houses.</li> <li>• It seems unreasonable to propose a green space alongside Elcot Mill House and Elcot Mill Stables, when no such provision is made for the larger number of houses in Elcot Orchard, Barnfield and White Horse Road.</li> <li>• It is not clear what “Emergency Exit via Elcot Lane” involves. It is difficult to see a) how there is space to create an exit for vehicles, and b) if this is possible, what is to stop people using it all the time, which would create major blockages in Elcot Lane.</li> <li>• The “main vehicular access” would be from White Horse Road. This is already congested, especially at peak hours, with cars parked along one side of the road, and a sharp corner at the Eastern end (see attached photos).</li> <li>• In addition, the drop from the road on to the field seems quite steep, but maybe that is not an insoluble problem.</li> <li>• The field is very damp in wet weather (see photo). Has anyone checked that building so close to the River Kennet is safe?</li> </ul>
68	<p>It is commendable that Marlborough is putting its hand for new housing but I struggle to see how the road network can take the additional vehicles in each of the areas of the proposals . As the towns sits in a valley flanked by beautiful countryside it’s hard to see how a network of new roads can be accommodated and certainly how this would work connecting to the current routes in and out of the town.  The lack of employment in the town and current strain on services and in particular the surgery surely limits any significant expansion .</p> <p>I don’t support the proposals offered. Invariably houses are not affordable for those on low income , is generally only short term and just provides more opportunities for multiple property owners.</p> <p>We must protect the market towns if value rural Britain</p>

69

I am responding to the MANP consultation exercise. I wish to express my general concerns about any further housing development in Marlborough beyond current plans, and specifically about proposals for site 1 (Chopping Knife Lane)

The current proposals for Marlborough as a whole are problematic for a number of reasons:

- Firstly, further housing development in Marlborough will require building on green field site(s) in the AONB with the consequent permanent loss of this precious and finite natural asset to current and future generations.
- Secondly, more housing will only erode the attractiveness of Marlborough as a place to live, which rests on its current compact size, its historic character and access to AONB countryside. Demand to live in the town will always be high and never satisfied. All that will ultimately be achieved is that a beautiful market town and its surroundings will be destroyed by new housing development.
- Thirdly, the basis for much of the proposals is to deliver affordable housing sustainably that meets the needs of low paid local resident. This is indeed important and I support it, but all evidence of past initiatives with this goal point to failure as they have simply resulted in market priced housing beyond the reach of many local people
- Fourthly, new housing will place even more strain on Marlborough's infrastructure. Peak time congestion is common and parking in the town a real problem at any time of day. More cars will, in turn, generate a major safety, noise and air pollution hazard to residents.
- Fifthly, other parts of the town's infrastructure would come under in pressure. Thames Water is already having to tanker away sewage and the existing sewerage system cannot meet demand.

Every effort should be made to avoiding building on greenfield sites. Future housing development should be more profitably directed.

I would like to raise a number of concerns with the current proposals, specifically in relation to site 1 (Chopping Knife Lane). I think this site should be removed from the proposals for housing development for the following reasons:

- Firstly, development here will have a very detrimental impact on landscape along the Kennet valley to the East of Marlborough. It will encroach on the river Kennet and SSSI and have a strong negative impact on wildlife and biodiversity. The MANP document and AONB state that site 1 is "highly visible in particular from the South and East and from the North side of the river valley. Development would be highly visible and would have a significant impact on the character and quality of these views".
- Secondly it will destroy an important recreation space for Marlborough residents and walkers more generally. There is heavy daily footfall along the current footpaths.
- Thirdly, it will envelope the ancient Elcot Mill which is designated a woodland priority area. It would also impinge on an important Roman archaeological site, which will be a field away.

- Fourthly, it will destroy the green buffer between Marlborough and Mildenhall, destroying the character of an historic local village.
- Fifthly, there is no suitable road access to the site. Elcot Lane has only single lane access after the railway bridge, which itself has a conservation order meaning it is not possible to widen the road at that point. White Horse Road and Chopping Knife Lane as the access to White Horse Road are both reduced to a single lane throughout day and night because parking is so tight and both roads are used to park vehicles.
- Finally, it will exacerbate current sewerage problems with Thames Water frequently having to unblock the local sewerage system.

If building has to go ahead in Marlborough – which I believe is unnecessary, unwanted by many and problematic – then Barton Dene (site 3) is the better site. It sits in a well screened valley which shields the impact of development on views and the site is already surrounded on 3 sides by housing. It is a large site, which together with the College Fields site (site 4) at a later stage, has the potential for further contiguous development beyond the needs of the 2036 time horizon. Choosing Barton Dene should mean development of only one green field site in Marlborough over a timeframe that stretches beyond 2036.

If further development land is required, site 2 is preferred over site 1. Site 2 is in an enclosed valley setting and development here would not impact the wonderful vistas along the Kennet Valley.

70

a resident of Marlborough I wish raise objection regards the draft Neighbourhood Plan.

Specifically the volume of housing development proposed and its location. Marlborough it seems, is at real risk of losing its small market town identity with the councils plans to continue to expand. The infrastructure already appears at saturation point. For example, Secondary education provision, at what point will St John’s be deemed at full capacity, it is already nearing 2K students, will the council plan to build another school to accommodate all the new residents?

Marlborough is blessed to be surrounded by an AONB, it should be a collective responsibility of the town council to preserve this, I object to the plans to build on the Barton Dene area as this will encroach onto this land and expand the town boundary unnecessarily.

	<p>I would be very interested to see the quantitative evidence that local residents are in need of affordable housing, there appears to be adequate provision especially with the new development Marleberg Grange. What data can the council provide to show how the affordable housing was allocated to local people?</p> <p>I shall look forward to seeing a summary of the feedback submitted to the draft proposal.</p>
71	<p>This response was sent as a secure PDF that we cannot convert to text</p>

72

THIS RESPONSE CONTAINED IMAGES - Having read through the Marlborough Area Neighbourhood Plan, I would like make the following submission. I make this submission as one who has nearly 50 years of experience at a senior level in County Council and National Government and who understands to pressure to increase revenue by way of council taxes and rates, and to meet government demands to meet often vague proposals.

The submission is in two parts; the first dealing with the overall plan for the Marlborough Area, and the second dealing specifically with the proposals for the St Johns Park, White Horse Road housing development.

#### The General Plan

The Plan sets out proposals for a further 470 residences spread over 4 or 5 sites. The Plan also highlights the limitations of the total build environment of Marlborough in relation to the lack of available space for parking, light industrial development, shopping expansion, limited transport options, (buses, trains), congested roads and high traffic volumes. Mention is also made of the lack of employment opportunities in the immediate area, over subscribed school places and inadequate doctors surgery and medical practice facilities.

With all of these constraints, it is difficult and illogical to accept that a further 470 houses, with up to 1500 to 2000 extra people and over 1000 plus extra motor vehicles in a town that is already under serviced and congested can possibly be a sensible option. It is therefore quite obvious that the Local Plan needs much more specific detail on how areas such as public services, schools places, doctor and medical facilities, transport links to the railway at Great Bedwyn can be improved, none of which is currently included.. While it is an ambition to regenerate the High Street, it is difficult to see in the present and immediate economic future, how this can be achieved. The town is served by two barely adequate supermarkets and the High Street dominated by thrift/ charity shops and other business that are from national chains and which have closed down or are under significant threat of doing so.

Furthermore, as land for light industrial development is really non existent, it is difficult to see how employment opportunities can be provided in the foreseeable future. At present a large percentage of the population travels by motor vehicle to other towns (such as Swindon, Devizes and Newbury) or even further afield for employment. This requires all families to own motor vehicles which in turn block the streets of the residential areas and contribute to the often serious congestion in

London Road/Salisbury Road and the streets around the town centre such as Georges Lane and the High Street. The A346 to Swindon is a road in poor condition, narrow and, in my opinion, quite dangerous, with its dips and adverse cambers.

The town Police Station, which is a relatively new building and in excellent condition, has been closed and demolition is planned, despite the fact it would make an excellent venue for an expanded medical offering for the town. The few remaining police officers have been moved to a small building in Georges Lane car park. At the present time, and it would be worse in the future, the police to public ratio is arguably the lowest in the region.

The problem of relocating the doctors' medical practice to somewhere beyond the leisure centre is that it would be a huge inconvenience to the elderly and others who would find the distance, and uphill, difficult to access on foot. As a consequence there would be a need for plentiful parking to meet demand withouts causing further street congestion.

In summary therefore, it is not sensible to put more strain on the already overstretched services, with no real objective planning to improve them in the short

term. It is imperative to first put the necessary supporting foundations in place, before increasing the population of Marlborough and mitigating the subsequent demands such an increase in the population will make.

The Proposal for 50 dwellings at St Johns Park/ White Horse Road

The proposal for 50 new houses in this designated Area of Outstanding Natural Beauty (AONB) overlooking the Vale of Mildenhall is quite unfortunate. My comments are not part of some NIMBY attitude, nor do I object to the provision of social or affordable housing. My concerns relate to two key aspects of the proposal. Firstly the issue of traffic and access and secondly, how the maintenance of the affordable housing will be delivered.

The St Johns Estate (hereafter called the Estate), as it is or was known, was built on an already developed plot of land formerly occupied by the St Johns School and was a good use of land no longer needed by the school.

The new proposal for 50 extra houses and infrastructure would be directly on existing green field agricultural land and thus infringe on the AONB which is land we should be preserving. However, the recent sightings of people in yellow Hi Vis jackets and clipboards in and around this land might give rise to suspicions that the decision to build there has already been made and that this consultation is therefore questionable.

Putting aside this quite important, if overlooked point, I wish to focus firstly on the issue of traffic and access.

If the proposed development were to go ahead, it seems patently obvious that the access to the site, both during and after construction, should be via Elcot Lane which is very lightly used, and could give direct access with much less disturbance than the current proposals to route traffic through the Estate, via Chopping Knife Lane and White Horse Road. Both roads are quite narrow, always full of parked cars, which already makes traffic movement difficult and turns it effectively into a one way street.

Currently on the Estate, cars must reverse when meeting others head on, queue at each end or pull onto the pavements while oncoming cars pass. This problem has been made worse by the current, and probably permanent, reliance on home deliveries. There is now a constant stream of vans of various sizes using Chopping Knife Lane for home delivery services, from early morning to late evening. Often they double park, blocking the roads completely.

Furthermore, the area of White Horse Road has a number of design problems already, such as twisting bends, adverse camber at the junction with Vespasian Road making the road slippery when wet, dangerous when icy and because of its width difficult for vehicles to turn into at the junction.

Left to right: Twisting bends on Whitehorse Horse showing high density parking; view up Chopping Knife Lane showing heavy parking including on double yellow lines; junction of Chopping Knife, Vespasian and Whitehorse Rds showing changing and adverse camber of the road.

During the estimated 2 plus years of construction, there would be considerable movement of large construction vehicles, cranes and digging machines, the passage of huge trucks carrying building materials and the parking of numerous vans etc of the various trades people employed on the site. All of this on roads already too narrow and almost one way and full of residents parked vehicles. The deposit of mud and debris from the building works and the damage caused by heavy vehicles to the roads and pavements would completely adversely impact upon the lives of the residents.

Once occupied, an additional 50 houses is likely to result in about 100 vehicles of various sorts belonging to the new residents, plus service and delivery vehicles, using White Horse and Chopping Knife roads in addition to the already heavy use by existing residents. It will simply be impossible to move along these roads in a two way system. Once again Elcot Lane could provide the solution for entry and exit to the proposed development.

Affordable housing is an admirable intention and where there is need I firmly support such objectives. However, it is also important that such a proposal is supported by rigorous and thorough research to ensure that the need is clearly demonstrated.

Furthermore, affordable housing carries with it the requirement to ensure that the properties are properly maintained to ensure they are kept fit for habitation and do not fall into a state of disrepair thus reducing their useful life.

On the existing Estate, there is evidence that some Housing Association premises have been neglected and it is my concern that this could happen to any new affordable housing that is built on the adjoining land. There are obvious examples of very poor ongoing maintenance to public pathways and flights of stairs between streets some of which which are overgrown with weeds and moss. It appears that no one takes any responsibility for these matters or holds to account those

who are responsible, such as Housing Associations This lack of maintenance in public areas affects all residents of the estate, both rental and private and detracts from the general environment.

Left to right: Flight of steps overgrown with weeds; weeds that have been allowed to take root and grow over a period of years.

In conclusion, the Area Neighbourhood Plan whilst appearing admirable at first glance if progressed under the existing proposals, will have a serious and adverse impact on the quality of life of existing residents in some parts of the town. For the St Johns Park estate, to particularly Chopping Knife Lane and White Horse Road.

I would encourage the Marlborough Town Council and Wiltshire County Council to:

1. Refrain from moving forward with the Plan as outlined in the consultative document until the very important negative aspects of the wider Marlborough infrastructure shortcomings, as highlighted in the above General part elements of the Plan, are properly addressed and rectified.> I have read with interest the extensive document known briefly as the Local Plan. As a resident of Choppingknife Lane for the past almost 8 years, I have a few observations to make about the current traffic situation and how this would be exacerbated by the building of 50 new homes with access via White Horse Road and, necessarily, along Choppingknife Lane.

>

> The housing development as it stands now suffers from having only one way in and out. At certain times of the day, there is a great deal of traffic negotiating around many parked cars, and children walking or cycling to /from school are vulnerable as they approach the need to cross Choppingknife Lane from one pavement to another with limited visibility, and often with drivers in total disregard of the speed limit. This would only get worse with more cars.

>

> Being so far from the centres of employment, very few people walk to work or use public transport. Very many households need 2 cars, but parking

provision for those houses without garages is limited to one car, meaning many cars are parked kerbside.

>

> In addition, many people seem to store quantities of stuff in their garages, leaving no room for vehicles, and some have turned their garages into gyms or workshops instead.

>

> The junction of White Horse Road, Cunettio Gardens and Choppingknife Lane is already dangerous, particularly because it is necessary for visitors (and those who choose not to use their garages) to turn around at this point when leaving the estate. It is all too often that a car executing a reversing manoeuvre is 'rushed' by another coming 'from nowhere', and there have been several near misses. Once again, the prospect of perhaps upwards of 70 more cars increases the likelihood of an accident at this point.

>

> One way to militate against this would be to have a mini roundabout at this junction. In addition, it would make sense for the proposed new properties (only) to have access from Elcot Lane. Some speed cameras might also be useful.

>

> Apart from concerns about increased traffic, I would also like to voice a hope that the public spaces (paths, steps, green spaces) in the new development would be better maintained than they are currently on St John's Park, where litter, weeds and general unkemptness abound in patches. The strategic placing of bins for litter and dog dirt would be greatly appreciated.

>

> There is obviously a need for more housing in the area, and I do not doubt that it makes sense to build alongside existing property. But St John's Park was built on a brownfield site, and the proposed development is on a greenfield site. To spoil the quality of life for residents already living here by not considering the traffic issues very carefully would seem to be a pity indeed.

2. Re-think the impact to and loss of the land of an Area of Outstanding Natural Beauty.

3. Re assess the proposed access to the new development and actively consider Elcot Lane as the means of entry to and from the new development both during construction and after completion of the build work. If Elcot Lane cannot be used, then you would need to completely rethink and analyse in depth the huge impact that construction vehicles and equipment will have, over a period of 2 plus years, on Chopping Knife Lane and White Horse Road. It would then be necessary to establish what remedial work, repairs and reconstruction of the roads and pathways would be required and who would be responsible for carrying out these remedial works. In addition, it would be necessary to carry out a traffic impact assessment of the junction of Chopping Knife Lane and the A4 London road, given the significant increase in vehicle movements the development will attract, including re-engineering at the junction which is already a requirement at this location.

I you were to publish such responses received by you I would be obliged if you would redact my name, address, email and telephone from any such published documents.



73

THIS RESPONSE CONTAINED IMAGES. We would like to thank the steering group and town council for the work that they are doing putting together the MANP on behalf of the community.

Policy MARL 1:

We think the plans very successfully meet the need for additional housing, whilst providing a balanced mix of affordable houses appropriate to each site, and in widely distributed locations that share the impact of this throughout the community, and without loss of biodiversity .

We would however like to note that additional housing could be built at Barton Dene if the Medical Centre (Health Centre) were to remain on its current site. Whilst understanding that the MANP is not able to specify this, councillors/planners/architects should look to ensure that the design for these homes shows a stronger relationship to the historical local character of buildings than other recent large developments.

Policy MARL 2:

We strongly oppose any proposal to relocate the Health Centre to a site at Barton Dene. Whilst in principle we could support a relocation to provide for alternative residential/employment opportunities at the current site, we would do so only on the condition that an alternative suitable town centre site could be found for the surgery.

Whilst we would encourage expansion to include a wellbeing centre that provided facilities for individual consultation/group sessions for conditions such as depression/anxiety, maternity, smoking, eating disorders, drugs and alcohol abuse, exercise, youth counselling and elderly care etc. we do not see significant advantages to moving these adjacent to the Leisure Centre.

As we do not believe that the community are widely aware, nor been given any opportunity to consult on a move of the Health Centre, we think it inappropriate for support for this to be included in this plan. Indeed we would be concerned that residents could be sufficiently angered by this move, in turn resulting in them not supporting the MANP.

The surgery needs to be most widely accessible by as many residents as possible on foot from home, and also have convenient and sufficient adjacent parking during opening hours. Barton Dene will never fulfil either of these most basic and essential requirements, and would drive additional and unnecessary car use across the town, with impacts on noise, congestion and air quality to all.

If an on-site pharmacy were not included in the plans, unnecessary time, parking expense and travel would be inevitable.

Moreover, in order to maintain a thriving high street, we ought to recognise the power the surgery has to bring people into the centre of town. The Barton Dene site does the opposite - pushing visitors away to the periphery rather than drawing them in.

Whilst agreeing that demand for General Practitioner and Nursing needs is increasing within the community, we should note that, as a result of actions necessary to prevent the spread of COVID-19 we are seeing the first beginnings of what can be achieved with telemedicine. That is, the convenience of remote telephone/video consultations leading to a reduced requirement to attend a surgery, hence having consequential reductions in the requirement for Practice space.

Furthermore, has the CCG thoroughly considered how they could extend/build on the existing site to expand the floor footprint whilst also adding additional floors to at least double the internal space of the surgery in a way that would remain consistent with the suburban character of George Lane ? With skilful design and considerate construction this could be achieved with minor interruptions to surgery operations, particularly if in the short term an alternative building (such as the nearby redundant police station) could be used.

Policy MARL 3:

We support this as set out in the Pre-Submission plan. The site designed as H on the informal consultation document being most suitable for this. Site G significantly less so as would reduce open views, and be more noticeable within the village.

Policy MARL 4:

We support this as set out in the Pre-Submission plan.

Policy MARL 5:

We support this as set out in the Pre-Submission plan.

Policy MARL 6:

We support this as set out in the Pre-Submission plan. Indeed we should go further and actively encourage small service businesses looking for office space and providing local employment meeting the 1FTE per 40sq.m net internal area or less requirement. With internet shopping here to stay, and High Street retail seeing significant changes with probably further vacant premises, do our Town Centre and brownfield development plans support such businesses ? Is this something that the MANP can address ?

Policy MARL 7:

As residents of Hyde Lane we are concerned about any additional traffic that the proposed car park would have on a lane where opposing traffic frequently gets stuck at the bend. This increase in congestion would certainly lead to an increase in damage to the raised bank (where erosion has already been significant), frustration amongst drivers, and as sadly observed, altercations between drivers.

Whilst agreeing with the benefit offered for Rugby Club users, we doubt that the further car parking at this location would be used by High Street workers or shoppers. Passing by the current car park at this site over many years at different times of day/days of week, there is usually spare parking available, other than on those occasions when the Rugby Club is holding an event.

In the absence of additional suitable land in the town centre, a similar grass grid, permeable car park on the Common junction with Free's Avenue (as used by car boot sales and when the circus, or mop fair are in town) would be more used due to it's closer proximity to the High Street.

Significantly, might we all be overlooking the possibility of making better use of the existing High Street for parking! There is clearly potential to use a little extra of the width of the High Street to create more angled nose-on parking , as is the case currently outside the Merchants House and neighbouring shops on the northern side eastern end. For instance, this could be an option for the spaces to the west of Ailesbury Court up to Waitrose where there is more than enough width on the High Street.

Policy MARL 8:

We do not support the proposal to use the parcel of land adjoining Free's Avenue for an extension to the cemetery. It will not be a very peaceful place because of the passing traffic, and even with hedging planting will not block out this noise, therefore failing to meet the basic requirement of a cemetery. As a whole the population is aware of the shortage of traditional burial spaces and is increasingly favouring cremation with ashes being placed in a churchyard memorial or scattered at a place close the hearts of loved one. Also with the growing trend for natural burials, might it be appropriate to explore this with Savernake Forest, and other local landowners to see if a site could be made available for this ?

Policy MARL 9:

We support this as set out in the Pre-Submission plan.

Policy MARL 10:

We support this as set out in the Pre-Submission plan.

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Policy MARL 11:

As owners of the house at the junction of REDACTED (REDACTED) with many of the characteristics that you define, we support the extension of the Cross Lane, Cardigan Road and Back Lane ASQ to include much of Leaze Road.

As users of Hyde Lane we are very aware of the damage that additional traffic is having on the character of the Lane. The raised banks are being eroded further and further away by vehicular traffic (there are currently no restrictions on either weight limits or speed). Furthermore, residents driveways are being used as passing places with consequential damage to private property, and consideration by all the relevant parties needs to be urgently given towards addressing this.

It is also appropriate to highlight that during wet weather, surface water is running down from The Common to below Cardigan Road before it encounters a drain, and that this is also contributing significantly to erosion of the Lane edges. The two drains below Cardigan Road are frequently blocked up, resulting in water, silt and debris ending up across the High Street. Clearly additional drains at several points up the Lane are essential if this historic country lane is to be preserved for the future.

Policy MARL 12:

We support this as set out in the Pre-Submission plan.

Policy MARL 13:

We support this as set out in the Pre-Submission plan.

Policy MARL 14:

We support this as set out in the Pre-Submission plan.

Policy MARL 15:

We support this as set out in the Pre-Submission plan. However, whilst we understand the plan has no remit to set out specific details, it is not clear who is responsible for improving this Green Infrastructure Network and ensuring it "will become more valuable over time". In particular, we think we should be looking to The Common site to improve biodiversity and habitats. Currently, we see this as a huge missed opportunity both in terms of the environment, and in terms of its potential to be a desired recreational destination. Whilst we understand that it is necessary to keep some areas of The Common as plain mowed grass (for car-boot sales, the circus etc), there is so much more we could be doing on the surrounding land. For example, currently there is a small area of mowed path in between 20cm of short wildflower. Why not let this wildflower grow tall - enhancing habitats, breaking up the landscape, and creating more of a 'route' and 'destination' for walkers.

Policy MARL 16:

We support this as set out in the Pre-Submission plan.

Policy MARL 17:

We support this as set out in the Pre-Submission plan.

Policy MARL 18:

We support this as set out in the Pre-Submission plan.

Policy MARL 19:

We support this as set out in the Pre-Submission plan.

Policy MARL 20:

We support this as set out in the Pre-Submission plan.

Policy MARL 21:

We support this as set out in the Pre-Submission plan

On the matter of increasing town centre parking, could we by changing from parallel-to-kerb, to angled nose-on parking along more of the eastern end of the

high street, safely and easily create some additional spaces ?  
(Pictures showing this included in the attached document).

74

Firstly, I'd like to thank the committee for all their work on this – I can see that there has been a vast amount of detailed work put into the draft plan, which is full of thoughtful and sensible proposals.

I'd like to make some observations about the connected issues of parking, green infrastructure, promoting exercise, air quality, and our High Street as a public space – some of which are prominent in the ANP and some of which aren't – but are nonetheless relevant to it.

Is the parking survey still reliable data?

The parking survey was undertaken in 2017. Given the increased awareness of the climate emergency, the impact of greenhouse gases, and of the importance of air quality I am not convinced that the survey would have the same results if repeated now: there's a possibility that it is out of date.

Stating the obvious, people need parking because they arrive in cars – and if you ask them about how easy it was to park, unless they drove straight into a space on arrival, it could have been easier, so that's what they will tell you (and how difficult they find it is subjective not objective). There also appears to be an assumption that parking and retail (now definitely questionable) are key draws for people – but no consideration of the fumes, noise, or risk to pedestrians from large cars and similar vehicles that can equally put people off from using the High Street.

However, there does appear to be an appetite to come into the town centre by bike or on foot, which begs the question what would better encourage people to do so. Usually, if something is convenient, safe and pleasant, people are happy to do it.

GBI – more ambition

When I look at the GBI map, there are to my eye some broken links – especially providing cycle routes into the High Street. You do have to be brave to cycle into town eg from the west side of town; and in addition cyclists can make pedestrians feel less safe.

Please can the Plan be more ambitious with regards to GBI in order to increase cycling and walking, especially into the town centre, and thereby help reduce the pressure for parking spaces. The new housing proposed to the west of the town must surely have good quality walking and cycling into town built in – even if this requires some compromises for motorists or some imagination to make them work. This is only really a plea for better balance between cars and others, and to take more account of the needs and preferences of people who want walk and cycle.

In addition, increasing walking and cycling should materially improve air quality in the High Street – I note that improving air quality (essential for both younger and the older people and important for all) is not anywhere in this plan despite the known, well-evidenced and severe impacts on health from exhaust gases and particulates.

Town centre – a better public space

Please can the Town Centre policies (and future plan) be more ambitious in making the High Street a better public space: a better balance between vehicles, cyclists and pedestrians; better air, less noise, and more greenery; a better environment for outside eating and drinking, outdoor spaces and facilities for sitting, or for meeting up; and perhaps more of a feeling of community it is more than a commercial thoroughfare in the life of the town and this dimension could be enhanced.

I recognise that some of these aspects are marginal to the formal scope of the plan (this is more of a defect in the plan's terms of reference than anything

	<p>else). However, even while they are not formally in the plan's scope, they can nevertheless be factors in the decision-making about the housing and where it goes, the balance between motoring versus other means of transport, the likely impacts on our natural environment and the opportunities to enhance this instead, and our overall amenity.</p>
75	<p>I appreciate a lot of work has gone into the plan by, I assume, councillors with the best interest of the town as their goal. That said, I found the plan disappointing in several areas. My main concern is that the focus appears to be simply on increasing the housing stock with insufficient justification as to why. There's little explanation how the infrastructure will be improved to meet this desire to add hundreds of new residents. Apart from a few extra 'informal' car parking spaces at the rugby club, the plan seems to be to simply 'encourage' as yet unknown proposals to the parking problem. Unless I missed it, there's little (if anything) new for the youth of the town in the plan. Having personally benefitted hugely from the skill of our local Drs over the last 34 years of living in Marlborough, wonder if building a new surgery in a less accessible location on the edge of town will in itself solve the chronic delays residents experience in booking an appointment - it seems unlikely as the current problem appears to me to be lack of available Drs rather than physical space in the surgery. We are fortunate to live in a peaceful and beautiful market town, I fear the core proposals of the plan risk changing that.</p>
76	<p>4. Land off Cherry Orchard Page 26</p> <p>Concerned about the increased traffic in Cherry Orchard as a result of this development. Currently, during school term times the top of Cherry Orchard is a traffic jam of cars either dropping or collecting children from St Johns. Cars turning and parking to collect children blocking driveways. The 3 new houses and approximately 15 flats at the top of Cherry Orchard are still unoccupied but when the additional traffic from this site and from the proposed development are trying to access the top of Cherry Orchard while all the parents are turning their cars round or parking then it will be bedlam. The vehicular exit from all these new houses and flats will be blocked! I did see in the early plans for Marleberg Grange that there was to be a school drop off place on that estate so that parents could drop their children off there and they could walk up the footpath to school.</p> <p>Driving up and down Cherry Orchard, which is in effect a single track road, will also become increasingly difficult at all times of day as more cars need to use</p>

	<p>it.</p> <p>Would it not be possible for the vehicular exit from this new estate to go through the development proposed on the land rear of Salisbury Road (Page 24) and through Marleberg Grange?</p> <p>The new flats at the top of Cherry Orchard are currently unsold and of the three houses 2 are allegedly under offer having been on the market for over a year. I am not sure what the reason is for this but could it be that people don't want to live up here?</p>
77	<p>Page 11 paragraphs 2.9 and 2.10</p> <p>No relevant policy currently – new policy to be included</p> <p>The draft plan needs updating to recognise that:</p> <p>(i) existing spaces and facilities used for sport should be protected and improved; and</p> <p>(ii) more spaces and facilities for sport are needed and this must be taken into account in future planning</p>
78	<p>We've had a look at the draft neighbourhood plan and whilst most of it seems logical for the development of our lovely town we have major concerns about the proposed move of the medical Centre from its existing central location in George Lane to a new site at Barton Dene which appears to be out on a limb when compared to George Lane.</p> <p>Section 5.7 on page 28 of the plan states that the George Lane Health Centre is on a constrained site but a look at the map on page 58 shows quite a large site that could take a larger new building with some imaginative planning - e.g. redevelop the buildings on George lane, build on the existing car park and possibly retain the existing building. Car parking could be moved to the rear of the building (keeping existing trees in place) and the movement of parking to this location would also minimize any overlooking/overshadowing of properties to the north of the river when compared to the housing development proposal for the site.</p> <p>Not only would redevelopment costs of this site negate new build costs on the Barton Dene site but it would also have considerable environmental and health benefits in terms of access by foot for the majority of the town due to its central location and large public car parking available adjacent to the site - what's the proposed car parking arrangements for Barton Dene, and how much housing land would this take?</p> <p>I note that the Barton Dene site proposal advises it will be accessible by public transport but given the parlous state of public transport and the fact that it's subsidized by the taxpayer in many examples, how will these costs be factored in when Barton Dene is considered?, not to mention the probable limited bus service available vis a vis bus services serving a central location. Accordingly it's highly probable that the majority of visits to Barton Dene would be made by car thereby adding traffic to College Field /Barton Park and increasing pollution in this part of Marlborough.</p> <p>We trust these comments are useful and welcome any feedback</p>

## COMMENTS ON THE MARLBOROUGH NEIGHBOURHOOD PLAN FROM COUNCILLOR NICHOLAS FOGG, MBE, FRSA.

An initial disclaimer:

It appears implicit in Section 1.1 that the plan is being presented with the endorsement of Marlborough Town Council. As a Town Councillor, I cannot endorse something

that I have neither been asked to discuss – or endorse. This, of course, is not to negate the huge amount of effort put in by the working party on the plan's creation – or to prejudge its content. It has also been suggested that it was inappropriate that a landowner with an interest in a proposed development site was represented on the working party. I would stress that, if indeed, this conflict of interest existed, I had no prior knowledge of it.

I would also suggest that the time between the closing of the time for comments on the plan on March 8th and the proposed referendum upon it on May 6th is inadequate to assess the submissions and make necessary amendments. Although this may not have been the intention, it would appear the document is a fait accompli.

Comments on the Plan

We started from the recognition that the High Street model  
as we know it is finished. We need a radical transformation  
for it to have any chance of survival. Anything short of this  
is just window dressing, keeping a failed model on a life-  
support machine.

The Grimsey Review

“Where there is no vision, the people perish.”

Proverbs 29.18.

While it contains some information of value, overall the Marlborough Area Neighbourhood Plan (MANP) is a disappointing document. It holds no vision of a bright future, but consigns Marlborough to the role of a dormitory town with people going elsewhere to work and with increasing congestion and pollution in its thorough-fairs.

The complexity of an issue such as housing cannot be over-stressed. In 2015, the Wiltshire Core Strategy envisaged 922 new houses being built in the designated Marlborough Area of which 680 would be in the town of Marlborough. According to the Housing Land Supply Statement of March, 2017, all but 57 of these houses had been completed, or had been committed for development. The ‘required’ sites had already been identified. This is acknowledged by ‘Cobweb’, the consultancy employed by Marlborough Town Council in 2017.

Despite the virtual achievement of the housing target, HM Government has increased the target for Wiltshire to provide another 45,000 units. There is no indication of how local communities will maintain their integrity in the face of this additional dictat. Thus, we await the Wiltshire Local Plan (WLP) for Marlborough. Given that this is likely to be more comprehensive than the MANP and have a greater standing in terms of implementation, it might have made



sense to wait until this appeared, unless, of course, the essential data mentioned above was included in the MNP. In which case, it would have provided a useful base from which to defend its position from any undesirable aspects of the WLP. Perhaps, by preceding the WLP, Marlborough will be in a stronger position to see off any undesirable proposals, but it would be helpful to have this potential strategy delineated in the MANP.

In its very helpful survey, Cobweb Consulting appears to suggest that Marlborough's immediate housing needs will be fulfilled by the completion of the Core Strategy. It suggests that the two classes of people most in need of housing are single people and those with growing families, but these are not specifically mentioned in the Neighbourhood Plan. Indeed the MANP states that 'proposals for single tenure.... schemes will be resisted'.

The Cobweb survey, although excellent in many ways, is vague on specifics. It does not specify the level of social housing Marlborough requires. It does not quantify the level of social housing required to fulfil present and future needs. Nor, for that matter, does the Neighbourhood Plan. Yet such statistical analysis is vital if such a scheme is to be effective. It is difficult not to concur with the statement from Preshute Parish Council that the MANP 'is based on flimsy evidence of need'. Cobweb also suggests a shortfall in the take-up of lower-paid jobs in the town, an issue that may relate to lack of social housing, but, without an adequate database, who can tell?

It would seem to me a mistake to set too much credence on responses to surveys as to priorities for the town's development. Although they are not devoid of value, the responses are based on simple answers to complex questions and they tend to be led by the material presented.

'Affordable' housing is defined in the document as a desirable factor, but there is little attempt at definition of what is meant by 'affordable'. It is defined by the Government as 'social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market', but, a briefing paper released in August 2017, the House of Commons Library commented that there is 'a great deal of ambiguity' in the way the term 'affordable' is used in housing - there is no standard definition and approaches differ between local areas.

Of course, all housing is affordable to those who can afford it. Whether such a scheme would benefit first-time buyers in Marlborough or those seeking to move to a more pleasant environment from elsewhere is open to question. An analysis of what had happened in relation to previous schemes of this nature would have been helpful. Nor is there any definition of the 'specified eligible households' defined by the Government. This is a huge flaw in the MNP. Unless such definitions of eligibility are incorporated, it is likely that incomers will take advantage of the availability of the cheaper housing and good schooling and move into the town, which would defeat the original purpose of the exercise.

In a sense, the concept of 'affordable' housing contains an inner fallacy – that such a policy can fulfil housing needs in anything other than the short term. Once the immediate generation of housing needs is fulfilled, its place will be taken by others and yet, the MANP concedes that Marlborough's 'landscape setting' restricts the possibility of future development. If the relatively few existing sites are used up, what happens to the next wave of Marlburians looking for homes – and the plan is supposed to take the town through to 2036? What is needed is a strategy that will enable accommodation to those requiring it for the whole of that time, not just as immediate fix. This is an issue that should be reconsidered by the working party.

Similarly, there is little analysis of the potential impact of the proposed housing developments on the community infrastructure. The proposed development in the Salisbury Road would certainly add to the congestion in that area, notably at the roundabouts with its junction with London Road and George Lane, already notorious bottlenecks. The current development there aroused a lot of controversy on these grounds.

The MANP proposes the reestablishment of the Marlborough Surgery on the proposed Barton Park development site. This would substitute a central location which is highly accessible for one on the outskirts of town which would only be accessible to the aged, sickly and infirm by public or private transport. The MANP cites the provision of public transport, but nowhere does it suggest on what basis this would be provided. Nor is there any indication of whether a developer would be prepared to take on such a project, or of a default position if such an arrangement did not materialise.

It would seem a grave oversight that employment creation is not listed as a priority under the declared objectives in Section 5.2. To expand the population of the town without examining the possibilities are providing sufficient jobs to match the increase must be seen as a severe oversight. Just two paragraphs are devoted to Commerce and Industry and one of these is just a reprise of firms that have left the town in past decades.

In fact, the MNP devotes as much space to the expansion of the cemetery as it does to issues of employment. Any increase in the town's housing stock should be accompanied by at least an examination of the possibility of the expansion of employment opportunities, otherwise the Marlborough will become a mere dormitory town in the way that the MANP appears to acknowledge, rather than a place with a vibrant life of its own. A random search reveals at least 50 companies operating in Marlborough and its immediate environs, including such names as Stratagem, Design 360, Sarsen Technology, John P. Kummer, Tarant Air Conditioning, Adam Matthew Digital, Designer Billiards, Robert Kime and Ramsbury Brewery.

The MANP states that economic development in the town has been inhibited by lack of sites in which existing businesses can expand. It is therefore disturbing that no provision for employment sites appears to have been made in the plan. The sites earmarked for housing could have incorporated employment facilities. Nor does the working party appear to have examined the possibility of developing sites outside Marlborough, despite being entitled 'The Area Neighbourhood Plan'. A number of business sites have been established in local redundant farm buildings and the potential may well be there to extend such schemes. The two sections of the community that Cobweb Consulting identified as most in need of accommodation – single people and growing families are also those most likely to be those seeking opportunities for employment. Yet the MANP does little to address, or even acknowledge their special needs.

The MANP acknowledges that although the retail facilities in the town centre have ridden the 'storms of the past decade better than most, with few vacant units, we cannot be complacent in the face of increasing competition from online trading', yet there appears to be little in the plan to address the task of making the High Street a place that people will want to visit. It is notably difficult to predict future trends from present and past ones, but the MANP would certainly benefit from an acknowledgement of current thinking on the issue of the survival of the High Street. The Grimsey Review, the series of reports produced under the auspices of the former Chief Executive of Wickes and Iceland, is well worthy of consideration. It suggests that, to survive, High Streets have to become community-led facilities: places where the arts and recreation can flourish.

An analysis of retail trends would be helpful. It would be helpful to know, amongst other things, the extent to which footfall to Marlborough retailers is dependent on the presence of Waitrose. Studies of comparable towns, at home and abroad, and how they've handled this crisis, would also be useful.

The proposal on parking in the MANP not only goes against all current progressive thinking on the issue, it would contribute little or nothing to the solution of the supposed problem it is addressing. The current policy of the Ministry of Transport is to make town centres more amenable to walkers and cyclists. A modest start in support of this scheme was made with a small number of pavement extensions in response to the Covid crisis, leading to the loss of a small number of parking places. Nor does the emerging Wiltshire Council scheme for providing much-needed residents parking gain any consideration. The Council has committed itself to enacting this in 2022 and Marlborough Town Council has requested that a pilot scheme be enacted in the interim. Instead, the

working party's strategy seems to involve a never-ending expansion of available parking. This even extends to making parking available on The Common, which is so far from the shopping centre as to make it highly unlikely that anyone would choose to walk up the hill from the High Street carrying two heavy shopping bags in order to take advantage of the facility. No survey of parking trends has been undertaken. The working party appears unaware of the current controversy concerning the use of The Common, emanating from proposals for an extension of the land allocated for sporting facilities. Nor is any awareness of the role of Marlborough Town Council, as Guardian of the rights of The Common demonstrated. Under the Commons Act 2008, formal consent is needed to carry out works that impede or prevent public access to common land. Such legislation was enacted to preserve the heritage of common land for future generations. HM Planning Inspectorate is responsible for determining applications under the 2006 Act regarding common land in England. All applications are determined on behalf of the Secretary of State for the Environment, Food and Rural Affairs (Defra).

Surely there has to be a time when it needs to be recognised that town has reached its capacity with regard to parking spaces. I would suggest that that time is now. Otherwise the town is at risk of becoming a giant car-park with its special character destroyed. On the assessment of the MANP, people coming into the town only find difficulty in parking at certain times. In which case, there may be solutions other than a relentless surge to increase capacity. A campaign to persuade more people to shop at off-peak times might be less than effective, but would be worth a try. It might encourage this if parking charges were increased at peak times.

Nor is the huge problem of air quality in certain areas of the town adequately considered. Indeed it would appear that the MANP seeks to increase pollution by supporting policies that are bound to increase it. Yet this is literally a matter of life and death. According to Public Health England, 'Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure.' There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Since several streets in Marlborough are recorded as having levels of pollution well above the acceptable average, it is likely that this is having an adverse effect on the population. A clear strategy for improvement is required. As a contribution to what I hope will be a full discussion of the issue, I append herewith a paper I contributed to the MTC as Appendix A herewith. I have amended the original in accordance with subsequent developments.

#### APPENDIX A

#### RESPONSE BY CLLR. NICHOLAS FOGG TO PROPOSALS BY THE MINISTRY OF TRANSPORT FOR POST-PANDEMIC ARRANGEMENTS TO IMPROVE THE QUALITY OF LIFE IN URBAN AREAS

##### Background:

The centre of Marlborough is one of the four most polluted urban areas in the County of Wiltshire. Long-term monitoring has demonstrated that levels of toxicity in parts of the town are well above the level categorised as dangerous. In parts of the town, the air at times can only be described as putrid. It is now recognised that the respiratory conditions arising from such a situation are the greatest single cause of disability and death in the UK in normal times. This represents a huge responsibility for those who have been given authority for public welfare, whether they be elected representatives or delegated officials.

In the past the response to this situation has been characterised locally by an unacceptable inertia, although many other centres have taken steps to address this problem, but unexpectedly and encouragingly the opportunity has arisen to progress towards a level of improvement to the quality of life in the town. This has taken the form of a document from the Ministry of Transport, giving guidance on the means of improving urban locations for the benefit of cyclists

and pedestrians, thereby improving the health and well-being of the nation. The forward by the Secretary of State is categorical that significant action must be undertaken.

The government therefore expects local authorities to make significant changes to their road layouts to give more space to cyclists and pedestrians. Such changes will help embed altered behaviours and demonstrate the positive effects of active travel. I'm pleased to see that many authorities have already begun to do this, and I urge you all to consider how you can begin to make use of the tools in this guidance, to make sure you do what is necessary to ensure transport networks support recovery from the COVID-19 emergency and provide a lasting legacy of greener, safer transport.

The response of Wiltshire Council to the issue has been immediate and demonstrates that the role of Marlborough Town Council (MTC) in determining the issues may be, at best, limited. It has formed multi-disciplinary teams of Officers for each community area. 'These have initially been asked to identify potential sites and measures using their local and technical knowledge. Given the Government's timescale requirements and the growing on-the-ground need, it is not proposed to carry out an extensive consultation process either with stakeholders or the public. Rather, officers will liaise with local members (through Area Boards) and city, town and parish councils to further identify potential sites and measures using their local knowledge. In addition, suggestions from members of the public, stakeholders, partners and other bodies will be considered. Ultimately, it is proposed that all potential schemes will be assessed against the agreed criteria by a panel of officers to identify a priority list for design and implementation. Where applicable, measures will also be subject to a Road Safety Audit and accessibility audit prior to implementation.'

And, significantly, "the local Wiltshire Council members and the relevant city, town or parish councils will be informed of the intention to install the measure'. In other words, decisions may be made by WC officers unilaterally in response to what appears to be a governmental resolve to ensure that the situation post virus crisis is not simply a return to the status quo ante pestis. If MTC wishes to have any input into the process, it must come up with its own points for discussion with the enablers. Consulting local shopkeepers will simply not be seen as an adequate or sufficiently positive response. Nor, worthy, as the cause may be, is the improvement of the footpaths on the outskirts of the town, which would be seen as a diversion. Nor can loss of parking be regarded as an argument in itself against positive proposals. Although parking may be an important issue, in any argument involving the health and safety of cyclists and pedestrians, it is bound to take second place. It would appear that existing parking facilities in the Town Centre are more than adequate, particularly in the context of the probable reduced footfall post-virus crisis.

Thus, if MTC wishes to have any influence over this process, it must come up with proposals that fulfil the Ministry guidelines. This at least would give it some leeway in establishing the basis of the discussion.

Some Proposals for the Amelioration of Health and Safety Provision for Cyclists and Pedestrians and the Improvement of the Urban Environment in Central Marlborough

First, let it be said that, although Marlborough has lagged behind many other places in the improvement of the urban environment and has greeted many positive proposals with a disturbing negativity, it is not an easy issue. Situated as it is on the junction of East-West and North-South major through routes, the opportunities for such provisions as pedestrianisation are more limited than in many other centres. Nevertheless such opportunities do exist and it is important at this stage to examine them carefully with a view to instituting agreed schemes, initially on a trial basis.

It must also be said that where schemes for the improvement of the locale for non-motorists have been instituted, it has resulted in a considerable increase in footfall and trade. Witness the crowded pedestrianised areas of such places as Bath, Swindon, Oxford and Stratford-upon-Avon.

Faced with the competition from online shopping and multi-complex outlet villages, the only thing that will save the nation's High Streets is to make them places that people actually want to visit. Negativity in the face of decline is likely to accelerate the process rather than defer it.

As a result of the Minister's initiative, Wiltshire Council created a small number of pavement extensions in Marlborough High Street. These were at the request of the proprietors of the adjacent premises, all of whom were in the hospitality business. The exception was a small section of the arm of the High Street that leads into Kingsbury Street, where a pavement extension was created to further the cause of social distancing during the Covid crisis. Indeed, all the pavement extensions were presented by the council in this way, although they were actually a result of the Minister's initiative.

