

ANNEX B.
OBJECTION 1.

BY HAND.

Technical Services,
Council Offices,
Lewald House,
East Street,
Sittingbourne,
Kent. ME10 3HT.

7-12-15

REF: —

Marie Curie

HIGH ST., SITTINGBOURNE
I strongly object to the undated
Traffic Orders 2015 and 16/2015.

To remove the "Bus stop and Bays
is the idea of inconsiderate
thoughtless officials and councillors.
No provision has been made
to provide appropriate boundary points
and sketches for users. This is
unacceptable by all users contacted.
Yours sincerely

10TH December 2015

I'm reading of the plan to stop buses from using the High St. in Sittinaboune if and when the regeneration begins!

The bus stop at the rear of the Forum is totally inadequate especially when several buses pull up at the same time and when a pedestrian shopper, as I am, has to lug their laden bags across 2 busy roads to access St. Michaels Rd, bus stop!!!

At present the "market" is a few tatty stalls not worth the bother of investigating so what the hell?

Your "improvement" is a farce

Yours

ANNEX B
OBJECTION 3.

Technical services

Council Offices

Swale House

East Street

Sittingbourne

Kent

ME 10 3HT

Dear Sir/Madam

We wish to object very strongly to the proposals in amendment 16 order 2015, about Sittingbourne High Street and in particular that there will be no buses serving Sittingbourne High Street, if your proposals go through.

The High Street in Sittingbourne, as in most places has become less important and out-of-town centres become more important.

This is not generally helpful to people who do not have their own private transport.

It is also not generally helpful to the environment.

Currently, according to a cross party report of the House of Commons, chaired by the then Conservative MP Tim Yeo, in 2010 Road vehicle pollution kills around 30,000 people per year.

Air quality in Swale measured in St Pauls Street and East Street is already very poor and we will be interested to see any estimates from your department about improvements or lack of them as a result of your proposals.

Our colleague Bernie Smith from Swale, senior forum who has a much better background on engineering issues than we do, will have expressed his concern at the High Street closures.

We understand that you have apparently undertaken informal soundings about your plans. As the former statistics examiner for the then Chartered Institute of Transport (now the Chartered Institute of Transport and Logistics) would be interested to know about your sampling techniques to ensure that you have consulted a representative body of opinion.

In principle, we would both like to see a market, preferably selling local goods and services so that there would be both a local multiplier effect, and also possibly a reduction in the scandal that about 30% of food in the supermarket chain is wasted.

We would be interested in seeing any forecasts about what you think will be the expected outcomes for businesses in Sittingbourne High Street and elsewhere.

Annex B

I am sorry for the delayed response but I would like to object to the closure of the Sittingbourne Highstreet for buses on a Friday for the Sittingbourne Market on behalf of Arriva.

This will cause significant problems to Arriva because if this proposal goes ahead we will have to withdraw all of our vehicles out of the Highstreet. The alternative route proposal offered is not suitable for local buses. We cannot have a different service pattern on a Friday compared to Monday to Thursday because will cause widespread confusion for our passengers.

In addition, this proposal will require our passengers to walk further to access local bus services and some of our customers have mobility issues and these changes will have a detrimental impact upon them.

We would like the opportunity to talk about this further with you and this can be done at the Quality Bus Partnership in January.

Kind Regards

OBSECTION 4



ANNEX B.

Chalkwell

COACH HIRE & TOURS

Swale Borough Council,
Technical Services,
Council Offices,
Swale House,
East Street,
Sittingbourne,
Kent
ME10 3HT.

OBJECTION 5.

January 4th 2016

Dear Sir / Madam,

TRAFFIC REGULATION ORDER – CLOSURE OF SITTINGBOURNE HIGH STREET

We would like to raise a formal objection on behalf of Chalkwell Garage & Coach Hire Ltd to the proposed Traffic Regulation Order (TRO) to close Sittingbourne High Street to allow the relocation of the Traders' market on Fridays.

It is of particular concern that our earlier representations on this and similar proposals appear to have been misunderstood, ignored and or misrepresented, even though our clear views were aired at a number of Quality Bus Partnership meetings with Kent County Council and Swale Borough Council.

Chalkwell is a local, family-owned business which has been trading in Sittingbourne for over eighty years. As such, Chalkwell is now a substantial local employer and contributor to the Swale economy carrying thousands of passengers each day on our services.

