

SUMMARY OF MAIN ISSUES RAISED DURING CONSULATATION AND FURTHER RESEARCH ON SITTINGBOURNE TOWN CENTRE AND MILTON CREEK DRAFT SPD (2009); AND PROPOSED ACTIONS FOR FINAL VERSION OF THE SPD.

Topic / Issues	Summary	Responses and Proposed Change to SPD
General support for regeneration.	Apart from some individuals' and business properties which could be directly impacted by redevelopment proposals, there was general support, albeit caveated, in respect of the principle of regenerating Sittingbourne	General acceptance of the fact that Sittingbourne needs major change - still diversity of opinion on what should change and how.
Transport Issues	<p>The impact of closing St Michaels and perceived impact on congestion was the single biggest area of concern amongst the public. Opinion ranged from outright objection to the view that the Northern Relief Road should be in place in its entirety before closing St Michaels. Also concern about the additional population and strain on Junction 5.</p> <p>The practicalities and principle of two way buses on the High Street was also a concern for the bus companies and the public from a practical and safety point of view; as well as the general amenity of the High Street. Issues such as service access for the shops; disabled access; and access for major church events were raised.</p> <p>Improvement of bus services and hours of operation were sought by some members of the public.</p> <p>Highways Agency and Kent Highways offered support for the initiatives to move away from dependence on the car. Cautious support was offered for the reconfiguration of the road network subject to further detailed modelling as proposals are worked up.</p>	<p>It is not possible to achieve the retail footprints which will attract modern developers to the town with St Michaels Rd in situ and certainly not if it were to be widened. This would create an even bigger barrier between the station and the town and the new community who will be living to the north of the railway.</p> <p>Regeneration of the town centre is dependent on the Sittingbourne Northern Relief Road Creek section which is on site from September 2009. Development to the north of the railway will be dependent on the Bapchild section of the NRR being in place (although it may be possible to bring forward some limited development subject to a full transport assessment identifying some existing highways capacity). Therefore, through traffic, especially industrial traffic will be taken out of the town centre at an early stage before the new neighbourhood can be brought forward.</p> <p>There will become a point in the development of the masterplan that the full NRR to Bapchild will be needed, and further work will be undertaken to establish when this becomes essential in</p>

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		<p>terms of the quantum of development.</p> <p>The Borough Council consider that through traffic should be discouraged from using routes to the south of the town centre such as the Avenue of Remembrance through traffic management measures including revised signing and highway design. Instead, through traffic will be directed to use Eurolink Way with its higher design standards and available capacity.</p> <p>Initial modelling work suggests that with the diversion of heavy goods traffic to the NRR combined with a review of the main routes in and out of the town will change demand patterns, particularly at Milton Road and that the Crown Quay Lane bridge operates satisfactorily. Therefore it is believed at this stage that there would be no requirement to widen the railway bridges.</p> <p>A significant amount of modelling - indeed more than is usually required at masterplan stage has been undertaken. However, as more detailed proposals come forward, much more in depth work will need to be carried out to satisfy both the planning and highway authorities that what is proposed is appropriate.</p> <p>Planning for the longer term future has much more emphasis on enabling people to use public transport, walk and cycle short distances, both from the point of view of public health but also from the point of view of climate change and likely increases in fuel prices over the longer term.</p> <p>The purpose of the masterplan is to establish the principles for development. In relation to the High Street, the principle of two way bus flow in the High Street is a key component of the masterplan. A number of the points raised would typically be dealt with during the next stage where more detailed design work would be undertaken. The masterplan will be redrafted in relation to these aspects to provide flexibility in routeing options should aspects of what is shown in the final version become</p>