The initiative led to the loss of very few parking spaces and, with one exception, the proprietors expressed satisfaction with the arrangement, as representing a boost to their trade. This scheme should be continued and, where possible, extended, although there are areas of the High Street and elsewhere that do not lend themselves to such pavement extension. This reveals that the interests of all outlets in the High Street are not necessarily the same. The trend away from retail into service provision has undoubtedly changed the perspective. In the past MTC has tended to favour the small shopkeepers over all other interests. If the objective is to raise footfall in the High Street, this is a mistake. It is the leisure facilities that increase footfall and MTC should favour the pavement extensions outside their premises becoming permanent.

Other proposals.

Saturday Market

I cannot think of a market that is held in a more polluted place than the one in Marlborough and a great deal of consumables is sold there. That is why I always go early to the market, hopefully before the adulteration caused by pollution has taken its full effect. As well as the obvious dangers of toxicity, the market causes a mingling of pedestrians with passing traffic, which is a very bad idea.

It is tempting to suggest that the market should be moved to the less polluted area of the Parade, but I don't think that would work either from a consumers' or traders' point-of-view, since the obvious focal point of Marlborough shopping is Waitrose.

Instead, the Saturday market should be moved to the north side of the High Street between the Town Hall apron and the bus stop. This would reduce considerably pollution since the stalls would face away from the carriageway. It would also eliminate the danger to pedestrians. Stalls could even be located for a short way along the arm of the High Street that extends to the north side of the Town Hall. An added bonus of such a scheme would be that it would create a temporary shopping precinct extending to the junction with Silverless Street. This would be greatly to the benefit of the businesses in the area, which suffer from being somewhat on the fringe of things. As has been pointed out above, pedestrianisation invariably increases trade.

It also appears that such a move would not only improve the health and well-being of the public and the market traders, it might well contribute to an improvement in the size and quality of the market. A colleague on MTC, Cllr. Peter Cairns, has commented: 'I've spoken to a number of traders who deserted Marlborough for Newbury instead. Their explanation was having to work in the most anti-social, polluted, dirty & congested area was affecting their health.'

Since the lost parking spaces would be replaced by the release of those in the centre of the High Street, it is probable that the resultant increase in parking

spaces would more than offset those lost in this entire scheme.

One of the aspects of the Ministry guidance is that it suggests that schemes can be introduced on a temporary basis and the effects monitored. This is the procedure that has been followed in many other places where an element of pedestrianisation has been introduced, almost always with great success. I would suggest that such a scheme is introduced initially on a six-month experimental basis.

#### High Street north of St. Peter's Church

There is absolutely no reason why this area should be not be pedestrianised, with permitted access for residents, emergency vehicles and deliveries. This will provide a safe passage to and from Marlborough College and provide a respite for residents from the 'rat run' for which this little section of street is frequently used and for which it is entirely unsuited.

Ideally the street should be resurfaced with stone or brick cobbles. This would provide a psychological barrier, discouraging motorists from entering the space. In the past, Wiltshire has shown a strange reluctance to employ such materials, although they have had a positive effect in other places. Perhaps the Ministry guidelines may change this approach – at least a band of cobbles at each end of the section would be helpful.

#### Cyclists in the High Street

Certain it is that there is a need for increased provision of cycle parking in the High Street. My surmise is that this should be close to Waitrose, but it would be helpful to consult cyclists and their organisations.

#### The Parade

The top end of the Parade from its junction with New Road and the High Street should be pedestrianised. How far down the Parade this measure should stretch is a matter for discussion. Ideally it should stretch down to the lower boundary of the Crown Hotel, as it did during the Saturday of the jazz weekend. Access to the car park to the rear of Cross Keys House might be a problem, however, so this should be taken into consideration. Consultation would also need to take place with the Fire Brigade to consider how such a measure would affect its emergency provisions.

Again, pedestrianisation would give a boost to retailers in the area. The number of parking places lost would be very few, whichever option was adopted. According to the ATC, the proprietor of the Bear has expressed his support for such a development.

#### London Road

The pavement on the south side should be widened to bring it into line with the rest of the facility. At present it represents a danger to pedestrians, particularly those with small children. There has also been a problem with vehicles mounting the pavement and damaging the adjacent buildings.

There is no coherent reason why this measure should not be enacted as soon as possible. I'm only surprised it has not been done before.

#### Tree and Other Planting

	<p>Trees should be planted on pavements where practical in the most polluted areas of the town such as New Road (High Walls) and London Road. This would reduce pollution and also contribute to the enhancement of the urban environment. I understand plane trees are ideal because of their shallow roots and their robust ability to withstand toxicity. The great cities of the world all have large numbers of trees to enhance their beauty and reduce pollution – for example, Berlin’s famous Unter den Linden. Expert advice should be sought on this. Perhaps Marlborough in Bloom could be involved. There may be grant funding available for such a project.</p> <p>Obviously, there are places that are unsuitable. It has been suggested the High Street may be one such (there are two trees there already: has anyone noticed?). There may be a few possible places (outside the library?). Also, issues like the necessity for the emergency lanes during the Mop Fairs needs to be considered.</p> <p>High Walls would be ideal for the creation of a ‘Living Wall’, which would not only reduce pollution, but enhance the attractiveness of the area. This could become an important local project, an exciting follow through from the town’s success in the ‘Britain in Bloom’ competition.</p> <p>Another site where a ‘Living Wall’ would be effective is on the street wall of Marlborough College’s ‘B’ House along Bridewell Street. Contact should be made with MC to discuss this further.</p> <p>For more information on this, please see Scotscape, National Geographic, Green Scotland, Architectural Projects, ANS Living Walls Also: Planting Green Roofs and Living Walls by N Dunnett &amp; N Kingsbury (Timber Press, 2004 ISBN-9780881929119). Maybe MTC should invest in a copy.</p>
80	<p>We have no particular concern with regard to the proposed new 50 house estate outlined on page 23 of the Marlborough Area Neighbourhood Plan. However should the proposal be successful we strongly disagree that this should create a precedent for further development on land towards Minal. We strongly recommend that the council should seek alternative sites that do not blight the face of Minal's AONB.</p>

81	<p>MARL 4</p> <p>Having read and considered the MANP proposals for the future development upto 2036. Here are my thoughts on proposals within the plan</p> <p>1. The proposed sites for future housing in Marlborough look acceptable in terms of the proposed sites and number of houses. I note that the sites all contain affordable housing and would agree that the number needs to be maintained and not reduced, as there are many young people and families in Marlborough and the surrounding villages who want to stay living locally but cannot afford the high prices of houses within Marlborough.</p> <p>Further on in the plan there is a suggestion to turn the existing Medical Centre (if a new one is built elsewhere) into older persons accommodation. Is it not a better use of this building if it were flats for starter couples.</p> <p>The proposal for residential homes off St John's Park down in line with the Old Tannery building would make sense as in-filling, BUT that should then be the final building land as a boundary to the east side of Marlborough and not allowing building on along the valley towards Minal.</p> <p>MARL9</p> <p>2. More consideration should be given within the proposals to earmark more open space playing fields and sports facilities as these are severely lacking in Marlborough given the population and surrounding villages who would use such sports facilities. Marlborough has a thriving hockey, rugby and football club and now girls football club and wonder if consideration should be given to extending the current rugby clubhouse. I feel there is a need to expand the sports facilities within the town and this should include extending or replacing the very AGED' leisure centre which is no longer adequate for the needs of the town.</p> <p>MARL 2</p> <p>The Medical centre on its present site is totally inadequate and with virtually no car parking allocated to the centre only for staff and shared with the adjoining chemist this is a must to be re-located and a new one built. The site proposed at Barton Dene is not central to the Town and wonder if there is another alternative site which could be built on instead. However if Barton Dene is the only piece of land which is large enough then this should be pushed ahead with the proposals at the earliest possible date.</p> <p>MARL 7</p> <p>The proposal for a car park on part of the common land seems very sensible if no other land is available more central to the town. Presumably if there is any land then this would be considered as housing development land and not car parking. If the proposal for the common to be used gets approval then a ban on cars parking alongside the road up onto the common should be considered with double yellow lines all the way as this is a traffic nightmare in the mornings and evenings.</p> <p>NB</p> <p>BY-PASS no consideration has been given for options of a bypass possibly to the west side of Marlborough, to alleviate the heavy traffic particularly lorries using the route Swindon to Salisbury. The queues at school time and holiday traffic is not acceptable particularly with the traffic emissions being given out &amp; extreme deadlock when the M4 is shut for any reason. The signage on the A34 and A346 advising heavy goods vehicles to use the A34 does not happen if they are heading south or south west in their journey.</p>
82	<p>Page 23 – Policy MARL1</p> <p>3 – Land at Barton Dene</p> <p>The land specified on page 23 of the Neighbourhood Plan is an important area for wildlife.</p> <p>Aside from the general ecological impact which this development will have to many species in the area, the following protected species are also resident and this development will undoubtedly impact them:</p> <p>Barn Owls   Bats   Hedgehog</p> <p>As a former resident of No. 4, Barton Dene from August 2017-July 2020, I saw all of the above in the area around the house and within the region classed as the 'Land at Barton Dene' by the Neighbourhood Plan. These species are still resident, with my most recent sighting of a Barn Owl in the area occurring in</p>



	<p>January 2021.</p> <p>In addition, the sloping area to the east of the lane, consisting of trees and grass meadow, is a very productive habitat for migratory birds during both summer and winter. It is also home to resident species such as Bullfinch – classified as Amber under the Birds of Conservation Concern 4: the Red List for Birds (2015).</p> <p>Any proposal for development in this area should naturally include an assessment of the ecological impact, including any impact on the protected species mentioned above and surveys as necessary.</p> <p>The rural character and setting of Marlborough is one of its defining features as a location, and one of its attractions both for residents and visitors. I would hope that any proposed developments appreciate the importance of preserving endangered species’ habitats so close to the town.</p>
83	<p>Land off Elcot Lane</p> <p>I do have concerns over the proposal to develop the field below St John’s Park housing estate. This is already an extremely high density estate with inadequate car parking. To have two high density estates in an AONB so close to the river would be purely for financial gain by the developers and certainly not for the benefit of Marlborough town. At present the footpath along the perimeter of the field is an amenity well used by all. The Kennet valley is picturesque and should be protected. This site is on the outskirts of town and approximately two miles from the leisure centre and therefore most journeys would necessitate a car journey. I would also mention the elevation from Chopping Knife Lane to Elcot Mill is very steep and therefore any development that takes place would not blend into the landscape in a pleasing way. Indeed the existing estate demonstrates this fact. It is appreciated that St John’s Park had to take place to provide funds for the school to be on one site in the town.</p> <p>Road safety should be taken into account on this occasion. White Horse Road and Chopping Knife Lane are not suitable roads for so much traffic. It was also agreed by KDC at the time of the school development that the Junction from London Road into Barnfield/Chopping Knife Lane was substandard and I quote the following:</p> <p>1. Adequacy of highway access</p> <p>This matter was acknowledged in Report C\97\99 and is referred to in PolicyHC15. The access issue will require significant improvements to the junction with London Road something which will need to be addressed in the Development Brief to be prepared for the site.</p> <p>I would point out no improvements of any consequence were carried out. Indeed it is even more dangerous, particularly for the residents of Barnfield and Hazel Close. Cars come round the corner at great speed and it is quite right to say that residents take their lives in their hands when they cross over into Chopping Knife Lane. Road safety should not be ignored as it has been previously. Barnfield was there long before the school let alone St John’s Park.</p>
84	<p>Thanks for the detail below (<i>OUR STANDARD REPLY</i>) – we do have one additional comment/subject that we’d like to add –</p> <p>There doesn’t appear to be any mention of additional sport/recreation ground to cater for children from the additional potential housing sites and given the current request from the rugby club for more of The Common to be used as an additional resource for the club we think that the plan needs to recognise that further sports facilities such as football and rugby pitches will be needed for the town and for this to be accommodated within the proposed areas identified for potential housing, as opposed to further encroachment of the existing public spaces</p>

85	<p>I have a few points to make in connection with the Marlborough Area Neighbourhood Plan, if I may:</p> <ol style="list-style-type: none"> <li>1. The document is an excellent piece of work and I join others in thanking and congratulating Mervyn Hall, in particular, on the work of himself and his colleagues and on the way he chaired the recent public meeting.</li> <li>2. Housing developments. Several existing and suggested developments in the town have single entrances/exits by road, and these are verging on the inadequate. They concentrate traffic and contribute to bottlenecks. All developments should have two points of entrance and access, such as Barton Park has. Traffic from the Salisbury Road development opposite Tesco will make the congestion at the foot of the Salisbury Road worse and an alternative exit/entrance should be provided onto the A345 Pewsey Road. The suggested extension of the development off Chopping Knife Lane is another case in point; there should be an alternative route in/out via Elcot Lane, not just for emergencies, as the turn off/onto the A4 at Chopping Knife Lane will have to bear overmuch traffic.</li> <li>3. Parking. The extra parking places planned by the Rugby Club will alone not meet the present or future need. The scheme that is intended to create wider pavements (with the ugly bollards and signs) in the High Street reduces the number of parking places and should be reversed as soon as possible.</li> <li>4. Surgery. The proposed re-siting of the Medical Centre to the area behind Barton Farm should be re-evaluated. The proposed site is too far from the centre of the town, especially for the elderly who will rely on reaching it on foot.</li> <li>5. Police Station site. It is not clear from the Neighbourhood Plan what is suggested for the future of the Police Station. Has this central site been considered for some sort of public function?</li> <li>6. Schools. It has long been acknowledged that Preshute Primary School is housed in seriously cramped and inadequate premises.</li> <li>7. The Common. The points of view expressed in the present discussions about the request from the Rugby Club for a third pitch on the Common show that there is no overall plan or statement of principles for the management of the Common. There is a danger that the voices of organizations (eg the Rugby Club, the model aeroplane club) are more evident and likely to carry more weight than the interests and views of individuals who use the Common.</li> <li>8. Through Traffic. There is too much heavy traffic travelling through Marlborough, especially North/South on the A346. There should be some restriction and/or a recommendation that long-distance heavy traffic use the A34 and A350.</li> <li>9. Bus link with Bedwyn Station. This is inadequate and hence underused. It notoriously does not function on weekday evenings, nor on Sundays, nor always to coincide with trains arriving/departing.</li> <li>10. High Street. A situation may have to be faced in the near future in which Marlborough High Street, like many other similar town centres in the country, may be unable to sustain the traditional pattern and amount of commercial activity. Small businesses are hard pressed, not just by the present economic downturn, but especially by excessive business rates, and above all by the shift to shopping out of town and shopping on line. Representations should be made to reduce business rates permanently. Above all there should be some flexibility built into the Neighbourhood Plan, allowing and welcoming changes of use from Commercial to Residential in the High Street. Better a mix like this than empty or boarded up shop fronts.</li> </ol>
86	<p>We would like to send a few comments about the Marlborough Neighbourhood Plan</p> <ol style="list-style-type: none"> <li>1. We agree that the town needs more affordable housing as long as sufficient space is available for parking.</li> <li>2. Parking generally in the town is very sparse and more spaces are needed to attract people into the town.</li> <li>3. The Medical Centre is completely inadequate. A new purpose built building is needed similar to Ramsbury surgery.</li> <li>4. The natural environment is one of the major features of Marlborough and the landscapes should not be blighted by excess development. Both should be protected.</li> <li>5. The pandemic has shown how important open spaces are for recreation and walking. They should not be used for building.</li> <li>6. Marlborough has a wonderful heritage and the longer we live here the more we learn and appreciate it. Protection is essential to preserve it for future generations.</li> </ol>

87	<p>Page 11 paragraphs 2.9 and 2.10</p> <p>No relevant policy currently – new policy to be included The draft plan needs updating to recognise that:</p> <p>(i) existing spaces and facilities used for sport should be protected and improved; and</p> <p>(ii) more spaces and facilities for sport are needed and this must be taken into account in future planning.</p>
88	<p>COMMENTS ON THE MARLBOROUGH NEIGHBOURHOOD PLAN FROM COUNCILLOR NICHOLAS FOGG, MBE, FRSA.</p> <p>An initial disclaimer:</p> <p>It appears implicit in Section 1.1 that the plan is being presented with the endorsement of Marlborough Town Council. As a Town Councillor, I cannot endorse something that I have neither been asked to discuss – or endorse. This, of course, is not to negate the huge amount of effort put in by the working party on the plan’s creation – or to prejudge its content. It has also been suggested that it was inappropriate that a landowner with an interest in a proposed development site was represented on the working party. I would stress that, if indeed, this conflict of interest existed, I had no prior knowledge of it.</p> <p>I would also suggest that the time between the closing of the time for comments on the plan on March 8th and the proposed referendum upon it on May 6th is inadequate to assess the submissions and make necessary amendments. Although this may not have been the intention, it would appear the document is a fait accompli.</p> <p>Comments on the Plan</p> <p style="padding-left: 40px;">We started from the recognition that the High Street model as we know it is finished. We need a radical transformation for it to have any chance of survival. Anything short of this is just window dressing, keeping a failed model on a life-support machine.</p> <p>The Grimsey Review</p> <p>“Where there is no vision, the people perish.” Proverbs 29.18.</p> <p>While it contains some information of value, overall the Marlborough Area Neighbourhood Plan (MANP) is a disappointing document. It holds no vision of a bright future, but consigns Marlborough to the role of a dormitory town with people going elsewhere to work and with increasing congestion and pollution in its thorough-fairs.</p> <p>The complexity of an issue such as housing cannot be over-stressed. In 2015, the Wiltshire Core Strategy envisaged 922 new houses being built in the designated Marlborough Area of which 680 would be in the town of Marlborough. According to the Housing Land Supply Statement of March, 2017, all but 57 of these houses had been completed, or had been committed for development. The ‘required’ sites had already been identified. This is acknowledged by ‘Cobweb’, the consultancy employed by Marlborough Town Council in 2017.</p>

Despite the virtual achievement of the housing target, HM Government has increased the target for Wiltshire to provide another 45,000 units. There is no indication of how local communities will maintain their integrity in the face of this additional dictat. Thus, we await the Wiltshire Local Plan (WLP) for Marlborough. Given that this is likely to be more comprehensive than the MANP and have a greater standing in terms of implementation, it might have made sense to wait until this appeared, unless, of course, the essential data mentioned above was included in the MNP. In which case, it would have provided a useful base from which to defend its position from any undesirable aspects of the WLP. Perhaps, by preceding the WLP, Marlborough will be in a stronger position to see off any undesirable proposals, but it would be helpful to have this potential strategy delineated in the MANP.

In its very helpful survey, Cobweb Consulting appears to suggest that Marlborough's immediate housing needs will be fulfilled by the completion of the Core Strategy. It suggests that the two classes of people most in need of housing are single people and those with growing families, but these are not specifically mentioned in the Neighbourhood Plan. Indeed the MANP states that 'proposals for single tenure.... schemes will be resisted'.

The Cobweb survey, although excellent in many ways, is vague on specifics. It does not specify the level of social housing Marlborough requires. It does not quantify the level of social housing required to fulfil present and future needs. Nor, for that matter, does the Neighbourhood Plan. Yet such statistical analysis is vital if such a scheme is to be effective. It is difficult not to concur with the statement from Preshute Parish Council that the MANP 'is based on flimsy evidence of need'. Cobweb also suggests a shortfall in the take-up of lower-paid jobs in the town, an issue that may relate to lack of social housing, but, without an adequate database, who can tell?

It would seem to me a mistake to set too much credence on responses to surveys as to priorities for the town's development. Although they are not devoid of value, the responses are based on simple answers to complex questions and they tend to be led by the material presented.

'Affordable' housing is defined in the document as a desirable factor, but there is little attempt at definition of what is meant by 'affordable'. It is defined by the Government as 'social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market', but, a briefing paper released in August 2017, the House of Commons Library commented that there is 'a great deal of ambiguity' in the way the term 'affordable' is used in housing - there is no standard definition and approaches differ between local areas.

Of course, all housing is affordable to those who can afford it. Whether such a scheme would benefit first-time buyers in Marlborough or those seeking to move to a more pleasant environment from elsewhere is open to question. An analysis of what had happened in relation to previous schemes of this nature would have been helpful. Nor is there any definition of the 'specified eligible households' defined by the Government. This is a huge flaw in the MNP. Unless such definitions of eligibility are incorporated, it is likely that incomers will take advantage of the availability of the cheaper housing and good schooling and move into the town, which would defeat the original purpose of the exercise.

In a sense, the concept of 'affordable' housing contains an inner fallacy – that such a policy can fulfil housing needs in anything other than the short term. Once the immediate generation of housing needs is fulfilled, its place will be taken by others and yet, the MANP concedes that Marlborough's 'landscape setting' restricts the possibility of future development. If the relatively few existing sites are used up, what happens to the next wave of Marlburians looking for homes – and the plan is supposed to take the town through to 2036? What is needed is a strategy that will enable accommodation to those requiring it for the whole of that time, not just as immediate fix. This is an issue that should be reconsidered by the working party.

Similarly, there is little analysis of the potential impact of the proposed housing developments on the community infrastructure. The proposed development in the Salisbury Road would certainly add to the congestion in that area, notably at the roundabouts with its junction with London Road and George Lane, already notorious bottlenecks. The current development there aroused a lot of controversy on these grounds.

The MANP proposes the reestablishment of the Marlborough Surgery on the proposed Barton Park development site. This would substitute a central location which is highly accessible for one on the outskirts of town which would only be accessible to the aged, sickly and infirm by public or private transport. The MANP cites the provision of public transport, but nowhere does it suggest on what basis this would be provided. Nor is there any indication of whether a developer would be prepared to take on such a project, or of a default position if such an arrangement did not materialise.

It would seem a grave oversight that employment creation is not listed as a priority under the declared objectives in Section 5.2. To expand the population of the town without examining the possibilities of providing sufficient jobs to match the increase must be seen as a severe oversight. Just two paragraphs are devoted to Commerce and Industry and one of these is just a reprise of firms that have left the town in past decades.

In fact, the MNP devotes as much space to the expansion of the cemetery as it does to issues of employment. Any increase in the town's housing stock should be accompanied by at least an examination of the possibility of the expansion of employment opportunities, otherwise the Marlborough will become a mere dormitory town in the way that the MANP appears to acknowledge, rather than a place with a vibrant life of its own. A random search reveals at least 50 companies operating in Marlborough and its immediate environs, including such names as Stratagem, Design 360, Sarsen Technology, John P. Kummer, Tarant Air Conditioning, Adam Matthew Digital, Designer Billiards, Robert Kime and Ramsbury Brewery.

The MANP states that economic development in the town has been inhibited by lack of sites in which existing businesses can expand. It is therefore disturbing that no provision for employment sites appears to have been made in the plan. The sites earmarked for housing could have incorporated employment facilities. Nor does the working party appear to have examined the possibility of developing sites outside Marlborough, despite being entitled 'The Area Neighbourhood Plan'. A number of business sites have been established in local redundant farm buildings and the potential may well be there to extend such schemes. The two sections of the community that Cobweb Consulting identified as most in need of accommodation – single people and growing families are also those most likely to be those seeking opportunities for employment. Yet the MANP does little to address, or even acknowledge their special needs.

The MANP acknowledges that although the retail facilities in the town centre have ridden the 'storms of the past decade better than most, with few vacant units, we cannot be complacent in the face of increasing competition from online trading', yet there appears to be little in the plan to address the task of making the High Street a place that people will want to visit. It is notably difficult to predict future trends from present and past ones, but the MANP would certainly benefit from an acknowledgement of current thinking on the issue of the survival of the High Street. The Grimsey Review, the series of reports produced under the auspices of the former Chief Executive of Wickes and Iceland, is well worthy of consideration. It suggests that, to survive, High Streets have to become community-led facilities: places where the arts and recreation can flourish.

An analysis of retail trends would be helpful. It would be helpful to know, amongst other things, the extent to which footfall to Marlborough retailers is dependent on the presence of Waitrose. Studies of comparable towns, at home and abroad, and how they've handled this crisis, would also be useful.

The proposal on parking in the MANP not only goes against all current progressive thinking on the issue, it would contribute little or nothing to the solution of

the supposed problem it is addressing. The current policy of the Ministry of Transport is to make town centres more amenable to walkers and cyclists. A modest start in support of this scheme was made with a small number of pavement extensions in response to the Covid crisis, leading to the loss of a small number of parking places. Nor does the emerging Wiltshire Council scheme for providing much-needed residents parking gain any consideration. The Council has committed itself to enacting this in 2022 and Marlborough Town Council has requested that a pilot scheme be enacted in the interim. Instead, the working party's strategy seems to involve a never-ending expansion of available parking. This even extends to making parking available on The Common, which is so far from the shopping centre as to make it highly unlikely that anyone would choose to walk up the hill from the High Street carrying two heavy shopping bags in order to take advantage of the facility. No survey of parking trends has been undertaken. The working party appears unaware of the current controversy concerning the use of The Common, emanating from proposals for an extension of the land allocated for sporting facilities. Nor is any awareness of the role of Marlborough Town Council, as Guardian of the rights of The Common demonstrated. Under the Commons Act 2008, formal consent is needed to carry out works that impede or prevent public access to common land. Such legislation was enacted to preserve the heritage of common land for future generations. HM Planning Inspectorate is responsible for determining applications under the 2006 Act regarding common land in England. All applications are determined on behalf of the Secretary of State for the Environment, Food and Rural Affairs (Defra).

Surely there has to be a time when it needs to be recognised that town has reached its capacity with regard to parking spaces. I would suggest that that time is now. Otherwise the town is at risk of becoming a giant car-park with its special character destroyed. On the assessment of the MANP, people coming into the town only find difficulty in parking at certain times. In which case, there may be solutions other than a relentless surge to increase capacity. A campaign to persuade more people to shop at off-peak times might be less than effective, but would be worth a try. It might encourage this if parking charges were increased at peak times.

Nor is the huge problem of air quality in certain areas of the town adequately considered. Indeed it would appear that the MANP seeks to increase pollution by supporting policies that are bound to increase it. Yet this is literally a matter of life and death. According to Public Health England, 'Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure.' There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Since several streets in Marlborough are recorded as having levels of pollution well above the acceptable average, it is likely that this is having an adverse effect on the population. A clear strategy for improvement is required. As a contribution to what I hope will be a full discussion of the issue, I append herewith a paper I contributed to the MTC as Appendix A herewith. I have amended the original in accordance with subsequent developments.

#### APPENDIX A

#### RESPONSE BY CLLR. NICHOLAS FOGG TO PROPOSALS BY THE MINISTRY OF TRANSPORT FOR POST-PANDEMIC ARRANGEMENTS TO IMPROVE THE QUALITY OF LIFE IN URBAN AREAS

#### Background:

The centre of Marlborough is one of the four most polluted urban areas in the County of Wiltshire. Long-term monitoring has demonstrated that levels of toxicity in parts of the town are well above the level categorised as dangerous. In parts of the town, the air at times can only be described as putrid. It is now recognised that the respiratory conditions arising from such a situation are the greatest single cause of disability and death in the UK in normal times. This represents a huge responsibility for those who have been given authority for public welfare, whether they be elected representatives or delegated officials.

In the past the response to this situation has been characterised locally by an unacceptable inertia, although many other centres have taken steps to address this problem, but unexpectedly and encouragingly the opportunity has arisen to progress towards a level of improvement to the quality of life in the town. This has taken the form of a document from the Ministry of Transport, giving guidance on the means of improving urban locations for the benefit of cyclists and pedestrians, thereby improving the health and well-being of the nation. The forward by the Secretary of State is categorical that significant action must be undertaken.

The government therefore expects local authorities to make significant changes to their road layouts to give more space to cyclists and pedestrians. Such changes will help embed altered behaviours and demonstrate the positive effects of active travel. I'm pleased to see that many authorities have already begun to do this, and I urge you all to consider how you can begin to make use of the tools in this guidance, to make sure you do what is necessary to ensure transport networks support recovery from the COVID-19 emergency and provide a lasting legacy of greener, safer transport.

The response of Wiltshire Council to the issue has been immediate and demonstrates that the role of Marlborough Town Council (MTC) in determining the issues may be, at best, limited. It has formed multi-disciplinary teams of Officers for each community area. 'These have initially been asked to identify potential sites and measures using their local and technical knowledge. Given the Government's timescale requirements and the growing on-the-ground need, it is not proposed to carry out an extensive consultation process either with stakeholders or the public. Rather, officers will liaise with local members (through Area Boards) and city, town and parish councils to further identify potential sites and measures using their local knowledge. In addition, suggestions from members of the public, stakeholders, partners and other bodies will be considered. Ultimately, it is proposed that all potential schemes will be assessed against the agreed criteria by a panel of officers to identify a priority list for design and implementation. Where applicable, measures will also be subject to a Road Safety Audit and accessibility audit prior to implementation.'

And, significantly, "the local Wiltshire Council members and the relevant city, town or parish councils will be informed of the intention to install the measure'. In other words, decisions may be made by WC officers unilaterally in response to what appears to be a governmental resolve to ensure that the situation post virus crisis is not simply a return to the status quo ante pestis. If MTC wishes to have any input into the process, it must come up with its own points for discussion with the enablers. Consulting local shopkeepers will simply not be seen as an adequate or sufficiently positive response. Nor, worthy, as the cause may be, is the improvement of the footpaths on the outskirts of the town, which would be seen as a diversion. Nor can loss of parking be regarded as an argument in itself against positive proposals. Although parking may be an important issue, in any argument involving the health and safety of cyclists and pedestrians, it is bound to take second place. It would appear that existing parking facilities in the Town Centre are more than adequate, particularly in the context of the probable reduced footfall post-virus crisis.

Thus, if MTC wishes to have any influence over this process, it must come up with proposals that fulfil the Ministry guidelines. This at least would give it some leeway in establishing the basis of the discussion.

Some Proposals for the Amelioration of Health and Safety Provision for Cyclists and Pedestrians and the Improvement of the Urban Environment in Central Marlborough

First, let it be said that, although Marlborough has lagged behind many other places in the improvement of the urban environment and has greeted many positive proposals with a disturbing negativity, it is not an easy issue. Situated as it is on the junction of East-West and North-South major through routes, the

opportunities for such provisions as pedestrianisation are more limited than in many other centres. Nevertheless such opportunities do exist and it is important at this stage to examine them carefully with a view to instituting agreed schemes, initially on a trial basis. It must also be said that where schemes for the improvement of the locale for non-motorists have been instituted, it has resulted in a considerable increase in footfall and trade. Witness the crowded pedestrianised areas of such places as Bath, Swindon, Oxford and Stratford-upon-Avon.

Faced with the competition from online shopping and multi-complex outlet villages, the only thing that will save the nations High Streets is to make them places that people actually want to visit. Negativity in the face of decline is likely to accelerate the process rather than defer it.

As a result of the Minister's initiative, Wiltshire Council created a small number of pavement extensions in Marlborough High Street. These were at the request of the proprietors of the adjacent premises, all of whom were in the hospitality business. The exception was a small section of the arm of the High Street that leads into Kingsbury Street, where a pavement extension was created to further the cause of social distancing during the Covid crisis. Indeed, all the pavement extensions were presented by the council in this way, although they were actually a result of the Minister's initiative.

The initiative led to the loss of very few parking spaces and, with one exception, the proprietors expressed satisfaction with the arrangement, as representing a boost to their trade. This scheme should be continued and, where possible, extended, although there are areas of the High Street and elsewhere that do not lend themselves to such pavement extension. This reveals that the interests of all outlets in the High Street are not necessarily the same. The trend away from retail into service provision has undoubtedly changed the perspective. In the past MTC has tended to favour the small shop keepers over all other interests. If the objective is to raise footfall in the High Street, this is a mistake. It is the leisure facilities that increase footfall and MTC should favour the pavement extensions outside their premises becoming permanent.

Other proposals.

Saturday Market

I cannot think of a market that is held in a more polluted place than the one in Marlborough and a great deal of consumables is sold there. That is why I always go early to the market, hopefully before the adulteration caused by pollution has taken its full effect. As well as the obvious dangers of toxicity, the market causes a mingling of pedestrians with passing traffic, which is a very bad idea.

It is tempting to suggest that the market should be moved to the less polluted area of the Parade, but I don't think that would work either from a consumers' or traders' point-of-view, since the obvious focal point of Marlborough shopping is Waitrose.

Instead, the Saturday market should be moved to the north side of the High Street between the Town Hall apron and the bus stop. This would reduce considerably pollution since the stalls would face away from the carriageway. It would also eliminate the danger to pedestrians. Stalls could even be located for a short way along the arm of the High Street that extends to the north side of the Town Hall. An added bonus of such a scheme would be that it would create a temporary shopping precinct extending to the junction with Silverless Street. This would be greatly to the benefit of the businesses in the area, which suffer from being somewhat on the fringe of things. As has been pointed out above, pedestrianisation invariably increases trade.

It also appears that such a move would not only improve the health and well-being of the public and the market traders, it might well contribute to an



improvement in the size and quality of the market. A colleague on MTC, Cllr. Peter Cairns, has commented: 'I've spoken to a number of traders who deserted Marlborough for Newbury instead. Their explanation was having to work in the most anti-social, polluted, dirty & congested area was affecting their health.'

Since the lost parking spaces would be replaced by the release of those in the centre of the High Street, it is probable that the resultant increase in parking spaces would more than offset those lost in this entire scheme.

One of the aspects of the Ministry guidance is that it suggests that schemes can be introduced on a temporary basis and the effects monitored. This is the procedure that has been followed in many other places where an element of pedestrianisation has been introduced, almost always with great success. I would suggest that such a scheme is introduced initially on a six-month experimental basis.

#### High Street north of St. Peter's Church

There is absolutely no reason why this area should be not be pedestrianised, with permitted access for residents, emergency vehicles and deliveries. This will provide a safe passage to and from Marlborough College and provide a respite for residents from the 'rat run' for which this little section of street is frequently used and for which it is entirely unsuited.

Ideally the street should be resurfaced with stone or brick cobbles. This would provide a psychological barrier, discouraging motorists from entering the space. In the past, Wiltshire has shown a strange reluctance to employ such materials, although they have had a positive effect in other places. Perhaps the Ministry guidelines may change this approach – at least a band of cobbles at each end of the section would be helpful.

#### Cyclists in the High Street

Certain it is that there is a need for increased provision of cycle parking in the High Street. My surmise is that this should be close to Waitrose, but it would be helpful to consult cyclists and their organisations.

#### The Parade

The top end of the Parade from its junction with New Road and the High Street should be pedestrianised. How far down the Parade this measure should stretch is a matter for discussion. Ideally it should stretch down to the lower boundary of the Crown Hotel, as it did during the Saturday of the jazz weekend. Access to the car park to the rear of Cross Keys House might be a problem, however, so this should be taken into consideration. Consultation would also need to take place with the Fire Brigade to consider how such a measure would affect its emergency provisions.

Again, pedestrianisation would give a boost to retailers in the area. The number of parking places lost would be very few, whichever option was adopted. According to the ATC, the proprietor of the Bear has expressed his support for such a development.

#### London Road

The pavement on the south side should be widened to bring it into line with the rest of the facility. At present it represents a danger to pedestrians, particularly those with small children. There has also been a problem with vehicles mounting the pavement and damaging the adjacent buildings.

There is no coherent reason why this measure should not be enacted as soon as possible. I'm only surprised it has not been done before.

#### Tree and Other Planting

Trees should be planted on pavements where practical in the most polluted areas of the town such as New Road (High Walls) and London Road. This would reduce pollution and also contribute to the enhancement of the urban environment. I understand plane trees are ideal because of their shallow roots and their robust ability to withstand toxicity. The great cities of the world all have large numbers of trees to enhance their beauty and reduce pollution – for example, Berlin's famous Unter den Linden. Expert advice should be sought on this. Perhaps Marlborough in Bloom could be involved. There may be grant funding available for such a project.

Obviously, there are places that are unsuitable. It has been suggested the High Street may be one such (there are two trees there already: has anyone noticed?). There may be a few possible places (outside the library?). Also, issues like the necessity for the emergency lanes during the Mop Fairs needs to be considered.

High Walls would be ideal for the creation of a 'Living Wall', which would not only reduce pollution, but enhance the attractiveness of the area. This could become an important local project, an exciting follow through from the town's success in the 'Britain in Bloom' competition.

Another site where a 'Living Wall' would be effective is on the street wall of Marlborough College's 'B' House along Bridewell Street. Contact should be made with MC to discuss this further.

For more information on this, please see

Scotscape, National Geographic, Green Scotland, Architectural Projects, ANS Living Walls

Also: Planting Green Roofs and Living Walls by N Dunnett & N Kingsbury (Timber Press, 2004 ISBN-9780881929119). Maybe MTC should invest in a copy.

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On viewing plans for house building on land off Elcot Lane, there are plans for an Emergency access at the end of the lane, please can we have clarification on how that will work and how normal everyday traffic will be stopped from accessing this entrance once the houses are built?

### Overall

The Steering Group should be commended on the production and consultation process of this plan which will hopefully assist in optimised development in the future.

### Overall, Foreword and Community Views on Planning Issues – 4.1

Despite the lofty aspiration stated in the Foreword this is almost only about affordable housing. There is scant regard or solutions to the Community Views in section 4 regarding Amenities, Countryside and Recreation, Business and Employment, Design Conservation and Heritage. The community will surely not be happy with affordable housing at all costs particularly taking into account the huge impact on open spaces and environment.

### Overall, Page 22, Page 28

The structure of this plan makes it difficult, confusing, and very time consuming to read and understand what the resultant conclusions and recommendations are. There needs to be a concise and simply written summary at the beginning stating what this plan's conclusions are eg to deliver 5 housing developments, increased parking and cemetery. The policies MARL1 to 21 are embedded in the document without their own index number as per other paragraphs and sections. For instance, Policy MARL1 should surely have the index 5.6 etc.

In the summary define what the word "Deliver" means (page 22) as opposed to "Encourage" (page 28).

### Minal various

There is a strong need for a safe, all- weather foot and cycle path from Mildenhall to Marlborough – no mention of this anywhere? At least limit the speed on the road.

### Page 23: Land off Elcot Lane

This development will result in further eradication of open space in an AONB, is situated close to the river edge and is a relatively long way from the High Street of Marlborough, schools and other local amenities.

### Marl 15: Sports Development

This needs to be expanded as expressed in the online consultation on 24th Feb 2021. I am currently the Chairman of the Minal Sports and Social Club responsible for the Minal playing field. As yet we have not been directly consulted. REDACTED.

91

MARL 1

Is the affordable housing to be rented and managed by a housing association and accessible to tenants on minimum wage (that is the true definition of affordability). How is this to be developed – presumably all private sector. Have Marlborough Town Council considered developing truly affordable housing themselves ?

MARL 2

I do not understand the need for this. The present location is conveniently situated in the centre of town with a large adjoining car park. As an older George Lane resident this would be inconvenient for me and the other older residents of the old peoples' developments in the area.

MARL 4

I welcome this

MARL 5

This is fine but rather overtaken by events of the pandemic. I fully support the use of upper floors for accommodation. High Street shopping is in decline and a creative approach to the High Street is required to make it a destination. – A nice place to meet, cafes, some shops, possible business hubs (small rentable offices and meeting rooms) site for community events. Very low speed traffic (ref Germany). Reduction in parking. Trees in the High Street (would require the relocation of the Mop fair). Shops as small workshops for artists and craftsmen and other small non-retail businesses. Locally produced bread etc. Appears to be going backward but is a view of a more local and sustainable future.

MARL 6

I support anything which brings employment

MARL 7

I would like to see the High Street made less friendly to cars.

Parking on the common is a good idea. Has consideration been given to constantly running shuttle bus. This would only work if it was free or less than the cost of town centre parking. Is there a model for this in other towns.

MARL 8 fine

MARL 9 fine – I would like to see the Town Hall used for more community events and possibly as a business hub on a daily basis.

MARL 10

Generally I support the protection of the conservation area but would welcome high quality modern buildings within it.

MARL 11-20

No comments

92	<p>I fully agree with the need to preserve the green spaces and heritage within this beautiful area and to keep these spaces as accessible to all as possible.</p> <p>I am concerned about the amount of proposed new housing developments but realise a wider range of housing is required, particularly affordable housing in this expensive area. There is no mention of the development at the old police station, George Lane, which I imagine should be included in proposed figures of new housing stock. I hope new developments on areas close to green fields, ie at the end of Elcot Lane, will not go ahead until all other proposals are completed and the necessity for more housing is shown. Hopefully, after the Pandemic, Marlborough will become a thriving town again but many shops may not reopen. Change of use to private accommodation may be considered for some of them and therefore the number of new houses needed may not be so high.</p> <p>My main concern is the proposed building of a new medical centre on the western edge of town. The present medical centre is in an ideal place for easy access for a greater number of people than the proposed site. I imagine the Plan had been worked on before the COVID pandemic which has turned normal practices on their head. Many more consultations are taking place virtually and, in all probability, this pattern will continue. Would the wise move not be to see how the new 'normal' comes into being before taking on large building projects of this nature. It may be felt that there is inadequate parking at the present site but it is next to the public car park and, if the Centre was moved, this would create much more traffic around the town as more people would use cars to get to the new site instead of walking, as they can to the present one.</p> <p>On a personal note, we have been in Marlborough for just under 2 years and find it a wonderful place to live - even in a pandemic!</p>
93	<p>We commend the plan and the excellently produced document. It is clear with a good introduction and good maps.</p> <p>The attention to greenspaces and biodiversity is good.</p> <p>But</p> <ol style="list-style-type: none"> <li>1. Parking: Despite providing 60 places on the common we feel there would not be enough and there appears to be no provision for electric cars.</li> <li>2. We commend the provision of social and affordable housing which is much needed but are not sure about other housing unless we can't have the social and affordable without it.</li> <li>3. The proposed relocation of the surgery is not central enough especially as there appears to be little provision for parking. More people would need to drive to get there.</li> <li>4. It appears the old St. Peter's school Building development has come to a standstill.</li> </ol> <p>Is it really not possible to repossess that site as a community hub where the new surgery, a dentist, the health visitors and community nurses could be based, as well as a space for community groups, toddler group, Foodbank, CAB etc. If there is money for a new surgery building could this not enable this to happen?</p>

94	<p>MARL4 If the full number of proposed houses are built and occupied, the new residents will be commuting to Swindon, Royal Wootton Bassett and other centres of employment. The housing provision for the elderly is top heavy and no more developments of this nature should be permitted. Without this restriction Marlborough will become a dormitory town, unable to support the new numbers of residents.</p> <p>MARL5 Marlborough has changed considerably since I arrived in 1987 and is no longer the thriving community it once was. There is a growing number of vacant premises within the town and in the current economic climate this could well be the case for some years.</p> <p>MARL 6 Rather than move the Medical Centre to a less convenient location, would it not be possible to extend the present site?</p> <p>MARL7 The lack of parking is already a major issue in the town, and will only become worse with further numbers of new residents with cars. In our street alone we have an ongoing problem with almost permanent kerbside parking despite the fact that there are double yellow lines on the road. With limited parking already, the problem will only get worse and on occasion present dangerous situations, as is currently the case in Kingsbury Street. The creation of a car park next to the Rugby Club is unlikely to be the solution – the hill down to the High Street is too steep for the elderly or infirm.</p> <p>MARL15/16/17 Green spaces and protected recreation areas are of paramount importance and no more should be sacrificed.</p> <p>If these basic requirements are met, the other requirements such as Climate improvement and dark skies are much more likely to be achieved.</p>
95	<p>We have looked over your proposals and have some concerns regarding the River Kennet. I am under the impression that Marlborough's sewage processing plant is already too small for our areas requirements and so the remaining raw sewage is put straight into the river. Could you confirm if this is the case and if so what you propose with regards to all the additional sewage these five building proposals will create?</p>

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MARLBOROUGH AREA DRAFT NEIGHBOURHOOD PLAN REPRESENTATIONS BY REDACTED RESIDENT OF MARLBOROUGH

The Draft Marlborough Area Neighbourhood Plan is unsound and flawed for several reasons and should not be proceeded with.

1 GOVERNANCE AND LAWFULNESS - The Marlborough Area Draft Neighbourhood Plan (MANP), has been prepared by a Steering Group with oversight by Marlborough Town Council as qualifying body. A member of the SG is Mr. Roe, the Development Director of Marlborough College whose job is to promote the development interests of the College. The College have made no secret of their aspirations to obtain Planning permission for their land in Marlborough for financial gain. The College have submitted sites which they want to promote for development to Wiltshire Council in their Call for Sites for the Strategic Housing Land Availability Assessment and also to the SG in their Call for Sites for the NP. There is a clear and inescapable conflict of interests in Mr. Roe's organisation submitting sites to the SG on which they are represented. This seems to be contrary to the Codes of Conduct governing public office and plan making bodies. This may give rise to the appearance of bias. The appearance of bias is further compounded as land promoted by the College to the SG on which the College are represented is actually proposed for development in the draft NP.

