

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 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](https://www.scotscape.co.uk/news/living-walls-climate-change-solution) <https://www.scotscape.co.uk/news/living-walls-climate-change-solution>

[National Geographic](https://www.nationalgeographic.com/science/article/130325-green-walls-environment-cities-science-pollution) <https://www.nationalgeographic.com/science/article/130325-green-walls-environment-cities-science-pollution>

[Green Scotland](http://www.sgif.org.uk/index.php/green-infrastructure/green-walls) <http://www.sgif.org.uk/index.php/green-infrastructure/green-walls>

[Architectural Projects](https://architectprojects.co.uk/living-walls-welcoming-a-new-era-of-green-urban-design/) <https://architectprojects.co.uk/living-walls-welcoming-a-new-era-of-green-urban-design/>

[ANS Living Walls](https://www.ansgroupglobal.com/living-wall/applications/universities-colleges-and-schools) <https://www.ansgroupglobal.com/living-wall/applications/universities-colleges-and-schools>

Also: *Planting Green Roofs and Living Walls* by N Dunnett & N Kingsbury (Timber Press, 2004 ISBN-97808881929119). Maybe MTC should invest in a copy.