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		<p>difficult to deliver due to technical constraints.</p> <p>As we move through this design process we will make sure that the promoters of development regularly engage with the bus operators. The design and bus routeing in the High Street/Station Street as shown in the masterplan is indicative.</p> <p>Action: No substantial change is proposed to the SPD in respect of transport, but some detailed changes and correction to wording and maps, plus flexibility around bus routing will be needed. Phasing of provision of road infrastructure will also be revised as part of the restructuring of the Delivery and Implementation section of the SPD.</p>
Vehicle Parking	<p>Comments were mainly from the public who wanted more parking in the centre and for it to be free. Issues around the design and security of multi –storeys were also raised.</p> <p>For residential car parking there were some concerns that flats were a euphemism for reduced car parking standards.</p> <p>Developers sought flexibility in housing and commercial parking standards depending on its type and mix of uses.</p>	<p>The masterplan proposes a consolidation of existing car parking sites in the town centre. This will go a long way to evening out parking demand patterns that currently exist, where demand is focused on a small number of smaller car parks with others being little used. Park and ride is not being pursued at this time because this only really works where you have restricted town centre parking. Sittingbourne is currently well served by parking, but not all of it is in the right place.</p> <p>There will need to be a co-ordinated approach to town centre management including the provision and costs of car parking. There are very few town centres the size of Sittingbourne with free parking, especially in relation to long term commuter parking.</p> <p>The approach for the town centre will be to assess the access demands generated by the new development proposals through Traffic Impact Assessments and Travel Plans. The transport strategy should then be aimed at optimising opportunities for travel which do not require private car travel or parking, particularly taking opportunities to promote public</p>

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		<p>transport, walking and cycling for short journeys.</p> <p>Kent County Council will be issuing revised Vehicle Parking Standards later in 2009 - it is expected that the Borough Council will be using these as a guide. For residential parking provision, there may be opportunities to make provision below the maximum standard if the development is located in sites close to the transport interchange.</p> <p>Action: Some additional wording to clarify the approach to car parking provision will be needed in the SPD.</p>
<p>Landowner Comments and the level of detail in the SPD</p>	<p>Some of the larger landowners have objected to the level of detail in the SPD (particularly on design and layout), preferring as much as possible to be left to planning application stage.</p>	<p>The purpose of the masterplan is to establish the principles for development, which would include key design and layout matters which will ensure that the town centre is planned as a cohesive whole rather than a series of piecemeal developments which do not relate well to each other or the best of the existing townscape. This does need to make statements about building heights and massing; street patterns and layout; structural landscaping; public realm and open space; landmark buildings and viewpoints as these are integral parts of good urban design and townscape character. The SPD is considered to have the balance about right in these respects, but some restructuring to highlight key issues and important points for the various quarters of the town could be undertaken in redrafting.</p> <p>Action: No substantial change is proposed to the level of detail or design principles in the SPD, although the clarity in expressing the key points should be improved by some restructuring of the document.</p>
<p>Provision of Public Infrastructure and Phasing of Development (including developer contributions)</p>	<p>There have been a number of comments from key developers and landowners about the phasing and deliverability of the project overall, particularly in regard of those land parcels which would be affected by infrastructure provision; and issues around flood mitigation and biodiversity.</p>	<p>Section 8 of the SPD and Appendix F (Phasing and planning obligations respectively) are being re-cast and re-written with the assistance of consultants as a result of comments received. It is intended that this should ensure viability as well as ensuring that the right infrastructure is in place at the right time</p>

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		<p>to support each phase of development. It is considered that a consortium approach will be necessary at outline planning consent for key phases to ensure that development costs can be apportioned across land ownerships to secure the viability of the whole regeneration project.</p> <p>Action: The sections of the SPD dealing with phasing and delivery and planning obligations are being re-written. Drafts are appended to this item. Land to the North of the railway will need to be brought forward on a consortium basis for the whole area, indicating phasing, essential infrastructure, development contributions and flood and biodiversity mitigation measures.</p>
<p>Appropriate Assessment and Habitat Regulations (Biodiversity)</p>	<p>The proximity of the SPD area to the European protected habitats in the Swale Estuary and Marshes and the fact that some of the species use the Creek (parts of which are local nature reserves in their own right) has attracted strong objection from wildlife interest groups to the SPD and the supporting Appropriate Assessment and Sustainability Appraisal. Natural England are seeking more data on use of the Creek area by protected species to improve the AA. The main point of concern is the indirect impact of recreational access to the Creek area and how this should be mitigated. A number of different standards for space or approaches have been put forward. All seek provision of mitigation; management of access and maintenance and monitoring of mitigatory land in perpetuity.</p>	<p>This is a key point and Natural England will need to be satisfied in respect of observance of the European Habitat Directives prior to the adoption of the SPD. There is a fundamental conflict of interest between this and the principle of restoring the Creek as a major natural asset and focal point for Sittingbourne. The Milton Parkland Project goes some way to the management of recreational access and this will need to be cross referenced in the SPD. There is much confusion as to what level the assessments and mitigations should be identified at (Local Plan/ SPD/ Parkland Project/ or even planning application stage). Some additional evidence has been collated on bird populations to augment the Appropriate Assessment. The SPD will need to include some wording on establishing a suitable mitigation framework for the Creek area. This would be best achieved through a consortium approach at the outline planning application stage. It is likely to have to include mitigatory measures and some means of maintenance and management. It is not considered appropriate for the SPD to go into details of any such mitigatory scheme as this will depend on the broad location, type and quanta of development which will be identified at outline application stage. This also has the benefit of the fact that if development is delayed for any reason, studies undertaken now may have become out of date</p>

