

COMMITTEE – 30 JUNE 2016

PART 4

Report of the Head of Planning

PART 4

Swale Borough Council’s own development; observation on County Council’s development; observation of development by Statutory Undertakers and by Government Departments; and recommendations to the County Council on ‘County Matter’ applications.

4.1 REFERENCE NO - 16/503409/FULL			
APPLICATION PROPOSAL Proposed use of highway for Sittingbourne Market.			
ADDRESS High Street, Sittingbourne, Kent ME10 4PH.			
RECOMMENDATION – Grant subject to conditions below, and receipt of comments from Economic Development Officer.			
SUMMARY OF REASONS FOR RECOMMENDATION The existing market needs to be relocated due to the Forum car park no longer being available as a result of the Sittingbourne regeneration scheme. Use of the High Street for the market would not give rise to any serious amenity concerns.			
REASON FOR REFERRAL TO COMMITTEE Council application with local objections.			
WARD Chalkwell	PARISH/TOWN COUNCIL N/A	APPLICANT Swale Borough Council	
DECISION DUE DATE 16/06/16	PUBLICITY EXPIRY DATE 1/06/16		
RELEVANT PLANNING HISTORY (including appeals and relevant history on adjoining sites):			
App No	Proposal	Decision	Date
SW/03/0754	Part change of use of existing Forum car park to an open air market trading on Fridays only.	Approved	18.08.2003

1.0 DESCRIPTION OF SITE

1.01 The application site comprises Sittingbourne High Street, which is a defined core shopping area, a conservation area, an area of potential archaeological significance, and contains a number of listed buildings.

2.0 PROPOSAL

- 2.01 The application seeks permission to relocate Sittingbourne Market from the Forum car park to the High Street.
- 2.02 On Fridays the top section of the High Street (between Station Street and Central Avenue) would be closed to traffic. It is proposed to reverse traffic flow along the one-way section of Central Avenue (between the High Street and the Post Office) on Fridays to allow vehicles to enter the High Street from Central Avenue and use the lower, eastern half of the High Street.
- 2.03 On Saturdays it is proposed to continue the current practice of closing the whole High Street (from Station Street to Bell Road) to traffic.

3.0 PLANNING CONSTRAINTS

- 3.01 See paragraph 1.01 above.

4.0 POLICY AND OTHER CONSIDERATIONS

- 4.01 The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) both generally encourage developments that would contribute to a healthy and vibrant economy, subject to no serious adverse impacts.
- 4.02 Policies SP1, SP3, SP7 and B1 of the adopted Swale Borough Local Plan 2008 (SBLP2008) support and encourage developments that would contribute to a sustainable and vibrant economy, and that would provide community uses and *“bring life back into town centres”* (SBLP2008 para. 2.66).
- 4.03 SBLP2008 policies SP6 and T5 seek to ensure that all developments are well served by and well related to public transport links, and encourage sustainable modes of transport.
- 4.04 SBLP2008 policies E1, E14, E15 and E19 seek to ensure that all developments do not give rise to any serious amenity concerns, are of a good standard of design, and do not cause serious harm to conservation areas and listed buildings.
- 4.05 Policies CP1, CP4, CP6 and CP8 of the emerging Local Plan – Bearing Fruits – are similarly general policies. More specifically, policy DM2 encourages new retail opportunities within town centre locations, and policy Regen 1 refers to the wider aims of the Sittingbourne regeneration project and notes the redevelopment of the Forum car park area for cinema and restaurants.
- 4.06 The Swale Transport Strategy 2014-2031 (Consultation Draft 2014) notes, at para. 3.8, that the Government has issued a grant of £2.5 million towards the Sittingbourne Town Centre Regeneration scheme, and at Table 8 it states that this regeneration and public realm improvement scheme is necessary to *“increase the vitality of the town centre and make it more attractive for walking and visiting.”*
- 4.07 The document also notes, in general, that a key aim of the strategy is to encourage use of sustainable and public transport, and in particular to increase use of buses by 50% by 2031 and ensure that buses are *“accessible for all”* (Table 7). It also notes, however, that currently only 2% of the Borough’s population uses buses to travel to work (Table 3).

4.08 Of particular importance is Table 11, which states at section A6 (and the preceding paragraphs) that the relocation of Sittingbourne market to the high street is necessary as part of the wider infrastructure delivery plan, and to meet the aims of the Strategy.