Following deregulation of bus services we have tried over the years to develop local services including the Sittingbourne Rural network which has been operated by Chalkwell since 2003. Initially financially supported by Kent County Council, working in partnership with KCC Transport Planners we have endeavoured to sustain and build upon these routes and to develop these commercially where possible, decreasing the financial burden upon the County Council in what has become an increasingly difficult financial climate for the Local Authorities and bus operators alike.

By their very nature these rural services provide an important link to Sittingbourne for the surrounding communities and we have introduced further cross-town services to provide connections to main shopping areas and transport hubs together with improved links to Sheppey, Canterbury and the Medway Towns, all on a commercial basis at no direct cost to Kent County Council or Swale Borough Council. However, the proposals to close Sittingbourne High Street to traffic on Fridays will, in our view, have a negative impact on patronage and revenue thus putting the viability and sustainability of some of these routes at risk.

- 16, 25, 33, 49, 53 and 70 seater coaches with seat belts
- Executive coaches also available



Whilst in good faith we would wish to support Swale Borough Council in its wider aims of regenerating the town centre we must be mindful of the effect any changes to the Highway network would have upon the viability of the bus service network, a large proportion of which we provide. Many of them, whether commercial or Kent County Council funded, are operated on a marginal basis. Any increase in costs or decrease in revenue, however small, does therefore risk their continued operation in part or in whole.

Withdrawing bus services from the High Street IS **NOT** our preferred option. We have simply indicated that without a viable agreed alternative this change would force us to move services to the St Michaels Road and Forum area, which will disadvantage customers, increase our costs and seriously risk damaging the level of bus service that we will be able to provide. The decision which determines if this happens will be one made by Swale Borough Council who must, if it goes ahead, accept the consequences of that action.

Our objection is based on the following:-

- Such a closure would have a serious detrimental effect on many of the bus services we and other operators provide in and around Sittingbourne through failing to serve the stops in the High Street that customers wish to use, forcing bus companies to serve less ideal locations, and adding unnecessary time, mileage and costs to what are in many cases marginal services.
- It will make services less attractive to the travelling public. In our case our electronic ticketing system shows a substantial number of passengers per weekday boarding at High Street stops (*This information is commercially sensitive but further detail can be made available for discussion outside of the formal process*). There are also a large number alighting at these stops. This is where our customers wish the buses to stop, convenient to High Street shops.
- It is not practical to have different routes, stopping points and timetables on different days of the week. This will only confuse current and potential users. The solution must be a standard Monday to Friday timetable.
- No traffic modelling has been produced to help inform what the effect of closing the High Street will be on traffic flow in the area. The High Street is already closed on a Saturday and St Michaels road suffers from heavy traffic delays, and this is without normal peak Monday to Friday commuter and school traffic that we would have, further exacerbating the situation making services run late and less attractive to all users young and old.
- Closure of the High Street will displace delivery vehicles and increase illegal parking in other locations which will include any alternative road buses might use or stop in. Unless there are continual parking patrols this will add to the existing highway congestion and delays which Kent County Council has stated is already a problem for bus services.

- The closure of the High Street would only make congestion worse as further strain is put on the road capacity of the alternative routes, St Michael's Road and Park Road / Avenue of Remembrance. We are extremely nervous about alterations to the traffic flow in Sittingbourne, given events in recent years. For example, the change to the junction of Milton Road and Eurolink Way and the removal of the roundabout created severe delays both during and after, which had a significant impact on our business and other businesses in the area.
- There has been a continuous downward pressure in recent years on the income bus operators receive from school transport freedom passes (now Kent Young Person's Travel Pass), concessionary bus passes (ENCTS) and contracts to provide socially necessary bus services. Central Government have also reduced Fuel Duty Rebate by 20%, meaning that the viability of running commercial bus services is more sensitive to changes where the impact to passengers daily routines are greater.
- As a result many local bus services have become increasingly financially marginal and must be operated and scheduled as efficiently as possible with a minimum of spare time and unnecessary mileage. For instance, a bus leaving point A will normally be planned to return there to provide a journey one or two hours later. There is no real scope to add in additional running time without having to consider potentially unwelcome changes or loss of services. See also the comment below regarding the initially suggested alternative route which outlines the additional operating costs that might be caused.
- To be an attractive alternative to use of the private car bus services need to penetrate town centres and not hide or wander around the outside serving less attractive stopping points. Those who are elderly or have mobility problems will be particularly affected by having to walk longer distances.
- Without a viable alternative route and stopping places buses will be displaced from the High Street to the stops behind the Forum which are already known to be operating at, or beyond, capacity. This area will become overloaded and congested with buses waiting for a space to become clear (causing further delays!).
- It is likely that this may result in some eastbound services being further displaced to stops at either the Railway Station which has limited waiting areas for elderly customers and is not ideal for a large numbers of students to wait at, or north side of St Michaels Road. Until the Spirit of Sittingbourne development and associated bus stops are completed this area will be lacking in sufficient bus stops and suitable covered accommodation for waiting customers and vehicles.
- There is not a clearly defined path for customers to walk to/from the rear of the Forum to the High Street. The current walk is unpleasant and somewhat convoluted. While the Spirit of Sittingbourne development will eventually alter the dynamic of the Town Centre and the footfall in the general area, the current layout does not support this idea and therefore