Also, it is not clear that the SG has abided by its own Terms of Reference regarding the input to the plan by representatives of organisations whose input should be limited to the purpose of the organisation which in the case of the College is education.

2 PREMATURITY - The MANP is being promoted in advance of the draft Wiltshire Council Local Plan Review. Neighbourhood Plans must be 'in general conformity' with strategic guidance. The current Strategic Plan for Wiltshire is the Core Strategy 2006-2026. There is no strategic plan for the period beyond 2026. The MANP covers the period up to 2036 and proposes strategic housing development of 180 houses. As there is no strategic guidance for the period beyond 2026 the MANP is premature. The housing requirements for Marlborough in the Core strategy are for 680 houses in the period 2006-2026. By 2019, 721 had been built or had pp. There is no requirement for any more strategic sites to meet the Core strategy requirements to 2026, and there is no strategic guidance beyond 2026. Therefore, the MANP is premature.

3 RESPONSIBILITY FOR STRATEGIC PLANNING - Wiltshire Council are the statutory local planning authority and have the statutory responsibility to prepare strategic plans. WC are currently preparing the strategic plan for Wiltshire called the Local Plan Review. They expect the Local Plan for the period 2016-2036 to be adopted in 2023. The draft MANP proposes strategic development of 180 houses in the period 2019 -2036. The Chairman of the SG has said he expects the NP to be subject to a referendum in a few weeks or months. This means that the SG has taken upon itself the role of Strategic planning contrary to the Planning Act.

3 UNBALANCED STRATEGY - The adopted Core Strategy 2006-2026 required the provision of 3ha of new Employment land alongside the 680 houses as part of a balanced houses/jobs strategy. No new employment land has been provided and in fact existing employment uses have been lost through changes of use and redevelopment. This has led to unbalanced development.

WC have carried out an Employment Land Study of the Swindon Strategic Employment and Housing Market Area and concluded that 6ha (approx. 15 acres) of new employment land is required in this market area in the period 2016-2036, WC allocate all of this to Royal Wootton Bassett. The NP proposes no new employment land and non is likely. Allocating 180 houses in addition to the 280 with pp and the 160 on brownfield land which WC forecast will come forward by 2031 is an unbalanced strategy leading to excessive commuting, traffic congestion and poorer air quality, is unsustainable development and contrary to the aims of WC and indeed MTC of addressing climate change.

4 LACK OF EVIDENCE - The NP housing strategy is based solely on a 2016 opinion survey which is mis-named a Housing Needs Survey. The survey asked all residents of Marlborough over the age of 16 whether they were likely to require a house by 2021 and what they could afford. From this the SG calculated that 175 affordable houses were required. The SG acknowledge that 96 of these are already being provided eg. at Salisbury Road, Rabley Wood View and police station leaving a net figure of about 80 affordable houses. The SG then say that 180 houses (100 market and 80 affordable) are required.

Firstly, that opinion survey does not follow the Government advice on carrying out housing need assessments. Secondly it is out of date. Thirdly, It only covers the period to 2021 and will be out of date before it can be adopted. Fourthly, the conclusions of the survey do not even reflect the actual survey results in any case as these were manipulated to inflate demand. The survey by Cobweb confirms in para 5.3.2 that that the survey results were altered

because they thought more young people should have said they required a house in Marlborough and so they 'weighted' the results to inflate this figure, then assumed what these imaginary people could afford to arrive at a figure of 175.

Most fundamentally the housing survey failed to consider in any way the actual supply of affordable houses which is necessary to arrive at a net requirement for new houses. In response to a Freedom of Information request, WC housing department have confirmed that in Marlborough there are 733 affordable houses and Homes for Wiltshire re-let an average of 20 pa. which means each affordable house is let re-let every 36 years which is a very low re-let rate. WC also confirmed that in the 4 years 2016-2019 a total of 80 affordable houses were re-let which meets the SG figure. There is no reason to suppose that the re-let rate will reduce in future and as many tenants are elderly it may even increase. Over the 17 years of the NP this would mean that 340 affordable houses would become available. There is therefore no evidence to justify a requirement for 80 more.

WC also confirmed that of the 80 affordable homes re-let only 19 were taken up by local people. This is not surprising because people tend to locate where jobs are available to reduce the cost and inconvenience of commuting long distances. There is therefore no evidential basis for suggesting a need for 80 more affordable houses for local people when all the evidence suggests a surplus for this group.

WC also seem to share my view that the housing opinion survey is not a proper or sufficient basis for any specific housing proposals. In an email to you of 11th March 2020, Morgan Jones the NP link officer summarised the conclusions of a review of the survey by 'various internal consultees' which concluded that 'it doesn't seem immediately obvious from the current document that there is an overwhelming need to deliver affordable housing.'

The SG have produced no evidence whatsoever to justify 100 market homes.

5 SUSTAINABILITY - Planning permission has already been granted for 280 additional houses which remain to be built and WC forecast a further 160 on brownfield land making 440 houses, which WC confirm are already 'in the pipeline'. The NP proposes a further 180 houses which makes a total of 620 houses. This level of housing growth with no new jobs in a small market town where WC state there is already a shortage of employment land is unsustainable as it will lead inevitably to very high levels of commuting by car contrary to the aims of sustainable development with adverse effects on air quality and congestion, and is contrary to the aim of addressing climate change.

6 INFRASTRUCTURE - The draft NP provides no certainty about any new infrastructure to cope with this level of population increase. There is already a shortfall in sports provision public open space, and leisure facilities. The town already suffers from congestion, shortage of parking, and poor air quality and this level of growth will simply exacerbate these problems. The NP proposals do nothing to address these shortcomings and will do nothing to improve the lives of local residents.



7 BROWNFIELD LAND - National policy in the NPPF and WC Core Strategy 2 emphasise that priority should be given to brownfield land and unused land in the Settlement Boundary before greenfield sites outside the Settlement Boundary and encourages plan making bodies to use their endeavours to bring forward brownfield land. The NP however proposes 180 houses, of which 140 are on greenfield land outside the Settlement Boundary. The SG appear to have made no attempt to identify brownfield land and unused land in the Settlement Boundary such as land at Rawlingswell off Kelham Gardens put forward by the owners and dismissed for no reason by the SG, Kennet Tyres, St Peters School, for which WC prepared a development brief for residential redevelopment, and other possible sites and is contrary to national and WC policy in this respect.

8 IMPACT - The concentration on greenfield land has not been accompanied by any systematic analysis of impact on the AONB or setting of the town and fails to respect the recently adopted Settlement boundary. National Policy in the NPPF and WC policy is aimed at protecting the character of the AONB where large developments should be resisted. AONBs have the highest level of protection from development and have the same planning status as National Parks. The SG seem to have a casual attitude to this asset of national importance. Furthermore, the AECOM Strategic Environmental Assessment did highlight the adverse landscape impacts of all the greenfield sites on the AONB as well as adverse effects on air quality. These concerns have been ignored. The NP also does not analyse the social or wider environmental impact of its own strategy for instance on congestion, air quality and general infrastructure. When these matters have been raised the chairman of the SG merely dismisses them and says that traffic etc. is not a matter for the Town Council. This is not realistic as it tries to separate traffic impact and air quality, congestion etc. from its own land use policies which give rise to it.

9 CAR PARK ON THE COMMON - The NP acknowledges that there is a growing parking problem with cars parked along many residential streets and parking problems and shortages in the town centre. In response the SG propose an informal, unmanaged car park on the Common as an extension to the rugby club car park. This is an unsuitable location for public use as it is a long way from the town centre, up a steep hill and is unlikely to be used by visitors or shoppers. As it would be unmanaged, and unlit and has poor pedestrian access with no footpath or lighting along Hyde Road or on the Common it is unlikely to be attractive to people who work in town especially women who may feel that an unmanaged car park is unsafe especially in hours of darkness and the winter. This also reduces what remains of the common for recreational use. I have seen many families enjoying the Common and having picnics etc. and this development would reduce this as well as alter the ambience of the Common. In any event development on the Common is not in the gift of the SG or even the Town Council as approval by the Secretary of State is required under the Commons Act 2016. This proposal is simply an extension for the rugby club and will be used by them. In summer it may be used by camper vans and other travellers, especially as it will be unsupervised or managed. This is an unacceptable further encroachment into the Common and will be used mainly by a private club.

11 MEDICAL CENTRE - The NP proposes relocating the existing medical centre to land owned by a member of the SG. This proposal is enshrined solely in a housing section on George Lane and can easily be missed in a first reading of the draft plan. Relocating major essential community infrastructure used by the whole population is a significant proposal with wide ranging implications. Relocating the medical centre should have an entire chapter devoted to it, with a plan showing the exact new site, clear statement as to its size, and parking arrangements and a full explanation as to the reasons for this startling proposition. It is not clear where this new centre is proposed and no plan is included or whether the new site is larger than the current one. The size of the new centre is not stated. There is no detailed statement of the advantages of the new site over the current site which in any case has scope to expand the current centre. The most suitable location for a medical centre used by every member of the community is its current location in the centre of town, adjacent to the largest car park, adjacent to a pharmacy, on a bus route, and with a level walk into the supermarket and High street facilitating linked trips. No reason is given why it should be relocated at all and no evidence is given that the Clinical Care Commission wants a new site at all or approve of the new site or what the benefits are. No information is given about its size, parking arrangements, accessibility for those without a car and bizarrely there is no plan showing where it would be located. If it is intended that the medical centre would share the Leisure Centre carpark, this will lead to even more parking on narrow residential streets all round College Fields when the Leisure Centre car park is full which is often the case. Access to the new medical centre by public transport is virtually non-existent. If the Clinical Care Commission deem it necessary to expand local services the existing site has capacity for a sizeable extension possibly incorporating the pharmacy next door. There is no logic to this proposal apart from a financial gain for the site owner. There is no evidence

	<p>that the Clinical Care Commission has in fact requested this and it seems an opportunistic approach to achieve housing on the current medical centre site and for the College to sell or develop the new site. This proposal has no planning merits and no public benefits and has a range of adverse impacts on the whole community, and should be deleted.</p> <p>13 Employment - Policy MARL 6 para. B states that new employment developments in the 'development boundary' will be supported provided that it can be demonstrated that they will achieve a minimum job density of 1 FTE per 40sq m. This is a restrictive policy which will hamper economic development and may be ultra vires. Even if it is not ultra vires there is no way it can ever be enforced if job density falls below some arbitrary level.</p> <p>14 IMPLEMENTATION - The plan provides no certainty that the new medical centre will ever come to fruition or how it is intended that it will be implemented or by who. Similarly, in relation to the proposed car park on the Common, which seems more of a rugby club amenity than a public car park, there is no statement as to who will implement this car park and fund it. However, at the Public Consultation on 24th February The chairman of the SG said that the TC would implement and fund this. This should be included in the Implementation chapter.</p> <p>15 PHASING - There is already pp for 280 houses and WC forecast that 160 will be built on brownfield sites by 2031. The NP contains no phasing arrangements and as it stands the 280 with pp , the 160 brownfield houses and the 180 proposed in the NP could all happen at the same time and quickly even before 2026 which would not conform with the adopted Core Strategy. The Implementation chapter should contain a sequential approach and phasing proposals.</p> <p>16 CONCLUSIONS - The draft NP is ill conceived, has no merits, will not benefit local people and is not based on proper evidence. The NP is premature in that the SG appear to have taken it upon themselves to become the strategic planning authority by proposing unsustainable strategic development without any adopted strategic guidance and has been prepared by a SG containing a representative of the College who own the land proposed for the medical centre and one of the strategic housing sites which may have the appearance of bias. This draft plan is fundamentally flawed and should be set aside until the strategic Local Plan is approved and in the meantime many of the draft policies and proposals should be reviewed.</p> <p>NOTE I also attach an email from WC confirming that the 80 affordable houses which the SG say are required have in fact already been provided. The chairman of the SG said in the public consultation that he did not recognise these figures, The attached email provides these figures. (attachment stored separately to this spreadsheet)</p>
97	<p>In my limited understanding of the local plan I would like to ask the following:</p> <p>Why is there no consideration of specific investment of resources in attracting business development and employment opportunities to Marlborough?</p> <p>What is the credible rationale for building homes here for people to work in places nearer to Swindon? Where is the environmental impact of such a proposal considered?</p> <p>Why does here seem to be a myopic focus on building affordable housing when statistical evidence does not suggest a true need?</p> <p>Where is there evidence of developing and investing in the infrastructure to support the population growth we have had, let alone what is to come, which is not an ill thought through rush to catch up?</p> <p>Where are the plans to enhance the historic nature of our town to attract visitors and investment?</p> <p>It would appear that we are becoming a town where the unique characteristics of what we have more centrally are neglected at the expense of rapidly constructed developments on the edges. These developments have been planned failing to consider what 'community' is. How is community created? Where is the vision for an integrated town rather than clusters of new housing gradually consuming the surrounding area of outstanding natural beauty ?</p> <p>I remain deeply disappointed at all the opportunities that seem to have been missed</p>

98

5.1 Vision

Good, well balanced

5.2 Objectives

Good, well balanced

Marl1 Elcot

OK, but essential that 50% affordable homes completed

Marl 2 Salisbury Rd

OK, but essential 50% affordable homes completed

Marl 3 Bart

OK provided 40% affordable homes completed. Public transport must be provided to serve medical centre patients where needed.

Marl 4

OK provided affordable homes completed

Marl 5

OK provided affordable homes completed

Policy Marl 4

Important that 2/3 bedroom type included to meet local housing need

Policy Marl 7

Public parking proposals OK

Policy Marl 9

Community facilities proposed OK

Pol Marl 15

Green Infrastructure proposals OK

Pol Marl 16

Green Spaces proposals OK

Pol Marl 17

Community Open spaces proposals OK & very important

In General, I am impressed by the proposed Area Neighbourhood plan. It is probably obvious from my comments , however, that I feel the proposed levels of affordable homes should be strictly enforced. There are too many stories of how developers have managed to wriggle out of this type of commitment in the past.

1. Housing Development Site – Land off Elcot Lane. I strongly object to the proposal to develop the field below the St John’s Park housing estate off Elcot Lane.

o There is a lack of facilities to support development on the site. Unlike the area of Salisbury Road (that is in close proximity to a range of local amenities and facilities in the business park opposite) or Barton Dene (given its close proximity to the centre of town and the leisure facilities), there are no amenities at the East end of town to support further development at the site off Elcot Lane. All shops and facilities involve a drive, and adding 50+ more homes to the areas will result in increased traffic in the town and increased noise and air pollution.

#### 2. Barton Dene

Only one green field site should be chosen and the best location is the larger Barton Dene site. This site is close to town and does not impact the landscape setting of Marlborough as much as the other locations proposed. Preshute parish needs to be brought back into the MANP – their absence makes a nonsense of the MANP and the process.

#### 3. New Medical Centre at Barton Dene – parking

I oppose the move of the medical centre to Barton Dene unless sufficient dedicated parking is made available to allow users to park close by. I understand this is not the case under the current proposal. The current location of the medical centre off George Lane is very close to significant public parking near Waitrose and is central in the town, which provides significant convenience to all Marlborough residents.

#### 4. Affordable Housing - Clarifying the objective of greenfield development

The MANP document needs to state explicitly that “the need to build on green field land in the AONB is solely to meet the affordable housing needs of young low paid local residents and will be kept to the absolute minimum to do this”. This should be stated upfront and be referred to throughout the document. It took many pages of reading to understand this is the only driver for green field development and such a statement may improve the acceptance and support of the MANP.

#### 5. Affordable Housing – Smaller affordable homes at higher density

Based on the above point, housing on green field development should be planned for 1-2 bed homes and not the 2-3 beds being proposed for affordable housing by MANP. 1-2 bedroom homes were built as affordable housing by Crest Nicholson on their St John’s Park estate and their School Walk development. This allowed higher density development (more homes per hectare) which in turn reduces the demand on green field sites and improves the economics for the developer. The green field land demand could be reduced by a quarter or more in Marlborough by stipulating smaller homes that are better suited to meet the needs of the young on low pay (more affordable).

I refer to the pre – submission plans for two specific sites as follows :-

2. LAND REAR OF SALISBURY ROAD. Page 24

This site is inaccessible from Salisbury Road if you claim to “ RETAIN AND ENHANCE THE GREEN INFRASTRUCTURE ALONG ITS EASTERN BOUNDARY ( THE OLD RAILWAY LINE ) TO PROVIDE A WILDLIFE HABITAT

CORRIDOR NORTH & SOUTH TO DELIVER A BIODIVERSITY NET GAIN.”

The large black arrow indicates a MAIN ACCESS roadway cutting a gash through this critical wildlife corridor which would certainly be at least 15 metres wide. This corridor also provides a quiet & undisturbed access

The large colony of diverse BAT species living in the Old Railway Tunnel entrance just 100m to the south. The fracture of this wildlife corridor will deliver a serious BIODIVERSITY NET LOSS.

The extra volume of traffic generated by the existing Marleberg Grange site has overwhelmed the traffic flow into Marlborough ( A346 Salisbury Road) . In peak times and throughout the summer the traffic backs up

Posterne Hill towards Cadley. A queue sometimes over a mile long. A further 50 proposed homes feeding traffic onto the A346 will further exacerbate this chaotic situation.

4. LAND OFF CHERRY ORCHARD. Page 26

This 1ha brownfield site is bounded on the south side by the wildlife corridor (The old Railway Line) The proposed high density housing, 30 homes, would completely overwhelm the integrity and purpose of this

Wildlife habitat. It is already under pressure from the activity on the Marleberg Grange site to the south.

The extra traffic from 30 more new homes will add to the huge volume of traffic already using the ONLY access to T he Cherry Orchard estate from the A346 Salisbury Road.

I therefore suggest that a maximum limit of 15 new homes should be applied to this site. This will limit the pressure on the NARROW access to the site and also ease pressure on the adjacent wildlife corridor.

101	<p>The COVID pandemic has thrown huge uncertainty into any future planning exercises such as MANP. Demand for housing etc will be impacted by major economic, societal and working pattern changes for years. It would be sensible to save nugatory effort and cost by postponing this task for say 2 years until a way forward is clearer. Ploughing ahead regardless should not be an option. 17/ALL</p> <p>The schedule differences between the MANP and Wiltshire's planning process should be reconciled. Wiltshire Plans take precedence so surely the MANP should come later? 17/ALL</p> <p>The plan is intended to cover up to 2036 but many of the Wiltshire documents and especially the settlement boundary documentation runs until 2026. Presumably therefore, the MANP covers 2026-2036 or how is this reconciled? 18/ALL</p> <p>The main development areas in the MANP are outside the current settlement boundary as defined in the Wiltshire documents (ref Core policy 2). Since the presumption, stated in those documents is that developments outside the boundary will be refused, how can these developments be realistically proposed? 18/ALL</p> <p>Given the AONB and the policy to not extend settlement boundaries in it, any such proposals are likely to be rejected and/or subject to appeal to very high levels. This has happened in the recent past when proposals were dismissed by the Secretary of State. 19/ALL</p> <p>MANP Housing Needs Study dates from 2016 and questions covered a 5 year period, so to 2021. By definition, it is no longer applicable, especially see COVID comment above. 23/ALL</p> <p>The housing aspects are erroneously driven by the need for a certain number of affordable houses (80) and policy MARL1 and this then drives the total number of houses. A more holistic approach is needed, looking at total requirements of all types, considering national and local socio-economic aspects. 23</p> <p>The 180 total/80 affordable numbers from the 2016 study are already exceeded by the approved developments at Rabley, Salisbury Road and approvals expected at brownfield sites. These total about 440/160 approx. 12/all</p> <p>There are no plans to further develop business parks etc in Marlborough (nearest being RWB) so no new employment. This brings further doubt onto future housing demand. 12/all</p> <p>The MANP contains too few proposals to improve local education, health, leisure, transport, car parking to cope with an increased population inherent to the plan. 13</p> <p>The MANP contains no specific local traffic management proposals to cover the increased population inherent to the plan, especially given that Marlborough will continue to be dormitory town but with much through traffic. 33</p> <p>The car park proposal using land on the common is not satisfactory. It is too far from the town, with a steep slope en route and will not be used routinely. A difficult problem but this cannot simply be bypassed especially with the inherent population increase in the MANP. 13</p> <p>The logical site for the medical centre is where it is now, next to a large car park in the town centre. It should be enlarged, perhaps by adding a second storey</p>
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and/or building on its current small staff car park and perhaps incorporating the pharmacy.

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The Barton Dene site and its associated words have a number of problems.

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The site already has the Leisure Centre, teacher's houses and several College facilities, some with listed status. Access is narrow and difficult. The site is steeply sloped and has much biodiversity. It seems unlikely that 40 houses and a medical centre could be accommodated.

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Planning application K/53180/F in 2005 for the 6 teachers houses now built, had (< I believe>) a commitment not to further develop the site. I cannot check as the documents are not on line.

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The economics also look dubious with the developer being asked to subsidise affordable housing and land for a medical centre. With about 24 market-price houses to cover this, on a difficult site.

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A medical centre at Barton Dene is not well situated. This is the edge of town, has no reasonable bus service, no footpath/cycle path access, no nearby pharmacy etc. Further, the resulting car park requirements (it absolutely must have its own car park otherwise on-street parking will be a nightmare) of say 30 spaces, coupled with say 60 spaces for the 40 houses further complicates the sites practicality.

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The words associated with the Barton Dene site ("The housing scheme shall not....") are not definitive enough and allows the developer to finish building before any agreement ref the medical centre. This allows a "hold to ransom" situation to develop (as happened at the bottom of Grantham Hill). In other words, development permission must be withheld until a contract for the medical centre is in place (wherever it turns out to be).

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#### Comments on the Draft Marlborough Neighbourhood Plan

The Plan is premature

The Plan must conform to the Wiltshire Core Strategy which is currently to 2026.

The Neighbourhood Plan however covers the period up to 2036 for which there is no strategic guidance.

Wiltshire Council are in the process of reviewing the Strategic Plan and extending its period to cover the period 2016-2036. The Neighbourhood Plan is premature until Wiltshire have adopted Strategic guidance up to 2036.

As it currently stands under the Core strategy to 2026 Marlborough is required to provide:

680 houses, and 3h of employment

By 2019 Marlborough had provided 721 houses (built under construction or with planning permission) but no new employment land has been provided.

Therefore, Marlborough has already exceeded the Wiltshire housing requirement to 2026, and there is no need for any new housing land to be provided until then. Wiltshire have not decided the requirements beyond 2026.

Wiltshire are the Planning Authority and it is not the function of a Neighbourhood Plan to set strategic policy beyond 2026. The emerging Local Plan Review up to 2036 will set out the strategic guidance expected to be adopted in 2023 and the MANAP should conform to that plan and it is currently therefore premature.

Simply adding more houses and no employment land is unsustainable because it will lead to more commuting and strain on the current infrastructure and air quality.

#### Lack of Public Consultation on the Draft Neighbourhood Plan

Wiltshire Council's guidance is that the minimum period of consultation on the Draft Neighbourhood Plan is 6 weeks, but can be longer.

Due to the unprecedented circumstances arising from the Coronavirus pandemic the Public have not been engaged during the last 12 months of the Plan and for the last 6 weeks since the Draft was published have been in lockdown.

Since the Draft was announced in the local press and on the Town Council website there has been no public exhibition for members of the public to speak in person to the MANAP Steering Group and, due to the lockdown, even neighbours and different households have been unable to freely discuss its existence and content.

Only two 1 hour on-line Zoom consultations were available for the public to discuss the draft, and at these consultations only the Steering Group Chairman spoke, and Q&A's only lasted about half an hour. Many old people do not use social media, Zoom, or the internet, and there was a marked absence of young people at the Zoom sessions.

To access the on-line Zoom consultations the Public had to email the Town Clerk for the login details as they were not freely available, yet other Council Zoom meetings have login details attached to them.

A leaflet was delivered to houses advising of the Draft Plan, but, no dates for the Zoom on-line consultations were provided therein. In addition, in some areas the leaflets were delivered on the day of the Zoom consultation, hence on 26th January 2021 only 15 members of the public attended and were nearly outnumbered by the Steering Group and Councillors (see notes on TC website).

As the Plan is premature, and with the lifting of coronavirus restrictions imminent, the draft Plan should be delayed until a proper Public exhibition consultation has taken place where the Public can have proper discussions and explanations with all the Steering Group, see plans etc, as is usual for such important documents. It is also usual at consultation events for technical advisors and professional consultants to be present also.

Planning documents are not understandable for many members of the Public and they do need guidance on understanding and accessing them, even if they are aware of the document's existence. This is complicated by the fact that Wiltshire Council are simultaneously consulting on a different plan.

It could be perceived that the Steering Group do not really want the larger Public involved and are trying to rush their views and this Plan process through.

Housing Need – Delivering Affordable Homes



The entire housing strategy is based on a public opinion survey put to residents in 2016 asking if they were likely to move by 2021 and what they could afford. From this survey the Steering Group calculated a need for 175 affordable houses. 96 are already committed leaving a residual requirement for 80.

The Steering Group Chairman on 26th January Zoom meeting admits this is a novel and unique way of calculating housing needs and is not a recognised Planning Housing Needs Analysis Calculation.

A proper Housing Survey should also take into consideration the actual availability of existing affordable houses, and the turnover of these.

This whole exercise, which is out of date anyway and only covers up to 2021, supplies insufficient evidence to support the housing strategy AND even if it was correct fails to take into account the actual supply of affordable housing, and of those in the process of being built.

An opinion survey which takes no account of the 733 existing houses, (soon to be 829), and their relet rate cannot be relied upon as a basis for a strategic plan.

No evidence has been provided to support any particular number of market houses.

It also seems remiss that no housing sites are proposed in Savernake and Mildenhall Parishes, bearing in mind these are expensive areas and MARL3 is entitled Encouraging Affordable Homes in Mildenhall.

Sustainability

Para 2.20 in the Plan states 'Marlborough is now mostly a dormitory town'

No new employment land was provided as per the last Core Strategy requirement, nor is any proposed in this Neighbourhood Plan to 2036.

All planning should be sustainable. More houses without employment is not sustainable development.

It will lead to more commuting and congestion and pollution, and demand on the existing infrastructure.

New housing should be located near to jobs and services, in order to reduce commuting for people with cars and to facilitate access to jobs for people without transport.

The Plan ignores the 280 houses with planning permission yet to be built and 160 houses which WC forecast will be built on brownfield sites by 2031, totalling 440 houses already in the pipeline. The 180 additional houses in the Plan means that the town will grow by 620 houses with approximately 1500 additional people, with no new jobs or approved social and physical infrastructure.

The Plan is clearly not sustainable.

Medical Centre

Any proposal for a replacement medical centre should surely have a specific chapter dedicated to it, and full explanation and a detailed site plan included, as this is a facility that ALL residents of Marlborough use; instead, for some reason it scarcely gets a mention.

Also, there is no explanation or evidence as to why the medical centre needs to be moved. The current medical centre is in the town centre, accessible from all bus routes on the High Street and George Lane, and is adjacent to a large public carpark.

There is no plan showing where the new medical centre may be sited in Barton Dene near the leisure centre, nor any indication to its access, or parking availability, or its size, number of storeys, etc. Public transport to this area is limited and there is no room for buses to turn.

Parking at the leisure centre during normal times is usually limited and the MANAP parking survey concluded that all on road parking spaces on College Fields outside the leisure centre were occupied constantly throughout the day, essentially making College Fields a single carriageway road.

Additionally, there is no indication that the Clinical Care Commission have been consulted or support this. Instead, they will be approached if the plan is approved. This is a back to front approach.

If more space is needed it seems there is ample space next to the existing medical centre to extend in its current town centre location.

Area of Outstanding Natural Beauty (AONB)

Marlborough is a Kennet Valley Town situated in a protected landscape of national importance. The landscape was declared an area of outstanding natural beauty to ensure its protection from urbanisation and this should be the most important guiding principle.

Development on Greenfield Land on the edge of town in the AONB will have an adverse effect on the AONB and the setting of the town. But, development on Greenfield land is unnecessary anyway as Wiltshire Council already forecast 160 houses on Brownfield land.

#### The Common and Parking

The Parking survey identifies that there is a lack of parking in the Town Centre for residents and visitors.

The only site the Steering Group have come up with is on the Common next to the rugby club, which will be very inconvenient for everybody other than users of the rugby club. Residents want to park by their homes to unload shopping, charge their cars etc and visitors want to be in the town where the shops and teashops and toilets etc are located.

Also, as the Common was given for everyone to enjoy, the Town Council as custodians of the land should prepare an overall management and landscape and environmental plan for the whole Common, including any other changes to it that they are considering.

#### Sporting Facilities

The Neighbourhood Plan itself highlights the lack of sporting facilities although the Plan itself fails to address this issue.

The Town Council have voted to make a substantial contribution to the provision of a 3G all-weather football pitch. This should free up the existing football pitch on the Common. At the same time the rugby club have expressed a need for a further training pitch. The football pitch which is already level could be used for this purpose.

At the same time the Town Council are consulting on the Neighbourhood Plan which includes a car park for the rugby club the Public are being consulted separately on a rugby training pitch which does not mention additional parking. Also, at the same time the Town Council are promoting an all-weather football pitch at a school which will free up the existing football pitch on the Common. This is all very unco-ordinated and ad hoc and unsatisfactory and should now be brought together as an overall comprehensive and comprehensible strategy in a Neighbourhood Plan.

#### Conclusion

The Plan is premature and should be postponed until the Wiltshire Local Plan has been adopted which will set out the strategic housing and employment policies for the town.

In the meantime, more comprehensive and detailed plans should be made for the proposed medical centre, parking, sports facilities and overall strategy for the Common which the Public can then be consulted on properly once the pandemic lockdown has been relaxed.

103	<p>Thank you for inviting responses to the Marlborough Neighbourhood Plan.</p> <p>My overriding concern is the lack of evidential detail necessary to endorse many of the proposals contained in the plan. As a consequence, it is difficult to formulate a detailed response.</p> <p>But questions remain:</p> <p>On what basis are the figures for 'affordable homes' arrived at?</p> <p>Should these houses be built, what realistic plans have been drafted to provide a workable, realistic infrastructure to cope with the increased demands that will be placed on it?</p> <p>The Medical Centre is already under significant strain. With the projected increase in the 75+ age group of 85%, this would appear to be a pressing issue. It seems that no parking facilities are planned for the proposal to move the medical centre. (The notion of creating a carpark on the Common, or near the rugby club is clearly of little use to those needing to use the Medical Centre).</p> <p>The balance of age ranges in the local population is of significant concern, with indications that this is due to increase (an 85% increase in the over 75s, with a 14% decrease in the 45-59 range). In order to maintain a healthy, vibrant and balanced demographic, what incentives are planned to encourage new employment opportunities for the area in order to enable people of working age to remain living here, or indeed to move here? Proposing that employment opportunities exist/will exist in Royal Wootton Bassett appears arbitrary. Again, detailed planning is woefully lacking here.</p> <p>I am totally in favour of providing affordable houses for people to buy, rent and live in. I welcome the desire to develop and invigorate Marlborough. But I am concerned at what appears to be a drive to shoehorn more houses into a long-established town without sufficiently robust thinking/planning. The current document remains unconvincing. Please do not proceed by building houses and then attempt to deal with the consequences of that decision. Let's have some sense of a realistic, workable, exciting vision for our town.</p>
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PHOTOS WERE INCLUDED IN ORIGINAL RESPONSE

My first observation is that it is not easy to find the documentation you are asking for a response to. Even using google to find the actual page just takes you to a very muddled page with many links and confusing images. I believe the MANP page should be very much clearer, with large obvious links to the document itself and the feedback form front and centre, not small text links, or the image link taking you to yet another page for loads more links I struggled to find out which was the document that responses were requested for so ploughed my way through several before finding the right one. It may be a relatively minor thing but I saw several typos and other basic errors within the document which ought to be corrected before the final version is published.

Various maps

The maps shown within the plan document are atrocious. They are so small that they are of no use when trying to identify any particular areas mentioned in the document. Also, when they are all collected together at the end of the document it is very difficult to keep going back and forth to relate the wording in the document with the areas marked on any particular map. That's very frustrating. Had each map been placed directly below, or above, the part of the document which refers to it that would have been much easier to work with.

"St John's ... is currently oversubscribed..." WLP\_Market\_Town\_Planning\_for\_Marlborough\_FINAL states that "Marlborough St Johns can be expanded to supply new secondary school places." Which is correct?

2.12

If the "aim is to de-prime the A338/346" when is that likely to happen?

2.16

Any air quality readings taken 2008-2014 will have little relevance to levels now and in the near future. Currently during lockdown levels should be substantially reduced but liable to rise very quickly once life generally is back closer to a pre-pandemic level, and there is much more traffic around now than 6-12 years ago.

2.17

"1920's to the 1950 's" - improper use of apostrophes - should read 1920s to the 1950s

2.22

This paragraph is wrong as below:

2.29

The hamlet of Cadley Clench Common is an agricultural community in the northwest of the parish. The hamlet of Cadley is at the edge of Savernake Forest, on the A346 between Marlborough and Burbage.

... Within the Savernake Parish, Savernake Forest and Tottenham Park are categorised by Historic England as Grade Two Listed/Registered Historic Parks and Gardens. (Tottenham Park is in the parish of Great Bedwyn)

4.2

I understand that only land put forward by landowners could be considered for housing or other uses. I believe that's inherently wrong and the MANP should be able to identify any area which could be considered suitable, and then have the authority to approach the landowner to put the possibility to them.

Land off Elcot Lane

Pg 23

It is already difficult driving around White Horse Road so limiting access to 50 new dwellings solely from this road will cause far too many problems, for the residents of the current estate, for residents of the new homes to be built there, and for the many contractors' and suppliers' haulage lorries trying to access the site during its construction. I believe there should be a new access road leading directly off of Chopping Knife Lane along the edge of the field leading to the new development, also linking into White Horse Road to provide additional access to the residents of that development too.

Land rear of Salisbury Road

Terrible map, impossible to see the detail.

Pg 24

Again, if additional dwellings are to be built on this land then an additional access road should be provided onto the A346/Salisbury Road rather than creating a worse bottle-neck at busy times by only creating one entrance/exit from the entire estate.

And, by the way, I think Marlberg Grange is a terrible name for the Estate. There was no previous country house on that field that could have been considered a Grange, and Marlberg is just a completely silly name, a bad play on the word Marlborough.

Land at Barton Dene

An additional medical centre located here would be helpful, but it cannot be a replacement for having a site within the town itself.

Pg 25

Land at Cherry Orchard

Pg 26

If this is to be developed together with the adjoining land behind Salisbury Road a road link should be created between the two as well as a pedestrian link as that is another bottleneck, particularly at school times.

5.7

&

Policy MARL2

I reiterate my belief that any new medical centre at Barton Dene should not be at the expense of the removal of any medical practice within the town. I strongly object to the idea that the existing building would be 'surplus to requirements' unless another site within the main town is identified as a satellite office. There must be vacant properties within the town that could be adapted for use as a medical centre for those unable to easily get out to Barton Park. There does not appear to be anything within the document in relation to the old Police Station on George Lane to explain why that would not be suitable as a replacement medical practice site.

Pg 28

Policy MARL2

The map relating to this Policy has the old Police Station marked out, but there is no reference in the Policy text to it.

I don't understand how 2-3 bedroom properties can be considered starter homes, there does not appear to be any mention of the need for 1 bedroom properties, which would be much more suited to first time buyers and renters.

I fully agree that there should not be any more retirement home developments.

Pg 34

Policy MARL7

I truly do not know the answer to how the need for additional parking spaces can be met, but I don't think that creating space by the Rugby Club will make a great deal of difference and doubt that it would be used by tourists, being too far away from the centre of the town. It may be of use if formalised and used with a system of parking permits for people working all day in town, but would be unsuitable for short-term parking.

As an example, I am not considered disabled, but I am impaired and would find it impossible to walk from the rugby club to the High Street and back again so would always need to find a parking space within the High Street or behind Waitrose.

The Ordnance Survey, and road name signs show some of these to have been incorrectly named in the MANP document.

Cross Lane Road/Cardigan Road/Leaze Road Lane/Back Lane (North Side

Pg 37 B Typo - letter 'f' missing on northern "access from Nos."

Pg 38 E

Last sentence, 'In the meantime' at both start and end of sentence. Typo – The business name is 'Dobie Wyatt' - Dobie and Wyatt's

Pg39 5.36

Local Infrastructure Improvements

Pg 45

6.5

Generally, I feel it was short-sighted of the MANP not to include preferences or suggestions in respect of traffic matters, even if they are beyond the remit of the Plan to legislate for such matters.

For example: The need for additional road access to the proposed development at Elcot beyond the White Horse Road development.

The need for additional road access to any further development off the Salisbury Road.

The need to deal with the A4/A346/George Lane junction to provide better rights of way, to prevent the build-up of traffic unable to get onto George Lane or the A4.

I reiterate my strong belief that a medical centre or satellite office should remain located within the town centre.

.6.9

Pgs 66/67/68

Pages 66 & 67 show the same map. Pg 66 is designated 2 of 3, Pg 67 is undesignated, Page 68 is shown as 3 of 3. If there is a Map 1 of 3 it has not been included.

Appendix A

The Schedule of Local Heritage Assets for Savernake is missing from Appendix A.

Pg 36

Policy MARL11

Typo - incorrect space in the name St John's

Typo - letter 'n' missing on northern "forming the northern side"

105

Marlborough Area Neighbourhood Plan

Manton Residents' Association Consultation February/March 2021

Marlborough Neighbourhood Plan consultation

Following consultation in the Manton Village via leaflet and email, the Manton Residents Association have combined the views of contributors into the following document.

Importantly there are key issues/omissions in the main document which we feel should be amended to protect future planning development (see second section below)

1. New Medical Centre: there is some support for this on basis that the existing medical centre should be updated and, importantly, have enough parking so that groups can meet for special clinics, vulnerable and carers can access care easily, prescriptions collected and so on. But there is also some strong opposition to moving from the existing central site with its adjacent parking provision. Updating could be arguably achieved on the existing site.
2. Sustainability : many wish to see this as an important part of all future development and would be interested in more detail Transparency please!
3. General infrastructure, especially schools, roads: leisure centre: traffic jams, and even gridlock, occur around the town with increasing frequency. No recent building has been accompanied by any traffic measures of any significance at all. Even if working from home continues some commuting impact will be felt. The proposed land off Elcot Lane development (MARL1) with exit to main highways through White Horse Road /Chopping Knife lane development already has its own issues of parking and passing parked vehicles, which are potentially hazardous. Again specific details would be welcomed. Primary schools have space but there is concern about the capacity of St John's to cope without becoming too big for comfort. The leisure centre is small and in poor repair and needing update to meet the needs of the community. The provision of more bike racks to encourage biking is called for. One person mentioned increasing Business park. We favour the proposed new car park near the Rugby Club on the Common.
4. New Housing : there is a lack of comparatively low cost freehold housing in the town. It is agreed that the town does not need any future retirement developments as currently they are significant but underused.
5. Skyline and views: even if a clear skyline is technically maintained that does not necessarily mean that from eg centre of town a skyline is in fact uncluttered and spoiled
6. AONB and Conservation areas: we all cherish our beautiful surroundings and want these respected as far as possible. Marlborough is naturally constrained by the Kennet and other valleys and by water meadows and flooding. More tree-planting as part of development is favoured.
7. What we like about the present proposed plan: A number of small sites around the town are clearly better than one large new development. Most respondents recognise the need for more housing, especially social and low cost housing. But many are against any more housing for the elderly!

Marlborough Neighbourhood Plan Omissions/amendments (see page 40).