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		<p>before development schemes are brought forward.</p> <p>Action: The Appropriate Assessment and Sustainability Appraisal will need to be augmented and impact assessments updated accordingly. The SPD will consequently need to have additional wording that a mitigatory framework to support development proposals will be needed, at outline planning consent stage, which will need to be agreed with Natural England. This will need to be in the main body of the text and the Delivery and Implementation Section.</p>
<p>Flood Mitigation, Infrastructure Provision and Approach to Developable Land at Milton Creek</p>	<p>Some minor comments to wording have been received from the Environment Agency. Objections to the amount of green space shown adjacent to the Creek (both for flood mitigation purposes and biodiversity) have been received from affected landowners, to the effect that the allocation and phasing of land in this way effectively sterilises significant areas and could affect overall viability of regeneration.</p>	<p>Since the publication of the draft SPD, the Borough Council's Strategic Flood Risk Assessment has been finalised in partnership with Environment Agency. A detailed site specific flood risk assessment will need to be brought forward as part of the proposed consortium approach for the land to the north of the railway. However, there are some broad principles which can be used to clarify section 2.5 of the SPD. This will include preclusion of development in the functional floodplain; and then, a safe dry access being identified (which may involve level changes); and other mitigatory measures which would need to illustrate that flood risk was not worsened for adjacent areas.</p> <p>Action: The wording of the SPD will need to be amended in respect of flood risk; and recognise that this issue will need to be tackled in a comprehensive way for the whole of the area to the North of the railway in the phasing section as well.</p>
<p>Quantum of Retail Provision North and South of the Railway and Provision and Nature of the Bridge Link over the Railway.</p>	<p>There have been comments from developers and Kent County Council querying the overall quantum of retail development; the viability of a retail lined bridge; and provision of further retail floorspace to the north of the town centre. The balance of a convenience retail led scheme also raises concerns that the priority should be to secure comparison goods shopping.</p>	<p>The Local Plan (2008) retail studies set the context for the policies which support the SPD and the retail quantum is well within that range. However, given the current economic situation, updated retail impact assessments may need to be submitted as part of planning applications and especially as the delivery period for the town centre is likely to extend beyond</p>