immediately buses cease to serve the High Street bus patronage and revenue is likely to be adversely affected.

- Bus operators are required to give the Traffic Commissioner a **MINIMUM** of 56 days notice of any change to routes or timetables (*we would also require time to prepare these, and consultation with Kent County Council would also have to take place to ensure that any of the services that we operate on their behalf are amended with their agreement*). This is a legal requirement and not something that operators can vary.
- Chalkwell are not currently expecting to make any network changes and so any that are required by a closure of the High Street will be an additional unplanned cost. For each bus service registration that requires a change a payment of £60 must be made to the Office of The Traffic Commissioner and there is the further cost incurred in preparing and submitting the variation.
- In addition we will also have to print and issue new timetables, amend our website, update electronic ticketing system, drivers' duties and destination blind systems and change the majority of bus stop displays throughout our network, all of which will incur us additional costs.
- **Swale Borough Council would be required to meet the above costs if the Traffic Regulation Order is confirmed as Chalkwell are not instigating the changes – this was discussed at recent Quality Bus Partnership (QBP) meetings at Swale Council offices also attended by Kent County Council Transport Planners.**
- Any subsequent change(s) would have the same costs and resource implications.

INITIAL PROPOSAL BY SWALE BOROUGH COUNCIL FOR RE-ROUTING

After our initial response to the proposal to close the High Street it was suggested that services could be diverted by Central Avenue, Avenue of Remembrance and East Street. Whilst we welcomed the attempt to try and find a potential solution it was impractical.

- The diversion would add 0.4 miles to thirty eight eastbound journeys every Friday where our service operates. This approximates to 775 miles a year per weekday of operation. (*The additional cost of the mileage is commercially sensitive but can be made available for discussion outside of the formal process*).
- As commented on by Kent County Council it is likely that this route would be subject to unacceptable traffic congestion and delays, and they also raised concerns on the suitability of the route for buses (in particular the proposed right turn from Central Avenue into The High Street and vehicles moving in and out of parking spaces near The Swallows, Police Station and the Post Office).

These points have not been answered by Swale Borough Council; again these issues were raised by us and Arriva at recent QBP meetings with Swale Council.

- We estimated that this or a similar diversion would add 4 or 5 minutes to the running time of each journey. Not due just to the extra mileage but also the additional traffic and on street (illegal) parking the closure will inevitably cause.
- It would be impossible to add in an extra 4 or 5 minutes on each eastbound journey and maintain clock face half-hourly or hourly timetables. A major revision of services would be required including adding in at least one extra off-peak bus(es) and driver(s) into our schedules for no discernible additional income. It is more likely that such services will be less attractive to customers and we could instead see a reduction in revenue. There would be a considerable additional cost to us for the provision of additional resources against which no additional revenue can be expected (*These additional costs are commercially sensitive but can be made available for discussion outside of the formal process*). **Would this cost be met by Swale Borough Council?**
- The financial impact of potential reduced passenger numbers is not included in the above figures.

CONCLUSION

Changes in ridership on the service across the whole week can very quickly lead to a service becoming unviable. Once someone decides to use a car instead of a bus they are not only lost income to the operator but potentially to the local town as well as they may choose to shop out of town instead.

It is in all of our interests, including the market stallholders, to avoid this possibility. All retailers need buses as part of the process of feeding them with customers.

It is important that bus services in Sittingbourne have a high visibility and availability to the public and the best place for this is by continuing to serve the High Street on each weekday; buses need to be at the heart of the town centre not out of sight at the rear of the Forum. This is only going to be exacerbated when Spirit of Sittingbourne start construction work on the multi-story car park and other changes to the area.

Our preferred option is to keep regular, frequent bus services in the High Street where our customers want them, but we are receptive to any other viable alternative routes and stopping places and we are prepared to consider them and work with the Council to reach a suitable solution that fits all customers and residents' needs. Fundamentally getting more passengers who in turn become Market Customers is the correct solution for all involved parties including established Sittingbourne High Street retailers. Closure of Sittingbourne High Street on Fridays and the consequential relocation of Monday to Friday bus services clearly does not meet this objective.