Bullet point 4. Manton Road We believe this should read Manton High Street onto Manton Road

Section B ( to protect us from issues with planning and protecting the Conservation Area) The following two points should be added after bullet point 3

- Downs Lane, cut into the rising downland landscape to the north of mature housing on Bath Road and adjacent to Bridge St, was constructed in the late 19th century to serve the Manton Estate. At its south end there is a mature enclave of 1940s/50s housing including Manton Hollow with many mature trees and hedges that complement the older village setting.
- West Manton, to the south-west of Manton High Street, is a small 1960s housing development with mature gardens and trees and a complementary mature setting forming the western extent of the modern village.
- There should be no permitted development above the 150m contour on the fringes of the village. Development above this limit, even if it were practical, would have a severe impact on visual amenity, the character of the AONB and would compromise the setting and character of the village by introducing prominent development on the skylines

Manton Residents' Association Committee March 3rd 2021

106	<p>Land at Barton Dene</p> <p>1.The proposals for a medical Centre and 40 houses would increase traffic congestion in College Fields. The Medical Centre would no longer be in a central location in Marlborough and would be a good distance away from the people who live at the other end of the town, thus increasing the traffic and parking in the College Fields area. .Would it not be possible to redevelop/extend the present medical premises, perhaps adding an extra storey to the existing building?</p> <p>2. Housing on land at Barton Dene: I have a concern about any development on a greenfield site. The Barton Dene location is very close to an AONB and the number of houses proposed seems to be quite high considering the terrain. The access would have to be the road in the valley with adequate landscaping and regard to the local environment. Congestion would also be a factor here.</p> <p>3. The land at Barton Dene is the only 'green area' between the town and College Fields and the AONB. It is an area that has been extensively used for walking, running and dog walking for many years and is a very pleasant green space for local residents. In addition it is located adjacent to an AONB and is a wildlife haven and corridor. There is a small copse near the edge of the proposed development area (bordering Irving Way and Edwards Meadow) that is rich in wildlife: birds, animals, insects, butterflies and bats. I have in fact kept a monthly record of all the sightings in my garden since 2006 when I first moved to the area. I can provide you with the data if you require it. Species such as tawny owls, sparrowhawks, muntjac deer, pheasants and partridge, buzzards, pipistrelle bats ad butterflies, as well as two types of woodpecker, and treecreepers, to name but a few. Much consideration would need to be given to the preservation and safeguarding of the trees and the flora and fauna,. The removal of such areas supporting wildlife would certainly go against current trends.</p>
107	<p>I wish to raise my concerns and objections in relation to the proposed additional housing development off White Horse Road, Marlborough. The area in question is an AONB and provides a wonderful area for wildlife and local residents to access unspoilt countryside. Over recent months the amount and variety of wildlife using this land has increased noticeably.</p> <p>The loss of open countryside is a great concern. The area earmarked for development is part of an open space which is enjoyed by numerous walkers, dog owners, cyclists, runners etc and building on this land will have an obvious impact to wildlife and surrounding properties in White Horse Road, Elcot Lane and other areas. Building on a greenfield site such as this would mean losing countryside permanently, which would be a massive loss to the wildlife living in this area and numerous local residents who access this land for exercise and general wellbeing.</p> <p>Existing residents are likely to see an increase of 50-100 additional vehicles passing a minimum of 40-50 existing houses – resulting in an inevitable increase in noise and air pollution, plus a reduction in privacy and quality of life the existing residents and wildlife currently enjoy – i.e. replacing open fields, trees and hedgerows with additional buildings, roads and street lights.</p> <p>At the moment the existing development has a number of issues with vehicles/parking. These issues include:</p> <ul style="list-style-type: none"> <li>• Parking on pavements – resulting in wheelchairs, pushchairs, people with young children being forced to walk in the road</li> <li>• Parking across resident's driveways or causing obstruction to driveways</li> <li>• Parking in no parking spaces including grass areas, service areas (such as the pumping station) on pavements.</li> <li>• The introduction of double yellow lines in part of the development has had minimal impact. These double yellow lines are largely ignored and never policed so people park their vehicles over them regardless.</li> <li>• Parking on corners, restricting sight for other road uses</li> <li>• Parking on both sides of the roads</li> <li>• Exceeding the 20 mph speed limit on the development. Speeding seems to be a general problem for Marlborough.</li> <li>• Problems with emergency vehicles access.</li> <li>• Additional traffic trying to access to, exit from the A4 from the A4.</li> </ul> <p>None of these traffic issues will be news to the council but it appears little has been done to address them and hopefully it will not take someone getting injured or worse before action is taken.</p> <p>Introducing additional homes and the traffic associated with that development will make the traffic/parking speeding issues notably worse for the current</p>



	<p>residents and also increase noise and air pollution.</p> <p>This will cause long lasting damage with a permanent loss of habitat for wildlife, and years of disruption and a disrupted and reduced quality environment for existing residents, given that the building work is likely to take some years before</p> <p>The disruption from construction traffic is likely to last for some years using the speed at which the original Crest Nicholson development was completed and the current approach to the Redrow development south of Marlborough. I would imagine the levels of complaints would be significant and frequent and the impact on the local environment significant.</p> <p>In addition the trees, bushes, shrubs etc planted by the original developers, Crest Nicholson, are now well established having been in place for up to 10 years and form a key feature of the development and support local wildlife with many birds nesting in the trees. Any building work will no doubt involve the removal/loss of some or all of this greenery, resulting in a reduction in the quality of life for wildlife and residents alike. Further planting, landscaping could take 10 years to establish to the same standards which is a long time for existing residents to suffer.</p> <p>A number of homes will have their outlook changed significantly. Currently many houses in White Horse Road and Elcot Lane enjoy wonderful views across open countryside, trees, shrubs etc, which is clearly a key reason why these properties were specifically selected for purchase. This proposed development will change the view to rows of houses and clearly could result in a reduction in quality of location and loss of value in properties.</p> <p>The area in question will also be of concern for drainage as it is notable lower than other parts of the existing development and particularly close to the River Kennet and its flood plain. This will almost certainly result in it being extremely expensive for residents to purchase home insurance to cover against flooding if they can get any cover at all.</p> <p>The existing development already suffers with drainage issues and the pumping station has had a number of issues and the drains regularly block, building additional homes will add to this issue and potentially also cause environmental issues for the nearby River Kennet and the wildlife that river supports.</p> <p>Given the increase in home working and the move away from people having to travel to and work from offices, couple with the inevitable increase in people shopping on line, I am surprised there is not more consideration/focus given to the conversion of existing retail units, offices, etc to housing. Many of these sites will already have road access, connections to main utilities, lighting etc and would be a more beneficial method of providing affordable homes, close to amenities and the town centre.</p> <p>Many organisations are looking at the ways of working and ensuring there is a quality work/life balance. Firms are actively trying to avoid the mass returns to offices/retail units so it is highly likely many offices/commercial etc may stay empty/unused for a number of years If not permanently.</p> <p>This is something that has and is being done by other councils to avoid building on undeveloped land and reducing development costs.</p> <p>I would suggest that the plan should avoid the development of existing countryside at all costs until all options to utilise existing brownfield sites have been exhausted. Certainly the loss of this area of countryside must be avoided and remain a wonderful habitat for wildlife and a glorious view and recreational area for all Marlborough residents</p>
108	<p>There are a number of constraints on the site identified in the Wiltshire Site Selection Report namely the impact on local congested corridors and access to the town centre and associated amenities,</p> <p>The report also recommends a strong landscape buffer to the River Kennet.</p> <p>This landscape buffer should also extent to the existing and proposed footpaths to mitigate the visual amenity and to allow pathways for wildlife between the river and the wider habitat such as the Savernake Forest,</p> <p>Access to the site during construction will be a major problem and should not be via Elcot Lane due to narrow road width and the railway bridge pinch-point. Wiltshire Council already limit the size of their rubbish collection vehicles through this route. Also there are safety concerns if construction traffic is via White Horse Road.</p> <p>It seems obvious that brownfield sites should be prioritised and green field development should be a secondary consideration.</p>

	<p>With climate change resulting in more frequent severe events, particularly rainfall, development near the river could result in shorter stormwater runoff time and potential flooding.</p>
109	<p>We wish to register our concerns over two of the proposals in your neighbourhood plan.</p> <p>1) your plan to construct a car park on the Common is wrong for two reasons. It will undoubtedly increase traffic on Hyde Lane, which, even now, is used as a cut through for traffic between the Swindon and Bath roads. Hyde Lane is totally unsuitable for the current level of traffic, being only one car wide in places, bounded by high hedges and winding. Moreover it is only a 30mph road, where it should be 20, if not 15. At the point when it bends nearly 90 degrees, there is an entrance from Leaze Road, where it is impossible to see up Hyde Road until one's car is almost across the road. An accident waiting to happen, especially if the volume of cars is increased by the new car park. Your efforts should be focussed on making Hyde Lane safer - lowering the speed limit, installing road bumps, installing a mirror for people exiting Leaze Rd or even making it one way.</p> <p>Secondly, a car park on the Common will ruin the ambience of the Common, which currently is a large open space allowing the residents of the town to get away into nature.</p> <p>2) we fail to see the point of moving the Medical Centre from its convenient town centre location to a point where the vast majority of its users will have to drive there...with the added complication of not having any parking. The current Medical Centre is walkable for many of the older residents of the town who live in facilities close to the centre, those who have to drive have the municipal car park. To avoid patients having to pay for parking, would it be possible to designate a number of the spaces in this car park for the free use of patients attending the Medical Centre? This would be a much better way of using our taxes, than spending them on a new facility in an inconvenient location for the elderly with no parking.</p>
110	<p>1. New Medical Centre We don't understand why the existing site can't be developed as its in a central location with access to parking. However, whilst we don't object to it being moved it is essential that Parking is available onsite.</p> <p>2. Existing pressure on Local Services The current infrastructure in the town (medical centre, schools, volume of traffic, parking, leisure centre etc), is unable to cope with the existing number of houses, so building more will only exasperate the problems. We don't think there is a need for any more houses beyond the existing commitment of 440.</p> <p>3. Car Parking We favour the proposal for a new car park near the rugby club as it will serve traffic coming from the M4 and mean cars don't have to enter the town.</p> <p>4. AONB &amp; Conservation It is essential that the protection of this AONB and Conservation is identified as being of prime importance when considering the Neighbourhood Plan.</p> <p>5. Development Consideration of the development of the water meadows along the banks of the river kennet which are subject to flooding (eg along the A4 to the west of the town) should be removed from the plan. In addition, the plan should specify that there should be no permitted development above the 150m contour on the fringes of Manton village. Development above this limit, even if it were practical, would have a severe impact on the visual amenity, the character of the AONB and would compromise the setting and character of the village by introducing prominent development on the skyline.</p> <p>6 Wiltshire council local plan. We don't understand why the Wiltshire council local plan and the Marlborough Neighbourhood plan aren't being co-ordinated.</p>

111	<p>Regarding the new houses proposed to be built at the end of Elcot Lane, below the ones built on the old senior school.</p> <p>My biggest concern is access to the new houses, although on the plans this is from the A4/ Chopping Knife Lane/White Horse Road, there are plans for an emergency access from Elcot Lane, prior to the entrance to the Mill, which is where my concerns lay.</p> <p>What prevention will there be put in place to stop the residents of the new 50 houses from using this entrance to enter the new estate?</p> <p>Elcot Lane already supports the houses along its length, plus Barrow Close and several other cul-de-sacs, most of the lane is one way traffic due to it being a lane as the name suggests and even at its widest part by the football field/green area due to parked cars for allotment owners and residents, its one way only, therefore there are very little passing places from entering by the Roebuck Pub all the way past Marlborough Tiles to the end to the lane by the footpath which gives access to White Horse Road.</p> <p>At the moment, it keeps its character as a lane, much used by the residents walking to and from the high street and the local schoolchildren and much used by walkers (and dog walkers) often following the foot path to Mildenhall or walkers and cyclists accessing the railway path in Barnfield.</p> <p>Clarification regarding how the Emergency access will operate will be very much appreciated.</p>
112	<p>It is very important to remember that 1) people need homes and 2) new homes need to fit in with the existing neighbourhood .</p> <p>It is to be hoped that the character of Marlborough will not be overwhelmed with huge swathes of housing developments.</p> <p>Brownfield sites must be used first.</p> <p>Consideration must be given to the whole of the infrastructure, to medical facilities, schools, dental services, shopping, parking, and public transport. Most of these facilities especially public transport are already inadequate. Also supplies of gas, electricity, water and communication networks need careful planning of course.</p> <p>Do not endanger the unique footprint of this ancient town.</p>
113	<p>I would like to make some observations on the Pre-Submission Plan.</p> <ul style="list-style-type: none"> <li>• I would like to support the proposals for new homes on MARL 1:1, MARL 1:2, MARL 1:3, MARL 1:4 &amp; MARL 1:5 with provision for the “affordable homes” that are desperately needed in the town.</li> <li>• I would hope that the footpaths and cycle paths connecting #1: 2 (Rear of Salisbury Road) &amp; #1:4 (Off Cherry Orchard) are considered carefully. It is dangerous at the moment to use the footpath on the Salisbury Road to the Tesco roundabout and this issue needs addressing.</li> </ul> <p>There is a lack of parking for residents, visitors and workers.</p> <p>I think the proposal of MARL 7, 5.28 for an area around the rugby club house is appropriate.</p> <p>However the charges for any parking would need to be reasonable as many workers in the town are on a minimum wage.</p> <ul style="list-style-type: none"> <li>• The tendency for the parking spaces in the High Street to be whittled away must also be resisted. The crossing points we have now in the High Street are sufficient and unlike pedestrian crossings they do not take away too many parking spaces.</li> <li>• There are also sufficient places now for bikes to be parked.</li> </ul> <p>I am pleased to read that Wiltshire Council/HGV working group is aiming to de-prime the A338/A346 through the town.</p> <ul style="list-style-type: none"> <li>• I was surprised there was no mention of a possible by-pass to the town : in the first instance North to South. This was proposed by the County Council some years ago and there was a lot of comment and opposition. The needs of the residents of the town who suffer traffic noise and pollution never seem to be considered.</li> </ul> <p>River Walk : Page 17. Saved Policy AT24.</p> <p>I support the idea of a river walk through the town. It would be possible to extend this river walk from the Bridge Garage past Churchill Court (I believe this was a condition of the planning) to Stonebridge Meadows. This was “vehemently” opposed by Churchill Court residents but I think they should have been</p>

made aware of this when they purchased.

Extension to Cemetery.

I note it is proposed to extend this onto Common Land. I do think it is a pity that Marlborough College who have benefited hugely from selling off development land in the town cannot see their way to giving up a part of Wedgewood Field for an extension to the cemetery. The college occupy over a third of the land area of Marlborough Town and the extension onto the Wedgewood Field could have signage explaining how this field came to be named.

In conclusion I think the working party under the chairmanship of Councillor Mervyn Hall have done a great job

PS I thought the Borough (& therefore the town) boundary was along the line of the bridleway behind Barton Park and College Fields (following the line from Manton Hollow) so that field is within the plan area. Has this area been transferred to Preshute or does my memory fail me ?

paper copy also put through the letterbox

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Abbreviations used

Wiltshire Core Strategy (WCS), adopted in 2015 (covering 2016 to 2026) Wiltshire Council Local Plan - draft (WCLP or LP)

WC Emerging Spatial Strategy (WCESS)

Wiltshire Council Local Plan - Planning for Marlborough (WCLPM) Marlborough Area Neighbourhood Plan - draft for consultation (MANP)

MA - Marlborough Area (incl Savernake and Mildenhall PCs) MCA – Marlborough Community Area (includes 19 Parishes) NP – Neighbourhood Plan General

As a Marlborough resident, I would like to thank members of the MANP Steering Group for all their work over the last 4+ years to pull the plan together.

I appreciate the numerous competing issues that are being tackled in the efforts to meet different needs, while offering some protection from unwanted development over which little or no control can be had.

General

I would challenge whether the consultation should be taking place currently

1. during a pandemic where it is not possible to hold meetings and discussion groups to help residents understand the detail and implications and for them to raise issues and challenges verbally. This marginalises those who may not have the confidence or ability to read long complex documents and respond in writing. It is anti-democratic. 2 x 1 hour zoom sessions is not adequate preparation and risks undermining what is a democratic process

o As an absolute minimum, arrangements should be in place for documents to be available in audio format and for feedback to be given/received through audio recordings such as can be made using a smart phone.

2. immediately before the next Town and relevant Parish Council elections when the shape and approach of the councillors could change given MTC is the qualifying body

General

For the same reasons I would challenge any proposed referendum on 6th May as I doubt this will provide sufficient time after the consultation ends to follow up on the feedback in full, particularly as it is clear from feedback already shared, that basic assumptions on house numbers will need to be revisited and aspects of legislation reviewed.

Marlborough Area Neighbourhood Plan Housing Needs and Requirements Study, Cobweb Consulting, May 2017.

Covered 2014 –

2026

Every household able to input; 4,217 questionnaires distributed, 24% were completed. It concluded

- 107 households wishing to move in the next five years would need social or affordable rented housing
- 68 households wishing to move in the same period would need shared housing
- Averaged over the five-year period this gave an estimate of 35 households per annum

A survey based on the wishes of 135 households (3% of those surveyed, 13% of those who responded) in relation to a 5-year period, lacks credibility in setting numbers for over 9,000 residents in a 20-year neighbourhood plan.

It is not clear what type of housing respondents were occupying when responding or if they were responding for the adults or their children. If adults were already in social or affordable housing then their wish to move would free up housing for others.

Affordable/social housing comes available as people move away or into 'market' priced properties. The 'net' position in relation to wishes expressed must be considered in a needs- analysis.

It was also not made clear what split of houses for affordable rent vs affordable purchase might be appropriate. However, the report noted, "... the income required to service a lower quartile purchase entry price of £220,000 in Marlborough would be £47,000 pa. The equivalent sum for the more expensive rural areas would be just under £54,000. The income required to service a private rented two bedroom lower quartile home would be £19,000 in Marlborough and £24,000 in the rural parishes"

Given these numbers it is not logical to lump together the need for affordable rented property and shared ownership to a single 'unit' figure. The proposed split should be made clear in all relevant policies.

MANP

Informal Consultation July/August 2019

154 responded.

Of the 968 comments made, the largest percentage, 15%, related to parking, 14% re amenities, 12% Countryside and recreational. Just 9% were specifically Housing (as opposed to comments on specific sites listed)

The MANP includes policies it states "relate to the development and use of land in the designated Marlborough Area. They focus on specific planning matters that are of greatest interest to the local community, especially in seeking to address the shortage of affordable housing and in providing essential social infrastructure".

Unfortunately, evidence is not provided that the shortage of affordable housing is of the greatest interest (perhaps explaining the 3% of respondents stating they would be looking for affordable homes). And it does not appear to be so based on the consultation feedback.

Affordable Housing needs in Marlborough Area Neighbourhood plan, Cobweb Consultation, June 2020

update

In this paper, Cobweb took WC's 2017 Strategic Housing Market Assessment (SHMA) for Swindon and Wiltshire, which estimated a need for 14,376 affordable housing units over 2016- 2036 and, to estimate the need for the MA, applied factors they believed likely to affect the distribution across Wiltshire

1. the numbers of 0-30 year olds on the basis they drive demand for affordable homes and relative affordability vs the rest of Wiltshire

The approach is manifestly flawed

- It used estimates of population from 3, unnamed "Middle Layer Super Output Areas" (MSOAs) which in aggregate contained 4.45% of the population of Wiltshire aged up to 30 in 2018, and as such suggest 639 affordable units are required in the MA (4.45% of 14,376). However, the combined population of these areas was over 24,000 which is not representative of MA's c9,200 suggested in the MANP.
- <https://www.wiltshireintelligence.org.uk> provides a breakdown of Parish populations in mid 2016: Marlborough – 8455, Mildenhall – 468, Savernake – 303. Of these 3202 were aged 0-30. This is 1.85% of Wiltshire's 0-30 group, not 4.45%
- Whatever the percentage, it is not logical to apply it to the 14,376 affordable housing units needed across Wiltshire as
  - one is a figure of population, the other of housing units. The intended size/occupancy rates of the units is relevant to meeting the population based need

- The number of units in the SHMA covers all age groups. The proportion of these units intended for young adults isn't given.
  - Not all 0-30 year olds will either
    - o want to stay in the local area (university and employment opportunities will attract them away) or
    - o need access to affordable housing, being outside the 'target' population.
- e.g. those able to stay in family homes or with family money to support them move out

If the occupancy rate is 1, which the report implies, there is no logic to an NP that demands all housing units are a minimum 2-3 bedrooms. Single bedroom flats/maisonettes should be a major feature of the plan. They would also require less site space.

A more transparent approach that people can understand would be to highlight that with 3202 young people age 0 – 30, on average approx. 107 will turn 18 each year. From this we could suggest the % likely to want to stay living and working in the MA and of these the % who need support.

This could then be easily consulted on e.g. "Do you think providing affordable housing for approximately 25% of young people age 18-30 who have grown up in the MA and would like to live locally, feels....about right, too high, too low?"

25% of the 107 could mean c25 units a year are required. With an occupancy rate of 2, that would be 12. And with the focus on young people, this would drive a demand for one bed flats as close to the town centre as possible to minimise the need for cars.

None of this is reflected in the MANP and is a major omission.

The MANP could, for example, set a policy that Planning will be given to all brown field sites that come available if used for 1-2 person flats and maisonettes.

2. Relative affordability was then used to increase the 639 unit figure 781 - +22% with no supporting evidence.

Even if the approach were valid, the text implies it relates to all properties in the three (previously unnamed) areas not to properties which any first-time buyer (or renter) might typically consider – reasonably this is the lowest quartile. A few very expensive houses well outside the average would skew the income to prices ratio. If the ratio of lowest quartile house prices to incomes were compared with those across Wiltshire, it is inevitable that a far lower variance would be identified

The report then suggests further variations to apportionment were examined but only led to minor variations in the total, yet it concludes 700 units are required. No details are provided for the reader to assess the revised number even though the 'simple' % of those turning 18 alternative proposal above leads to a much lower figure.

700 is a 10% reduction from 781 which is not 'minor' and undermines the original figure's credibility.

81 fewer units in a 40% affordable/60% market price development represents 202 fewer houses – quite possibly a whole site that would not be required.

Definition of affordable housing

The MANP has not defined what it means by affordable housing nor the criteria for those intended to benefit from it. There is a significant risk that any new properties built will remain out of reach by local people.

An analysis of those who have bought or rented newly built properties in Marlborough, say, in the last 10 years in terms of their previous residency would inform this risk and help define the policy more clearly to ensure the intended beneficiaries do so.

Without a more informed approach and clear criteria that enable Marlborough residents to benefit, the availability of new housing (and excellent schools in a beautiful area) will attract new comers, which would defeat the original purpose of the exercise.

MARL1

The MANP states in para 5.8 “The evidence to demonstrate this level of need for new affordable homes is contained in the separate Housing Needs Assessment report.”

So how does the 700 affordable unit conclusion in the 2020 Affordable Housing Needs update, relate to

- MANP Steering Group (20/8/20 minutes) noting that “The Housing Needs Study had shown that 175 affordable were needed” – this study was superseded as not fit for purpose so the number is not valid
- 82 in the MANP now being consulted on under Policy MARL1 and which, with Policies MARL2 and MARL3, point to 150 new affordable homes
- The total 680 the WCLP suggests are required to meet the MANP’s affordable homes requirement, of which 245 (yet to build or without planning) need sites to be found
- If there is at least a 40% affordable /60% market rate split in developments, 150 new affordable homes, would suggest 375 houses in total would be required. At 50% this would be 300. How do these figures relate to WC’s 245 remaining?

None of the need assessments take account of the “net” position i.e. factoring properties that come up for re letting and indeed, their take up by Marlborough residents.

WC’s response to a recent Freedom of information request confirmed that of the 80 affordable homes re-let since 2016 – approximately 20 per year - only 19 were taken up by residents of Marlborough. The remaining 61 went to people from all over Wiltshire and from other Local Authorities as housing associations can allocate houses to anyone in their operating area which cover several counties.

20 properties re let each year is 400 over the plan period. This suggests no new properties are required and maybe our focus should be on up grading them to be attractive places to live.

The NP figures simply don’t stack up, with different documents referencing different house numbers over different timescales, including (or not) those already built or with planning permission – based on information which is up to c2 years out of date (e.g. the LP references properties built and with planning to 1/4/2019).

We must have clarity over the requirements that make sense; to which there is obvious logic to ordinary people. And we must know the numbers as of 2021 for the MANP to be updated, with the figures referring to the numbers of Marlborough residents we anticipate supporting in addition to property units.



The current outcome is confusion. This lack of clarity drives a lack of trust and a consequential lack of support at the referendum stage. This is not what we want.

MARL1

Para B states that proposals will be required to make an appropriate financial contribution towards the green transport initiatives in the town. What are the green transport initiatives envisaged? No details are given. Is there a plan for cycle routes or enhanced pedestrian access e.g. wider pavements down the Salisbury Road?

For the proposed housing developments, it would be useful to estimate the CIL/Section 106 funding that will be generated and have a strategic plan for its use to guide future decision making.

MTC currently has a 'project list' but following a request for information there appears to be no decision-making guidelines or criteria to prioritise projects funded by levies on developers.

"Where a neighbourhood plan has been made, the charging authority and communities should consider how the neighbourhood portion can be used to deliver the infrastructure identified in the neighbourhood plan as required to address the demands of development. They should also have regard to the infrastructure needs of the wider area." (<https://www.gov.uk/guidance/community-infrastructure-levy#spending-the-levy>)

The NP is the ideal place for the required infrastructure requirements to be listed and prioritised for feedback.

Reference is made in the NP to carbon sink funding. If new developments are to be supported by current residents they will want to see that there is a credible plan for how their effects will be mitigated. Without this, there is a risk the plan will simply be rejected.

MARL1

Redevelopment of the brown field sites at Cherry Orchard and Kelham Gardens should be prioritised in line with the WCLP Emerging Spatial Strategy, which states

"To maximise the use of previously developed land and support urban renewal where needed, each of the main settlements will have a target amount of new homes that will need to be planned for within its urban area." (Delivery principle, p6)

And "which will form the basis for a housing requirement for neighbourhood plans" (para 3.8)

It would be helpful if this was made clear and how this might be achieved.

MARL1

The Plan must show ambition for any developments to meet the needs of young people it has identified. This must include education and employment.

With no sites other than adjacent to Marlborough itself identified, it is clear that at an occupancy rate of 2.4 people per house, the additional population, using WCLP's 245 figure (with 280 yet to be built), would result in over 1,200 additional people (525 x 2.4); a 14% increase from the current estimated 9,200 population of Marlborough (noted in MANP 2.25 p14).

If we assume 0.8 children per household this would also represent c420 additional children. Even 0.5 children per household would represent c262 additional

children.

Whatever the figure, the MANP makes no provision for land to cater for this number entering our schools. This is despite WC having made the MANP Steering Group aware of the constraints on local primary school places in the town's catchment area (School capacity 420 Number of pupils on roll 384 (ss at Jan 20) - from <https://www.get-information-schools.service.gov.uk/Establishments/Establishment/Details/142335>)

It is not reasonable to say education is a matter for WC if the NP is choosing to build the highest possible number of properties that WC deem necessary (their figures are 50 to 250) and aim them at young families (over 30 years of age based on statistics presented above) vs our current young people. Nor to omit any consideration for nursery place provision.

MARL2

This policy notes that development proposals for the change of use of the Health Centre site on George Lane, to a residential use will be supported in principle.

It also states it is not considered realistic or practical to seek to retain the site for alternative community facilities. Why? What is the reasoning here? If it is because the land must be sold for residential purposes to raise sufficient funds to build a new centre, why not just say so?

The plan should layout why it is considered that the medical centre can't expand on its current site such as extending over the parking area (given it is next to a large car park) reconfiguring the gardens for disabled parking or indeed building a second storey.

What will happen to the pharmacy, conveniently located in a large residential area, if the MC is relocated?

Given the medical centre is a private enterprise, is it even appropriate to include it specifically in a NP?

Para 5.10 notes that residential use is reasonable and as a brown field site would contribute to the 160 target set by WC in the LP. A fast start could be achieved by targeting the site for one bed flats/maisonettes aimed at young people, possible through a Housing Association development. This would demonstrate the town's commitment to meeting the needs of this specific group identified in the MANP.

An alternative use would be for a nursery school. Marlborough has no facilities for the under 4s and its close proximity and access to short perm parking would make it an ideal site to meet the needs of this population estimated at 350 0-4 year olds in Marlborough alone with more local workers travelling in from the surrounding area, who would find this facility very useful. This might be possible with only internal alterations to the existing structure, which would benefit the green agenda.

MARL2

If it is appropriate to identify land for a private enterprise, the proposal in this policy exchanges an easy to access central location with one on the edge of town with poor access for older residents and those in poor health/with mobility issues and who, the absence of public transport, would be reliant on cars – completely contrary to its green policy 18.

Again, the plan lacks any vision, simply proposing to replace like for (larger) like. The pandemic has shown us that a huge amount of work can be done online

which reduces the need for face to face appointments and on site administration with all the space this demands. Is it time for the MANP and the owners of the surgery to rethink the need for ever larger premises?

MARL3 Encouraging Affordable Homes in Mildenhall

Para 5.12 references the out of date affordable housing assessment that WC identified as not fit for purpose. The 2020 update identifies a need for 700 affordable units, not 100.

MARL4

What is windfall development? Terms need to be clear to the lay reader.

This policy is in effect saying there should be no single occupancy properties including flats built and in para 5.16 it says “The evidence base shows that two and three bedroom housing types will meet the needs of the existing and future population of the town”.

Other than the sufficiency of specialist housing for older people, what is this evidence base? It is not reflected in the 2 housing needs analysis documents.

In 2016 Sue Harris wrote a report “Description of Marlborough Area Neighbourhood Plan Parishes” Much of the content has been reproduced word for word in the MANP (which explains some of the out of date references such as school names)

Interestingly, they did not reproduce the following in reference to WC’s 2012/13 Marlborough Community Area Joint Strategic Assessment which cited

“Marlborough Community Area has above average levels of social rented accommodation (17.3% of all households, 14.7% in Wiltshire) and demand for affordable housing is high. At the end of the fourth quarter of 2012/13, 772 households on the housing register were seeking affordable housing in Marlborough Community Area, an increase of 155 households in two years.”

And

“The highest demand in the Marlborough Community Area is for one-bedroom affordable homes (470 households) and the next highest is for two-bedroom homes (198 households).”

This seems to be valuable data, supporting the need for both affordable homes for rent as well as purchase (a differentiation missing from the MANP) – why have numbers on the register not been included in the evidence base and why is the previous 65% seeking one bed, 27% two bed not reflected in the future housing mix?

Clearly the picture is not static. In WC’s November 2019 version it states that there was demand in the MCA for 35 one-bedroom, 47 two-bedroom and 21 three-bedroom affordable homes.

A total demand of just 103 but also a housing mix of 35% one bed, 47% two bed and 21% three bed highlighting the housing mix required

A natural stepping stone is to help young people move out of the family home and, given the average age of a parent’s first child is over 30\*, single bedroom properties could make a huge difference to the 18 – 30 age group – as singles or couples - to help them live locally with lower entry cost and less expensive

homes to run. Similarly, one bed properties would also help many older people in social housing to downsize, freeing up large properties.

\* <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthcharacteristicsinenglandandwales/2019#age-of-parents>)

Nb According to Statista, “The purpose built, low rise flat was by far the most popular type of houses in the social sector in England in 2019. 35.7% of social houses by housing associations are low rise flats, as well as 37.6% of local authority social dwellings.”

(<https://www.statista.com/statistics/286443/england-number-of-social-rented-households/>)

Further, they note

“Different types of households occupied social rented homes in England in 2019 to 2020. The largest share of respondents in the category of social renters were females living alone, with a share of 22.5 percent of social renters. With a share of 13.5 percent ...were lone parents with dependent child(ren) .... [and] lone parents with independent child(ren) (5.6%)...”

Do we understand the position of those needing affordable homes to help decide on the mix?

This would better support the objective in para 5.2/page 21 “Delivering a range of housing mix and types that encourage and enable local low-income groups including young people to live in the Marlborough Neighbourhood Plan Area”

MARL4

Properties do not all need to be 2-3 bedroom to counter “in commuting” and, while it may make sense to address the loss of existing affordable homes through the ‘right to buy’

(assuming the loss can be evidenced in the MA – can it?) this should reflect current and anticipated local needs, not simply assume like for like.

Is it being assumed that those travelling to Marlborough to work want to live here? Is there any evidence for this? If “in commuting” is a problem, its nature should be clearly stated along with the benefits it brings and to do this the community needs to be understood, for example, in terms of

- age group
- means of transport used; impact on parking etc
- contribution to the local economy
- any desire to live in Marlborough rather than just work here.

Inclusion of broad statements without evidence undermines the plan’s credibility.

MARL5

Para C includes a number of vague terms e.g.

- “carefully designed to achieve a good quality of life for residents”
- “well-designed development that creates a safe and comfortable living standard” How would the impact of such statements be considered in planning

applications and why should they not apply to any housing construction – in Marl 1, 2 and 3?

Also Para D re front access

- “provided it will not result in a proliferation of residential accesses that would undermine the vitality and viability of an individual shopping frontage”

What number is a ‘proliferation’? Unless all applications came in at once, how could this be assessed?

How is the vitality or viability of an individual shopping frontage assessed?

Subjective, unquantifiable statements hold no weight. The intent should be reassessed and the expectations made much clearer.

This point applies to a number of Policy clauses. Without clarity they cannot be enforced.

MARL6

It is unclear what the benefit of this policy is. Given the scarcity of space, the likelihood of employers considering using land with low FTE density is low yet it would artificially restrict activity that might be very valuable including, for example, many arts, recreational or sports facilities – an indoor ball park for young children quickly springs to mind – or indeed one of the new Amazon grocery stores!

In place of FTE the combined FTE and customer density would be more appropriate.

Introducing constraining policies to mitigate very low risk events does not add value; rather it highlights a lack of imaginative employment considerations, particularly the 1,200 additional adults the proposed housing will attract.

It would add significantly more value if a Policy were introduced to seek out and attract employment types, for example, that drive the green/climate change agenda. Has the use of redundant farm buildings in the area been considered? I understand various sites were put forward by the Ramsbury Estate.

I appreciate that land can only be offered which current landowners would be prepared to make available (sell) but in the absence of a vision for the type of employment the town might actively target, the situation is unlikely to change and Marlborough will increasingly be a coffee shop led dormitory town for commuters.

MARL7

I dispute the statement in para 5.27 “The policy forms a key part of the strategy for sustaining the success of the town centre”

While the proposed parking will assist residential parking requirements and weekend activities centered around the Rugby club and possibly in town workers (and for these reasons is welcomed in principle), it is not suitable for visitors, being unlit, with an uneven base and access pavement, unsuitable for those with physical disabilities and too far from town, down/up a steep hill. There is also a risk that the shorter Hyde Lane route will be taken by pedestrians, which is clearly dangerous.

As the use of common land is under dispute (in relation to the Rugby Club’s request for a 3rd pitch) the legal position over allocation of space to parking must

be in question and the position requires full legal examination of the Commons Act 2008, which controls any activities that impedes or prevents public access.

Can we allow the lack of parking to continue? The plan notes in para 5.27 “There is a danger that if left unaddressed, the viability of the town centre may suffer” and this requires difficult choices.

Therefore, we either build more capacity or decide that the environmental benefits of limiting access by cars (through limiting car parking) outweigh the direct economic risks. The Policy should be clear – and of course such a big decision specifically consulted on.

Can we build more? In theory yes - WC could be asked to add a floor/second level onto existing parking areas off Hyde Lane and, possibly, George Lane. As with any 2 storey building, roof lines and external facias can be attractively designed to ensure they blend into the local environment.

MARL8 Delivering New Cemetery Land

As above, is provision of more Common land to a specific purpose in the gift of MTC? Use has been challenged in the context of the Rugby Club’s request for an additional training pitch and the legal position needs clarifying. The policy should at least acknowledge this as a possible constraint and reflect on alternatives.

The ability to maintain pedestrian access along the length of Free’s Avenue on the cemetery side should be allowed for, such that the additional cemetery land NW/SE border should stop short of the road itself. If not the area to the north west will become redundant with the risk of fly tipping.

Has any consideration been given for alternatives to meet the preferences of those who do not opt for burial? A garden of remembrance for example, which might better contribute to the aims of bio diversity, open spaces etc. Is ‘more of the same’ appropriate for changing views?

Has any research been done to ensure future needs can be met? For example, growth in cremation, rising prices for traditional burials, and environmental awareness are expected to lead to an increase in demand for natural and alternative burials.

MARL20 Mitigating Climate Change – New Buildings

This policy is too narrow in focus to mitigate the climate change impact of its policies given the total number of houses to be built.

As the NP makes no proposals for any jobs, the adults in the extra 1,200 population identified previously are likely to be commuters adding to congestion and poor air quality which is a major problem in a number of areas in the town. Para 6.11 on p55 suggests this topic lies

outside the scope of the land use planning system to control but this is not an adequate response given the proposed policies will worsen the air quality issues and the NP purports to support a green/carbon neutral agenda.

Many members of the MANP Steering Group are on the MTC which declared a climate emergency in 2020. The positioning of “not our problem’ has no logic and is a major flaw of the plan.

So the question must remain, given the policies to increase housing numbers, where are the balancing policies to mitigate the effects? How will the health of

existing local residents be impacted? Has this been analysed as part of the proposals? What does the evidence tell us – either of our own research in the MA or similar areas?

Additionally, what regard has been taken of the increased flooding risk experienced by the country? Should the flood plain restrictions for the Kennet be reviewed to extend the likely land affected?

MARL20 Mitigating Climate Change – New Buildings

It is proposed that at least 50% of the building units will be certified to a PassivHaus standard

I understand using an EPC rating to try and achieve carbon emissions reductions is unlikely to have the desired effect, for example, it's more a measure of the cost of energy than the rate of emissions and so the cheapest way to achieve a higher EPC rating is to add just a small amount of PV (sola panels) and a gas heating system will get a better rating than electric even though it produces worse emissions.

And I commend the vision in proposing a policy linked to PassiveHaus standards.

The issue with PassiveHaus is that it risks setting the bar so high that developers won't have the infrastructure to meet it (as acknowledged in para 5.66) and the additional costs will not offset the benefits gained through lower contributions to various levies used as incentives. In addition, the cost of the units built will increase which may defeat the purpose of more affordable housing.

If the steering group believe otherwise, the cost benefit analysis for, say a 50 house 40/60 affordable/market split development such as those proposed in the NP should be offered as evidence for how the finances would work along with the house price differential.

There is also a definite risk that the 50% built to a PassiveHaus standard are the 'market' properties, the rest, 'affordable'. If retained, the policy must ensure this is not possible

The EPC model on the other hand is managed by regulation so is 100% adopted by developers and landlords and its standards are being tightened over time. The assessment process produces a measure for fabric efficiency and the NP policy might achieve the same carbon goals by demanding a minimum Target Fabric Energy Efficiency (TFEE) rating (a measure of the efficiency of the fabric and ventilation of the dwelling) combined with the requirement for Mechanical Ventilation with Heat Recovery (MVHR) (or equivalent ground source heat pumps) as standard.

The PassiveHaus Trust's April 2020 paper, "EPCs as Efficiency Targets Lowering emissions, raising standards" discusses these issues.

However, the Policy ambition may in any case be defeated, as outlined on page 49 in para 5.64 "... .... the Government's proposed Future Homes Standard.... will be applied nationally and will focus on ensuring that the country's new building stock will be net carbon neutral. Development proposals will therefore be expected to comply with the Standard, which will replace any local discretion."

It is for this reason that the NP needs to offer incentives to builders, but the impact of those incentives on the funds being raised for its green/climate change policies is not made clear; nor the likelihood of them being taken up – it's far simpler to hand over money than completely redesign template based houses. The financial and carbon impacts of developers taking up the incentives needs to be modelled and presented so we can assess the overall value of the Policy.  
MARL21

Given there are no proposed developments sites larger than 2 Ha, no new green woodland would be introduced and it is not yet clear how any funding received would actually be used in relation to the green infrastructure noted in Policy 15. A specific focus on tree planting in all areas of the MA might be an example (not just green/blue network), the creation of living walls, supporting wild flower meadows etc. Detail is required on how all development levies would be used associated with a strategic infrastructure improvement plan for the MA.

It should be highlighted (see para 5.83 page 53) that no contributions would be required from developers until the Carbon Sink Fund is operational and its activities will be dependent on securing agreements with the relevant landowners. Its position and ability to operate is therefore no means certain and many, many houses may be built making no contribution before it even exists.

More ambition is required here in relation to the quality of housing developments which should be should be clearly articulated – both for private and communal space.

For example, studies have shown a combination of 50% flats and 50% family housing will generate far more open space – for gardens, courtyards, marked out courts for games etc – than can be achieved by simply reducing the density of 2-3 bedroom houses, which in turn requires more sites to be found.

We need to be ambitious in creating better places for people and greener, more ecologically sensitive residential environments.

This may require consulting with forward thinking planning experts, with relevant experience and not leaving it to developers to inefficiently recreate suburbia, where you could be in any town in the country.

The Policy should reference the ambition to create interesting and unique residential environments, in which landscaping is integral, biodiversity is sustained, and the variety of public spaces makes walking and cycling and taking children to school a positive experience (see, for example, Sustainable Suburbia by Sir Richard MacCormac) by considering

- The mix of property types to attract a diverse population
- Provision of affordable rented as well as for purchase properties
- efficient parking facilities on the site with provision of electric charging points
- the layout of properties to provide access to green spaces, tree planting, 'park benches', pedestrian and cycle lanes and facilities such as play areas and hard courts for games.
- Low carbon space and water heating solutions (see comments re PassiveHaus)



- The intended density for different areas, be they green field or 'in town' brown field sites

While it may be difficult to impose all such requirements on developers this would set a clear direction of travel and expectation that is more likely to resonate with local residents, reflecting the NP's drive for better quality environments not just volume.

It would also demonstrate the original 2019 consultation document's claim that "1.4 Neighbourhood Plans provide local communities with the chance to manage the quality of development of their areas" and be in line with the quoted NPPF's intention (noted in para 3.2) for Local and Neighbourhood Plans to deliver a wide choice of high quality homes (§61)

Appendices

MEETING NOTE 4 June 2020

Marlborough Area Neighbourhood Plan (MANP) Reps, Wood Plc Reps

In relation to the Elcot Lane Site Evidence Base to support Neighbourhood Plan Allocation,  
"It was agreed that emergency access was not necessary to be made an absolute requirement in the MANP"

Can this please be explained?

Various notes refer to a Community Land Trust (CLT) being created to support the affordable homes target. This could be a very exciting approach and might lead to more support for the NP if it was felt more control could be exerted over developments.

Should this not be specifically referenced as a Policy in the NP? If this is too advanced, should the concept of and ambition for a Community Land Trust not at least be raised?

115	<p>I understand the need for development however this must be done holistically understanding the impact current and future development will have on existing infrastructure and services within the town that also services surrounding areas. Overall I feel the ANP is lacking detail or timing on how infrastructure will be improved to meet existing residents needs. This is before additional housing is built that will only increase demands.</p> <p>Currently:</p> <ul style="list-style-type: none"> <li>• The local primary and secondary schools are already at or near capacity. Current admissions policy for St Johns prioritises linked academies in surrounding villages. This could mean children more local to school living in these new developments will have to travel outside of town for schools.</li> <li>• There is a known limitation for the town in terms of flat land available for sports and recreation with an already popular sports such as rugby and football being prevented from expanding to meet current needs. There is no understanding shown of how large developments will impact on this. Surely we need to provide quality of life as well as quality of housing for new residents.</li> <li>• The leisure centre is too small to cater for the needs of local community and requires expanding. Especially for young people as it would appear the Youth Centre will no longer be supported which will only increase the pressure on the leisure centre.</li> <li>• The sole GP Centre is too small for the needs of the local community and needs expanding now.</li> <li>• How to mitigate impact of speeding cars and HGVs through the town and connected major through roads is not addressed. Currently the road system is designed to enable high speed driving vs. discouraging this behaviour with limited safe crossing points for pedestrians in the approach roads to the town centre.</li> <li>• There is nothing in the plan that comments on how to encourage less car use in the town. For example, encouraging more walking and cycling with safe routes and cycle lanes. This would improve air quality and reduce demand for increased car parking. The plan should consider how electric cars will be charged for residents in public spaces or in areas that do not have parking within the resident's property as ICE cars will be phased out by 2030 according to current UK Government plans. More electric cars should at least improve air quality.</li> </ul> <p>In addition in relation to Marl1 Site 1.</p> <ul style="list-style-type: none"> <li>• Walking distance to school, shops and amenities for development is greater than 20 mins which will encourage more car use and decrease air quality and traffic issues in the town.</li> <li>• There will access issues through existing development as it was not designed as a access road.</li> <li>• Emergency access route is not feasible as requires access under railway bridge via a single track lane. This is evidenced by the turning over of an HGV trying to maneuver and resulted in the road being blocked both ways for a significant period of time. How is this a suitable access point for a fire engine or specialist vehicles.</li> <li>• What is the boundary of Marlborough Town before surrounding villages are no longer separate. This site is very close to Mildenhall now.</li> </ul>
116	<p>MY COMMENTS ARE AS FOLLOWS:</p> <p>1. THERE WERE SEVERAL STATEMENTS ABOUT BUILDING ON AREAS BEHIND ELCOT LANE. MUCH OF THE LAND SHOWN IS EITHER WATER MEADOWS OR FLOOD PLAINS. NO SUCH AREAS SHOULD BE BUILT UPON, EVEN IF IT HAS BEEN SEVERAL YEARS SINCE THE RIVER FLOODED. THE TOWN SHOULD NOT BE PUT AT RISK AS SOME WERE THIS WINTER AND IN THE PAST IN SOMERSET. WATER MEADOWS AND FLOOD PLAINS WERE CREATED FOR A REASON AND BUILDING ON THEM IS COUNTER PRODUCTIVE.</p> <p>2. THERE IS A SUGGESTION THAT THE DOCTORS' SURGERY SHOULD BE MOVED TO BARTON PARK. THE MAJORITY OF PEOPLE LIVE IN MARLBOROUGH AND NOT IN BARTON PARK WHICH WOULD REQUIRE MOST TO FIND TRANSPORT TO GET THERE. IF BARTON PARK REQUIRES A SURGERY, WHY NOT BUILD SECOND ONE, SURELY THERE ARE ENOUGH PEOPLE NEEDING A SURGERY TO WARRANT ONE, ESPECIALLY AS MANY OF US ARE SENT TO PEWSEY OR RAMSBURY FOR TREATMENT. PARKING PROBLEMS ARE NOT A SENSIBLE REASON AS THERE IS PLENTY OF PARKING IN THE GEORGE LANE CARPARK.</p>

3. IT IS TIME THAT SOMETHING WAS DONE ABOUT THE TRAFFIC AND THE INCREASING USE OF MARLBOROUGH AS A SHORT CUT. NO HGVS SHOULD BE ON GEORGE LANE, A B-ROAD, OR IN THE HIGH STREET MUCH LESS GRINDING THEIR WAY UP HERD STREET OR THE SALISBURY ROAD. THE WILTSHIRE COUNCIL HAS THE FINAL SAY ABOUT TRAFFIC BUT IT IS TIME MARLBOROUGH COUNCIL TOOK THE INITIATIVE AND DEMANDED CHANGES. THIS TOWN PAYS HEAVY COUNCIL TAX AND SEE LITTLE IN RETURN.

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Please pass on my thanks to everyone involved with assembling and progressing the Plan - it looks like a lot of thought and effort has gone into getting it this far.

I've been impressed with the level of communication and community engagement that has taken place, especially in the current circumstances. I'm not sure how many people are aware of how important the Plan is in shaping the town's future. GENERAL

- Is there some way the Plan could recognise the impact of the current Pandemic on the way people live & work?
- The pandemic has perhaps accelerated existing trends towards remote working and shown that many people (myself included) can work effectively from home. A lot of commentary and research suggests that in the future people will be less willing to commute long distances to work and more will wish to work from home permanently or work flexibly.
- I think Marlborough could benefit from this trend – it is a great place to work & live. Could the Plan recognise this trend in that the town should not just be perceived as a dormitory/ retirement town but as a place people wish to work as well, but in a different way.
- This could have an impact on the type of new homes built, employment land (e.g. need for flexible workspace), greater demand on telecoms infrastructure and other services. But it could also mean more jobs and money spent locally rather than in London, Bristol etc as more people are staying in Marlborough during the day.

MARL1

- Support all potential development sites.
- My only concern would be with access to the Cherry Orchard site (Area 4) – this is quite a narrow road.
- Agree focus should be on affordable homes. Could there be more focus on social rented housing? My feeling is that for many people on low incomes home ownership will never be an option in this area, and there will be a continuing need for good quality housing at an affordable rent previously provided by Council Housing.
- These sites focus on housing – is there any scope for mixed use to encourage employment e.g. housing with workshop space attached?
- I would support encouragement of self-build housing on at least one of the proposed development sites. I think there is a strengthening interest in this type of development that does not seem to be well catered for in the UK. In many countries self-build is actively promoted and encouraged, not sure why it isn't here! I think it would provide a less homogenous feel to new housing areas, create more of a community feel and perhaps better quality new housing. Also potentially another affordable housing route.
- Could higher density housing (i.e. flats) be considered? This suits some households and could provide more affordable options. You could also fit more homes in a given space which might reduce the number of areas that need to be developed? I am sure with the right design standards higher density housing would fit in.

MARL2

- Has the possibility of upgrading the existing surgery building been investigated? Could this provide a more cost effective way of upgrading surgery facilities than building a brand new surgery? Might also allow higher housing numbers or more flexible use of Barton Dene site.

- Appreciate there is a need to find finance any new surgery which may be via housing development and support surgery move to Barton Deane as an option.
- Concerned that Barton Deane is further from town centre than existing surgery so need to consider accessibility carefully, especially for less mobile people and for pedestrians/ cyclists.

MARL4

- Fully support focus on providing more smaller and more affordable family homes. See comments under MARL1 heading.