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	<p>The Retail Park has commented that they could make an early contribution to non – bulky goods comparison goods shopping north of the railway subject to appropriate consent.</p> <p>Most public concern is around the fact that the decline in the fortunes of the High Street and that all opportunities should be taken to reinvigorate the area or it will be irrevocably damaged by new retail provision. Others are keen that the new development should be well integrated with the High Street and that the historic buildings be retained and used.</p> <p>The issue of future Town Centre Management has also been raised.</p>	<p>the Local Plan horizon date of 2016.</p> <p>The balance of convenience and comparison floorspace to be provided is an issue, but the Borough Council will expect any scheme to show a considerable focus on comparison shopping as well to support viability.</p> <p>Retail floorspace to the north of the railway is an extension to the town centre, should demand require it and it can be demonstrated that it is to the benefit of the whole town centre to do so. It is not an alternative to the current town centre. The bridge link between the two is therefore critical.</p> <p>Policy B27 of the Adopted Local Plan expects the bridge link will be retail lined or similar. However, there could be issues relating to costs/viability and practicability which suggest that a retail lined bridge may not be appropriate. In these circumstances, the Council would expect a full review of design options aimed at maximising the integration of the Milton Creek area with the town centre core area south of the railway line. The bridge design should secure the potential for a well used and attractive pedestrian and cycle friendly route, be well lit and landscaped and provide for secure and safe use during night as well as day. It is considered that a bridge width of at least 15m should be provided to ensure such integration. The SPD does need some flexible wording to indicate that should demand not exist in future to provide retail to the north of the railway and a retail lined bridge, then some review of strategic policy for the town centre in the emerging LDF Core Strategy would be prudent.</p> <p>The High Street has a high level of vacancies partly due to recession and partly because these buildings are simply not attractive to larger modern retailers. People have consequently chosen to shop elsewhere and a major change is needed if the town centre is to be successful once more. This may mean accepting that some of the High Street will need to change use,</p>

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		<p>perhaps to allow small offices or residential (on upper floors) or other uses. Attracting investment to the town with new development is the best chance of attracting other small businesses to use and restore the High Street. There is ample design guidance in the SPD to ensure that the integration of new development with the High Street is an essential part of any development proposal.</p> <p>The Council will expect any major developer in the town centre to work with them and other public agencies on effective Town Centre Management and there may be S.106 contributions sought for this purpose.</p> <p>Action: Some more flexible wording will need to be added to the SPD to allow for changing economic circumstances and the form and nature of retail provision and the bridge link. The possible need for town centre management also needs to be included in the relevant sections of the document.</p>
Health Impact Assessment	A Health Impact Assessment (HIMP) was carried out for the draft SPD by the Primary Care Trust.	<p>Most of the findings of the HIMP are already integral in the SPD. Where the SPD could be strengthened, and clarified, for example by including the suggestions on enhancing social inclusion, these can be added to the SPD.</p> <p>Action: Add para on enhancing inclusivity to the SPD in delivery section.</p>
Air Quality Assessments	Air quality impact may become an issue resulting from the changes proposed to the traffic circulation around the town centre (especially the St Pauls end); and also residential development at the eastern end of Milton Creek because of its proximity to industrial processes. Changes in the permitted levels of pollutants may compound the issue.	This is an issue which will be very dependent on the precise nature of traffic circulation; the type and layout of development elsewhere. For this reason, it is probably not an issue that the SPD can deal with in detail but needs to flag up as something to be examined at planning application stage.

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		<p>Action: Add words that air quality is a sensitive issue which will need to be addressed at planning application stage.</p>
<p>Skills / Learning and Performance Space</p>	<p>Funding for the Skills and Learning centre is unlikely to be forthcoming in the near future due to the effect of recession on public funding for this project.</p> <p>The Sittingbourne Cultural Infrastructure Study recommends that this facility should be combined with a Arts Centre with a 300 – 500 capacity performance space.</p>	<p>A further education college and improving skills of the local workforce is seen as essential by the Borough Council and the need to ensure that a site is reserved for this is a priority</p> <p>The Learning and Skills centre is intended to offer a broad base of skills. Funding for this is unlikely to be available in the short to medium term, but provision of a site within the town centre is viewed as a critical objective to support the future economic regeneration of the town and the Borough. The preferred location for the facility is to locate it within the town centre core area, but if this cannot be achieved then a site on publicly owned land in Central Avenue will be sought. Funding will be sought from a mix of public sector and public / private sector partnership agreements.</p> <p>The model for delivering the overall service may be that the facility in the town centre will also sign post to other training facilities in the town such as KSRC and the construction skills centre in Bonham Drive.</p> <p>Action: Minor rewording to reflect the long term need to secure such a facility.</p>
<p>Feasibility Study on Developing Cultural Infrastructure as part of Sittingbourne Town centre Regeneration</p>	<p>This is a costed study which has been consulted upon in parallel to the SPD. Four recommendations emerge.</p> <p>Town centre cinema Milton Creek Heritage Centre Civic Square Civic Hall / Arts / Learning Centre</p>	<p>Provision is already made in the SPD for all of these uses in land use terms – although the dimensions of the civic square in the study are inadequate. This would be part of the design and layout of the central area. There is substantial public support for these facilities, some of which would need to be privately funded and some through public / private partnership</p>