If you decide to go ahead with this closure it leaves us (and other bus service providers) with **NO** currently viable alternatives. We will **NOT** in such circumstance be willingly withdrawing bus services from the High Street as it will not be us who have made the decision to close it.

That decision is not ours to make, but yours. The only alternate you have so far suggested is impractical and would have an adverse effect on the bus network and cost that we as bus operators would be unable to bear.

We also object to comments released to the local press suggesting that we have decided to withdraw bus services from the High Street and have made the local publications aware of the misinterpretation.

There is an obvious risk that we may have to consider adjusting or reducing service provision to account for any additional unmet costs or reductions in revenue. This is **NOT** our preferred option or choice.

As has already been clearly indicated we are a private business and many of these bus services are marginal at best. We cannot reasonably be expected to accept a situation when we are then to operate them at a financial loss. Kent County Council have in recent meetings indicated that in the current financial climate they will **NOT** have the budget available to meet any of the additional costs we have listed above for either those commercially provided services, those operated on behalf of KCC, or for replacement of services that may need to be withdrawn.

The proposed closure of Sittingbourne High Street on Fridays demonstrates that there is an apparent lack of understanding within Swale Borough Council of the impact this closure will have on local bus services, the part that bus services play in providing footfall to High Street traders, and a lack of support by SBC for the provision and further development of bus services in and around Sittingbourne.

The proposed TRO is counter-productive to the fundamental purpose of regenerating Sittingbourne Town Centre and must not be granted. An alternative site should be found for Sittingbourne Market on Fridays and the High Street remain open to buses and general traffic.

Yours faithfully

ANNEX B.
OBSERVATION 6.

Dear Sir, I feel I must write to you as I am a
Constant Bus user. I have Mum 96 in a wheelchair and if I
can ride to the Forum on the bus it makes my life easier.
I have no opposition for the Market to move to the high Street
on a Friday if that has to be but to close the road to
Buses every day is unthinkable. I belong to Clubs in the
Town and if I had to rush to the Forum Hub I could miss my
Connections. The Bus Stop outside Edingburgh Woods is used constantly
by people shopping in the high Street it is more convenient to get
to. I write sheernis to shop in Tesco quite often. I live East Street
end and I use the stop outside St Michael church constantly.
It would be hard going for me with Mum in her wheelchair to have
to go to the Shopping Forum to get that Bus. I know a lot of
people shopping in Iceland use St Michaels stop. Can you
really expect old people to have to carry up hill their shopping
from Iceland unable to catch a bus home. I don't think so it
would be hard they might stop using Iceland and where would
they be. I have friends in Barrow Court who shop in
Sainsburys and catch their bus home from St Michaels ch.
It is easier then going to the Forum. You should be working
to keep people shopping in our town not making it difficult.
It is the elderly who are going to suffer most as they can't
walk as far or fast as young people. Please reconsider.
There is no reason the buses can't operate Sunday
to Thursday down the high Street as usual.

I have spoken to the bus companies and they are both against the closure. They know their public and are worried at losing trade. We don't want to lose our buses. They are getting a petition up with feed back against the closure.

If you want people to vote for you you have to look after them their needs and you are not.

Another issue I don't agree with the closure of our car parks. Quick Fit holds many cars, The Station is always full. So is the round car park in front of the station. Coleshall Walk holds many and so does remembrance Ave behind Argos etc.

Do you really think all these people will be happy going to a Multi story, I think not. We had one, no one would use it when the Forum was opened, it was secure late at night should worry I felt unsafe there. Open car parks are much safer especially for ladies on their own. We need good central car parks to encourage people to come into town and spend money keeping our shops open. I am against closing the Forum car park to put a cinema in it I use it a lot with mum in a wheel chair and it is always full and difficult to find a space so why close it.

If you must build a cinema there is all that empty land from home base down to crown Key round about that Tesco bought. Can you not use that it would still be central for a cinema.

Do you not realise we already have enough coffee shops restaurants in the high street already and if you build on the Forum car park you will be taking their trade away not creating more just moving it. We already have 2 affordable cinemas, families can go several times at £4 a time, we can't all afford £8 each so who is going to use a new one I won't and I know a lot of young families who won't they can't afford a family of 4 at £32 against £12 now please reconsider and support what we already have in the Avenue theatre and old Odeon cinema. Thank You