MARL5

- Not sure this is within the scope of the plan but is there a way of encouraging smaller retail businesses into the town centre? Retail unit rents appear to be very expensive, and with business rates on top might be a discouragement to small start ups.
- I note in your supporting research that there are a higher than average number of national brands in Marlborough, which may historically have pushed up rents. Again there may be a post-Covid adjustment as high street retailers go bust or move online.
- It's a shame Marlborough doesn't have a Market Hall or other covered place offering smaller retail units or stalls that would give the chance for new retail businesses to access and test products in a flexible/ low risk environment (i.e. without having to sign up to a long, expensive lease on a retail unit). This could also help provide a more varied & unique retail experience for shoppers.

MARL6

- See comment under MARL1 – do developments have to be exclusively for employment. Encourage mixed-use e.g. Workshops with residential above, retail with offices above etc. Would allow denser use of space available?
- I think it is important to protect employment land/ uses wherever possible, I'd imagine there is constant pressure to redevelop vacant land into residential but my feeling is there is a decreasing reserve of land available for employment use.
- Reiterate need to recognise changing working patterns as a result of the pandemic, more people working from home etc.

MARL7

- Support parking proposal, should help remove pressure from parking for High St and the Common.

MARL8

- Fully support proposal.

MARL20

- I think the 50% Passivhaus standard should be increased – perhaps to 75% or even 100%, why not aim high?
- I think large housebuilders dislike Passivhaus as it can mean higher constructions costs, and smaller margins, ignoring the long term saving to householders and environmental benefits.
- Target social housing for Passivhaus as lower running costs will be of greater benefit to residents on lower incomes.
- Is there scope for future-proofing future housing to allow switch to non-gas heating (e.g. air/ground source heat pumps, hydrogen), enabling solar energy installation etc?

118	<p>I object to the proposal to develop the field below the St John’s Park housing estate off Elcot Lane</p> <p>-The MANP says that we should preserve and enhance our countryside assets, but this field forms a central part of the countryside vista along the Kennet Valley and developing it would permanently deprive residents of its benefits.</p> <p>-To quote the MANP Site Assessment Report... ‘it is ‘highly visible in particular from the South and East and from the North side of the river valley. Development would be highly visible and would have a significant impact on the character and quality of those views’ even after mitigations were attempted.</p> <p>-The alternative sites of Barton Dene, Salisbury Road and Land south of the A4 ( London Road) are well screened from a landscape perspective and do not detrimentally impact outstanding views and vistas. Choosing these sites should be the priority to conserve the beauty of our landscape.</p> <p>-Development would negatively impact the setting of Elcot Mill and Mildenhall Hall as existing landmarks within the countryside. Also the field at the end of Elcot Lane provides a close point for people who live in Marlborough to access the countryside and these outstanding views.</p> <p>-Its development would definitely have a serious detrimental impact on biodiversity, wildlife &amp; bird and river habitats along the river Kennet valley – introducing far greater intensities of noise pollution, air pollution, water pollution and run off, and human impact on wildlife.</p> <p>It abuts the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat.</p> <p>-This is a greenfield site in the AONB. There are no “exceptional circumstances” provided to support this development, a requirement demanded for development in the AONB.</p> <p>-The Marlborough community identified as a key priority (page 19 of the main MANP document) the preservation of Countryside (specifically: “Open spaces are valued and should be protected from harmful development” and “Maintenance and improvement of existing green spaces”). The MANP main document (page 21) states the vision is that “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”. Development of land off Elcot Lane is in direct contradiction to these stated goals.</p> <p>-The late withdrawel of Preshute Parish Council from the process seems to have negatively impacted the development of a larger and more suitable site at Barton Dene. Should this issue not be raised to Wiltshire Council in the MANP so full consideration can be given it?</p> <p>-Affordable Housing-Lastly it seems that the objective of providing relevant affordable housing will not be met via this Plan. This seems to be a sad indictment at this stage and surely this admission, (contained in a supplementary document ‘Supporting Statement on Housing Proposals Jan 2021), must mean that the Plan should be revisited. We need some hard facts with criteria and information to be presented so that this consultation process does not just result in more attractive houses for those that can afford them and is of no benefit to local people who live and are employed locally, but and cannot afford to do so?</p>
	also delivered in hard copy
119	<p>We don’t think the access through Marlberg Grange estate is suitable for any more traffic, due to tight bends &amp; narrow bends, also we don’t want anymore site traffic (construction) through a living estate, secondly the sewer system is designed for this estate only because it’s pumped &amp; only designed to take this amount of houses only.</p>

120	<p>We read of the plans for this new estate with un-supressed horror!</p> <p>You are talking of building 50 houses in an area of outstanding beauty with the River Kennet running at the bottom of the valley. As members of ARK, my wife and I are appalled. This development is bound to effect the wild life and eventually the purity of this rare chalk stream. I thought government policy was to reduce air pollution not to increase it, particularly in sensitive areas. 50 houses – probably the best part of 100 more cars. Madness!!</p> <p>Quite apart from those considerations; the parking problems in the White Horse estate are already pointing to a trauma waiting to happen. If a house fire were to develop it is unlikely that the emergency services could get through – certainly not at any speed. Building more houses will only exacerbate the problem.</p> <p>Also do we really need more houses in Marlborough – the general parking in the town is getting more and more of a problem – quite impossible at Christmas time? Is there room for more children in the schools? The medical services are already overstretched with the Marlborough surgery being rated the worst in North Wiltshire.</p> <p>We think that all possible pressure should be brought to bear in order to bring this crazy idea to a halt.</p>
121	<p>With reference to the above I just wish to register my thoughts about the proposed new development adjoining St John’s Park and the access proposed via White Horse Road.</p> <p>Whilst understanding the need for increased housing in the town, to suggest that access to the proposed new development should be via White Horse Road is a viable plan when the current development already has problems with parking and, for a residential development, the high level of traffic is does not make sense.</p> <p>I note from the plan that emergency access is planned from Elcot lane and surely this is the most sensible main access for the new development.</p> <p>I have lived here for over 10 years now and the traffic and parking problems have got steadily worse, to add a large amount of extra traffic, which this development will certainly do, will make it unbearable and also more dangerous for our children and animals on the streets.</p>

122

Housing Development Site – Land off Elcot Lane.

We strongly object to the proposal to develop the field below the St John's Park housing estate off Elcot Lane for the following reasons:

50 additional new homes = 50/150 additional vehicles.

White Horse Road is already extremely narrow, with cars regularly parked on the LHS, leaving only room for single file traffic.

Traffic would also have to access White Horse Road via the A4/Barnfield/Choppingknife Lane entrance, which again, is far too narrow to accommodate a substantial increase in traffic.

The estate is already in jeopardy should an emergency vehicle need to access a property. Despite the fact that some properties either have garage, vehicle or drive space, most often these vehicles are left parked in the road.

In addition trade vans of those living in properties on the estate are also parked up on the roadsides over night.

Congestion, Parking, traffic, lack of wheelie bins provision, inadequate road infrastructure, no room for emergency vehicles; where does the risk lie, who is taking the risk?

This is a greenfield site in the AONB:

The field at the end of Elcot Lane provides a place for people living on St John's Park to access the countryside that abuts the River Kennet.

Its development would have a serious detrimental impact on the wildlife that inhabit the field and river.

Open spaces are valued and should be protected from harmful development. Instead these green spaces should be maintained and improved for the benefit of all those living in the area.

Elcot Mill, is a Grade II Listed house originally constructed in the early 18th Century. It is one of the last houses on Elcot Lane located on the eastern boundaries and currently enjoys a rural setting with direct river frontage in this AONB overlooking the water meadows and adjoining farmland.

Elcot Mill currently forms part of the unique historic landscape, this too is in jeopardy. How will the new development sustain and enhance the setting of Elcot Mill House and Elcot Mill Stables heritage assets?

Schools, Doctors' Surgeries – all at breaking point. Insufficient Medical Staff; GPs, Nurses etc. What happens in the future, are more planned for the town?

As a resident on St John's Park for the past 10 years, we have seen 50% of social housing standing empty. Do we really need to add more capacity?

123	<p>While the need for more housing is undeniable, the proposal to extend the Crest Estate on the green space above Elcot Lane is not realistic or adequate as it stands, because it does not take into account the dangerous access problem that additional demand will create.</p> <p>The sole route into and from the new development is along Chopping Knife Lane and White Horse Road, which will have to be used by an additional 50 households, many of them with more than one vehicle, to travel anywhere. Although both Chopping Knife Lane and White Horse Road may appear on planning maps to be two-way streets, in fact they are also used as parking for convenience or out of necessity, and are single-carriage lanes. Cars travelling in opposite directions have to wait for oncoming traffic at the ends of the street or in spaces between stationary vehicles to progress.</p> <p>If further families need access to and from the London Road, this problem, already an issue with a lower density neighbourhood especially during commuting times at the starts and ends of each day, will become not only frustrating but also dangerous,</p> <p>The proposed dwellings require the creation of access either from the Elcot Lane and/or Barnfield directions. The fact that the current plan outlines emergency access from Elcot Lane to the new development is an acknowledgement of the bottleneck that Chopping Knife Lane and White Horse Road already present. If this proposed entrance from Elcot Lane is only for emergency use because of the low bridge at the Barnfield corner, then it will obviously be inadequate for a number of emergency vehicles arriving or departing together, especially larger fire engines.</p> <p>Our Council cannot be expected to approve a proposal which is irresponsible without the creation of extra access points.</p>
124	<p>Policy MARL 11  Enhancing Marlborough's Areas of Special Quality with specific reference to St John's Close  I was pleased to see the care and thoughtfulness that went into the Town Character Study; such a positive message gives credence to the need for identifying, promoting and retaining community features which enhance the lives of residents.  As identified the space within the Close is integral to the housing; I support the proposal</p> <p>Policy MARL 7  Improving Public Parking – proposed new parking at the Rugby Club on the Common  I have concerns about this proposal: whilst recognising the need for additional parking space, using the Common for car parking could be the 'thin end of the wedge' Buildings have encroached on common land over the years; is there a way to say 'enough and no more'  Should there be a development, will it be restricted e.g. long stay for people working in the town (I'm aware that this is likely to be the case at the moment)  This would help to restrict movement in what is quite a confined area. Will there then be a loss of parking for those who use the road outside St Luke's Court, currently used by local residents  Should the development go ahead, I would support the recommendations made in the document to ensure that it is sympathetic to the area</p>



125

2.9 Update reference to the youth centre to reflect current status as on lease to the town council.

2.14 Should the A34 not be mentioned as a connected arterial route for the A303 and M4?

2.16 Is the HGV Working Group still active? If not, this needs to be reviewed and updated to reflect Wiltshire Councils lack of up-to-date freight strategy. There are multiple roads in Marlborough that are at dangerous levels of air pollution.

2.17 Air quality discussions should include all types of air pollutants like particles, not just NO2.

2.22-2.26 Should include the influx of luxury retirement complexes taking up valuable infill plots in the town.

3.4 Minal not defined so could we be missing opportunities for infill?

1 Land off Elcot Lane

Sad to lose a green space used and enjoyed by many locals.

Access via White Horse Road is a major concern. This development already has ongoing problems with traffic and access. Could access via Elcot Lane be suggested as an alternative? It is a straight wider road mostly with off street parking and much better visibility. Appreciate this is not a proposal for the development but do not feel this access should be baked into the NDP as it needs to be addressed in the full context of a planning application.

Retaining and connecting footpaths is positive, notwithstanding the above issues.

Due to its rural location and expansion into open countryside, lighting during construction and in a finished development should be extremely minimal.

Although this would normally be something dealt with at planning application stage, I think it's worth noting in the neighbourhood plan, as protecting dark skies is essential to limiting damage to the environment.

2 Land rear of Salisbury Road

Access across railway line to Marleberg Grange is currently indicated at the southernmost point of the eastern side of the site – can this not be further north, where this is already development? The further south the access, the more damage to the natural environment as it is right in the middle of this section of the railway track, which is well used by residents of Cherry Orchard/Orchard road area as our closest green space.

The whole site is in a Source Protection Zone. Is this level of development appropriate/safe here?

Due to its rural location and expansion into open countryside, lighting during construction and in a finished development should be extremely minimal.

Although this would normally be something dealt with at planning application stage, I think it's worth noting in the neighbourhood plan, as protecting dark skies is essential to limiting damage to the environment.

4 Land off Cherry Orchard

Why can't this be 50/50 affordable?

Access to Cherry Orchard is a big concern – 5 access roads all converge on one point with bad visibility and lots of on street parking. There are ongoing issues in Cherry Orchard/Orchard Road regards traffic and dangerous driving and there have been collisions within the last two years. Again, I do not feel this access should be baked into the NDP as it needs to be addressed in the full context of a planning application.

Footpath connections and biodiversity gains are positive, notwithstanding the above issues.

Sad to lose a green space used and enjoyed by many locals.

5 Land at Kelham Gardens

Why can't this be 50/50 affordable?

5.6

While positive that so many affordable homes can be enabled, the language around “affordability” needs clarifying here and in Wiltshire Councils Local Plan. 80% market rate is still not affordable for someone on the median salary for the area. Unfortunately continuing to rely on private companies to provide appropriate housing will likely mean these needs will not be met and I can’t see how the Neighbourhood Plan with the best intentions can affect change here.

MARL2 Managing Change at George Lane, Marlborough 27

Can this site not be used to add to town centre parking instead? As it is so close to the river, a housing development will be complex and parking for the primary school and the pharmacy is already challenging.

MARL4 Meeting Local Housing Needs 29

Very supportive of resisting more retirement complexes.

MARL7 Improving Public Parking 33

Very supportive of Rugby Club parking scheme. The Town Council needs to start acting seriously on the parking, traffic, air quality and overall highways issues in the town. While this is not in the remit of the Neighbourhood Plan, it is very difficult to comment on a lot of these policies without mentioning it because they must be looked at together. Most of these policies are fine in principle but they rely wholly on rethinking transport in the town, ie the policies would not be acceptable if highways issues are not addressed.

MARL9 Protecting & Supporting Community Facilities 34

Additional car parks not mentioned: Salisbury Road, Youth Centre?

Youth Centre is currently on lease to the Town Council - the Town Council should pursue securing this as an asset transfer to protect it from development by Wiltshire Council.

MARL14 Protecting Local Heritage Assets 41

Can’t find document named “MANP Design Study”?

MARL15 Protecting and Improving Green Infrastructure 42

Green infrastructure map doesn’t follow the shape of fields etc to the south of St Johns school. It should be noted that the land allocations are intruding on green infrastructure instead of drawing arbitrary borders through the middle of fields etc. The same goes for the Elcot Lane field/site.

Reading further, it’s clear there’s a contradiction here between the sites “Land rear of Salisbury Road” and “Land off Elcot Lane” with policy MARL15 where it states “Proposals that will lead to the loss of land lying within the Network and that will undermine its integrity will be resisted.” as there’s no way of developing on these sites without removing some green infrastructure. Both sites are well used by residents as informal dog walking routes etc. I presume this is due to pressure to identify sites but it should be laid out and justified instead of presented in a contradictory way.

MARL16 Protecting Local Green Spaces 43

The language should be stronger here, similar to the Green Infrastructure Networks stance of resisting development instead of support in very special circumstances. This leaves these areas with a level of vulnerability, and some of them are much more easily encroached on than others.

MARL19 Achieving Dark Skies 46

This policy could be strengthened to further outline why dark skies are important – namely, for preserving biodiversity but also for health and wellbeing of humans.

References to the 2020 festival should be removed as this is not relevant to the Neighbourhood Plan.

The Neighbourhood Plan should commit to adopting the AONBs lighting guide as policy and ensuring all developments adhere to this policy going forward.

This policy should reference non-residential development/changes in particular, as businesses are most prone to use excessive external lighting.

MARL20 Mitigating Climate Change: New Buildings 47

Supportive of the ambition to encourage more PassivHaus standard homes.

A development being certified as meeting the PassivHaus standard is something that won't happen until after it is built, whereas some of the requirements needed if this standard is not met would need to be demonstrated at the planning application stage. What protections will there be for developments that don't end up meeting the standard but also haven't addressed the other requirements. Can they be retrospectively implemented, or an alternative mitigation for climate change included?

Water efficiency is important to achieving net zero. Current Sewage Treatment Works are already overrun and unable to cope with demand. How will this be addressed in new developments? How will water efficiency be designed and built into new developments? Can there be a stipulation for rainwater harvesting and recycling, for example? There is a lot about tree planting and energy efficiency but there needs to be a holistic approach to achieve climate friendly measures across the board.

Water efficiency and net zero information: <http://www.cmscoms.com/?p=23305>

5.7

most organisations are revising their targets to 2030; the Neighbourhood Plan should follow suit on this to be forward thinking and ambitious.

MARL21 Mitigating Climate Change: Carbon Sinking 51

Is there any more info on how the Carbon Sink Fund will be managed to ensure actions are taken swiftly?

6.2 Development Management

There has been a lot of activity recently by the Wiltshire Area Localism and Planning Alliance (WALPA) group around the 5 year housing land supply in Wiltshire. Where Wiltshire has been unable to demonstrate a 5 year housing land supply developments have been allowed to go ahead despite contradicting the neighbourhood plan, namely in Malmesbury. Another issue is Neighbourhood Plans not holding weight if they are more than 2 years old, or without a recent review, which is a completely unrealistic expectation considering the time needed to review Neighbourhood Plans.s

Can the Neighbourhood Plan refer to these problems or provide any strengthening to its policies to protect it from the same situation happening in Marlborough?

Comments relating to 6.5, 6.10, and 6.11

As previously mentioned, most of the Neighbourhood Plan is difficult to comment on without any assurances that transport infrastructure will be addressed, because if it is not, then much of the proposed policies are unacceptable due to the current state of transport in the town; it is unsustainable to add to the pressure on the roads/air pollution now.

126	<p>MARL7 P34 Using land adjacent to the rugby club, even with a grid will be unsightly. The Common is of benefit to all Marlborough residents as an attractive green space. Do we really want to be overlooking a carpark? During the pandemic it has become obvious that people’s health and well-being depend on exercising regularly. Despite its rural location there are few accessible green spaces in the town.</p> <p>There is no space in the town centre for further carparks. This has to be a limiting factor on further growth in the town.</p> <p>P25 3 Land at Barton Dene This valley is so beautiful it seems a travesty to build here. It is crazy to build a medical centre without adequate parking. The sport centre carpark is already inadequate at busy times. The medical centre needs to be in the town centre so that people can access it easily from buses or can park in the town centre carpark.</p> <p>P27 Land at Kelham Gardens This seems to be a sensible site for regeneration as it is rather unsightly. It is convenient for employment in the town centre and for bus routes. Is this a more sensible site for the new medical centre as it is close to the town centre carparking? Is the police station site a possible site for the medical centre? It is not clear if this site is included in the Plan.</p> <p>P26 Land off Cherry Orchard This parcel of land that is relatively central for access to employment, schools, and bus routes.</p> <p>P30 Marl4 Many young people leave Marlborough for Swindon, Calne and Devizes as there are more employment opportunities and housing is cheaper. To reduce congestion and pollution it makes sense for people to live close to their employment. There are no real plans to expand employment opportunities locally.</p> <p>P34 Marl8 It seems inappropriate to allocate Common land to extend burial facilities. The cemetery should be contained within current boundaries, reusing land for those insisting on burial. With a growing population it seems appropriate for everyone to consider cremation. The cemetery has plenty of space for memorial plaques and burial of ashes.</p>
127	<p>MARL 2 Where is the evidence base for the relocation of the Health Centre? In my view the present site is the best site for the Health Centre and why can it not be redeveloped on its existing site?</p> <p>MARL 9 Why is the Health Centre not listed as a community facility in MARL 9? Parking in Marlborough could be greatly improved by indicating where it is. The Polly’s Garden car park is greatly underused. It, according to the Marlborough Neighbourhood Plan, almost never exceeds 50% utilisation. The Polly’s Garden car park entrance looks like the entrance to a service yard not a car park. It needs the simple addition of two small P signs at the entrance.</p>

	<p>Only Long Stay car parking is sign posted. There are no signs in the High Street to indicate where the parking is. Not surprisingly visitors drive round the High Street looking for somewhere to park.</p>
128	<p>MANP Page 23 Mar11 Land off Elcot Lane</p> <p>The proposed development of 50 houses on land off Elcot Lane indicates that the main highway access proposed by the Contractor/Developer (Crest) is via a residential estate road ie.White Horse Road.</p> <p>This is completely unacceptable to current residents for the following reasons,</p> <ol style="list-style-type: none"> <li>1. The actual useable size of the road is less than 11 feet in width due to the number of current resident's cars that have to be parked on the roads (White Horse Rd, Vespasian Rd, Chopping Knife Lane) at or near to their homes. There is insufficient parking provision provided on the Crest Nicholson Estate for such cars to be parked anywhere else.</li> <li>2. Any restrictions on current resident's car parking on the road near to their homes would be a reduction in their quality of life and cause considerable hardship and consequently is not a solution.</li> <li>3. A traffic survey on Sunday 07.03.2021 at 1015 am indicated 86 cars parked on these roads (47 on White Horse Rd itself) in this high-density housing estate.</li> <li>4. If 50 houses are built this would indicate (from a survey of the current estate) at least 100 extra cars from these household's (even at only x2 journeys per day in/out +200 would be flowing onto White Horse Rd. This not taking account of extra deliveries etc to the proposed estate. This extra traffic will increase noise, air pollution and road traffic dangers on the effectively small 11' estate roads causing vehicles to mount pavements etc where there are a high number of young families with children at play.</li> <li>5. The Crest proposal to break the major access road into the new estate via White Horse Rd is near the existing Children's Play Park. This produces a real danger to children and others using and accessing the park on skateboards, cycles and on foot. The obvious noise, pollution and road traffic dangers to existing residents and children have already been stated.</li> <li>6. Emergency Services already have difficulty with the narrow estate roads and on at least one occasion the fire service had to park some distance from Cunetio Gardens Flats after reports of burning.</li> <li>7. The Developer's road access proposal is clearly the most cost-effective option for them but to the detriment of the current residents living on White Horse Road and other estate roads. This reduction in the quality of life for residents does not accord with the aims and objectives published in the Public Consultation Leaflet of the MANP</li> <li>8. If the proposed development is to go ahead, along with the safeguards as listed regarding protection of green space and footpaths' there must be full and proper regard given to access. There is already provision proposed for the New Estate emergency access via Elcot Lane near the Industrial Units (Tile Factory) currently used by HGVs and others at the site. This would be much more suitable, albeit with some upgrading, as the main access rather than small estate roads suggested.</li> <li>9. Also with some minor widening of Chopping Knife Lane (for approx. 70-80 yds) an alternative access would be to construct a new access road through the</li> </ol>

	<p>existing farm entrance gate off Chopping Knife Lane to keep traffic from an already crowded estate.</p> <p>10. As our representatives it is very important that the Council strongly push back on proposals that affect the well being and lives of their residents and tax payers and ensure that the Developer meets their (residents) need not just the needs of shareholders by taking the cheapest option to the detriment of existing residents.</p> <p>11. On 07.03.2021 the following Residents of White Horse Rd wished to be associated with and give their support to the above comments: REDACTED</p> <p>From: REDACTED</p>
129	<p>Page 14 Paragraphs describing Manton are presumably irrelevant as Manton Parish Council not participating.</p> <p>Page 17 "It proposes to amend the settlement boundary in Marlborough (see Plan B overleaf)." Plan B on page 18 doesn't look to show amended boundary as page 25 then seems to show development outside the previous boundary.</p> <p>MARL1 and page 28 It is unclear that the assessment for affordable homes takes in to account turnover. If not by assuming occupiers don't leave regularly then the need for such housing will be wrongly inflated. Has this been taken into account?</p> <p>Page 25 "The land for the medical centre will be located...". Elsewhere it is stated that movement of the Marlborough Surgery requires the support of the NHS. (I assume NHS equates to the Wiltshire Clinical Commissioning Group referred to on page 55.) If this support isn't provided in a timely fashion then it would be vital that the proposed space be retained and not given up for housing. Otherwise the opportunity for relocation would be lost for good.</p> <p>MARL5 Proposed scale of development risks the town's centre as Marlborough's centre is maxed out with current size of the town.</p> <p>MARL6 Further housing development needs to be in line with a green agenda for the town which promotes the idea of live-close to work. So if there a lack of employment opportunities to support local people, particularly those in affordable housing, then we should avoid building more dormitory houses where the occupants then commute out of Marlborough for work.</p> <p>MARL7 Accept that Marlborough has a parking problem but despoiling more of the Common for parking isn't a good solution. Unlikely to be used by shoppers or tourists.</p> <p>MARL8 Avoid this expansion. Encourage use of crematorium &amp; cemetery facilities in Swindon.</p> <p>MARL9 List is missing the new cinema in the Parade which is now being converted.</p> <p>MARL12 Section is presumably irrelevant as Manton Parish Council not participating.</p> <p>MARL15 Needs to specifically address the lack of safe cycle routes into and within the town. Especially from the western end where only option is to ride on the A4.</p>

	<p>MARL16 “Land at College Fields/Barton Park, Marlborough” – protection required particularly in light of content within the Wiltshire Area Plan for Marlborough.</p>
130	<p>Policy Marl1: 3: Land at Barton Dene Core Policy 2 &amp; 51</p> <p>The Barton Dene proposal will undermine the Community View and Objectives set out in the Plan. It will change the open character and scenic beauty of the valley and given the AONB is in place (Core Policy 51). There is also a policy (Core Policy 2) to define the settlement boundaries</p> <p>MARL18 It is not evident how this will be met with the proposals outlined</p> <p>23 The number of houses needed in Marlborough were identified in the 2016 study as 180/80 and this number has been exceeded by current and approved developments at Salisbury Road, Rabley Wood and expected brownfield sites. The existing plans in place allow for 440/160 new homes and there are already more than 700 affordable homes – the NP does not seem to take account of these.</p> <p>12/13/25</p> <p>There are no plans to increase or develop business parks in Marlborough why do we need all these houses? There is no provision to improve education – St Johns is at capacity. No provision for increase to leisure facilities, transport, parking. The proposal to use land at the Common for parking is unsuitable, too far from the centre, steeply uphill and poor pedestrian links to the town</p> <p>To move the medical centre to the western edge of town with no transport links is entirely unsuitable.</p> <p>There is no specific information on the NP as to position.</p> <p>Car parking would be required, there are no reasonable footpaths, no pharmacy, and a much further trek for the residents of the assisted living homes currently close to the centre. A surgery in Barton Dene would significantly increase traffic and impact on the A4, College fields, the College estates, sports pitches and at least two boarding houses, pupils and town residents.</p> <p>25Where would the parking be as there does not seem to be provision on the plan and no provision would be a disaster</p> <p>Enlarging the current site, perhaps with an additional floor or using the staff car park would be a better option</p> <p>The site at Barton Dene had College Houses built some years ago along with an assurance that there would be no further development – we remember that the planning for this was not as transparent as it should have been at the time. The steeply sloping valley provides an area where sound travels very easily and unusually. There is significant noise increase provided by the provision of six teachers houses. The site is not conducive to building and it is difficult to see how 40 houses would be accommodated. Development would negatively impact on noise pollution, wildlife, the people who currently live there and any future residents</p> <p>How development would take place with 40% affordable houses, a medical centre, further homes for teachers – and retired College staff (as far as I know there is no provision for housing for retired staff). One has to be concerned that there appears to be no wording that would hold a developer to provisions of a medical centre</p> <p>The current College fields development is bordered by a mature border of trees and shrubs. This is home to a large variety of wild life birds, including owls</p>

	<p>and hawks, it is populated by foxes, rabbits and muntjac deer. It was also part of the building agreements when the houses were built intended to screen the town from the estate. I understand there are also protected trees in the belt. If development were to be permitted this should be allowed to remain. The College appear to be allowed to develop with little heed to the regulations other companies and residents adhere to. This Planned development adds to the local feeling the the town Council are biased towards the College. The temporary car park in Barton Dene remains and appears now to be permanent even though the new boarding house is complete,</p> <p>There is a genuine fear that development here would encourage further development to the north of the town, demonstrated recently by the College actively trying to develop land at Barton Park. This was with the promise of help for Preshute Primary and this site appears to be with a promise of help for the surgery.</p> <p>The NP and the Wiltshire Strategic Plan should be considered in tandem rather than one before the other. Given the current economic downturn perhaps a delay to come into line with the Wilts Plan would be sensible. A real undertaking of what housing is actually needed in the current climate and going forward is very much required.</p>
131	<p>MARL1 pp.23-28</p> <p>We support, in principle, the provision of genuinely affordable housing in Marlborough through further development. However, the draft Neighbourhood Plan proposes that a significant proportion of this affordable housing be provided through the development of greenfield land which is within the AONB and, in the case of site 1, Land off Elcot Lane, also lies close to the River Kennet SSSI. Given the high value to our community of these areas, such development should only be considered if it can be guaranteed that the housing needs of local people on lower incomes will, in this way, be met.</p> <p>It is clear that other recent housing developments, e.g. St John's Park or Marleberg Grange, off Salisbury Road, did not provide adequate quantities of affordable housing. The Neighbourhood Plan, therefore, needs to set out in detail how the local community's housing needs will be better met by future developments.</p> <p>Specifically, where a tenure of mix of 'affordable' and open-market housing is given in the Neighbourhood Plan, it must be clear what definition of affordable housing is being used. Following the definition in Annex 2 of the National Planning Policy Framework, the Neighbourhood Plan should set out:</p> <ul style="list-style-type: none"> <li>• how much of the 'affordable housing' proposed for each site will be designated for rent;</li> <li>• how much of the 'affordable housing' proposed for each site will be designated as 'starter homes';</li> <li>• how much of the 'affordable housing' proposed for each site will be 'discounted market sales housing';</li> <li>• and how much of the 'affordable housing' proposed for each site will be offered through other affordable routes to home ownership and what, precisely, these will be.</li> </ul> <p>Further, where a proportion of the proposed affordable housing is designated for rent, there must be clarification of whether this is likely to be affordable for the target local population on lower incomes. (The government's rent policy for Social Rent or Affordable Rent defines this as being at least 20 % below local market rents.) Similarly, where a proportion of the proposed affordable housing is designated as 'starter homes', it must be clear what the particular maximum level of household income will be and whether this will allow the target local population on lower incomes (and, in particular, younger residents) to purchase the homes. Finally, where a proportion of the proposed affordable housing is designated as 'discounted market sales housing' (i.e. to be sold at 20 % below local market value), there must be clarification of whether such housing is likely to be affordable for the target local population on lower incomes.</p>



1. Land off Elcot Lane, p.23

The proposal is that “the scheme shall have a main highways access on to White Horse Road”. This is wholly inadequate. Currently, there is a lack of parking capacity for the existing 170-home St John’s Park estate, meaning access via Chopping Knife Lane and White Horse Road (both reduced to single lanes by parking) is already difficult and, at times, due to reduced visibility, dangerous. Given the lack of amenities within walking distance of the proposed new development, it is very likely that traffic volumes through both of these roads would increase significantly. Alternative access to the new development (likely via widening Chopping Knife Lane) must be a prerequisite to planning permission being granted.

New medical centre at Barton Dene, p25

It must be a requirement that the site of the proposed new medical centre at Barton Dene include adequate parking capacity. The existing medical centre on George Lane is in the centre of our town and very close to public parking. The Neighbourhood Plan states that the new site is “also close to the town centre and accessible by public transport” (5.7, p.28). However, the centre will not be within walking distance of the centre of town for many of the residents who will need to visit it, i.e. patients who are unwell, disabled and/or elderly. Existing public transport will in many cases not meet the needs of this population, again through a requirement to walk to bus stops and because the transport is not frequent and will often not coincide with appointment times. We ask that you consider the case made when reducing parking capacity at the time the Great Western Hospital was planned and built. The proposal was that staff and patients would not require parking because public transport would be available. We now find ourselves in a situation where staff and patients are frequently left unable to park at the hospital site, causing significant disruption to the provision of patient care.

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First may I compliment the Steering Group on a clear and informative pre-submission plan.

Marl 1 Site 1 The Elcot Lane site is too far out of town; residents will drive into town for work, shopping and leisure. This will generate extra traffic, exacerbate the parking problems, desecrate the AONB (notwithstanding the fantasy that this can be mitigated) and further reduce the quality of air in town and along the route. Roundabouts may become necessary at the junctions of the A4 with Barnfield and/or Elcot Lane, causing problems for A4 traffic. I oppose this policy.

Marl 1 Site 2 The same objections apply here as to Site 1 with the amendment of exacerbating the problems that will arise at the Tesco and double roundabouts.

Marl1 sites 3-5 If more housing is necessary these appear to be the least damaging sites.

Para 5.6 The quality of life of those living in Marlborough should not be sacrificed for the benefit of those with no current connection with the town. The demand from "outsiders" for housing in Marlborough is probably unlimited; building such housing will not reduce the demand. Housing wishes have been mistaken for housing needs.

These draft policies are primarily for private housing with only 47% affordable. I suggest that the bulk of new housing should be affordable and only low-cost private housing should be developed; maybe no private housing that sells new for more than the average for the area (£318,450 in 2015 p14). Housing associations would no doubt be willing to develop such mixed tenure schemes.

Para 5.8 I feel that AONB should be developed only if necessary; these are not necessary.

MARL2 Moving the Health Centre from the town centre to Barton Dene will force many patients to drive rather than walk, generating the problems listed above (Site 1). It will further disadvantage those who cannot afford cars, older and disabled patients and others who do not drive.

A competitor or subsidiary surgery in Barton Dene would be a benefit for those living in Barton Park and College Fields, but I am against closing the George Lane site. If the centre must expand purchasing the George Lane pharmacy would provide more space, and the pharmacy could be assisted to relocate to or behind the Skurrays site.

MARL3 I do not know Mildenhall well enough to comment.

MARL4 I fully support this policy. It can be a shock on returning to Marlborough from a university town to see how old the population is.

Marlborough is oversupplied with older people's accommodation.

Covid may have made the provision for home offices more important, and time may show that these should be actively encouraged.

MARL 5 I feel that Covid has rendered this partly out of date.

A. While I would not support hot take-aways in primary frontages coffee shops and bars might not be detrimental.

B. This is somewhat obvious. C, D & E. I fully support these.

Para 5.20 & 21 If there were to be an oversupply of retail premises in the town centre I would like the bottom of Kingsbury Street and some of the other secondary frontages to become less commercial in order to strengthen the High Street.

I think the plan has rather limited horizons. The High Street could become a destination rather than a route by closing it at St Peter's Church and routing A4 traffic via George Lane (with suitable road adjustments).

The High Street's pavements could be doubled in width to encourage visiting and local pedestrians, and in summer outdoor eating/drinking. No parking spaces would need to be lost as the carriageway is wider than necessary.

Marl 6 This appears sensible.

I do not know FTE/m2 norms but 1 FTE/40m2 seems rather low to me.

I seem to recall, however, that the Tesco business park was justified on the grounds that it would provide light industrial work for Marlborough's young men.

Marl 7 I do not support enclosing any of the Common. I recall that the Rugby Club only gained planning permission for its enclosure because it appealed to Deputy PM John Prescott against the wishes of the Town Council and Kennet Council.

The number of drivers willing and able to reach the summit of Kingsbury Street is limited and it may not ameliorate the town centre parking problems. A public car park within the proposed housing estate in Barton Dene might be a better alternative.

While I do not support this policy I agree that the six conditions are sensible.

Marl8 More enclosure of common land. I suggest what I believe to be farmland to the North-West of the current cemetery would be more suitable than the proposed North-East site.

Marl9-12 Yes

Marl 12 Manton might also benefit from a guarantee that ribbon or other development will not make it a suburb of Marlborough.

Marl 13 I do not know Mildenhall well enough to comment but the provisions appear sensible.

Marl 14 Yes

Marl 15 Yes

MARL16 Yes, but it could be stronger: inappropriate development will never be supported.

MARL17 Yes, but it could be stronger: inappropriate development will never be supported.

MARL18 I agree, but how is this compatible with the development of the Tesco business estate and the Tesco housing estate? This policy is of no value if it is easily circumvented by redesignation.

MARL 19 Yes.

MARL 20 Yes, but why does the requirement to consider embodied emissions (I seem to recall that English Heritage recently calculated these at 35% of whole life emissions) not also apply to domestic properties?

MARL 21 Yes, although I seem to recall recent research suggesting that tree- planting is not an effective technique for carbon capture.

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#### General comments

With respect to the maps and figures presented within the plan, the scale and resolution of these important figures is of an insufficiently high standard to enable the public and wider stakeholders to fully view, interpret and understand the implications of the plan on their neighbourhood. This form of unclear communication is incompatible with the principles of clear, accessible consultation.

#### Town Council Website for presentation of Regulation 14 documents

The website is difficult to navigate, with a cluttered, unclear layout which provides no logical order for any of the documents, nor does it convey the importance and relevance of the documents to consultees in order that they may be able to find, review and respond to the consultation documents in a thorough way. This lack of accessibility in presentation is likely to have prevented some respondents from engaging as fully with the consultation as is necessary to ensure residents are fully informed of the implications of the Marlborough Area Neighbourhood Plan.

#### MARL1 p23

With respect to the proposals for the development of land off Elcot Lane, we note the following issues.

The scale and density of the proposed development is such that a number of significant adverse effects would be created on the neighbourhood. The principal of which would include the following:

##### 1) Noise, traffic and air quality.

The proposed development would overwhelm local infrastructure and access which is already at maximum safe capacity. Development of the former St John's school site has already resulted in significant increases in traffic in the area, which has corresponding deleterious impacts upon air quality from vehicle emissions. Further development will introduce yet further air quality issues, creating health and wellbeing implications for the local community.

With respect to road safety, the lack of adequate parking in the existing former St John's school site results in significant on street parking, creating various blind spots and introducing unnecessary hazards in a densely populated area. Further development of the land off Elcot Lane will bring with it a corresponding increase in traffic and an elevation of road safety issues which place the lives of local residents at unnecessary risk.

##### 2) Access and public safety.

The proposed emergency access via Elcot Lane is unsuitable, and unsafe. Elcot Lane is a single track road beyond the entrance to the sewage treatment works, and is height restricted at the old railway bridge. Any emergency service vehicles attempting to access the site from this access route would be subject to safety issues facing oncoming traffic, including frequent lorry and other commercial vehicle traffic to and from Marlborough Tiles and local residents. Any increase in traffic using Elcot Lane would increase the risk to pedestrians exiting Barnfield, Forest Dale Road and the properties to the south of Elcot Lane. Near misses with pedestrians and cyclists is a real and readily observable risk along this stretch of road and any additional vehicular traffic would greatly increase this risk.

No vehicular access of any form should be permitted to the site from the end of Elcot Lane as part of any future development of the land. It is an unsuitable, and unsafe access point. Whilst the plan figure indicates an emergency access, we note that there must be clarification that should development of this land be permitted in future, construction access must not be permitted via Elcot Lane for public safety reasons. The road is height restricted, single track and has several low visibility splays from adjoining roads which would lead to heightened risks to both pedestrian and road user safety.

A further concern with regards to public safety is that those persons who may ultimately become resident in any new development will place additional pedestrian pressure on Elcot Lane. The road has long sections with no form of pavement, resulting in pedestrians needing to use the road itself as a thoroughfare. There is no opportunity for pavement to be installed given the single track nature of the road and private land ownership right up to the

adopted road boundary. Significant increases in pedestrian footfall would result in heightened public safety risks given the poor visibility along sections of Elcot Lane coupled with the lack of a continuous pavement. Such risk is not acceptable.

### 3) Degradation of landscape.

The proposed development does not appear to accord with the principles of MARL18, Conserving the Scenic Beauty of the AONB. The additional development will markedly increase the footprint of development in this important landscape, changing its character and integrity to an unacceptable degree. This will be especially observable from elevated positions towards Savernake and to the north of the River Kennet towards Mildenhall.

At a more localised level, the additional footfall which would arise as a consequence of development of the land off Elcot Lane would further exacerbate issues of landscape degradation on the footpaths crossing the agricultural land towards Werg and Mildenhall and onward towards Stitchcombe. This year has seen a marked increase in pedestrian usage of these paths, and this has corresponded with significant increases in path erosion, issues of littering and dog fouling, instances of trespass and misuse of footpaths by cyclists. We are very concerned that 50 additional houses worth of new residents will result in further environmental degradation within the AONB, affecting the integrity of the landscape and the safety of local residents using the paths.

MARL19 Achieving Dark Skies will also be significantly impacted by the proposed additional development, such that local residents in the neighbourhood will no longer be able to enjoy this feature of the AONB.

### 4) Wildlife and nature disturbance.

The area between Elcot Lane and Mildenhall bordering the Kennet is highly biodiverse, with various species including bats, wildfowl, birds of prey, small mammals, insects and badgers being amongst those readily observed. Such biodiversity is an important feature of the area, and protection of this feature including the preservation of connectivity between local SSSIs and wildlife corridors must be taken into account. The importance of nature to human wellbeing is perhaps more relevant now than ever, and any development which has a detrimental effect on habitats and biodiversity reduces the ability of the community to enjoy the wellbeing benefits of time in nature, and would not be well aligned with this imperative. This is a very special area and it is important for current and future generations to be able to benefit from these characteristics. It is all of our responsibility to ensure the stewardship of nature as our most precious asset.

### General comments on climate change.

In general, the plan appears unambitious given the pressing need for the societal improvements needed to mitigate the risks of climate change. Noting the target of only 50% compliance with PassivHaus building standards outlined under MARL20, this does not appear sufficiently ambitious against the context of Marlborough's existing building stock, which is of a generally poor efficiency standard as a result of age and historical building standards. All new development should be subject to the most efficient standards possible, whilst also significantly increasing the use of renewable energy technologies to reduce the carbon intensity of housing in the local area. Any developers bringing forward future proposals should be required to achieve the highest possible green standards – not just the minimum.

Further, with respect to local transport impacts, any new housing proposed in the area should be required to align with the corresponding phase out of petrol and diesel vehicles in the UK by 2030. Properties should be designed in such a way as to accommodate electric vehicle charging infrastructure in a safe and accessible manner.

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I am responding to your request for feedback and comments on your Neighbourhood Plan. In particular MARL1 1:Land Off Elcot Lane.

We have reviewed the plans laid out in your published document and we are writing to express concern over the plan to build houses on the land off Elcot Lane below the St John's estate.

The St John's estate is already crowded, with very poor access – many houses have inadequate parking and so the road, which meanders through the estate, is not very free flowing. Adding further traffic to this road will present a hazard to the residents. Even the road to Chopping Knife Lane, which already has traffic calming lumps in the road, has cars parked on the road-side which leads to poor traffic flow.

Your plan includes 'Emergency Vehicle Access' off Elcot Lane near the Tile Factory. This is a clear admission that the access from the Chopping Knife Lane end of the estate is not sufficient. Everyone knows that 'Emergency Vehicle Access' is really just an open gate and it is therefore highly likely to become a shortcut for those residents near that end of the estate. This will lead to additional traffic on Elcot Lane and also up Barnfield from Elcot Lane as a rat-run to the A4/London Road. Barnfield is an unpaved private road and unsuitable for additional traffic. The Town Council cannot make any promises or guarantees that this will not happen: it is clear and obvious that it will.

To build on those open fields would provide a precedent for building further into the field towards Cock-a-Troop Lane. Although this plan does not mention this and mentions some form of boundary, there is no reason why the Council (or anyone else for that matter) would not want to extend the development. The land out this way is of archaeological interest, because of the proximity of the Roman settlement, but also part of the natural landscape which makes Marlborough such a beautiful place to live. Part of what attracted us to Barnfield was the extensive views down the valley towards Stitchcombe. Developing on this land would rob us, our neighbours and those in the St John's estate of this.

This end of town is a long way (relatively) from shops or other services and at the top of a hill. People will naturally drive rather than walk so traffic will increase. Building closer to town and these services would be far better and not result in such a dramatic increase in the boundary of the town.

We have objected to planning in the past but have found that residents views are typically ignored, particularly when large developments are concerned.

Although you have asked for feedback, our experience is that the decisions are already made and a 'consultation' such as this is just a formality and window dressing. We sincerely hope that the Council will listen to residents and their concerns, and not allow development on this field.

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Overall I am in support of the Neighbourhood Pre-Submission Draft Plan and congratulate the members of the Steering Group for producing such an extensive document that addresses many of the issues that our community faces concerning use of land.

The following are my comments against specific policies:

#### MARL 1 Delivering Affordable Homes in Marlborough:

I support the aim of this policy to deliver 82 affordable homes to local people, particularly the young and with families. It is good that the development proposed to deliver the affordable element is spread around the town rather than one or two large scale sites and the location of 4 of the proposed 5 sites at the edges of the present built environment minimise the detrimental impact on the surrounding AONB and accessible green spaces.

Sites 1 & 2 however present specific problems which any successful development plans will need to mitigate.

##### Site 1 – Land off Elcot Lane

The scheme proposes access via White Horse Road – a relatively narrow road that is extensively used by St John’s Park residents for roadside parking. Additional traffic flows resulting from the proposed development will cause congestion unless some re-engineering of this road is included in the plan.

##### Site 2 – Land at rear of Salisbury Road

The land immediately to the south of the proposed development rises steeply and a roofline limit of 150m above OD should be applied to protect views from the wider AONB of the escarpment at Pantawick.