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		<p>arrangements.</p> <p>Action: The SPD can cross refer to this study and add clarity as to the facilities sought.</p>
Leisure and Sports Facilities	<p>There was considerable support from the general public for a wider range of leisure provision in the town centre including especially cinema, bowling and more cafes and restaurants; and activities for young people.</p> <p>Sport England queried the adequacy of sport pitch and indoor sports facilities for the level of new housing.</p>	<p>Some of the leisure issue have been picked up under the Culture Study and the learning and skills sections. The SPD does make provision for leisure activities and open space - they are an essential part of a successful town. The proposed square is ideal for outdoor events, markets and performances - this is stated in the SPD. Commercial leisure facilities like cinemas and theatres have to be provided and run by the private sector and this in turn depends on getting people into the town for shopping and other activities.</p> <p>Sport pitches and open space will be required in accordance with Local Plan policy (and the developer contributions SPD).</p> <p>Leisure Services advise that at the present time the Swallows Centre has plenty of spare capacity in all its facilities. A study is being commissioned for the Borough on the provision of indoor leisure facilities as part of the Open Space Assessment, which will feed into the LDF Core Strategy and future provision needs. Given that delivery of the SPD regeneration will extend beyond the current Local Plan, this could be cross referenced.</p> <p>Action: Add cross reference to indoor leisure study.</p>
Local Heritage including Sittingbourne and Kemsley Light Railway and the Paper Trail	<p>Public support for celebration of local heritage in paper, brick and barge building and the older built heritage of the town. Support for retention of SKLR from general public, and County Archaeology Service, although concern over references to viability of railway.</p> <p>Suggestions to use this as a park and ride route.</p>	<p>The Sittingbourne Cultural Infrastructure Study recommends that a Heritage Centre at Lloyds Quay would showcase the town's industrial and social heritage and the ongoing regeneration of the Creek. This should be expanded upon in the SPD. The estimated initial cost to set up is £700,000 which would need to be met from development contributions from all</p>

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	<p>Support for creation of a heritage quarter in vicinity of Creek head and SKLR terminal; and location of museums</p> <p>Support for retention of historic buildings and restoration of High Street and careful integration with new development. Some comments that no new development should take place until High Street shops re-occupied.</p>	<p>development within the SPD area.</p> <p>The reference to SKLR will be retained - it supports the operation of the light railway within the service corridor. The masterplan also states that should the railway become unviable in the longer term then the corridor would be retained for the use as a cycle and pedestrian corridor.</p> <p>Action: Expand on provision of a heritage centre in the appropriate sections of the SPD.</p>
School Provision	<p>Much concern from the public that there is a shortage of secondary school places currently.</p> <p>Kent County Council has expressed some concern that the phasing of housing numbers and type is not clearer in relation to school provision.</p>	<p>The SPD makes provision for a primary school at Milton Creek and the Local Plan (2008) allocates land for a secondary school at Quinton Road. There will be some further clarity for phasing and delivery with the re-drafting of Section 8. However it is unlikely that all of the housing envisaged to the north of the railway will be deliverable in the short term. Given the longer term delivery period for the regeneration plans, it will be essential to work alongside Kent County Council to monitor school capacity and plan for the timely and appropriate provision of additional school places.</p> <p>Action: Words to be added to clarify the need for school provision.</p>
Nature and location of civic uses and facilities	<p>Strong support from KCC and other public bodies for a 'gateway' building approach to provision of public services in the town.</p>	<p>Discussion is ongoing with KCC property, KCC service providers and the Borough Council to explore how public services should be delivered in a regenerated Sittingbourne. This is a complex area and may require different working practices within and across organisations. The contribution of public services to vitality is noted. The Masterplan will be amended to allow for more flexibility in provision of this his</p> <p>Action: Revision of Masterplan figure to allow for greater flexibility in the provision of a 'Gateway' type facility.</p>