Also, the site is close to the established and nationally important bat colony roost in the disused railway tunnel. Minimising additional light pollution, noise and traffic along their flight paths will be essential to reduce the level of disruption to their habitat.

In addition to contributing affordable homes, sites 3 and 5 also present significant opportunities for other improvements .....

##### Site 3 – Land at Barton Dene

I support provision for new Medical Centre which is essential as the capacity of the present provision in George lane is inadequate for the needs of the town.

##### Site 5 Land at Kelham Gardens

This scheme should make provision for a section of a riverside footpath and cycleway that would ultimately link Stonebridge Lane with Kelham Gardens and provide a safe walking/cycling route from the east of the town to the town centre via Wye House Gardens. The longer section of this route to the east of the site is dependent upon future possible development of land off Rawlings Well Lane. However, it is essential to make provision now in the Kelham Gardens scheme if the goal to create this important piece of infrastructure is to be realised.

#### MARL 15 Protecting and Improving Green Infrastructure

I support the designation of a Green Infrastructure Network. Of pressing importance is the completion of the Chiseldon to Marlborough railway path from its present terminus at Five Stiles Road to the Business Park. Longer term objectives should be the creation of a riverside footpath and cycleway from Stonebridge Lane to Kelham Gardens (see above under MARL1) and, at Poulton, a footpath from the bridge over the railway path to the bridge over the river Og.

#### MARL18 Conserving the Scenic Beauty of the AONB

I support the conservation of the surrounding AONB. Specifically, the escarpment from Pantawick to Stitchcombe and the escarpment from Granham Hill to Manton Grange form the southern landscape settings for the town and any development at higher elevations along these escarpments would be detrimental for sight-lines from the wider AONB, habitats and the value of this land for recreation. A roof-line development limit of 150m above OD should be specified in the policy.

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Thank you to all who have worked on this. My husband and I would like to offer the some comments. Mick was born here on the Common and went to school on the Common and has lived in Marlborough for over seventy years. I have lived here for 25 years. We have five daughters: one lives in Herd Street, one in Barrow Close and the other three have had to find houses to buy in other locations. We live in St David's Way and walk on the Common every day so this is our area of particular interest.

We were delighted to hear that there is to be no more accommodation for the over sixties (even though we fall into that category). We consider it appalling that some much land has been given over to these developments. We endorse all the potential building plans although feel concerned that there are plans to give up the local Youth Centre. There is so little in the town for young people.....

We also endorse the proposed addition of 60 parking places on the Common but wonder whether some of these spaces will be allocated for residents only? It's such a nightmare for those living in Kingsbury and Herd Streets trying to find a space to park and we can't imagine many shoppers taking advantage of these spaces. Parking in the high street is always difficult and central town parking is too expensive. Perhaps the 'Tesco' bus could add the carpark to its stops.

We would like to know more about the proposed new rugby pitch before endorsing this: will it be for the exclusive use of the Rugby Club - in which case we would be against it - will it be an artificial surface? We never walk on the Common in the morning and evening without seeing young people playing on the pitches and feel that this should be allowed to continue on all pitches as formal games take place at specific times and the rest of the time they are unused. We are against the golf club taking over any more space and resent the fact that they are currently fencing off areas where we have always walked. We understand that this is to allow reseeding but it could well be a slippery slope.

We realise that this is not the forum to raise this issue, but living adjoining Herd Street is challenging. Lockdown has provided a so much needed respite from the constant flow of traffic and we dread the noise and pollution - not to mention the difficulty of getting out of our close - resuming post lockdown. Something really needs to be done. You can't hear yourself speak when out in the garden.....

We hope the plan is passed - and is not then turned down by Wiltshire County Council..... we are glad to have had the opportunity to read it. Just as a footnote, It was impossible to read any of the diagrams or street plans which supported the document on the computer. I would have liked to have seen these but don't have a way of printing at home and didn't feel it right to ask for a hard copy!



137	<p>Policy Marl 1. Section 5: Land at Kelham Gardens</p> <p>Whereas I agree wholeheartedly with the need for additional affordable home, there is a problem with this site. The proposal states that the “highways access is on to Kelham Gardens only”. However, the existing access to this land from the highway is only 10ft wide. This does not match minimum highway standards. Widening access to meet minimum standards would require agreement from third parties on neighbouring land. The existing narrow access is also on a 90 degree bend of Kelham Gardens, which could be hazardous for traffic within Kelham Gardens and would likely need the removal of at least 2 public parking spaces to make it safe.</p> <p>The main problem with this housing option is that all of the land at Kelham Gardens is Flood zone 2. When climate change is taken into account, some of it is Flood zone 3. Wiltshire council core policy does not support building houses on flood zone 2. The proposal states that “the developable area shall not include land that lies in either of these zones”. This will be impossible. Any building development on this land will cause flooding on neighbouring land and properties from either surface water flooding or river flooding. In addition, there is no space within the land to provide the necessary volumn of flood water compensation if the land area is reduced by building 10 flats.</p> <p>I am concerned about surface water drainage as the land is completely surrounded by private landowners, with no rights to drain water to the watercourse, the River kennet or the highway without crossing third party land.</p> <p>Given the history of the site and the clear contamination risks, any soakaways as a self contained method for dealing with surface water could be hazardous to the local biodiversity and River Kennet SSSI.</p> <p>Thames Water have easements over part of the land at Kelham Gardens so this would further restrict the space which could be developed.</p> <p>This brownfield land would be better used to deliver other local plan objectives including:</p> <p>Marl15 - due to its location next to the river Kennet.</p> <p>Marl 9 – supporting community facilities with the creation of an additional “Local Green Space” like Plume of Feathers garden.</p> <p>All other land areas proposed in the plan are suitable for housing developments.</p> <p>Policy Marl6</p> <p>Scare Employment Land Efficiently</p> <p>I disagree with the proposal to require an employment density of 1 FTE job per 40 sq meters. Some businesses require lots of space for the service they deliver: eg photography studio/fitness instructors/cabinet maker. Photographer requires a studio/yoga instructor requires space for all clients/cabinet maker needs storage for all materials etc. This policy effectively bars certain types of sole traders from starting a business or relocating a business to within Marlborough’s development boundary</p>
138	<p>Page 23 1. Land off Elcot Lane</p> <p>I understand the need for the additional housing, my concern is the access route to the new houses.</p> <p>The traffic on the estate is already affected by the houses being built so close together and a lack of sufficient parking.</p> <p>Access to the estate along the second part of Chopping Knife Lane is not straightforward, particularly in the evenings and at weekends.</p> <p>Then where Chopping Knife Lane runs into White Horse Road traffic becomes more congested as the road is not straight and forms several sharp bends. Visibility onto the bends is obscured by the houses which are built close to the road. When meeting an oncoming car trying to reverse back around the bends in either direction is not easy and often results in cars and delivery vans having to mount the pavements to pass.</p> <p>I feel your officials should view the congestion situation in the evenings and at weekends to see for themselves safety issues to pedestrians and drivers.</p>

Apologies, these are comments and a few random thoughts intended to be helpful - a huge document on which many hours and much effort has clearly gone in - congratulations to all!

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" 2.10 On the eastern side of Marlborough the public have access to 15 acres of water meadows at Stonebridge Lane which provides nature walks with some access for the disabled. This area is used for environmental projects undertaken by a local voluntary group, scientific research and educational purposes and is a well-used local amenity."

Comment; "A local voluntary group" I strongly feel with the amount of work being carried out by this group, not to name them in this document as "Action for the River Kennet" appears as almost dismissive. They are, in fact, a nationally recognised Rivers Trust who work closely with statutory bodies eg Thames Water and Environment Agency and are crucial to keeping our treasured river not only flowing, monitored, restored and protected but kept in good health in every aspect!

Page 13

"2.19 Although there are eight official car parks in Marlborough (providing 638 spaces) at peak times there are parking shortages. There is a limited amount of land available for innovative car parking solutions and, given current and foreseeable public funding constraints, it is feasible that this will remain a problem for the considerable future."

Comment; Can a possible solution be mentioned in order to strengthen the need and encourage Wilts Council to recognise their role in assisting to solve this problem?

For instance; Given the land constrictions, there are members of the public who consider that some organisation of on road parking for residents and low paid workers, would not increase numbers of parking spaces required, but encourage tourists and visitors into the pay car parks at all times - thus increasing revenue for council which would help pay for the said organisation that is clearly required.

Page 14

"2.25 McCarthy & Stone, have built 27 apartments for the over 55's at Granham Hill and Renaissance Retirement have completed 28 luxury apartments for over 55's at a site in Stone Yard, London Road."

Comment; Could mentioning the already existing retirement dwellings also be mentioned?

ie. This is in addition to Purcell Court, Town Mill, Churchill Court, Castle Court ..... etc with total numbers of retirement homes in the town. In addition, Care Homes which also place huge burdens on local medical facilities?

"2.26 According to the 2011 census the population of Marlborough was 8,400. The present population is estimated to be around 9,200"

Comment; The water flowing in the river the the upper reaches of the Kennet requires a full feasibility study, impact assessment and modelling to ascertain the tipping point (taking into account climate change) at which the supply of water will become unsustainable for a further increase in population. The loss of

	<p>this chalk stream through Marlborough would be unthinkable. Drought scenario does not seem to have been included... I may have missed it, but believe some information was sent to the town council. We simply cannot rely on the nod from Thames Water - a body that it took more than 20 yrs of campaigning (ARK) in order to restrict abstraction to supply part of Swindon.</p> <p>Page 17  “3.4 Saved Policy AT24 – proposing a Riverside Walk along the Kennet in Marlborough.”  Comment; I would dearly love to see this plan revisited as having been a supporter of it some 25 years ago, I can now see the havoc that is wreaked to wildlife when you give public access over great tranches of land. The cost of maintaining river banks and the vegetation is also extremely high, as discovered in the failed attempt to make a pathway through Churchill Court. No path, but the costs to maintain the trees are high with no gain to public.</p> <p>Page 19 “Housing  • Less retirement complexes”  Comment; exactly right but would prefer to see ‘No further specific age related housing’. Whether for young or old, It is far too inflexible.</p> <p>Countryside &amp; Recreation  “Improved access to the countryside through enhancing the existing network of rights of way, footpaths and cycle ways and new public open spaces”  Comment; could improving signage and using footpath numbers on such signage be included in the statement specifically?</p> <p>Page 45 Policy MARL17: Protecting Valued Community Open Spaces  “9. Kennet Place Waterside Garden”  Error, should read: Kennet Place Waterfront Garden</p> <p>Page 65 Map - Protecting Valued Community Green Spaces  “Label: Kennet Place Waterside Gardens”  Error, should read: Kennet Place Waterfront Garden</p>
140	<p>MARL1  The map for Land at Barton Dene does not show the location of any access roads to the 40 properties. How are Marlborough Residents supposed to support a plan that has insufficient detail?  On your first zoom presentation the proposed Medical Centre was “adjacent” to the Leisure Centre and on the second zoom presentation the location had moved to “north” of the Leisure Centre, so where exactly is it? Both locations are vague at best.</p> <p>MARL2  There appears to be no business case for moving the Medical Centre from it’s current location in the centre of town to Barton Dene, which is not exactly central. The current site appears to have room for expansion into the car park and given that there are adequate parking spaces near by, building on to the</p>

	<p>existing car park would disadvantage nobody.</p> <p>MARL7</p> <p>The proposed new Car Park next to the Rugby Club is likely to be taken up by rugby players, spectators and parents on a Saturday when matches are played. Given that this is the busiest day in the town it appears to serve no valuable purpose tourists or shoppers.</p> <p>MARL16</p> <p>I fully support the policy for protecting Local Green Spaces. However, I would suggest that the Marlborough Neighbourhood Plan should include a proposal to enhance those green spaces by the addition of facilities that would benefit local residents (e.g. benches, dog poo bins).</p>
141	<p>My greatest concern is for the environment in terms of climate change.</p> <p>ALL development needs to meet the council's targets for carbon reduction and all it's objectives (and more) as set out in it's Climate Emergency Declaration of February 2020</p> <p>P.4 Housing</p> <p>All housing must be carbon neutral, with the infra structure to enable use of public transport and not be car dependent.</p> <p>The priority must be for brownfield sites, including small scale infilling. The brownfield target should therefore be higher and the greenfield on much lower. Greenfield sited must be a last resort</p> <p>All further housing must be for local people with the priority being for starter homes and affordable homes. WE DO NOT NEED ANY MORE 55+ RESIDENTIAL HOUSING, which are already straining our local doctors and social service resources.</p> <p>P.5 Priorities</p> <p>Climate change issues must be the priority.</p> <p>What is the renewable energy strategy for Marlborough?</p> <p>How will the traffic planning improve air quality unless public transport become a major priority?</p> <p>We do not need more parking in the centre of the town, we need better public transport and cycle paths (I speak from personal experience as a long term resident and cyclist).</p> <p>Businesses in the town need to be developed so that people can work locally and use public transport.</p> <p>Where people commute a priority needs to be for co-ordinated public transport e.g bespoke bus-train connections running at times that suit commuters.</p> <p>More express buses to e.g Swindon, Salisbury. These can be smaller minibus types as other countries use.</p> <p>Leisure</p> <p>The new facility for Rugby/Cricket club combined is not a priority as they both have sites which could be combined. Why do we need another all weather pitch? Surely a little creative negotiation with Marlborough College and St John's is called for.</p> <p>The recent increase in people walking, running and cycling has highlighted the need for these outdoor activities to be supported. We don not need more gym space but more signed and maintained footpaths and cycle ways both of which would support a low carbon strategy.</p>

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Policy Marl1 Page 26

I have read the Neighbourhood plan with interest and think that the initiative taken by the Town Council to seek to provide housing and infrastructure in the most beneficial way is highly commendable.

As a resident of Barton Dene in the area which is under consideration for a new Medical Centre and some 40 homes I can see the advantages to using this site for this purpose.

However, I would be interested to understand how the following points might be addressed:

Access

Currently the road providing access to Barton Dene is single track, and cars have to wait to allow others to pass both on the road, by the entrance to the College Astro turf pitches, and at the entrance to the bottom of College Fields (both to turn in from the main road, and for cars passing the row of parked cars on the right). At certain times of day (e.g. when the Marlborough College staff leave after work, or when a high degree of pupil parents are on site), the traffic flow is heavily obstructed. There is no pavement. 40 homes and a medical centre would create a significant increase in vehicles requiring access be it for deliveries, services, or residents.

How would the problems with access be mitigated?

Traffic

Traffic to the College Fields side of Marlborough is often slow. During peak times cars frequently queue along the Bath Road, often having to wait for the pedestrian crossings. The College Fields Estate is frequently used as a cut through.

Currently the existing medical centre is in the centre of the town, thus being within walking distance for people from all sides of Marlborough. Should it be relocated to one end as is proposed with the Barton Dene site, the risk would be that many more people end up driving to one end of Marlborough to get to the facilities (as evidenced by people using the Leisure Centre). This would presumably have a negative impact on traffic flow and carbon emissions / detrimental environmental impact

How would these things be addressed?

Health and Wellbeing / use of a green space

As I reside on the site, I see how it is used by the local people. It is a fairly unique space as it provides safe, easy terrain in open countryside but within striking distance of housing. Both the south facing and north facing area under proposal is heavily used by dogwalkers, families, bike riders accessing the downs for recreation, elderly residents, those seeking exercise etc. The fields surrounding the area are crops and therefore provide a slightly different landscape.

How would this loss of a significant green space and area used for exercise and recreation be addressed?

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The omission of Preshute Parish is significant as it makes it difficult to fully understand the environmental impact with further potential housing developments on the Northern Boundary of College Fields and Barton Park not considered.

Policy: Policy Marl 1: 3: Land at Barton Dene

Core Policy 2 – defines a boundary/limit of development for Marlborough and limits development in Manton to infill within the existing built area.

Core Policy 51 – recognising the importance of designated landscapes like the North Wessex Downs AONB

Community View: Open spaces are valued and should be protected from harmful development.

Vision: The open character and special scenic beauty of the Area of Outstanding Natural Beauty has been preserved, and in some cases enhanced.

Objectives: Conserving and enhancing our special heritage assets and the landscape and scenic beauty of the North Wessex Downs Area of Outstanding Natural Beauty.

Policy MARL18: Conserving the Scenic Beauty of the AONB

A. Development proposals outside the defined Marlborough development boundary and of the built up areas of Manton and Mildenhall 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

Comment:

It is difficult to see how the Barton Dene proposal meets with Core Policy 2 & 51, Policy MARL 18, the Community View or Objectives set out in the Plan. It will undermine the open character and scenic beauty of the Barton Dene valley to the detriment to the AONB.

Wildlife Corridors

Comment:

The current Western boundary of College Fields is marked by a mature copse which is home to a wide variety of wild-life (a variety of birds including owls, bats and hawks) and is a wildlife corridor used by foxes and muntjac deer. This copse also provides screening of the existing estate from any new development and retention of this feature should be fundamental to any future planning permission.

Noise Pollution

Comment:

The proposed Barton Dene site is quite a steep valley. The supposedly restricted development which the College were allowed to pursue in the Valley has already significantly increased the noise pollution due to the acoustics of the valley. The building of a housing estate within the valley location will have a significant negative impact on noise pollution locally, impacting wildlife and current and future residents.

Proposed Marlborough Medical Centre

Comment:

The proposal for a new medical centre in Barton Dene is very vague and therefore difficult to comment on, including its precise location and carparking arrangements. However, what is clear is that moving the facility from the centre of town to the western edge will reduce access on foot, particularly for those in the protected living facilities in the town centre and residents to the East of Marlborough. This is likely to significantly increase traffic and add to the traffic congestion at the junction between the College Fields' entrance, the A4 and the College entrance, as well as at the current entrance to College estate facility and sports pitches. If additional car parking is required, this could add to the environmental impact on the local area.

Marlborough College Bias

Comment:

This plan adds further to a local perception of a Local Authority bias towards Marlborough College. The College was allowed to develop houses for College workers within the Barton Dene valley several years ago. As this was portrayed as a limited development there was little local opposition. It now seems to be used as a precursor to further development. The creation of a new car park in the same location during the build of the new boarding house was meant

to be temporary but has been allowed to become permanent.

There is real concern that this development could be used encourage further development on the northern boundary of College Fields, which is now outside of the MANP.

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MARL 1 Page 23

I have concerns about the impact of this development upon the surrounding existing residential roads. Fifty further dwellings will increase the number of residents vehicles (possibly by 100) and added to that the number of delivery and trades persons vehicles will increase.

From the plan it looks as though the majority of the traffic will access from the A4 onto White Horse Road via Chopping Knife Lane. The extra turning traffic from the A4 may cause congestion and accidents especially since the East bound A4 has been narrowed from two lanes to one in that location.

The concern will also be that people may be tempted to instead travel Elcot Lane and use the emergency access to the new development. The end of Elcot Lane near the proposed emergency access has no pavements, is single track and the road surface is loose. This combined with the high number of pedestrians who walk there to access the old railway line path and the footpath towards Mildenhall will create a real danger to pedestrians.

Hopefully the proposed emergency access would be controlled by bollards which only emergency services could remove. If this is the case traffic may travel along Barnfield which again has no pavements, high foot traffic and is single track. Furthermore Barnfield is a private road and thus maintained at private expense. As a resident I would very much resent paying to maintain the road against the wear caused by the extra traffic to the proposed development.

How will the council support the residents and pedestrians of Elcot Lane and Barnfield and prevent these roads becoming a 'rat run'. Will they add traffic calming and extra road signs in these areas? Could this be a condition of approving the development, making the developer put these in place? I would also hope that the developer would not be allowed to use this route for construction traffic, the roads simply will not cope.

Finally the development will encroach upon the fields and footpaths around the River Kennet SSSI that are enjoyed by many residents of Marlborough and

	<p>the surrounding area and have been used more than ever during the lockdown periods. It is doubtful that any biodiversity strategy or retention of rights of way will reduce the impact upon wildlife or the loss of the beautiful countryside.</p>
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In reacting to the consultation on the MANP we would like to share with you the following generic comments which cover a range of topics including the environment, transport and local services.

Marlborough Town Council, as elected representatives of the local community, must take the position that the proposed scale of growth for the town is too high, affects too many green field sites and risks to significantly, and perhaps forever, damage the fragile eco-system that currently thrives in the Kennet Valley.

It is quite natural for there to a political desire for the town to be seen to be playing its part in achieving the targets set by central government. However, to achieve what it is being suggested the town needs to achieve will mean building on green field site(s) in the AONB with i) the consequent permanent loss of this precious and finite resource to current and future generations, ii) the serious strain on local infrastructure and services iii) the loss of habitat for the wildlife with whom we share the precious resources of our part of the county.

The AONB surrounding Marlborough is of outstanding landscape value with wonderful open, wide-ranging vistas which will be negatively impacted by further housing development.

- o Housing Development Sites

- o Land off Elcot Lane

§ The field to which the MANP refers sees regular agricultural activity. It is far from being a chunk of fallow land, unlike the land that is located on the A4 almost opposite the entrance to Barnfield. This would perhaps be a better location and although probably green field is far less likely to have a negative impact on the Kennet Valley eco-system.

§ The site off Elcot Lane forms an integral part of the wonderful countryside vista along the Kennet valley that is enjoyed by many Marlborough & Mildenhall residents. These views would be detrimentally impacted by any further development along the valley. We will erode permanently one of the most valued assets of Marlborough town, and the very asset the MANP purports to want to preserve and enhance.

§ The site is “highly visible” in particular from the South and East and from the North side of the river valley. Development would be highly visible and would have a significant impact on the character and quality of these views” (page 27 of the ‘MANP Site Assessment Report’). No amount of attempted mitigation would atone for that.

§ Access to this site is along the single track Elcot Lane (the bridge over has a conservation order on it) and there is very little scope for widening. Any attempt to provide access along Chopping Knife Lane would be disastrous. This is already in effect a single track road and there is no scope for widening.

§ Its development would have a serious detrimental impact on biodiversity, wildlife & bird and river habitats along the river Kennet valley – introducing far greater intensities of noise pollution, air pollution, water pollution and run off, and human impact on wildlife.

§ Slow worm, viper, grass snake, field mice and bats have all been observed on the St John’s Park development and birds of prey and waterfowl are frequently observed over the field.

§ It seems that people are deliberately overlooking the fact that this is a greenfield site in the AONB. There are no “exceptional circumstances” provided to support this development of this option, a requirement demanded for development in the AONB.

- o Barton Dene, Salisbury Rd and Land south of the A4 (London Rd)

§ These sites appear to have better accessibility, are well screened from a landscape perspective and were they to be developed, would not detrimentally impact outstanding views and vistas, or the natural habitat of the wildlife along the Kennet Valley.

§ In particular Barton Dene would be significantly closer to the new medical services facility being proposed and is already serviced by the town circular bus route thereby offering lower carbon transport options for residents to access the town centre

- o General environmental considerations

- o Development would have a devastating impact on the setting of Elcot Mill, bringing it into the town rather than its current setting outside town. Elcot Mill currently forms part of the unique historic landscape of our countryside asset.

o Development would similarly negatively impact the setting of Mildenhall Hall as a landmark within the countryside.

o The field at the end of Elcot Lane provides a close point for people who live in Marlborough to be able to access these locations and the countryside around the Kennet Valley and these outstanding views on foot. It abuts the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat.

o The Marlborough community identified as a key priority (page 19 of the main MANP document) the preservation of Countryside (specifically: “Open spaces are valued and should be protected from harmful development” and “Maintenance and improvement of existing green spaces”).

The MANP main document (page 21) states the vision is that “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”.

o Development of land off Elcot Lane is in direct contradiction to these stated goals.

o Barton Dene and Preshute parish council withdrawal.

§ Sections 1.7 and 6.8 of the ‘MANP Site Assessment Report’ (page 5) notes that the withdrawal of Preshute parish council at a late stage of the process negatively impacted the option of proposing a significantly larger development site at Barton Dene.

§ Developing the most beneficial outcome for the expansion of Marlborough town needs all the stakeholders to be involved and to play their part. This must not be influenced as a result of historical parish boundaries (set centuries earlier) and by what appears to be self-interest from Preshute council to limit development to the west of town.

§ From a Marlborough town development perspective and from a Wiltshire Council perspective this essentially arbitrary segregation results in sub-optimal outcomes for our town.

§ Marlborough Town Council must bring this disappointing position to the attention of Wiltshire Council in the MANP document. A larger Barton Dene development that may fulfil all or very many of the housing development requirements for Marlborough through to end 2036, should be seen as a priority.

o Accessibility, Transport, Connectivity

o Traffic and Air Pollution – A346 de-priming

Sections 2.14 to 2.17 (page 12) of the main MANP document note the high pollution levels along key highways in Marlborough particularly along London Road, Herd Street and Salisbury Road. These levels are of a direct consequence of the high density of HGV traffic passing along the A346 through Marlborough.

The work of the Transition Marlborough Transport group was very successful in bringing about the reduction of the speed limit on the High Street as an expedient in reducing carbon emissions and reducing safety risks.

Concrete action is now needed to limit HGV and other commercial traffic, almost all of which is passing through Marlborough and not serving the town. On the basis of an environmental/Air quality, societal risk survey, the A4 and the A346 through Marlborough should be removed from the list of primary routes for HGVs – most of the traffic on the A346 is coming from the Midlands and the M5 and going towards the A303. Alternatives exist for this traffic on the M40, M25 and M3.

There should be an end to talking about frameworks and agreements. The “long term aim of de-priming the A338/A346” mentioned in section 2.16 of the MANP needs to be translated into specific steps that lead to this outcome within the timescale of this 2016-2036 plan.

o Town Centre Congestion

There is too much reliance placed on the use of the private car as can be evidenced by the congestion in the High Street and the numbers of road vehicles looking for parking spaces.

Rather than looking for additional parking options, the town should be actively researching alternatives.

Transition Marlborough did some good work in lobbying for additional cycle racks and for the creation, maintenance of cycle routes so as to encourage

people to leave the car at home.

This does not suit everyone but the town circular bus service is sporadic at best and does not serve all the main developments in the town – St John’s Park being a good example – and so whilst a solution, it is not the optimum one. Rather than relying on a centrally negotiated transport contract with bus service providers, providing a timetable that is cost driven rather than service driven, the town should look to take on some of the challenges itself.

o Connectivity

The idea that was set out at the consultation meeting we attended to set up a transport group as part of the longer term plan bears much merit. As a transport professional, that thinking resonates with me and there are options that this town, with its own ideas and with the ability to put actions into place, could achieve.

Transition Marlborough also pushed the plan for the restoration of the railway link with the town. With modern lightweight tram/trains and minimal infrastructure requirements, this is fully achievable and is something, as part of the overall carbon reduction programme this town should set itself the goal to push.

o Affordable Housing

o Lessons learnt?

§ Sections 2.24 and 2.25 (page 13-14) of the main MANP document state “the gradual deterioration of affordability has left many residents experiencing difficulty gaining access to the housing market, especially given the low household-based income of certain areas.”

§ Previous recent housing developments in Marlborough have clearly not met the ‘affordable housing’ requirement.

Given this, where is the study and evidence to show what lessons have been learnt from prior housing developments in Marlborough? For instance, how effective was the recent housing development off Salisbury Road in providing genuinely affordable housing for local residents on low pay?

§ More development following the patterns and approaches of the past will again fail to meet the local needs and simply draw more people into Marlborough from elsewhere, creating even greater strain on local infrastructure, services and amenities.

§ Before focussing on the emotional topic of low cost housing, a survey should be undertaken to see what proportion of these properties are occupied.

Marlborough is not the cheapest place to live and is therefore not the most attractive place for people on ‘low income’ and there are often properties lying empty on St John’s Park for example.

o Ensuring genuine affordable housing delivery and retention?

§ Section 6 on page 1 of the supplementary document entitled ‘Supporting Statement on Housing Proposals (January 2021)’ states that “Addressing affordable housing is one of the local community’s biggest concerns about the future of the MANP area”.

§ This section says the intent of the MANP in building affordable housing is to address “our high house prices that are driving away younger, economically active, people” and that local “employers are concerned their staff, especially those on lower pay grades, are not able to afford housing in the town”.

§ There appear to be no criteria, nor information in the MANP proposal to provide assurance on how those houses that are built as affordable housing will be affordable to this target group of people. If they are not, then this objective will not be met.

§ The MANP proposal should not progress until this matter is clearly detailed in the policy statements of the plan – what criteria will be applied to ensure successful delivery of affordable housing in the sense of it being affordable to local employees on low wages? And what assurances will there be that, once built, and put onto the rental market, that people then subsequently get the chance to buy and the low cost stock is reduced, leading to a clamour to build yet more houses (see the comment below)

o Affordable Housing – nothing but a tick-box exercise?

§ Furthermore, section 8 on page 2 of supplementary document ‘Supporting Statement on Housing Proposals (January 2021)’ concedes that the objective of ‘affordable housing’ will not be met, stating “affordable in planning terms will rarely mean genuine affordability when compared with local incomes”.

§ This admission fundamentally undermines one of the most important stated objectives of the MANP plan. Before the MANP plan is progressed further, this issue needs to be addressed in the proposal.

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We write to object to the proposed housing development at Barton Dene/College Fields.

This land is situated in an AoNB, part of which falls outside the town boundary. Access to the site is very difficult and the construction of the site and usage when developed will cause extra traffic and congestion on an already extremely busy part of the A4. This area is high up in the landscape and a new development will be clearly visible from the south side of the A4, ruining a beautiful part of the countryside and visible for miles around. Air quality in this area will also be negatively affected due to an increase in pollution.

It seems unnecessary to build extra housing when there is a lack of employment in Marlborough for those people moving into the proposed houses. The infrastructure of Marlborough is already pressured with high volumes of traffic coming through the town - this development would add to an already

	<p>overloaded infrastructure. We have very limited public transport - again an issue for those needing to get to work outside the town. The housing strategies are based on a false premise that 80 new affordable homes are needed. Marlborough already has 733 affordable homes. Wiltshire council confirm that of the 80 affordable houses that were re-let 2016-2019 only 19 were taken up by local people.</p>
147	<p>In response to your proposals for the housing development at the end of Elcot Lane, I have some serious concerns regarding this proposal. My greatest concern is the access to this development via Elcot Lane. Despite this being classified as an emergency access to the development there is no proposal of how this access would be controlled. The road here is a single track lane and certainly not suitable for traffic to a new development of 50+ houses. As a resident of Elcot Lane we already have many issues with delivery lorries getting lost down here after following SatNav's . There is no easy way for them to turn around and they often climb the pavements and come dangerously close to pedestrians and property doing so. To add access to an additional housing development via this road is disastrous and dangerous. Access to this development must only be from London Road and not through this single track.</p>
148	<p>A well thought out suggested plan to enable Marlborough town to move forward and listen to new fresh ideas. Our town is now going through one of its toughest times, as we all know, and during this long period of lock down given us the time to think “where are we going”</p> <p>As we know the government plans financially to help County Councils and town councils of plan a positive way forward to revive the high streets. We now have that moment.</p> <p>Our high street has been having a reduction in business since 2018 due to a slow down in the economy and on line trading that has now taken 30% of trade off the high street.</p> <p>To survive, rates and rents have to reduce by at least 20% if we want to see our high street come back to life. This means some very positive changes need to take place to attract visitors.</p> <p>Locals will support the shops, but we have to make Marlborough an exciting and welcoming place to visit. The town will be filled with specialist shops, dentists, private professionals, cafes and restaurants and pubs. On consulting many traders and offices these are my thoughts.</p> <ol style="list-style-type: none"> <li>1. Traffic....use the centre of the high street for the main flow of traffic.</li> <li>2. Use the sides to broaden the walkways and have a chevron style parking system. This will also enable more safety from when the market days operate.</li> <li>3. Parking. Charges needs to be less with free after three. Welcoming people to shop in town. To support the free half hour simply charge cars 50 pence or get a free ticket from the machine.</li> <li>3a. Build a one tier multi story car park in George Lane car park.</li> <li>4. Continue with the successful cafe bays from last year making the town more continental and to have more attractive barriers.</li> <li>5. Plant more trees in tubs along the widened pavements and have more open air seats. National Trust are offering free cherry blossom trees to all towns in Britain to creat a Japanese style feel good factor.</li> <li>5. Place the markets in the car park near Waitrose and George Lane. This would be safer from passing traffic and create a good atmosphere and attract more people.</li> <li>5. Parking on the Common. This would be for 100 cars, with an annual charge of say £300, only for town residents and staff coming to work. The revenue could be used by the Town Council to support deserving causes. So those motorists would be helping their own town directly. The Common is for all the people of Marlborough. In 1980's cars parked up on the Common!</li> <li>6. Rugby club to have more playing fields to keep young children occupied and healthy.</li> </ol> <p>These are a few ideas that can be developed of course to make Marlborough a true and exiting destination town.</p>

149

this submission contained images. Organisation or Body- Marleberg Grange Community

Consultee Type- Residents of Marlborough

Plan- Site 2, Land Rear of Salisbury Road, pg 24, specifically bullet point 3 'the scheme shall have a main highways access to Salisbury Road via the new Marleberg Grange scheme'.

Comments:

The residents of Marleberg Grange are opposed to the proposal of the Marleberg Grange estate to be used as an access road to a future development site. In addition, there are objections in relation to the access road to be constructed through the railway track. The list of signatories those of whom I managed to contact in the short amount of time that current residents have been made aware of the proposal. The main concerns raised by those I spoke to were as follows:

- The main road through the Marleberg Grange estate would become overwhelmed by additional site traffic leading to the new development. After this, the road would be then overwhelmed by new residents on the new development site.
- The main road to be used is very narrow, with many pinch points where it is not wide enough for two cars to pass and is therefore inappropriate as an access road; for example, at one point on Jennings Road, it is only 4.27m wide
- Additional traffic created from using Marleberg Grange as an access road would add to the issue of build-up of traffic at rush hours past Postern Hill. The roundabout that is situated at the entrance to the estate will not manage the extra traffic and this would then lead to congestion throughout Marleberg Grange.
- The additional traffic will pass the new children's play area and two communal areas which will put children playing at much greater risk and jeopardise their safety
- There will be a huge increase in traffic going through the estate and this will lead to increased noise pollution and poorer air quality for residents and children
- New residents and potential new residents currently buying and exchanging on houses on the Marleberg Grange estate are having to add details of awareness of the proposed plans; those of building an access road and for using the Marleberg Grange road as access into their contracts. Existing residents were NOT told about the plans for the estate road to be used in such a manner and would NOT have bought their properties if they had known. We have no such amendments of awareness or permission in our contracts with Redrow.
- The 'village' feel of the estate will be compromised and property values will therefore be compromised.
- The proposed access road will have a significant impact on the nature and wildlife found along the old railway line. In particular, I refer to Wiltshire Council Planning Response from REDACTED, Senior Ecologist for Wilts Council, dated 7/6/17 ref:17/03219/REM, whom writes of her-
  1. 'raised concerns about the proximity...to the disused railway tunnel which hosts possibly the largest hibernation roost in the UK for Natterer's bats'
  2. The same site 'is also an Autumn swarming and mating site for several species of bat, potentially including at least two out of the four species that are on Annex 2 of the Habitats Directive; ie/ two of the rarest species of bat found in the UK'
  3. In addition, 'Annexe 2 bats...commute along hedge lines and across pastures between the Forest, the tunnel and other nearby roost sites'
  4. 'Dormice are known to be present ...in hedgerows around the periphery of the application site. Dormice are also a European Protected Species receiving stringent protection under the Habitats Regulations 2010'
  5. Paragraph 2 of the document continues 'a parameters plan was agreed that gives substantial stand-offs from all hedge lines and tree lines...to be managed solely for the benefit of ecology. It is important that this area remains undisturbed and managed according to the requirements of foraging and commuting bats, as well as dormice. Without this provision of habitat buffering, it is likely that... there would be an unacceptable impact on European Protected Species which would breach Habitats Regulations'
  6. Paragraph 4 'It is imperative that existing retained hedgerows and tree lines ...are not included within the residential curtilage'

	<p>7. Paragraph 5 'There should be no development at all within 5m of the edge of any retained ecology features, so that there is a large enough area to accommodate commuting and foraging bats that fly adjacent to the hedge line'</p> <p>The proposal of using the Marleberg Grange road as the only route into the proposed new estate contravenes the guidance as published in the 'Wiltshire Council Local Plan-Looking to the future; Site Selection report for Marlborough'. The construction of an additional access road across the old railway track also goes against the statements in the document as shown below:</p> <p>The residents of Marleberg Grange believe that the proposal should be removed from further consideration as the site is more than 'relatively inaccessible' and would absolutely impact on those already living in the surrounds beyond acceptability.</p> <p>Please see aforementioned research already taken on the area by Fiona Elphick.</p> <p>The residents of Marleberg Grange believe the new site to be 'relatively inaccessible' for the reasons listed above.</p> <p>The residents of Marleberg Grange believe that by using the existing road through the estate to a further 175 houses would lead to an unacceptable amount of traffic and worsening congestion as listed above. It would also lead to poorer air quality.</p> <p>The development of an access road from Marleberg Grange to the new estate has the physical barrier of the old railway line, which provides a wildlife corridor as mentioned previously.</p> <p>The use of Marleberg Grange as access to a new development would absolutely add to the congestion along Postern Hill.T</p> <p>The residents of Marleberg Grange believe a more obvious and less invasive approach would be from the A345, adjacent to the St Johns School entrance, as illustrated.</p>
150	<p>With the levels of obesity and mental health issues constantly on the rise and the strain that these problems cause the NHS we should be looking for ways to encourage people to exercise more.</p> <p>This could be achieved with an increase in sport and leisure facilities for children and safer footpaths and cycle ways all ages.</p> <p>The lack of safe footpath along the Salisbury road to the business park is disgusting. It is by far the most terrifying stretch of pavement I have ever had the misfortune to walk. On occasion I have observed groups of (pre Covid) St John's pupils walk along it while two 32 tonne lorries pass each other and wonder how there has been no serious incident to date.</p> <p>A safe footpath / cycle way joining the Chopping Knife estate to the business park and Marlberg Estate would also encourage people consider non motorised alternatives to moving around Marlborough.</p> <p>It has also been proved at various places around the country that having a pedestrian bias to a high street actually encourages shoppers and trade rather than the outdated notion that a vehicular bias is better.</p> <p>One positive of Covid has been that it has encouraged people to walk and cycle more frequently but the return of heavy traffic on roads with limited pedestrian and cyclist safety measures will only force those people back into their cars.</p> <p>We need less provision for parking and more provision for helping all ages to stay fit and healthy</p>

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Contained photos and links

response text: As a resident of Marlborough and over looking the proposed site at Elcot lane, I am concerned that the plan has not been thought through in a holistic manner. The responses to my questions to the MANP team on the Zoom calls have confirmed this.

The plan has been created in complete isolation with no input nor regard to important points such as increased traffic congestion in the town, increased pressure and demands on utilities and provision of jobs for the increase in residents within Marlborough. Whilst some consideration appears to have been made for leisure facilities, schooling and parking, I am not confident that a complete picture has been thought through and considered. This is of massive concern as the full range of knock on effects are unknown. The towns utilities such as water, electric, sewage, gas and wi-fi provision. Does this have capacity for the extra housing and is it fit for purpose?

Consideration as to what makes Marlborough special has been neglected. Marlborough is a small market town surrounded by beautiful country side, natural habits for animals and historic sites.

The Elcot lane development will encroach onto the site of SSSI river Kennet and cover open land and stunning vistas. The Kennet valley is a stunning landscape filled with natural habitat for animals and plants.

Whilst I appreciate that the estate I am living in was approved around 10 years ago, this was built on an ageing and dilapidated school building and not on a green field site in an area of AONB. The proposed 2Ha development is to be built on what is currently a working farmers field with many species of flora and fauna. We often see pheasants, Grouse, Deer, Badgers, Foxes, Geese, Viper, Grass snakes, Red kites and even owls on this land and feel blessed to be living here. Further development into green field sites will push this natural habitat away further from the town and make the estate even more visible from the village of Mildenhall. Other proposed sites on Salisbury road Barton Dene and Cherry Orchard and Kelham Gardens are better suited to this development as they are not building on a working farmers field. The stunning Elcot mill which is a designated woodland priority habitat, would be absorbed by the new estate and lose its idyllic setting outside of the town.

The approach to the Elcot lane site of 50 homes will bring with it approx. 70 cars (based on 2018 numbers) and likely to be over 100 cars by 2032 (<https://www.statista.com/statistics/314912/average-number-of-cars-per-household-in-england/>) which will be using the already heavily congested, ill thought through and dangerous access via White Horse Road, Chopping Knife Lane and the T junction onto London Road.

Picture A Even without this new development, the roads in and around the estate are very narrow with very little provision for off road parking. The roads are tight and deliberately styled with acute turns and blind corners to keep speeds low. This also makes these very dangerous. Cars are parked for over 100 meters along Chopping knife lane and White Horse Road causing congestion and a dangerous problem for cyclists and mobility scooters using this road.

Picture B

Picture B As can be seen, the end of this road is on a corner, so clear path cannot be seen once committing to drive this road. Even the van at the end of the road in the above picture is unclear.

This is the ONLY entrance and Exit to the proposed site.

Pictures C, D and E show just how tight the turns into the current estate are. The average width of an ambulance is 230cm in the UK ([https://engage.improvement.nhs.uk/operational-productivity-comms/english-nhs-ambulance-vehicle-spec/user\\_uploads/national-ambulance-vehicle-specification-for-english-nhs-ambulance-trusts-final-2.pdf](https://engage.improvement.nhs.uk/operational-productivity-comms/english-nhs-ambulance-vehicle-spec/user_uploads/national-ambulance-vehicle-specification-for-english-nhs-ambulance-trusts-final-2.pdf))

and the average width of a UK fire appliance is also 230cm (<https://www.hwfire.org.uk/about-us/the-fire-service/our-vehicles/scania/#:~:text=Length%3A%2010.5%20metres,Load%20weight%3A%2012%20tonnes>)

My measurements suggest that the roads in the estate are 5m in width. With the lack of car parking a single side of the road and often some of the pavement) are used to park cars. This is particularly bad at weekends and evenings (increased risk in the dark), leaving only 2.5m of width for the emergency services to use to access the estate. At worst case this would leave 10cm each side of margin – which is clearly tight.

Every other week, the residents of the estate watch as the council operated dustbin lorry struggles to obtain access to all the houses on the estate as it



currently is. A recent academic white paper suggests that a clear road width of 5m is required to operate a standard UK refuse lorry safely.

[http://www.docs.csg.ed.ac.uk/estatesbuildings/guidelines/environmentalandsustainability/section4\\_waste\\_recycling\\_container.pdf](http://www.docs.csg.ed.ac.uk/estatesbuildings/guidelines/environmentalandsustainability/section4_waste_recycling_container.pdf)

The estate is currently able to offer half of this (2.5m) at best.

Picture C – Note tight road and commercial vans parked on one side of the road – completely blocking this carriageway.

Picture D – Commercial vans and cars parked on the tight road reducing the width to less than 2.5m. Note van is also parked on the pavement.

Picture E – Tight road approaching the proposed development of 50 homes. Note the tight roadway which is unsuitable for emergency vehicles and refuse lorries. Foliage obscures oncoming vehicles for over 100m. This is dangerous.

Furthermore, the plan show an emergency access via Elcot lane under the historic and width/height restricted railway bridge adjacent to Marlborough tiles. This road is single carriageway with few passing places with a very neglected road surface. This would be a woeful emergency access approach and also becomes very busy during peak times of the day and weekends.

Picture F – Elcot Lane – proposed Emergency access to the new development. This road is poorly surfaced and is very busy during Peak times, evenings and weekends. Few passing places and not suitable for an emergency vehicle. The Elcot railway bridge is also height and width limited and an ambulance or fire truck would struggle to negotiate this delaying response times.

Whilst I appreciate that there is a council and government led demand for affordable housing and that 50% of the proposed 50 houses will be affordable, I would like to point out that the estate currently has a large number of vacant affordable housing units. During my 8 years living here, I cannot recall one single occasion when every one of these houses and flats (Cunetio Gardens) was occupied. A recent conversation with Sovereign housing confirmed this. Many of the affordable homes on Vespasian road and White Horse Road are unoccupied and appear to have been derelict for some considerable time. This leads me to believe that the drive to erect further affordable housing is coming from those who really do not understand the current situation. Has the question of where these people will be employed or how they might access public transport been considered? Many of these homes are occupied for very short spells of time before being cleared out by Sovereign.

If these residents are living out of choice in Marlborough, then the town should offer opportunities for employment at this level. If the residents of these new houses are to commute, then public transport and links to public transport should be provided. How has this been thought out?

I am very much opposed to the Elcot Lane development and feel that there are several other locations within the town that would be better suited to this build.

More pressing matters such as road safety in the town and the limitation to the number of HGVs using the town as a rat run to avoid the M4, A34 route to the south coast is unsettling and a serious hazard to the residents of the town, should be considered in parallel to plans for additional housing.

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I suggest that Marlborough Council reject the Wiltshire plan as Chippenham and Bradford have done and for the same reasons. I do not believe that the people of Marlborough should have such huge developments imposed on them by central government without their consent. It is undemocratic.

<https://www.gazetteandherald.co.uk/news/19120550.chippenham-unanimously-votes-reject-wiltshire-local-plan/>  
Manton Residents' Association Consultation February/March 2021

#### Marlborough Neighbourhood Plan consultation

Following consultation in the Manton Village via leaflet and email, the Manton Residents Association have combined the views of contributors into the following document.

Importantly there are key issues/omissions in the main document which we feel should be amended to protect future planning development (see second section below)

1. New Medical Centre: there is some support for this on basis that the existing medical centre should be updated and, importantly, have enough parking so that groups can meet for special clinics, vulnerable and carers can access care easily, prescriptions collected and so on. But there is also some strong opposition to moving from the existing central site with its adjacent parking provision. Updating could be arguably achieved on the existing site.
2. Sustainability : many wish to see this as an important part of all future development and would be interested in more detail Transparency please!
3. General infrastructure, especially schools, roads: leisure centre: traffic jams, and even gridlock, occur around the town with increasing frequency. No recent building has been accompanied by any traffic measures of any significance at all. Even if working from home continues some commuting impact will be felt. The proposed land off Elcot Lane development (MARL1) with exit to main highways through White Horse Road /Chopping Knife lane development already has its own issues of parking and passing parked vehicles, which are potentially hazardous. Again specific details would be welcomed. Primary schools have space but there is concern about the capacity of St John's to cope without becoming too big for comfort. The leisure centre is small and in poor repair and needing update to meet the needs of the community. The provision of more bike racks to encourage biking is called for. One person mentioned increasing Business park. We favour the proposed new car park near the Rugby Club on the Common.
4. New Housing : there is a lack of comparatively low cost freehold housing in the town. It is agreed that the town does not need any future retirement developments as currently they are significant but underused.
5. Skyline and views: even if a clear skyline is technically maintained that does not necessarily mean that from eg centre of town a skyline is in fact uncluttered and spoiled
6. AONB and Conservation areas: we all cherish our beautiful surroundings and want these respected as far as possible. Marlborough is naturally constrained by the Kennet and other valleys and by water meadows and flooding. More tree-planting as part of development is favoured.
7. What we like about the present proposed plan: A number of small sites around the town are clearly better than one large new development. Most respondents recognise the need for more housing, especially social and low cost housing. But many are against any more housing for the elderly!

Marlborough Neighbourhood Plan Omissions/amendments (see page 40).

Bullet point 4. Manton Road We believe this should read Manton High Street onto Manton Road

Section B ( to protect us from issues with planning and protecting the Conservation Area) The following two points should be added after bullet point 3

- Downs Lane, cut into the rising downland landscape to the north of mature housing on Bath Road and adjacent to Bridge St, was constructed in the late 19th century to serve the Manton Estate. At its south end there is a mature enclave of 1940s/50s housing including Manton Hollow with many mature trees

and hedges that complement the older village setting.

- West Manton, to the south-west of Manton High Street, is a small 1960s housing development with mature gardens and trees and a complementary mature setting forming the western extent of the modern village.
- There should be no permitted development above the 150m contour on the fringes of the village. Development above this limit, even if it were practical, would have a severe impact on visual amenity, the character of the AONB and would compromise the setting and character of the village by introducing prominent development on the skylines

<https://www.wiltshiretimes.co.uk/news/19135144.bradford-votes-reject-wiltshire-local-plan/>

### 1 -Water Infrastructure

Improving the local foul and surface drainage infrastructure should be a 'Key Objective' and stated in the MANP (at para 5.2) as an additional bullet point. The existing sewage network is not fit for purpose despite Marlborough STW being upgraded in 2012/13, the STW is still 'struggling' currently. In 2019, this sewer storm overflow spilled 87 times for a total of 989 hours, discharging untreated sewage into the R. Kennet SSSI. There is not capacity for new development without significant investment in the sewerage network. All new development within the MANP should make substantial contributions to this infrastructure through the planning system using s106 Agreements, alongside significant investment from the Water Industry.

### 2 -Sustainable Urban Drainage Systems (SuD's)

Any form of development within the catchment of the R. Kennet has the potential to threaten the quality and biodiversity of the river itself and in turn, the landscape of the North Wessex Downs Area of Outstanding Natural Beauty (NWDONB).

The use of a comprehensive SuDS scheme can mitigate or lessen impacts of development proposals SuDS can provide:

- flood risk management –reducing the risk of flooding from development
- water quality management –reducing the impact of diffuse pollution
- improved amenity and biodiversity –the integration of green infrastructure with SuDS solutions can help to create habitat, recreational and biodiversity areas
- improved water resources –SuDS can help to recharge groundwater supplies and capture rainwater for re-use purposes e.g. raingardens, attenuation ponds, green roofs etc.

However, standard engineering solutions do not go far enough e.g. underground detention tanks in areas of high ground water (i.e. the Kennet Valley) do not work. Innovative new solutions need to be applied.

Within the MANP Policy MARL 1-Sites 1-5 and at MARL 20 there should be a highlighted bullet point requiring a 'comprehensive SuDS scheme to be incorporated in all development proposals, addressing the 'four pillars of SuDS' as identified in the SuDS Manual.

### 3 -Water efficiency and Climate Change

All new homes should be water efficient from the start. Building an inefficient home builds 100 years inefficiency into the system –its cost effective to include rainwater harvesting and greywater recycling (as part of a comprehensive SuDS scheme) from the start.

The independent water efficiency experts 'Waterwise' have drafted a new paper, with input from the UK Water Efficiency Strategy Steering Group, highlighting the role that water efficiency can play in reducing carbon emissions over the next two decades.

The Paper states that around 6% of the UK's total greenhouse gas emissions are from household water supply and use. This equates to over 2.6 kg CO<sub>2</sub>e per home per day. Approximately 90% of these water-related emissions are from how we use water in the home –the other 10% are operational emissions from water companies supplying water and removing and treating wastewater. The water sector has recently committed to reaching Net Zero by 2030 for its own emissions but this paper highlights

how modest reductions in household water use of 5-6% could deliver annual emissions savings of around 1.3 MtCO<sub>2</sub>e. This is a bigger saving than was actually

achieved in the whole UK housing sector in 2017-18 or in 2018-19. A 10-12% reduction in household water use could reduce greenhouse gas emissions by a similar amount to the total operational emissions of the whole UK water sector (circa 2.4 MtCO<sub>2</sub>e).

A water audit/assessment, (similar to an energy audit), is the method of quantifying all the flows of water in a system to understand its usage, reduce losses and improve water conservation. This should be provided with any development proposal.

Within the MANP Policies MARL 1, 3 & 5 there should be a highlighted bullet point requiring a 'comprehensive SuDS scheme together with a Water Audit/Assessment to be incorporated in all development proposal.' This should be cross referenced to policy MARL 20.

DRAFT MANP RESPONSE -SPECIFIC

Page 10. para 2.3

Insert bold italics below:

The River Kennet rises north of Avebury and flows through part of the North Wessex Downs AONB and Marlborough. The Kennet is a globally important chalk stream, designated as a Site of Special Scientific Interest (SSSI), that runs through the centre of Marlborough, which is built in the river valley and on the slopes of the Marlborough Downs to the north with Savernake Forest as its southerly boundary.

Page 11 para 2.10

We would prefer the following wording below to be substituted:

‘On the eastern side of Marlborough the public have access to 15 acres of water meadows and the River Kennet at Stonebridge Wild River Reserve. The site provides nature walks with some access for the disabled. The water meadow is co-owned and managed by ARK and MTC; and maintained in accordance with best conservation and environmental principles, the stretch of river and the associated land is an exemplar for the River Kennet as a whole.

The projects are undertaken or overseen by local river trust Action for the River Kennet (ARK) and their volunteers. The site is used for scientific research, educational outreach and is a well-used local amenity’.

THE SUSTAINABILITY APPRAISAL (SA)

Page 9 (NTS iii)

Table NTS.2 Site 1 - Land off Elcot. The findings regarding Land, soil and water resources are ‘uncertain effects’, along with Biodiversity and Climate change.

Likely adverse effect (without mitigation measures) at Site 1 for Air Quality, Health and wellbeing, Landscape and Historic Environment.

If development expanded onto Site 2 the same table includes the same negative effects, but with the exception of Climate change effects being likely rather than uncertain.

Sites 1 and 2 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.

Site 8 - Land at Kelham Gardens. This site is partially within a high flood risk area. The Plan refers to managing surface water flooding within the site.

We would expect to see sensitive green SuDS features, adding to the site’s amenity and biodiversity value and improvements to the river and banks, to address the reasons for the river failing to achieve good ecological status.

Page 14 (NTS page viii)

‘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 Kennet 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.

Originally in Bullet Point 2, why has 'rainwater harvesting, water efficiency measures' been removed from the second draft. Can this be reinstated.

#### KEY SUSTAINABILITY ISSUES

Page 25 (SA page 9) We note that:

The SA Report includes consultation response from the EA :

'Environment Agency Richard Jenkins, Planning Adviser 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.'

On page 51 (SA page 35) We note in Table 4.6 . Theme: Land, soil and water resources -Significant effect appraised as 'Yes-negative' for all Options D, E & F.

Page 26 (SA page 10) Fourth Bullet Point Land, soil and water resources,

- 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.

The latest Environment Agency data confirms that 0% of rivers met good chemical status.

Therefore, there is a need for greater investment in water treatment, creating SuDS systems and minimising water consumption within policies that can be delivered in the MANP.

See also Water Quality, para 2, page 92/93 (SA page 76/77) which is therefore also incorrect. However, the 'reasons for not achieving good status' (RNAGs) are listed in the paragraph.

Action for the River Kennet 8 March 2021

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5.2 There is no mention of actively reducing the need for more car parking spaces through reducing traffic flows. There is no mention of a comprehensive plan to improve routes for cyclists and pedestrians to encourage residents to cycle and walk to the High Street, Schools and public facilities.

Policy Marl 1 Currently states:

The layout shall 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

I agree that all rights of way should be maintained. However, this is an opportunity to upgrade these to 'Bridleway' status to encourage cycling.

Policy Marl 2 The main Salisbury Road from the town centre to the Business Park / Tesco / Marlberg Grange is already congested, narrow and very dangerous for cyclists. Can this additional development be used to build a safe cycle way for residents into town / schools with the objective of reducing overall traffic flow.

Policy Marl 2 Please can you be clearer about the quality expected when mentioning building cycleways. These need to be 'high quality dedicated cycle paths'. Painting a picture of a cycle on a pavement, or building a cycle path that comes to an abrupt stop leads to paths that will not be used.

Policy Marl 3 This seems to be an inappropriate site for a medical facility. There is insufficient space for car parking. This will generate additional traffic along the A4 which is already a dangerous road for cycling (and deters children from College Fields/Barton Park from cycling to school. Surely expansion of the centrally located George Lane site is a better option.

Policy Marl 3 I note that land to the north of this site is not within the Marlborough Local Plan boundary. Marlborough College have made it clear that they wish to pursue development this land. This site should not be included for ANY development unless plan 'boundaries' are amended and the associated further development considered.

Policy Marl 3 This is no a suitable site for additional housing. No mitigation has been included for the additional traffic generated. It is currently very unattractive (noisy, polluted) to walk into town from this site. The recent widening of the pavement on the A4 has made it even more dangerous to cycle.

Policy Marl 3 If housing I allowed here there needs to be additional public open space to the boundaries to ensure that no further development is allowed.

Policy Marl 2, Page 28 Managing Change at George Lane. This site is centrally located, next to a large car park. If the health facility is too small, it could be rebuilt on the current site. It seems that this is included in the plan as a means to facilitate funding rather than how to best meet the needs of the town.

Page 31 Currently states:

minimise street clutter by directing supporting infrastructure such as bin stores and cycle facilities away from active frontages. Where located in service yards

Please can you separate out the sentence on cycle facilities. The currently sentence implies that you want to put them in 'service yards'. There are currently very poor cycle facilities on the high street and it is correct to include a statement to improve them. However, they need to be in prominent positions.

Missing

There does not seem to be a policy on promoting green transport. For example:

- Promoting high quality cycle routes (and facilities) that will encourage safe cycling to the High Street and Schools.
- It does not take into account the revolution in cycling that is underway with the advent of electric cycles.
- It should promote the potential to reduce the demand for car parking spaces
- It should promote the opportunity for the towns business to benefit from the cycle tourist trade

Missing

A policy to improve public access to the river Kennet through Marlborough.

Missing

	<p>A policy to improve the quality of the environment on the High Street (e.g. some trees, public seating, improved siting of Market) which could be easily achieved without loss of car parking.</p>
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## Abbreviations used

Wiltshire Core Strategy (WCS), adopted in 2015 (covering 2016 to 2026)

Wiltshire Council Local Plan - draft (WCLP or LP)

WC Emerging Spatial Strategy (WCESS)

Wiltshire Council Local Plan - Planning for Marlborough (WCLPM)

Marlborough Area Neighbourhood Plan - draft for consultation (MANP)

MA - Marlborough Area (incl Savernake and Mildenhall PCs)

MCA – Marlborough Community Area (includes 19 Parishes)

NP – Neighbourhood Plan

General I want to thank members of the MANP Steering Group for all their hard work to produce the neighbourhood plan. I appreciate what a monumental task this has been. Balancing the needs of different parts of our community is a complex task and I understand that compromises have to be made. I also acknowledge that having the neighbourhood plan in place allows access to a higher percentage of community funds generated by development and additionally provides some protection from unwanted development.

General I have received feedback that the consultation was not well advertised, naturally it is difficult during a pandemic but I would urge consideration of further consultation as it is important for residents to be able to understand the detail and implications and for them to raise issues and challenges in a variety of ways. The documents are necessarily dense texts and this is a barrier for many people. I appreciate that two one hour zoom sessions did take place but given the previous efforts with public displays etc in the Town Hall and village halls this is a very limited outreach.

It appears that the Full Town Council have not had an opportunity to debate the MANP and this seems to be a missed opportunity. The local elections on 6th May might produce a significantly different body of Councillors and it is felt it should be possible for them to debate the MANP as MTC is the qualifying body. General I have received comments that the proposed referendum date of 6th May 2021 is too early and will get lost in the PCC, Wiltshire and Town Council elections. There is a degree of feeling that clarification of the MANP in key aspects is still required and it may not be possible to undertake this work within the two month timescale allowed if the referendum goes ahead on 6th May.

Marlborough Area Neighbourhood Plan Housing Needs and Requirements Study, Cobweb Consulting, May 2017. Covered 2014 – 2026

Concerns have been raised around the definition of 'affordable housing', i.e. is this more housing for rent or to buy at below market rates. Experience in the villages shows that even below market value housing remains beyond the financial reach of key workers etc who might wish to purchase housing.

There are also questions around the quality of the consultation undertaken on housing and whether the responses have been considered against the availability of existing affordable housing stock, in particular to rent, but also to buy.

MANP Informal Consultation July/August 2019 No comment.

Affordable Housing needs in Marlborough Area Neighbourhood plan, Cobweb Consultation, June 2020 update There are concerns about the number of new houses required and the type of housing required. There is insufficient clarity in the documentation.

## Definition of Affordable Housing

If the affordable housing is intended to be for local families then the type (rent or buy) and size (one, two or three bedroom) of housing required needs to be more clearly defined. Marlborough is a welcoming community but our infrastructure is currently stressed and the influx of new families will have an impact on all aspects of local services.

MARL 1 Redevelopment of the brown field sites at Cherry Orchard and Kelham Gardens should be prioritised above development on precious green field sites. If development of brown field sites is not given particular emphasis in the MANP then developers will always opt for building on green field sites as it is less problematic and more profitable.

MARL 2 Local feeling is that the existing site of the medical centre is generally preferable to a site with restricted parking. It is not acceptable to suggest the Leisure Centre car park is suitable for use by a new medical centre as that car park is already heavily used and at times has zero capacity for people wishing to use the leisure centre. The proximity of Marlborough College's estates team means the access route is already heavily used by a variety of vehicles.

Expansion of the medical centre on the existing site, directly adjacent to the main town car part is the preferred option given by local residents.

MARL 5 The general nature of the comments are hard to interpret in terms of planning. More specific detail would be helpful. The use of the High Street will inevitably change in response to the increase in online shopping and as a result of the pandemic. Creative re-use of retail space for employment, social access and residential use should be considered as part of a thriving community.

MARL6 Creative re-use of redundant buildings both within Marlborough and on surrounding land should be actively supported as part of a vision for Marlborough which emphasises the productive use of brown field sites. Creative re-use of retail space for employment, could also be considered.

MARL7 Feedback from residents is that they are sceptical that additional parking for 60 cars at the rugby club will support shopping in the town centre except by secondary effect by allowing residents to park off street thus creating more central parking and more temptation to residents to increase car ownership. The area of land available is relatively small and is part of the Common. The visual impact of more cars on this space has not been given sufficient consideration.

MARL 8 Pedestrian access is required along the frontage of the cemetery and must be maintained if the necessary extension is agreed.

MARL15 Protecting and improving Green Infrastructure is crucial to retaining quality of life in Marlborough. The current comments are positive about resisting detrimental development and setting expectations, but some feedback has been that this should and could be more ambitious not just relying on development to provide improvements but asserting support for community groups, charities and local councils to create improvements such as tree planting.

MARL 17 Supported.

MARL18 Supported.

MARL19 Supported.

MARL20 Mitigating Climate Change – New Buildings. The construction of new houses inevitably creates a negative impact on climate change due to the energy required in building and in occupation. It is perceived to have an especially negative impact if new houses are allowed to be built on green field sites. This policy focuses on mitigating the direct impact of construction and occupation but does not touch upon the upgrading and re-use of existing building stock as a way of reducing the impact of development. It is understood that brown field sites cannot be considered within land supply unless ready for development, however this is considered an inadequate position which serves to drive over supply of development.

MARL 21 The use of carbon sinking is supported, however the relationship of the fund to be set up and s106 contributions is not clarified. A clear strategic approach to the allocation of s106 money and its intended destination drawn up by MTC would be beneficial.

6.5 Local infrastructure improvements, 'where opportunities arise through Section 106 agreements (or through the Community Infrastructure Levy) to secure financial contributions to invest in improving local infrastructure, the Councils will review the evidence base and community consultations for the MANP to inform their view in liaising with Wiltshire Council. This is in addition to the infrastructure projects that are proposed to be delivered through site specific policies in this Neighbourhood Plan.' A serious absence in the MANP is consideration of the AQMA and already significant issues with traffic congestion. These problems will only intensify as the population expands unless a strategic approach is taken which includes improvements in traffic infrastructure. A commitment from MTC to co-work with Wiltshire to support road infrastructure improvements using s106 (and CIL) should be stated within the MANP.

6.10 A town centre plan is strongly supported, however the restrictions of MARL5 may hamper creative use of the High Street. A mixed use of the High Street with a combination of retail, community spaces, business enterprise hubs and residential is preferable to empty retail spaces.

6.11 More detail is required on how the MTC intend to support improvements in air quality which are inevitably connected to vehicle use. Attempting to deal with these very significant issues within day-to-day business is unlikely to produce effective outcomes. A more robust and detailed strategic commitment is

required within the MANP.

Final comments. The hard work of the Steering Group is appreciated and the onerous complexity of the task is clear. However, there are deep local concerns around what appears to be a considerable expansion of the town population based on housing needs figures which are not easy to understand. Further clarification of the need for social housing — the number of bedrooms, rental, shared ownership or affordable purchase is still required. The positive ambitions of the MTC around green infrastructure, carbon sinking, the town centre plan, and a more recently expressed interest around strategic traffic assessments, should be used to counterbalance the potentially very negative impact of expansion on a physically constrained small town set in a valley with historic roads and limited infrastructure.

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General Infrastructure funding.

Whilst it is inevitable that some additional housing will be built in Marlborough, it is vital that this is supported by increased infrastructure and that, unlike the fiasco surrounding the Section 106 provision for the development by McCarthy Stone, developers must be compelled to pay for sufficient infrastructure improvement whether or not it reduces or removes profit.

MARL1 Salisbury Road footpath.

In the matter of pedestrian safety, and in the interest of encouraging people to walk instead of using cars, there have now been two major developments off the Salisbury road which were a missed opportunity to improve the very inadequate footpath along Salisbury Road. Anyone in any doubt of the danger should try walking up from Priorsfield to Tesco in commuting hours. The single narrow pavement means heavy vehicle wing-mirrors pass inches away from pedestrian heads. Also people walking in opposite directions are often forced to step off into the road. It seems only a matter of time before there is a serious incident along this footpath. Wider footpaths should be provided on both sides to encourage more frequent and safe pedestrian use between the town centre and a growing population at the South of the town. This will require some expensive retaining walls but is not impractical.

MARL2 George Lane Surgery.

The proposed move of the only Marlborough surgery is misguided and moves a facility away from the centre of town adjacent to a large car park. The George Lane Surgery site already has plenty of space. Its problems stem more from its inability to manage and retain an effective staff as evidenced by its poor performance in user surveys. A new surgery further away using funding from the "house building magic money tree" will not improve matters. A new and competing surgery in the west end of town might well improve performance. Also the George Lane plot on which the Pharmacy and Surgery stand benefits from a covenant which only permits one dwelling per plot.

MARL 6 Local Employment.

The emphasis on the existing plan seems to be on housing with a sop to include "affordable" housing. Unless more incentive and provision is made towards land for employment Marlborough will continue its slow decline into a "Dormitory" for the wealthier workers of Swindon combined with a plethora of retirement homes.

MARL 7 Improving Public Parking.

Improved parking will help the prosperity of the town, in particular the health of the High Street. However, the proposed additional parking near the Common is likely to be too far away for most.

MARL 15/16/17/18/19/20 Protecting and Improving the Environment.

I support all the measures proposed. Keep Marlborough a wonderful market town!

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In the current environment with COVID it is hard to envisage what the new vision will be for Marlborough and its working population. Working practices are changing and more people living remotely from their workplace. This means that at this point in time it is impossible to determine how things will be in the near future let alone 15 years. It is also very difficult to gain a full understanding of the impact when we cannot see what Preshute Parish will be doing. This could have an even bigger environmental impact on the area around the Barton Dene locality.

The Wiltshire Plan is separate from this NP and it is important that the need and wants of Marlborough folk are taken into consideration for this plan to be effective. With a years difference in these two plans would it not be more prudent to wait and have the final consultation on MANP at the same time to allow us to take into consideration the wider Wiltshire plan? The numbers of housing required are different in both plans so this makes it very difficult to anticipate the needs for the town.

There is confusion over exactly how many additional homes will be required and the sites proposed on greenfield seem to be in excess of what is actually required. There are many sites with planning permission already granted along with brownfield sites which could be used to achieve the requirements outlined by the Steering Group in 2016. In addition there seems to be no provision for additional infrastructure to support the additional families who will move to these houses. Marlborough's air quality is already poor and with the addition of more vehicles in the area it will be worse endangering the health of the inhabitants further.

Page 17 The need for more housing goes hand in hand with employment. In a time when we are looking at the environmental impact of travel Marlborough is not showing any new development for commerce or industry providing any employment for these new households. This means further commuters adding to the high level of pollution already recorded.

Page 18 Settlement Boundary at Barton Dene – current proposed land falls outside the agreed boundary for building. Several years ago the development in Barton Dene was taken beyond the existing settlement line and local residents were assured that this was not a creep of the building line but a one off to provide much needed housing for College Staff. It would now appear that this boundary can yet again be ignored. This area is a local nature spot where red kites, kestrels, buzzards, owls, and several species of woodpeckers can be seen, foxes and muntjac deer are seen in the valley and beautiful wildflowers grow. The animals use this corridor to move freely between the Preshute parish and Marlborough Town Community. The North Wessex Downs AONB would be detrimentally affected by any development in the Barton Dene area. This is in direct contrast to Core Policy 51. And Policy MARL18 The loss of the natural habitat would result in a decline in biodiversity in this area having serious consequences where mammals and insects live and breed which all aid the farmers and nature to thrive. It is also a huge benefit to locals who enjoy this space particularly now we have had the lockdown and chance to truly appreciate the local scenery.

Page 25 Barton Dene Development would be outside of the town development line. As per Core Policy 2 – defines a boundary/limit of development for Marlborough and limits development in Manton to infill within the existing built area.

I note with concern that a parking area that the College assured us was temporary a few years ago is showing on this plan. This land should be made back to green field as they committed at the end of the construction of the boarding house on the A4 / College Fields junction. As mentioned above the College made assurances to the local community that no further development would be required in Barton Dene once they had completed the staff housing at that time. If the housing options can be met from brownfield and current planning permissions would it be necessary to destroy this green space. If locals are

able to access the affordable housing in the plan from the permissions already granted and converting the brownfield sites such as the Police station is it necessary to steal places such as Kelham gardens, Rabley Wood and Barton Deen and choppingknife lane?

The need to relocate the Medical Centre from a central location to an area on the edge of town with limited parking and transport infrastructure is concerning. The parking currently in college Fields obstructs the traffic flow already – the addition of more housing and a large medical centre would create a danger and potential hazard to children of the area as they walk to class and to the community as they move around the town. The old Police Station which is a large area was declined for some reason but would have been much better location and more accessible to the public as a whole. The additional transport and parking required for a medical centre will require a restructuring of the roads and public transport routes with cycle paths and footpaths into and out of College Fields to accommodate the large addition of traffic. None of this is included in the plan.

#### Car parking on the common

Page 34 It is clear that there is insufficient parking in the town. Although anything that brings more cars to Town will increase the already poor record for air quality that the Town has. The common is an amenity to all the community but converting a portion to car parking would ruin the biodiversity of the land and restrict access for recreational purposes. The common is gradually being eroded and the destruction of it to provide additional parking should not be allowed. People use this space for recreation and wellbeing which would no longer be possible with a car park there. This comes on top of the suggestion that more of the common should be taken for use as an additional football / rugby pitch and this has caused a huge discussion. How much worse to lose it to cars?

#### General

##### Sports and Recreation

There seems to be a lack of sporting provision in the NP. With the addition of many new families to the area there needs to be additional space for existing clubs to expand and for new provision for recreation and leisure. It is critical that we ensure that there are safe protected environments in the plan for future residents to enjoy healthy outdoor activities and recreation. It would be good if this could be added to the plan.

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More sustainable transport needed  
Better walking routes from east of town to Tesco's  
More emphasis on affordable house it within walking distance of town centre  
More shops of use to local people  
Leisure centre update needs emphasis  
Less light pollution  
Less encroachment on common by sports clubs  
No unsightly billboards on common  
Protect open spaces from Wiltshire Council sell offs

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By default, where consideration is given to the needs of pedestrians/cyclists (e.g. footpaths, cycleways) the needs of horse riders should be included. Horse riders are, along with walkers and cyclists, considered to be vulnerable road users and the planning process should aim to take every opportunity to provide the means by which they can avoid motorised traffic, both by enhancing existing bridleways and byways connecting communities and by creating new ones and enhanced connectivity.

Every opportunity should be taken to achieve a net gain to the rights of way network for vulnerable road users (footpaths, bridleways and byways) when considering development, whether it be housing or industrial.

Page 23 MARL1 PRES32 is not affected by this proposal

Page 23 MARL1 It is not only necessary to “retain” impacted rights of way but it is also necessary, as per planning guidance, to avoid wherever possible their diversion onto estate roads. It is important that what makes a route attractive to its users (e.g. its rural nature, or its grass surface) is retained wherever possible.

Page 43, MARL15 Para A does not mention the Public Rights of Way network as being part of Green Infrastructure, even although public footpaths, bridleways and byways are shown on the policies map. This should be explicitly included. “Off-street footpaths/cycleways” is not the same thing.

Para 5.45 I don’t know if “walking, cycling and recreation” is a direct quote but if not it needs to be amended to make clear it includes horse riding and carriage driving; if it is then the same point needs to be made elsewhere.

General It should be incumbent on Parish Councils to seek input from interested organisations (e.g. the Ramblers, the BHS) when considering changes that could impact, for example, the Green Infrastructure. Parish Councils need a shift in mindset when considering whether, for example, a right of way is “needed”, and the presumption should always be that it is.

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### Response to Pre-submission Neighbourhood Plan

These comments are made on behalf of the St John's Close Residents' Association (SJ RA).

SJ RA wish to comment on two items from the Pre-Submission Neighbourhood Plan:

1. Policy MARL 11: Enhancing Marlborough's Areas of Special Quality - specifically, the proposed Area of Special Quality B at St John's Close; and,
2. Policy MARL 7: Improving Public Parking - specifically, the proposed new parking area on The Common at the Rugby Club.

#### MARL11

##### Comment 1. Proposed Area of Special Quality at St John's Close

With regard to Inset Map MARL 11: SJ RA appreciates and AGREES with the designation of an Area of Special Quality at St John's Close which covers both the original housing and the central area defined by the housing on three sides and Cross Lane on the fourth side. We also agree that the central space is integral to the setting of the houses.

We appreciate the description of the area in the Town Character Study (August 2020) but wish to point out a few minor discrepancies:

##### Age of and layout of properties

- The Town Character Study (para 3.13) refers to the houses as

dating from the 1920s. The houses are from slightly earlier date. A plaque on the wall between numbers 15 and 16 is dated 1908. This is significant because this terrace of 6 houses is a direct copy of the award winning terrace of houses from the Letchworth Garden City Urban Cottages housing competition held in 1907. SJ RA can provide photographs and other details relating to the Letchworth cottages designed by architect C M Crickmer. The award winning cottages are found at 110-120 Pixmore Way, Letchworth. A photograph of this notable terrace can be seen on the RIBA website: <https://www.architecture.com/image-library/ribapix/gallery-product/poster/110120-pixmore-way-leitchworth-garden-city/posterid/RIBA9849.html>

- The Town Character Study (para 3.14 and also in the table at

Appendix A) identifies two rows of cottages along the eastern side of St John's Close, backing onto the Common. Please note that these consist of a terrace of 4 cottages (numbers 9 to 12) and a terrace of 6 cottages (numbers 13 to 18) - not two terraces of 4 cottages;

#### MARL7

##### COMMENT 2. PROPOSED ADDITIONAL PARKING AT RUGBY CLUB, MARLBOROUGH COMMON

SJ RA has CONCERNS regarding the proposed additional parking adjacent to the Rugby Club on Marlborough Common.

- SH RA notes that this is the only area for additional public parking proposed in the Pre-Submission Neighbourhood Plan and that the proposed parking is for general public use to relieve parking pressure in the town as a whole.
- SJ RA understands that the parking proposed in the Pre-Submission Neighbourhood Plan is not related to the other current Marlborough Town Council consultation regarding a proposed permanent training area for the Rugby Club. We understand that all additional parking for the training area proposal will be provided elsewhere on the Common itself;
- SJ RA does not understand how Registered Common Land can be turned into general public parking (as opposed to sports related parking). We ask that it is confirmed that this proposed use is allowable under legislation relating to Registered Commons, including the various Commons Acts, the Countryside and Rights of Way Act and any other relevant legislation. We note that any such proposals would need to be approved by the Commons Commissioner through a tribunal process, and that this is separate to the provisions of town and country planning;
- Given that the proposed public parking is at the top of a steep hill and some walking distance from the centre of the town, we are concerned that the proposed parking will do little to achieve the stated objectives of relieving pressure on town centre parking;
- SJRA notes that the Town Character Study describes and identifies key views from Hyde Lane and the far side of the Common towards the Grade II Listed former workhouse (now St Luke's Court) and the rear of numbers 9 to 18 St John's Close. SJRA consider that a large area of public parking will detract from the identified important views;



• SJRA are concerned that any gains in additional car parking spaces adjacent to the Rugby Club will be off set against the potential loss of existing on road car parking spaces adjacent to St Luke's Court (approximately 8) and along Free's Avenue (approximately 20 between the top of Kingsbury Hill and Hyde Lane), due to potential road safety requirements accessing the expanded car parking area and to prevent further traffic safety concerns in these areas. Should the additional car parking area come forward, we note the design requirements set out in the Town Character Study and in Policy MARL 7 within the Pre-Submission Plan, namely: surface permeability; aesthetics of the area; setting of the adjacent listed building; limiting access to cars rather than high-sided vehicles.

We also note that point 6 of Policy MARL 7 states "Any impact on the amenities of adjoining residents can be satisfactorily mitigated." In regard to this we ask that any proposals additionally consider the following points:

- Light pollution - the current Rugby Club car park features non-directional lighting attached to the Rugby Club building which is frequently left on over night and creates unwelcome glare, disturbing some properties within St John's Close and also having a negative impact on the use of the area by mammals, birds etc which are active at night.
- Adding to the effects of existing traffic queuing to pass along part of Free's Avenue due to existing roadside parking - more cars using the proposed car park will add to existing speedingsp, visibility and safety concerns.

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The plan seems to be to load more and more houses in the Marlborough area with little more than acknowledgement of the issues to actually address the impact this will cause with extra traffic, parking requirements, employment, leisure, medical and schooling needs of this additional population.

- Traffic is already a massive issue in Marlborough. During the last estate build near Tesco the opportunity was lost to build a southern relief road to reduce 'east/west' strain on George Lane and the High Street. This type of additional road infrastructure is desperately needed due to the frequent hideous traffic jams in the town centre, especially centred around the double mini roundabout. The traffic implications for the Tesco site were brushed under the carpet with a report that said there were no traffic issues on that stretch of road, a conclusion that everyone who uses that road knows was a sham. Having a plan which doesn't recognise or address the traffic implications of development short-sighted and destructive. Before any more development takes place we need to take a long hard look at how traffic levels are better managed, especially through traffic. This would also help address pollution.

- Elcot Land development.

1) Access is a major issue. Anyone familiar with the St John's Park estate knows the roads and parking element of the build are a disaster. The current roads are totally unsuitable to be used as access through roads for further developments. Off road parking is very limited and even that is compromised as the garages and driveways are too narrow to fit a family car. As a consequence cars are littered all over the very narrow roads of this estate. Due to the estate's location outside town, car ownership is high and will only get higher as more of the currently predominantly under 16 child population start driving. Estate roads, including the Choppingknife lane access, are effectively single track including round blind bends. Delivery trucks are regularly unable to access meaning fire engines too would not be able to fit. It's also lethal in winter due to the shaded, north facing slope. Minor accidents and near misses are common (I've seen several myself) and the recent additional safety measure have had very little impact. Putting more double yellows down will just shift the problem somewhere else. The proposed new estate access via White Horse road would entail even more cars travelling round the treacherous single track blind bend by the flats where it's already downright dangerous. Access off Elcot would be far more sensible, and if that's not possible the plan should be scrapped altogether. It was obvious from the start that developers would want to extend the estate on that piece of land, and they should have thought about it when they planned the original road structure to accommodate it.

2) Impact on the AONB and access to open space. Despite talking about the importance of open space and protecting the river valley this development is slated which will negatively impact the view of the valley and the nearest open land access for 100's of residents from the Elcot and St Johns park areas.

- Parking. The plan goes on about how there isn't enough but offers no solution except to say it will be an ongoing problem. This is unacceptable. Without parking the shopping businesses can't thrive, and cars will go in circles trying to find spaces making traffic/pollution worse. People will also avoid the town altogether. As the town's housing expands fewer people can walk in and need to drive and park. The reason there's no land for parking is because every time land in the town centre does become available (St Peter's site, Kelham gardens new site, doctors current site, site off Waitrose car park, old Marlborough builders site off the A4, old Renault garage by the Scout Hut...) it's immediately allocated to housing! And the High Street could potentially have a double row of cars in the middle as is often the case when it snows and people can't see the lines. The expended pavement seating areas outside most pubs/cafes were not used and simply meant less free parking, another thing that's important to support business, so please don't make this permanent.

- Housing. Pleased to see it's acknowledged in the plan there is far too much senior housing already built and very little affordable. Please put a stop on further blatant developer profiteering into this demographic. Why are so many new homes needed in the Marlborough itself vs surrounding villages or bigger towns?? Pleased to see an attempt to protect public open spaces from development.

- Health services. Welcome to see the health provision is recognised as an issue. Getting a doctors appointment currently can take 6 weeks+. It's not just about facilities, which increasingly overstretched due to all the new (especially senior) developments but need for more actual doctors in the Marlborough (not Pewsey) surgery. I can't see this being addressed.

- Business premises. Point echoes the parking comment above but relates to the areas further out of town. The plan calls for more land for business and to boost employment meanwhile allocating all available land to housing.

	<p>- Residential parking. Being a resident of the St John's Park estate, where parking is a disaster, estate roads dangerous and access compromised, please do not repeat the same mistakes with new builds. Put in decent wide access roads, driveways and decent sized garages like on the college fields estate. Making it hard/painful/dangerous for people to park won't stop them needing and buying cars.</p> <p>- Schooling. The main Marlborough St Mary's primary school is now at its limit in terms of Reception level intake. More primary capacity will be required for the town to keep growing. Not sure about St Johns but know the 6th form is already overstretched.</p> <p>- Leisure facilities. Not seeing much about this in the plan. More people means more facilities will be required and current ones are already overstretched. Swimming lessons and family swim sessions are maxed. Parking is often an issue. The current swimming pool especially is in a late stage of decay and needs seriously refurbishing or replacing like the facility in Pewsey. The changing rooms there are also frankly disgusting. If the Barton Dene is being developed can expanded leisure facilities be added like a sports field for the leisure centre site, new swimming pool etc??</p> <p>In summary, this plan seems mostly to be about adding as many house as possible and then identifying but ignoring the issues caused. For a happy, thriving town more needs to be added to address the the two in tandem.</p>
162	<p>A neighbourhood plan cannot pre-date or preempt the Local Plan made by the planning authority, in this case Wiltshire Council. Wiltshire Council's draft Local Plan for 2026 to 2036 is at present available for consultation and will not be made until late 2023 at the earliest. Therefore the draft MANP can at present only extend to 2026 and a new plan would be required for the period to 2036 with consultations beginning in 2024 at the earliest. Only then would it be possible give coherent comment on any proposals.</p> <p>It is difficult to understand how this approach could be approved by the planning authority.</p> <p>Meanwhile the withdrawal of Preshute Council demonstrates serious misgivings about the content of the draft neighbourhood plan as published. Without gaining community support it is surely unlikely that the draft plan will receive approval in the referendum.</p>
163	<p>MARL 1</p> <p>The town has a number of building projects already in the pipeline – a commitment to another 440 houses of a mixed specification, so does not need another 180 houses included.</p> <p>If the medical centre is to be relocated to the site of the existing leisure centre what are the arrangements for car parking and bus routes to allow elderly/ disabled residents easy access to the facility. Equally where is the leisure centre going to be relocated so that it is still accessible.</p> <p>The plan stipulates that there is limited scope to develop industrial/ business facilities within the town so if there are going to be no new jobs for people why build more houses and by doing so increase the amount of commuting and therefore air pollution.</p>

164	<p>I have a general concern with the size and number of developments being proposed. I think it is excessive for a small market town with limited employment and facilities.</p> <p>I feel the proposed number of new dwellings will result in owners having to commute out of the town for employment, increase the already existing traffic issues and put untold demand on our utility services and social requirements such as doctors. I understand the plan includes a new medical centre/surgery; but the current situation is already in high demand with not enough medical staff to satisfy the need.</p> <p>There seems to be an 'obsession' with social housing when the demand is not in excess of the provision already made.</p>
165	<p>Marl 1 Land off Elcot Lane</p> <p>On paper this looks a well-designed plan with a lower density of houses in comparison to the adjacent St John's Park (SJP). A major fault with this site is that the proposed access road from White Horse Road, SJP, does not take into consideration the major existing problems with lack of parking for residents of SJP. The estate roads are choked with parked vehicles and restrictions of movement caused by parked cars is a daily problem. This will only be exacerbated by additional vehicle movements to and from the proposed new development on Elcot Lane 1 and the SJP parking problems could well engulf the new estate and the quality of life for both sets of residents would be severely affected.</p> <p>There is also an existing safety issue here with regards to children from SJP having to cross White Horse Road to the play area with so many parked cars along the side of the road. Additional vehicles accessing the proposed new development would present a road safety issue.</p> <p>Kelham Gardens Development (also Marl 15)</p> <p>The MANP is following NPPF guidance and Government Green policies in identifying locations where the green infrastructure can be linked together to promote safer walking and cycling routes around the town. This land where Kelham Gardens, Rawlingswell Lane (land that may well be developed within 10 years) and Stone Bridge Lane could be used to provide a very useful walking and cycling path from the west of the town to the countryside and other cycle paths on the east of the town. People on the east of the town could then access the town centre with very little contact with the main roads that are busy and much polluted. It would be short sighted to encourage development on this small piece of land and not to take the longer view to plan to create a green and safe connection which would realise massive benefits for the health and safety of the community.</p> <p>Land at Barton Dene</p> <p>Although all development with the town is built in the AONB this area is tucked away in a valley and will be less intrusive than most other developments proposed or already in existence. The fact that an area of land has been provided for a new or additional medical practice or facility will ensure that there is at least an option for future decisions as land within the town is a rarity.</p> <p>Land off Cherry Orchard</p> <p>Residential development on this site is well overdue. It is an abandoned eyesore and it will be a relief to local residents when it is developed and provides some further affordable housing for the local community.</p> <p>With regards to the development of homes in the MANP, I would like to see a slow release of these pieces of land for development. So often the release of a Neighbourhood Plan creates a frenetic period of house building as land for development becomes identified.</p> <p>Young local people have had problems in accessing affordable homes in the area for over 50 years. Whilst it is good to address this problem planning permission should be given sustainably over a number of years. There must be an infinite number of local young people looking for housing and if all the sparse land is developed in the next few years there will not be enough land to sustain a steady supply and release and so the future affordable housing will be taken up by other than local people. It is important to have a balance of age groups within the town particularly as the local older population give support to young families and will possibly need support themselves from their families in the future.</p> <p>Marl4 Meeting Local Housing Needs</p>

Strongly support this policy.

**Marl 15 Protecting and Improving Green Infrastructure**

This is a good opportunity to identify and protect areas where new footpaths and cycle ways can be used to create safe, healthy and carbon neutral ways of accessing the town and countryside. Three of the routes marked on the map are a high priority to protect the community as they access the facilities in the town and countryside in a safe manner. There are probably other areas which local members of the community could identify to reduce the overuse of cars on MANP roads.

**Marl17 Protecting Local Green Spaces**

There is a shortfall in the provision of playing pitches at present and additional pressures have been identified for sporting facilities in the future in the public domain and within educational settings in the MANP area. Is the NPPF guidance enough protection for local sports grounds or should these areas be added to the Marl 17 policy?

**Marl18 Conserving the Scenic Beauty of the AONB**

To stop the coalescence of the village of Minal and Marlborough and to protect specific escarpments of the MANP area this policy should be worded more strongly and specifically as illustrated in some of the support documents for Regulation 14.

**Additional Policy**

There should be an additional policy whereby, when Wiltshire Open Space and Play Area Study and Wiltshire Playing Pitches Strategy and local Councils identify the shortfall in provision in the MANP Area, CIL payments are secured so that the recreational infrastructure is realised alongside the development of housing.

**MARL11:**

Enhancing Marlborough's Areas of Special Quality I agree with the proposed designation of Area Special Quality B: St John's Close as defined on Inset Map MARL11.

**MARL7:**

Improving Public Parking and MARL8: Delivering New Cemetery Land

I appreciate and have sympathies with the difficulties with regard to general car parking in Marlborough and also the need to extend the town Cemetery. Unfortunately, the options proposed are inappropriate uses of Registered Common land as set out below.

Both the proposed extension to the car park for to relieve car parking elsewhere in Marlborough and the proposed extension of the Cemetery onto Registered Common Land are not permissible under the Commons Act 2006.

Both these proposed uses fall under the category of "D. Works not consistent with use and enjoyment of the land as common land" as defined on "Common Land Guidance Sheet 1a - Consent to construct works on Common Land" prepared by the Planning Inspectorate in April 2020.

Within the table at the Annex to Guidance Sheet 1a, "Burial Grounds" are specifically listed as an example at section (b) Buildings and other structures. "Car Parks" are listed at section (d) Resurfacing works.

This also applies to extensions to existing car parks on Registered Commons.

The guidance note states that for examples listed in "D. Works not consistent with use and enjoyment of the land as common land", it would be necessary to deregister the Common for these uses and to offer land in exchange for the area required for these works.

The Pre-Submission Neighbourhood Plan does not offer any alternative land to compensate for these uses.

I therefore object to the proposals to extend the current car park on The Common and also to the extension to the Cemetery - due to loss of Registered Common land.

I also note that there is currently a separate public consultation regarding a proposed permanent training facility for the Rugby Club on other nearby land on the Registered Common. Combined with the proposed extensions to the Cemetery and the existing car parking area, these represent a further unacceptable diminishment of The Common for use by the general public for informal recreational uses such as walking, picnics, jogging and dog walking.

The Common is an important asset for the whole community and should be kept as an open space, with permanently unimpeded public access, for the benefit of the residents of the town.

This response contained images.

I feel privileged to live in Marlborough town and its surrounding area of outstanding natural beauty. For this reason, I would argue that further greenfield development of the area should be curtailed, and future further development should be restricted to brownfield sites only. Why?

Marlborough is an attractive market town because of its size and high street. A tourist attraction and shopping destination for surrounding villages, delivering a high level of footfall and spending to the town, at a time when many UK towns are experiencing economic degradation in the high street.

There is a balance however, increasing the size and population of the town beyond a certain point will tip that balance - I strongly feel that any overdevelopment will result in Marlborough losing its market town uniqueness and surrounding natural beauty – The UK has many examples of failed towns and inner-city developments, can we learn from these and keep Marlborough special.

1: Land off Elcot Lane

1. The housing scheme shall comprise approx. 50 homes on a developable area of approx. 2 Ha.
2. The housing scheme shall comprise a tenure mix of 50% affordable housing and 50% open market housing.
3. The scheme shall have a main highways access on to White Horse Road.

Comments on point 3, main highways access to proposed housing scheme on to White Horse Road:

(a) White Horse Road is currently congested due to on street parking for 90% of its length. This effectively makes White Horse Road and Chopping Knife Lane a single-track route with a single passing place, created by double yellow lines at the junction of White Horse Road and Chopping Knife Lane as shown in Figure 1.0 (below).

The red line shown in figure 1.0 indicates the route of main highway access to the proposed housing scheme (approximately 300m of Chopping Knife lane from the A4 junction to the junction with White Horse Road and along White Horse Road a further 200m).

(b) Figure 1, taken in April 2020 during the week at midday, highlights the congestion along Chopping knife lane and White Horse Road, due to on street parking during the hours: 15.30pm to 09.00am on weekdays and all weekends. (Note: during COVID lockdowns, White Horse Road and Chopping Knife Lane are congested 24 hours a day, seven days a week)

Figure 1.0 Aerial view of existing Crest development, showing White Horse Road and part of Chopping Knife Lane

(c) Figure 2, shows White Horse Road (looking south)

Figure 2.0 White Horse Road looking south

Figure 3.0 Looking north-east on White Horse road from the junction of Chopping Knife Lane.

Figure 4.0 Looking West along Chopping Knife lane from the junction to White Horse and Vespasian Road.

The proposal to use Chopping Knife Lane and White Horse road as the main highway, or even a secondary access to proposed housing scheme is untenable for the following reasons:

- Existing congestion due to on-street parking (as detailed in points (a) and (b), figures 1-4 above) – In summary, “This effectively makes White Horse Road and Chopping Knife Lane single-track roads with a single passing place, created by double yellow lines at the junction of White Horse Road and Chopping Knife Lane”.
- Emergency vehicle access:
  - o larger fire service vehicles currently have to mount the pavement to access houses along the north route of White Horse Road due to on street parking.
  - o delay to Fire, Ambulance and Paramedic services reaching casualties when encountering vehicles driving the opposite way along White Horse Road and Chopping Knife Lane due to on street parking.
- Delays and roadblocking caused by delivery service vehicles and council waste services.
- Further traffic congestion and negative air quality impact of potentially 100 additional vehicles (2 vehicles per household based on vehicle numbers in Crest development) using White Horse Road and Chopping Knife Lane, if the proposed scheme goes ahead.

4. The layout, the form of housing and the landscape scheme shall be designed in such a way as to conserve the landscape and scenic beauty of the AONB

5. 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

6. 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

Comments on point 6, Biodiversity strategy.

(a) With the increased use and enjoyment of our footpaths in the area, the biodiversity strategy must consider the impacts of human and pet pollution on the biodiversity of the locality, specifically:

i. Additional litter dropped along footpaths and riverbank rights of way,

ii. Dog fouling along footpaths (dog waste is generally removed by owners on pavements, but not along any of the footpaths in the valley, there is now a build-up of dog fouling at the start of all footpaths in the valley).

7. The layout shall 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



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This response contained images. I am writing to express my concerns over the neighbourhood development plan for St John's Park, Choppingknife Lane, Marlborough.

The proposal to develop "Affordable Homes" in the land off Elcot Lane, is rather misleading in itself as it seems that Elcot Lane will not play much of a part in the development other than in the case of allowing emergency access to the area in the event of fires or such like.

With regard to the traffic and vehicle management in the development, it is now possible with the benefit of hindsight to see the shortcomings of the existing park. A combination of inadequate parking for residents, and the extremely limited access for traffic entering or leaving the area has lead to congestion and dangerous road conditions throughout the estate, particularly along the western end of Chopping Knife Lane, hereinafter referred to as 'CKL'. My principal objection to the proposed development area arises from the additional pressure that will be put on the vehicular access to both the proposed and existing developments.

It is fair to assume that the proposed development of 50 homes would increase the number of vehicles, (mainly cars and vans) requiring access, by at least 75 or so vehicles. This is based on the reasonable assumption of every household having an average of 1.5 vehicles. Despite the plan detailing that access to the development would be via White Horse road, this is only part of the story. ,

PICTURE 1 : Chopping Knife Lane showing the 'single track' effect caused by parked cars. This is the principal access to the existing and proposed development.

PICTURE 2 : Shows the effect of cars entering or leaving the area having to weave in and out of gaps (when available) to allow oncoming cars to progress.

As the principal access to White Horse Road is via the western end of Choppingknife Lane, by my conservative reckoning development would lead to an increase of at least 33% in traffic throughout each day. Each time anyone needs to make a journey to the shops, to work, to schools, or any other arrangement necessitating travel, the vast majority of this extra traffic entering or leaving ST John's Park will pass along CKL.

This road is extremely busy at peak times during the morning period between 7.30am and 9.00am, and again in the evenings between 4.30pm and 6.30pm. CKL at this point is effectively a single track road. (See photos herewith). With residents parking outside their homes along the roadside, all vehicles heading in or out of the area invariably need to wait as required to allow other road users to pass through the 200 yards or so of single track wchich constitutes this bottleneck. The effect of this is to cause drivers to speed up as they pass through the section. The 20 mph speed restriction along this stretch has absolutely NO effect on the traffic. Neither does the ludicrous 'traffic calming' obstacle which was constructed in the road, as local residents are perfectly aware of how to position their vehicles while passing over the hump without needing to reduce their speed. (NOTE. As can be seen in the photo, parked cars park over one of the traffic calming humps, rendering it useless !). In fact, speed has become quite an issue at this point, as motorists attempt to pass through in the quickest possible time to appease the motorists who are forced to wait at either end of the bottleneck. The estimated 33% increase in traffic will in all likelihood equate to 33% extra danger to pedestrians, cyclists, and all other road users.

Over the lifetime of the development, the volume of 'Service traffic' needing access to the development has grown out of all recognition, especially with the increased volumes of home deliveries spawned during by the lockdown periods. Due to the enormous increase of on-line purchasing, there has been an endless stream of white home delivery vans driving in and out of the area at all times of the day. 50 extra homes would undoubtedly create even more of this sort of traffic along CKL, and would exacerbate the congestion and the danger.

One other aspect that needs to be given consideration, is the current volume of traffic using the entire length of Choppingknife Lane, as a 'Rat Run'. This is the 1.75 mile stretch of CKL from the junction at the bottom of Stitchcombe Hill to its junction with London Road. At peak times, any pedestrians using this formerly quiet country lane for exercise now take their lives in their hands as they encounter a significant volume of passing motorists exceeding the speed limits along the lane. More residents in St John's Park would undoubtedly add to this problem.

Parking in St John's Park is already inadequate, and those unable to park in the vicinity of their homes think little of parking wherever they can. Visitors, especially at weekends add significantly to, and exacerbate the problem.

In summary, 50 extra homes and the resulting additional traffic, would make road access to the development via an existing inadequate road system to become significantly worse for all existing residents. This would impact significantly on the quality of life to residents and affect the amenity of the area. I would ask that plans for this development should not be pursued.

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There was no text in this response

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I can see that the preparation of a Neighbourhood Plan for the Marlborough Area has been the focus of much time and effort. As a resident I do not have the capacity to look forensically at all the detail and policies and I hope that ARK (Action for the River Kennet) a respected Rivers Trust Charity will make comment and add to the document. For example it references Stonebridge Meadow; this is a key natural resource for the community but it does not say that it is part owned by the Town Council and ARK and that since its purchase high quality environmental projects have been carried out by ARK Volunteers who are residents of Marlborough and the surrounding villages

Also that other interest groups will be listened to and heard.

Corrections

Para 2.12 St Johns should be referred to as an Academy; it is part of the successful Excalibur Multi Academy Trust. It hasn't had the name community college for a long time!

A protected landscape

Marlborough and Manton are in the North Wessex Downs AONB. The primary purpose of AONB designation is to conserve and enhance the natural beauty of the area, as confirmed by Section 82 of the Countryside and Rights of Way Act 2000 (CRoW Act). Section 85 of the CRoW Act places a duty on all relevant authorities to have regard to this purpose in exercising or performing any functions in relation to or affecting land in AONBs. This is very important and if we are trying to use the planning system to provide affordable housing and to make sure that change does not adversely affect our environment we should use planning terminology and the word "scenic" is used all the time in this document and I do not know what it means not I would think would a Planning Inspector.

It is the this legislation and that of the National Parks Act 1949 that talks about "natural beauty" and to conserve and enhance. In the MNP the use of the word " scenic" is unhelpful in a planning context . It also in the same context talks about conserve only and this has negative connotations the legislation and national policies relevant to protected landscapes all talk about conserve AND enhance. There is an understanding that we are living in a working landscape. A key element of the NPPF's 'environmental objective' (supporting the defined purpose of the planning system to contribute to achieving sustainable development) is the protection and enhancement of the natural, built and historic environment.

Housing S106 & CIL Affordable Housing MARL1

All residents should be concerned that development happens in the right place and that our young people should be able to afford to live in the area should they so wish. I have read the Wiltshire Local Plan consultation and it is clear that for this area there is sufficient sites already in the pipeline to meet the regional requirements (not all houses have to be built in Marlborough) We would only need another 30 in the pipeline to meet the requirements of the life of this plan to 2039.

However specifically for the sites identified as "additional" so of 170 of which only 78 are affordable and unfortunately in Marlborough there is not a good track record of holding developers to account and ensuring they do deliver. I am very cautious about this. I think we need to look for other sites and not those more difficult to develop. I would always favour brownfield sites.

Salisbury Road site – I object The site does not form part of the current Redrow site.. Its location in an upper valley away from the main settlement gives it a strong rural character and development of this would incongruous and it would be visible from the A345 which affects the approach into and out of Marlborough.

Barton Dean – Could accommodate some development but not this number. The site is steep!! And must require significant engineering works. I do not see how legally using planning conditions or otherwise you can ensure that 10% are rented for Marlborough College Staff – it is difficult enough to hold the developer to the % of affordable homes. I think we saw this with the Clarke & Rodway Garage Site at the bottom of George Lane?

Also we cannot afford with an ageing population to close a surgery before a fully functional surgery/health centre is fully operational. And as I said before the topography of the site means that it will be costly to develop and the first thing a developer will do is to negotiate a reduction in planning gain.

Cherry Orchard – I don't think you could fit 30 dwellings on this site , perhaps less. It is a brownfield site but the adjacent former railway line is a Bat Corridor.

	<p>I would also like to see more about infrastructure such as sewage treatment.</p> <p>Lighting One of the issues I find most annoying is the way Marlborough College contributes to light pollution. I know that the Town Council sees dark skies as important and I would suggest that rather than talking about a dark skies festival you include reference to the AONB Position Statement on Dark Skies and any guidance that is issued.</p> <p>Finally Can we try and achieve some good design in new development; Marlberg is unattractive and doesn't seem to have any environmental credentials such as solar panels? And the plots seem very small!</p> <p>Again an epic task and all my comments are meant to be constructive.</p>
171	<p>MARL1</p> <p>We object to proposal ( A2 ) to designate 2 ha for the construction of a further 50 houses in addition to the 175 houses plus hotel already being constructed on land to the west of Salisbury Road. This area is an AONB and the proposed high density of the housing will be out of keeping with the area. Traffic on Salisbury Road is already very heavy and would be further increased if the proposed development were to go ahead.</p> <p>We also object to proposal ( A4 ) to build 30 houses on a 1 ha site off Cherry Orchard. This development would be adjacent to the southern boundary of our property and would overlook our garden and conservatory particularly if the upper windows of the houses were above the 150 m contour which runs through the middle of our garden ( the old adult training centre was only single storey ).. Another concern is the extra traffic which will be generated on Cherry Orchard which is of limited capacity because of cars almost always parked on the west side of the road.</p> <p>In the last few years 48 houses have been built on the north side of Upper Churchfields and 175 houses plus a hotel on land to the south</p> <p>We presently have a lot of wildlife in our garden ( pheasant, muntjack deer, woodpeckers, ducks, hedgehogs, grass snakes, adders, squirrels, herons etc. ) which we fear will lose habitat if we find ourselves in the middle of a large estate of high density housing.</p>

172	<p>MARL1 P24 and P26</p> <p>I am disappointed to read that the Marlborough Neighbourhood Plan proposes the siting of 80 houses to the West of Salisbury road– 30 houses on the site of Postern house (4: Land off Cherry Orchard p26) and 50 in the field next to the Old Railway line (2: Land Rear of Salisbury Road p24)</p> <p>If this proposal goes ahead it will mean that the Old Railway Line with the Bat colony in the disused railway tunnel will now be surrounded on 3 sides by housing which is a net loss (rather than a net gain to biodiversity as purported in your plan).</p> <p>I am also very worried about the proposal to cut an access road from Marleberg Grange through the Old Railway Line thus not minimising but destroying the small tract of land there which is so important for wildlife and culminates in a the old tunnel housing the bat colony: To quote from p24 of the plan: The 50 houses in the field will “have a main highways access to Salisbury Road via the new Marleberg Grange scheme which minimises the loss of land of biodiversity interest on the former railway line”. Surely there are other brownfield sites available for development in Marlborough without having to resort to building again on a field and increasing the sprawl of residential homes in this area with negative environmental impact. If the 50 houses in that field are permitted to go ahead then I can see further development in that area up to Pantawick Woods and further on to the Pewsey road.</p> <p>Pages 24 and 26 of the MARL1 proposal also means that this small area of Marlborough is taking the brunt of the new housing development in Marlborough with almost half of the 170 new houses proposed in the plan sited here.</p> <p>I also have reservations on the housing density of 30 houses on the 1.0Ha site((4: Land off Cherry Orchard p26) – this seems too dense for the area and will add to the congestion that is already high in Cherry Orchard.</p> <p>Rather worryingly also is the fact that some of my neighbours in Upper Churchfields do not appear to have received the flyer and I was only alerted to it by another neighbour in Cherry Orchard.</p>
173	<p>Core Policy 43 – designating Marlborough and the surrounding area as a 40% affordable housing zone, requiring site of five or more dwellings to provide at least 40% affordable homes. Surely this is unrealistic unless Wiltshire Council builds them. Also there is no point in building them, if they can then be sold on the open market and the town is later on left with no affordable houses.</p> <p>Core Policy 51 – recognising the importance of designated landscapes like the North Wessex Downs AONB. If this is the case they should not be considering land at Barton Dean, especially as the land higher up is in an AONB and developing lower on the site will simply open up that whole ‘parcel’ of land in future for development</p> <p>3: Land at Barton Dene</p> <p>This site would be totally inappropriate for a new health centre as access is poor for people on foot, especially older people who access the GP most. It isn’t on a regular bus route either. Also being on the west side of town would mean more use of vehicles to access the centre. Is it a developer thinking this would be a good idea or do the GPs want a new health centre as they will be footing the bill? I can’t believe it somehow since they have huge difficulty recruiting GPs, this being the reason why they had to join forces with Pewsey Surgery a few years ago, so I cannot understand why they think they can expand (if that is their plan). If they were more forward thinking they could consider redeveloping the site they are on – a complete rebuild with a lift so upstairs could be used and sort out an arrangement whereby their staff used the public car park (through an agreement with Wiltshire Council) and the current car park was used for patients, which would more than double the current car park. This is in a far better central position. If they had thought about it a bit earlier they could have purchased the Vauxhall garage site or even consider the Old Police Station. There is a lot of housing for older people near the current GP practice where patients can walk to the surgery – there are no similar housing for older people anywhere near Barton Dean. Travelling by car will increase considerably as will demand for the local community transport scheme.</p> <p>Furthermore, if a health centre should go ahead it should not be seen as a community benefit/mitigation for the houses as GPs are independent contractors and should be providing their own facilities with support from the CCG.</p> <p>If a health centre does end up on this site there should be a caveat to allow more parking than probably the Planning regs allow, otherwise the parking for users will not improve.</p>

	<p>Policy MARL6: Using Scarce Employment Land Efficiently          If there are no employment sites identified why are there so many houses to be built? While more people may be able to work sometime from home, this suggests with no additional employment locally people will be driving further afield, which is not sustainable for the environment.</p> <p>Policy MARL7: Improving Public Parking          While a car park up on the Common might improve parking for local residents, I fear it is highly unlikely that any visitor to the town will be willing to trek up and down Kingsbury Street, which is horrid to walk up when it is busy as the carbon monoxide levels can be high.</p> <p>Policy MARL17: Protecting Valued Community Open Spaces          Areas designated in your list as 10 and 11 are surely the same piece of land, while you have omitted the piece at Farrar Drive within Barton Park.</p>
174	<p>Page 24 – 2: Land Rear of Salisbury Road          Consequences of breaching the disused railway line as outlined in the Draft Neighbourhood Plan, page 24:</p> <ul style="list-style-type: none"> <li>• This will create light, noise and air pollution that will disrupt the established wildlife corridor.</li> <li>• The boundary, created by this disused railway line, was seen to be a precious boundary when the Marleberg Grange development permission was originally granted – why is it okay to back track now?</li> <li>• The access route, through the Marleberg Grange development, onto the A346 (Tesco/Premier Inn) roundabout would create significantly increased traffic movements onto an already congested key north-south road – further delaying emergency vehicles.</li> <li>• Using this route through to the proposed development will put increased traffic along an existing estate road only designed for the housing originally applied for. This estate road is narrow and winding and potentially would be carrying a further 100 cars, and associated daily delivery vehicles. This surely exceeds what it was originally configured for.</li> <li>• The increased through traffic will be cutting between the existing housing and the children’s playground. This would create danger for the children and parents crossing to the playground.</li> <li>• Increased traffic would create increased air pollution for the children and parents using the playground.</li> <li>• If this road is also used for the heavy construction traffic this will further exacerbate the danger, noise nuisance, dust and air pollution to all residents and children using the existing playground.</li> <li>• Breaching this disused railway line, as proposed, you are linking together two developments and therefore creating a supersized estate that is completely out of character for the town of Marlborough.</li> </ul>
175	<p>Hello, I’d like to express a few points of concern regarding the Elcot Lane area. I noticed there is an ‘emergency access’ point from Elcot Lane onto the proposed estate. By what method will this be for use only in emergency? How will it be policed? My concern is that it will become a busy, constantly used entrance. Elcot Lane isn’t a road that can manage heavy use. A long stretch is single lane. Where it is two way traffic, one side is constantly in use due to residents and allotment parking, also at the weekends parking for football matches. There is a very sharp entrance to Barnfield, which is a pot holed lane that leads to the cycle track and very popular with walkers, cyclists, dog walkers and families. It would be dangerous to have a busy road so close, as the corner is very sharp and vision to oncoming traffic is limited. Much of Elcot Lane does not have a pavement, making busy traffic dangerous to residents and people walking. The tile factory has many visiting lorries which reverse onto Elcot Lane to exit, another reason why the road isn’t at all suited for additional traffic.</p>

	<p>I live near the footpath entrance to the proposed Elcot Lane site. A huge number of people use the footpath everyday for walking exercise, as do I and my family. We really enjoy watching nature and love spotting the birds and small animals there. It's a thriving area of natural beauty and it would be a disaster to destroy that.</p> <p>The footpath runs along a river, unsurprisingly its gets very wet and boggy in the winter. Building houses here is a flood risk and what effect would that have on the surrounding area?</p> <p>In response to the plan as a whole, the local secondary school is over subscribed and the health centre is already struggling to manage its population, you have to wait weeks for an appointment. Twice recently my father had to wait 3 weeks for a telephone appointment. Surely it makes no sense to build new houses in a town that is already over stretched?</p>
176	<p>I support the following view expressed by fellow residents of Marlborough:</p> <p>The housing strategies are based on a false premise that 80 new affordable homes are needed. Marlborough already has 733 affordable homes (plus the 96 new ones being built). These are re-let at the rate of about 20 each year and 80 have been re-let since 2016, meeting the NP figure. The NP does not take any of these into account. 340 affordable houses will be re-let between 2019 and 2036. WC confirm that of the 80 which were re-let 2016- 2019 only 19 were taken up by local people. There is no need for any more houses beyond the existing commitments of 440.</p> <p>The 180 houses in the NP and the 245 in Wiltshire's Plan will mean more people, more cars, greater traffic congestion, even poorer air quality and increased pressure on local services. All the new employment in this area will be in Royal Wootton Bassett. More houses in Marlborough would mean that residents will need to commute to work.</p> <p>The proposed new car park will be unlit, unmanaged and has poor pedestrian access, located as it is up a hill away from the High Street. Apart from the Rugby Club, who will use it?</p> <p>The proposed new Medical Centre will have no parking spaces and will likely lead to more on-street parking. Surely the existing Medical Centre could be extended incorporating the adjacent Pharmacy?</p> <p>With the NP and Wiltshire Plan at different stages surely the two plans should be approved at the same time, not a year apart?</p> <p>Both plans pose serious threats to the infrastructure of the Town and the well-being of residents and if unopposed will add more unnecessary homes to an already full Town.</p>

We strongly object to the allocation of this site as a way to meet the need for affordable homes in Marlborough, for the following reasons:

1. As the residents of Elcot Mill and owners of Elcot Barn, noted as a heritage asset within the MANP, we believe this development will negatively impact the property, in contravention of NPPF paragraph 194, which requires “Any harm to ... the significance of a designated heritage asset (..from development within its setting) should require a clear and convincing justification.” No justification is given for the negative impact on Elcot Mill and Elcot Barn arising from the proposed development within their setting. These negative impacts include:
  - a. The most obvious public value of Elcot Mill as a heritage asset are the views of its frontage within the beautiful, unspoilt valley from the popular footpaths MARL22 and MILD18. The proposed site would bring a new development up to the boundary of the site, destroying this public benefit.
  - b. Development of a site immediately uphill from Elcot Mill would create an unbroken stretch of developed land from Chopping Knife lane down to the boundary of the property, risking severely increased drainage onto land surrounding the building in periods of wet weather. As with many old buildings, Elcot Mill and Elcot Barn are both prone to issues related to damp. Any development which is likely to increase the level of moisture around the building, risks exacerbating problems relating to damp which could eventually compromise the structural integrity of these Heritage properties.
  - c. In addition to point (b) above, the houses nearest the boundary of the site immediately to the south of Elcot Mill would block winter sun to the property, slowing the essential process of moisture evaporation from the brickwork and further exacerbating damp issues.
  - d. We are concerned about the location of emergency access to this proposed site. The proximity to our driveway would appear to present safety and access issues for us. Besides, Elcot Lane is only a single lane access after the railway bridge, and it has a conservation order on it so cannot be widened. This is not a good choice for emergency access.
2. The MANP Site Assessment Report rules out a proposal relating to ‘Further Land off Elcot Lane’ because it “is too exposed in the open Kennet valley landscape to be capable of effective mitigation. The site lies within a beautiful, unspoilt valley which sits between a section of the Pantawick to Stitchcombe escarpment to the south and the River Kennet Valley to the north.” Given the fact that Site 1 is immediately adjacent, the same applies. Recommending this site as a preferred option for development suggests no heed has been taken of the feedback provided in the initial consultations in 2016, which made clear that “Open spaces are valued and should be protected from harmful development”.
3. Better alternatives exist, particularly the site South of the A4 (London Road). This site is well screened and would have minimal impact on the views toward the town or in the Kennet Valley AONB from any direction. It is closer to the town centre, and the owner’s proposal would support more affordable houses than the Elcot Lane site.
4. Development on the proposed Elcot site would have a serious detrimental impact on biodiversity, wildlife & bird and river habitats along the river Kennet valley. The site would run next to the River Kennet Site of Special Scientific Interest (SSSI) and the woodland area between the water works and Elcot Mill which is designated a woodland priority habitat. Development would lead to far higher levels of air, noise and water pollution and run off.
5. Development within an AONB, requires “exceptional circumstances” to support development. Neither the MANP nor the Wiltshire Council Local Plan provide any circumstances which justify the irreparable damage that development on this land would cause.  
Page 12 Section 2.14- 2.17
6. Traffic and Air Pollution – A346 de-priming.  
Sections 2.14 to 2.17 (page 12) of the main MANP document note the high pollution levels along key highways in Marlborough particularly along London Road, Herd Street and Salisbury Road and the high density of HGV traffic passing along the A346 through Marlborough. We need concrete action to limit



	<p>HGV and other commercial goods through traffic passing along the A346 through Marlborough and not just talk about frameworks and agreements. The “long term aim of de-prime the A338/A346” mentioned in section 2.16 needs to be translated into specific steps that lead to this outcome within the timescale of this 2016-2036 plan.</p> <p>Page 19 4.1 Page 19 of MANP refers to the preservation of countryside as a priority to the area. “Open spaces are valued and should be protected from harmful development”. It also refers to “maintenance and improvement of existing green spaces”. This land is an outstandingly beautiful green space which many of the residents currently enjoy exploring and it building on it goes against a priority recognised by the people of Marlborough.</p> <p>1. There is no mention of the other development already in progress Hawthorn Meadow by Greensquare Homes near the Golf course. Could this site be extended to deliver more of the homes required to meet Marlborough’s need for affordable housing?</p>
178	<p>1. Marlborough has a lot of transitory traffic (large lorries, people passing by who don’t stop) and this contributes to both pollution and congestions problems. The health of the local community should be of paramount importance. We also regularly experience issues with large vehicles failing to accurately navigate the narrow local streets.</p> <p>2. Parking is very much a problem. Regularly the high street and auxiliary parking spaces are at/close to capacity which just results in further pollution as people circle for spaces. Some of this is due to poor signage as often there are spaces in the “hidden” car parks that visitors won’t find.</p> <p>3. The St. John’s estate was poorly planned from the start and anyone who lives here or visits will see frequent examples of dangerous parking, lack of access for emergency vehicles (especially Fire Engines) and people using their garages for storage rather than car parking. The idea of opening up another residential area on the field at the bottom of the estate is only going to augment the problems that already exist. Many of the roads in St Johns are dangerous already, let alone allowing further traffic. Many children play outside but with all the parked cars and blind bends there are accidents waiting to happen. Furthermore there is no parking enforcement despite the “new” yellow lines that have been added. Cars parks on these with abandon as no parking attendants every visit the estate to issue fines.</p> <p>4. In general the community facilities are already at/past capacity. I’m specifically calling out schools and medical facilities. The only secondary school is oversubscribed and the waiting times for GP access are appalling (2-3 weeks for a standard appointment). The potential for Savernake Hospital to provide additional services doesn’t seem to have been explored.</p> <p>5. Affordable housing. Marlborough is not a cheap place to live and there seems to be a directive to build “more expensive retirement homes” rather than look at how those on lower incomes could afford to live in the town.</p> <p>6. As an attractive town with much history we do a very bad job of helping tourists navigate and make the most of the town. The Tourist Centre was closed down and although we now have a Travel Lodge there is precious little to help those visiting our town to make the best of the (many!) facilities.</p>

	<p>These are my comments on the current plan. I'd struggle to find many that disagreed with the above. However we don't need to re-state problems that everyone knows about. We need solutions and to accept that "expansion/growth" of the population may not be the "be all and end all". Especially if the infrastructure required isn't made available.</p>
179	<p>It has come to my realisation that the drafted plans for 50 houses neighbouring the disused railway (2: Land rear of Salisbury road p24) and 30 houses (4: land off Cherry Orchard page 26) will have a huge environmental impact for this area. Biodiversity in the area is high at present time and it even suggests there could be more. However by placing 80 houses will only create sterile environments of tarmac, concrete and brick rather than the current green grass, trees and hedgerows resulting in a loss of habitats. Placing a road to 50 houses from Marleberg Grange which would cut right through the old railway line (a small wildlife corridor) in no way would benefit or increase biodiversity as the plan claims. The Old Railway Line is home to many species of fauna and flora. Building near here would result in the old railway line being surrounded by 3 housing estates, which would greatly effect the colony of bats that have a habitat in the railway tunnel.</p> <p>In addition, Marlborough is supposedly a small market town in a county known for rolling fields - so how can this benefit the town ? The field southwest of Upper Churchfields has now gone from green fertile land to a building site full of litter and surrounded by fences. I am aware that this objection could be inferred as a "not in my back yard" but I am very concerned with lack of environmental consideration in this area. Also despite building the previous estate near Tesco, why are there still more houses required?</p>
180	<p>Page 23 : I would like to know what 'Emergency access via Elcot lane' would consist of and why it is needed. If it happens to be a connecting road with a sign saying Emergency access only I can assure you that it will be ignored and the resultant traffic will turn the single track that is Elcot lane into a rat run. Instead of creating an access point I would suggest that provision is made for at least two cars per house hold and those parking spaces should consist of drive ways in front of house as most rear house parking seems to be ignored by residents with the resultant road side parking turning most of our streets into barely usable single tracks. If that had been done you would have much easier road access through all housing estates</p> <p>General points</p> <p>Can we please get the facilities in place before we go increasing the demand. It is already stated that we fall below the air quality levels expected which is shocking for a small town in the countryside, the schools are over subscribed.</p> <p>The population of the town is mainly increasing due to inward migration which shows that affordable housing in such as a place as Marlborough is not working.</p> <p>If you build more houses that are affordable (certainly not 3x the average salary!), they are still only affordable to those who work outside of Marlborough and move in. The only way to buy a house in Marlborough is to move away to get a good job and then move back in your 30's and keep up a long commute. Any affordable house gets snapped up by someone to rent it out or to extend it and move it up to the next price bracket.</p> <p>We have just had two new estates built in the last couple of years without any increase in provision an all that does is bring down the over quality of life for those who already reside in the town.</p> <p>While the car is needed to bring in external customers to the High Street, the local use of the car is killing the town. Congestion both in terms of moving traffic and in turning residential areas into car parks.</p> <p>Hopefully walking has become a habit for some local residents during the last year and there is not a massive jump back to car usage in the next few months.</p>

181	I am not in favour of the proposed plan. Mainly because it requires building on greenfield sites in order to ease external housing pressure. This would increase the population of Marlborough and place even more strain on local services. It would also completely destroy natural wildlife habitats.
182	<p>I have the following comments on the MANP:</p> <ol style="list-style-type: none"> <li>1) Why did the parish of Preshute withdraw from the plan? What are the resulting implications of this action on Marlborough, Mildenhall and Savernake parishes and the subsequent changing of the boundary of the area under Section 61 of the Town &amp; Country Planning Act 1990?</li> <li>2) The need for affordable housing in Marlborough is supported and an increase in such residential use must be accompanied by a corresponding increase in local employment opportunities in the town, and enough land needs to be designated and made available for this purpose.</li> <li>3) The former police station site appears to be destined for redevelopment as housing. If this is the case then the site of the existing GP surgery should not be similarly redeveloped for residential use given its convenient central location. The site should be used for suitable business/retail/services use to provide local employment opportunities or this key site used for community purposes, which would be more in keeping with Policy MARL9B.</li> <li>4) The existing architecture of Marlborough and the heritage of the town and surrounding areas are important and any new development needs to be designed to be sympathetic and in keeping with this and thus any proposals for new development need to be assessed with this in mind.</li> <li>5) It is a shame that the thorny issues of heavy traffic and air pollution are not covered by the plan – this is a missed opportunity and one that needs to be urgently addressed elsewhere by others.</li> <li>6) Where possible amenity areas and small vacant or derelict areas of land should be grassed and landscaped and adequate seating provided for the enjoyment of users.</li> </ol> <p>I hope these comments will be taken into account as the next stages of the plan are developed.</p>
183	<p>My summary of my views on the Draft Neighbourhood Plan and large number of associated documents is that it is disappointing, is of serious concern, needs revisiting, and much more time given to the proposals.</p> <p>Accepting the need for copious detail in the whole process, the “pack” is daunting, I believe, to the average resident/reader and the absence of a Summary/Overview with unambiguous reasons backing up the key proposals is a significant deficiency in the communications.</p> <p>The Plan seems focussed on houses and cars (parking), indeed the council (or authors of the Plan) seem obsessed by affordable housing. Mervyn Hall says in his brief Forward to the Plan that “Our consultations with the residents of the area have revealed that there is a pressing need for affordable housing”. I cannot find in the Plan or supporting documents any quantified or measurable evidence of these consultations.</p> <p>Quoting Kofi Annan from a speech given almost 20 years ago to a world summit on Sustainable Development seems pompous and overblown, and more to the point, inappropriate. It may have been better quote examples of UK sustainable housing developments such as the Poundbury estate in Dorset in which Prince Charles had a guiding hand.</p> <p>I cannot yet see compelling evidence in the MANP, in the associated consultant’s reports, or the County plans that we need the stated number of new dwellings (including affordable homes). Whatever number we do need it is also disappointing that the vast majority have to be in sizeable developments e.g. 30/40/50 units, rather than smaller developments that most residents would prefer.</p> <p>I think the Draft MANP is unconvincing and possibly, seriously flawed</p>

184	<p>MARL7 p.33 The provision of extra parking for vehicles seems misguided. Additional parking is likely to encourage more motorists that will have the effect of increasing traffic, pollution, and causing more congestion and safety concerns. I would prefer to see good investment into improving or extending footpaths linking the outer reaches of the town (including the new housing developments) to the town centre and the business park. The government has published statistics proving that over 60% of journeys made by cars are under 2 miles (link below). 24% are under 1 mile! Distances that are easily walked or cycled if there were an infrastructure of safe, well lit, paved walkways and cycleways.</p> <p>In particular, I would like to see better foot/cycle connections to the Business Park avoiding Salisbury Road (i.e. opening up access along the Railway path from St Margarets Mead and from Cherry Orchard via the Marlberg Estate). A pelican crossing or footbridge would further encourage links to the park and town without risking life and limb on the death trap footpath following the road.</p> <p>If Marlborough/Manton residents, myself included, made more journeys by foot or bicycle, then we would not need additional parking. The current parking provision would be sufficient for our neighbouring village residents and visitors from further afield.  <a href="https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/1487/148705.htm">https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/1487/148705.htm</a></p>
185	<p>THIS RESPONSE INCLUDED MAP DOCUMENTS</p> <p>(1) Further work will be supported to investigate, define and deliver the optimum scheme for future works to remove all except blue badge parking from the High Street stretching from St Peter’s Church to Marlborough Town Hall and relocate it to George Lane with a multi-storey car park on the site of the existing car park. The new car park will be accessible to all users of the High Street.</p> <p>(2) The resulting public realm improvements will involve engagement with Wiltshire County Council highways and planning departments. The public realm improvements are shown indicatively on the Policies Map. The proposals will transform the High Street public realm experience and underpin the accessibility, vitality and viability of the centre for all present and future users including residents, businesses and visitors.</p> <p>See also attached indicative Marlborough Town Centre Regeneration Plan.</p>
186	<p>&gt; I have read with interest the extensive document known briefly as the Local Plan. As a resident of Choppingknife Lane for the past almost 8 years, I have a few observations to make about the current traffic situation and how this would be exacerbated by the building of 50 new homes with access via White Horse Road and, necessarily, along Choppingknife Lane.</p> <p>&gt;</p> <p>&gt; The housing development as it stands now suffers from having only one way in and out. At certain times of the day, there is a great deal of traffic negotiating around many parked cars, and children walking or cycling to /from school are vulnerable as they approach the need to cross Choppingknife Lane from one pavement to another with limited visibility, and often with drivers in total disregard of the speed limit. This would only get worse with more cars.</p> <p>&gt;</p> <p>&gt; Being so far from the centres of employment, very few people walk to work or use public transport. Very many households need 2 cars, but parking provision for those houses without garages is limited to one car, meaning many cars are parked kerbside.</p> <p>&gt;</p> <p>&gt; In addition, many people seem to store quantities of stuff in their garages, leaving no room for vehicles, and some have turned their garages into gyms or workshops instead.</p> <p>&gt;</p> <p>&gt; The junction of White Horse Road, Cunettio Gardens and Choppingknife Lane is already dangerous, particularly because it is necessary for visitors (and</p>

	<p>those who choose not to use their garages) to turn around at this point when leaving the estate. It is all too often that a car executing a reversing manoeuvre is 'rushed' by another coming 'from nowhere', and there have been several near misses. Once again, the prospect of perhaps upwards of 70 more cars increases the likelihood of an accident at this point.</p> <p>&gt;</p> <p>&gt; One way to militate against this would be to have a mini roundabout at this junction. In addition, it would make sense for the proposed new properties (only) to have access from Elcot Lane. Some speed cameras might also be useful.</p> <p>&gt;</p> <p>&gt; Apart from concerns about increased traffic, I would also like to voice a hope that the public spaces (paths, steps, green spaces) in the new development would be better maintained than they are currently on St John's Park, where litter, weeds and general unkemptness abound in patches. The strategic placing of bins for litter and dog dirt would be greatly appreciated.</p> <p>&gt;</p> <p>&gt; There is obviously a need for more housing in the area, and I do not doubt that it makes sense to build alongside existing property. But St John's Park was built on a brownfield site, and the proposed development is on a greenfield site. To spoil the quality of life for residents already living here by not considering the traffic issues very carefully would seem to be a pity indeed.</p>
187	<p>INTRODUCTION</p> <p>The council's premise for additional housing in Marlborough is that it is now a dormitory town. Is this true?</p> <p>GENERAL</p> <p>The following points make the real case for definition of the town as it is and the reasons why it is so unsuitable for further expansion under that spurious definition.</p> <p>North Wessex downs AONB has Marlborough at its heart as a site for tourism rather than destroying it with major settlement plans.</p> <p>In summary, Marlborough is not a dormitory town. As to services in the town, It does not have the roads, schools, shops, doctors and facilities to support, adequately, the existing residents, let alone a large number of new houses. The council need to decide whether it is there for the purpose of helping developers make money or to help the residents of Marlborough have a better standard of living. More houses with less adequate services will not do the latter.</p> <p>TRAFFIC AND POLLUTION</p> <p>Being bound by Marlborough school, the Kennet valley, the golf course and the Savernake forest, efforts to reduce and divert the traffic would be a better use of time than trying to expand the footprint of the town. In the absence of a by pass, traffic pollution and traffic noise will approach dangerous levels in the high street and George Lane. What are the plans for tackling the traffic, this has been a problem without a solution for as long as I can remember?</p> <p>Further dangerous levels of traffic through the town are not in line with the town's ambitions.</p> <p>FACILITIES</p> <ol style="list-style-type: none"> <li>1. Parking in the town is, as all know, totally inadequate.</li> <li>2. The local transport system which is the alternative to driving, is simply not good enough.</li> <li>3. St Johns school currently has many more pupils and staff than it was build for. How will it cope with even more pupils.</li> <li>4. The Kennet and Avon medical centre is being moved for yet more dwellings and moving where? With what access for residents of Marlborough? Including those without a car.</li> <li>5. Every available plot of land seems to be given up to old people's homes that contribute little to the local economy and use up space for accommodation if needed.</li> </ol>

	<p>6. There are, and always have been, too many restaurants, clothes shops and smart supermarkets and too few shops where the young and not-so-well-off can buy supplies at a reasonable price.</p> <p>MILDENHALL</p> <ol style="list-style-type: none"> <li>1. Light pollution will also increase, particularly in outlying villages like Mildenhall, where I and my family live.</li> <li>2. Further houses on the old school grounds opposite Mildenhall village will increase light pollution and make traffic even worse. This further encroachment up the Kennet valley and down towards the river Kennet cannot be sensible. And where do those news inhabitants go to shop etc? To Marlborough. And how do they get there, in cars to further increase the traffic and the parking problems.</li> <li>3. This area is a haven for wildlife and this will disappear as the human population increases. This situation does not fit current and future environmental ambitions and goals.</li> </ol>
<b>HARD COPY REPLIES. ALL RECEIVED WITHIN THE TIMESCALE AND OPENED ON 8 MARCH</b>	
188	<p>Page 35 MARL9 - properties as community facilities: re-purposing the groundsmen complex on the Recreation Ground as "heritage centre, store and archive to include reading room".</p> <p>Page 45 MARL17 - parcel of land in George Lane next to Culvermead Close.</p> <p>The plan needs to highlight the lack of sports areas in the town</p>
189	<p>Housing. I hope the affordable housing will include as much social housing as possible - housing at a reasonable rent or shared ownership.</p> <p>Car park - I approve the additional parking plan near the Rugby Club. Access would be greatly improved if the upper part of the path alongside the College Playing Fields had a gravel track (like the lower half). The present path is impossible to use in the winter particularly if you are walking to work. The laternative of walking in the road (Hyde Lane) is very dangerous particularly round the corner.</p> <p>Medical centre - if this has to be moved from George Lane and expansion isn't possible into the Private Car Park or upwards then there must be adequate parking on the new site and take into account the large number of staff cars.</p> <p>Hyde Lane - is a rat run now and will become increasingly more so with extra housing. I hope a 20mph limit might be considered. it is very dangerous for pedestrians now</p>
190	<p>Regarding plan for Marlborough and villages, explain what you call affordable. Example if you only earn twenty two thousand a year you can't afford to live here even though you may have been brought up here and attended school here. So more social houses but my main concern is Barton Dene. The College has houses for their workers yes but forty houses on the road leading down from the Dene is not wide what will you destroy if you make it (illegible) from the lovely wild place so just think of the cars coming out on to the A4 even more so if the health centre is moved. Regards health centre if moved rather than housing why not a two storey car park and why not put the health centre back in the High Street. EWM or the next door shop have closed down could be turned into a health centre?</p> <p>I also found a form in Town and Country to which filled in.</p> <p>Often (illegible.....) going up to Salisbury road is at times a nightmare and ..... out of control here ..... but it .... illegible</p>

191	<p>Thank you all for the hard work in producing this plan a very comprehensive work study.</p> <p>Got just a couple of things I would like to see</p> <p>A) Low cost housing should be just that - is it possible to put a clause in for these houses to be available to 1st time buyers and not for 2/3rd time people to buy &amp; then rent out privately (thus bringing a nice bit of income for those who can afford to buy more than 1 house as it defeats the object..</p> <p>B) also is it possible to put in a clause to prevent 1st time buyer from extending the property ie instead of adding more space &amp; move to a bigger house thus freeing up that property for the next 1st time buyer. So often one sees people moving in to a 1st time property &amp; straight away apply for an extension, making a mockery of the term "1st time property"</p> <p>C) housing behind what was St Johns school is that area prone to flooding from river Kennet &amp; destroying the eco &amp; wildlife system already in place</p> <p>Parking a total nightmare with all side streets &amp; roads used the worst being Frees Avenue, followed by College Fields just to name 2</p> <p>I thought I heard an extension to Rugby club car park (could be wrong) but that would be a nightmare for visitors as they would get there and find it full of rugby players transport</p> <p>But more importantly than anything else we need our shops to reopen &amp; new ones to be added, walking down the street just look at all the empty shops</p>
192	<p>MARL11 B Page 37 - as a resident of St Johns Close I fully support the proposal to include this area as an ASQ. However I feel strongly that more emphasis should be given to the importance of the green/allotment area within the development. The Close is an almost unique example of the principles embodied in the Garden City Movement, which stressed the importance, for the welfare of the community, of the integration of housing, gardens, and communal green space. Any alteration to the use of this green space would be seriously detrimental to the area.</p> <p>MARL7 Page 34 - Extension to Rugby Club car park for public parking:</p> <p>We are unhappy about this, on several counts:</p> <p>a) In the Town Character Study considerable emphasis is made of the attractive and integral view of the Common with St Lukes Court (Marlborough Townscape Study Inset 7) which would be damaged by a larger car park</p> <p>b) A car park for the town in this location is not ideal, as it is too far out for many people. Also it is likely that far more traffic would be brought into this area, possibly leading to the loss of existing parking on the road up to Merlin Court, and to more outsiders seeking street parking in St Johns Close and Hyde Lane.</p> <p>c) We are particularly concerned at the possibility of heavy run-off of surface water if the car park were to be tarmaced. This could presumably be ameliorated as indicated by installation of a permeable surface, but the point needs to be emphasised.</p> <p>d) If the proposal were to include charging for parking, this could mean even more outsiders seeking street parking nearby.</p> <p>MARL1 Page 25 - Relocation of medical centre to Barton Dene:</p> <p>I consider this a seriously retrogressive step. The location, unless fairly extensive car parking is provided, is very remote for the large proportion of Marlborough's population living in the south and east of the High Street. Incontrast the current site in George Lane is central, adjoins a large area of parking where short term use is not expensive, and the centre could presumably be extended to provide more accommodation if necessary. In addition it does not appear as if this site could produce any significant number of dwellings.</p>