5.0 LOCAL REPRESENTATIONS

5.01 The application was advertised by way of a site notice and letters to local residents / businesses. As a result the following responses have been received:

5.02 Chalkwell buses object to the application on the grounds that the closure of the High Street will *"have serious adverse affects on public transportation and discourage its use."* They also suggest that the proposal is contrary to the aims of the Swale Transport Strategy 2014-2031, of which one aim is to encourage the use of public transport. They suggest that redirection of services to St Michaels Road or the rear of the Forum on individual days would increase costs and inconvenience or confuse customers. I attach their complete objection for reference.

5.03 Two letters of objection have been received from local residents, raising the following summarised concerns:

- Loss of High Street bus stops. Will make it difficult for elderly or disabled people.
- Bus stop at rear of Forum won't be able to cope with additional traffic.
- The market *"is not worth saving let alone expanding."*
- Market should be held on Saturdays only.
- If the market is successful will this cause local shops to move out?

5.04 No other representations received.

6.0 CONSULTATIONS

6.01 The Council's Economy and Community Services Manager comments that local bus operators (including Chalkwell) were involved in discussions regarding the town centre regeneration, and that KCC Highways & Transportation favour the provision of one central bus hub at the rear of the Forum rather than individual bus stops along the High Street.

6.02 I await comments from the Council's Economic Development team.

6.03 No other representations received.

7.0 BACKGROUND PAPERS AND PLANS

7.01 Of relevance is application SW/03/0754, which granted planning permission in 2003 for use of part of the Forum car park for a market on Fridays.

8.0 APPRAISAL

Principle of Development

8.01 Relocation of the market would retain an economic facility / activity within the town centre, and contribute to the vitality and viability of the High Street. In this regard the proposal accords with adopted local and national policy and I consider it to be acceptable in principle.

Visual Impact

- 8.02 The proposal would have little visual impact beyond that normally associated with markets, i.e. the stalls would be prominent and visible for part of the day, but removed at the end of trading until the following week. Therefore, although the site High Street is a very prominent location and subject to formal designation as a conservation area, I do not consider that the holding of a market on two days each week would significantly harm the character or appearance of the area. Nor do I consider that there would be any serious impact upon the setting of the listed buildings along the High Street.
- 8.03 I consider that a market (which is being run by a new cooperative with the aims of emulating Faversham market) in such a prominent location would actually be a benefit to the town in terms of general levels of activity and vibrancy, and may encourage additional footfall to the benefit of local shops and services.

Residential Amenity

- 8.04 There are a number of flats above the shops in the High Street, but I do not consider that a market on two days a week would give rise to any serious amenity concerns over and above the normal functioning of the core shopping area. There may, in fact, be a slight benefit to residents as pedestrianisation would reduce local traffic noise for part of the week.

Highways

- 8.05 I have no serious concerns in regards to highway safety and amenity, and note that the covering letter confirms that trader's vehicles could be parked in Albany Road or to the rear of the High Street shops – these are permit controlled areas and thus the Council could ensure such facilities were not abused or over-subscribed.

Other Matters

- 8.06 I note the objection from Chalkwell buses, who (in essence) object to not being able to follow their normal route down the High Street on a Friday (the High Street already being closed off on a Saturday), and share concerns with local residents that elderly or disabled people won't be able to access the bus stops at the Forum or on the eastern part of the High Street.
- 8.07 I do not share their concerns however. It is approximately 120m from the bus stop by Berry Street (adjacent to Edinburgh Woollen Mill) to the one at the rear of the Forum, or 370m to the one at the eastern end of the High Street (by St Michael's church). Whilst I note some people may have mobility problems, this is not a significant distance and would not, in my opinion, seriously inconvenience bus users. It would also be possible to notify travellers that the service would be subject to change in advance (although I do appreciate that there may be a cost involved), much the same as would have occurred when the High Street was originally pedestrianised on Saturdays.
- 8.08 Neither do I consider it too onerous for the bus service to divert around the closed section of the High Street. Alternative routes are available down Station Street to the rear of the Forum, or by using Park Road, Avenue of Remembrance, and Central Avenue (which will be reversed, as at 2.02 above) to reach the lower end of the High Street – a total diversion of 650m.

8.09 In this regard I consider that, although perhaps causing minor inconvenience to some bus users and requiring a minor traffic diversion, the proposal would meet the aims of the Swale Transport Strategy.

9.0 CONCLUSION

9.01 Whilst I note local objection I consider that the use of the High Street for a market on two days of the week would be a benefit to the town and the local community, and would not give rise to any serious issues of amenity that would justify a reason for refusal. I also note that the market is required to relocate in order to facilitate the town centre regeneration scheme.

9.02 Taking the above into account I recommend that planning permission should be granted, subject to receipt of comments from the Council's Economic Development officer.

10.0 RECOMMENDATION – GRANT Subject to the following conditions:

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: In pursuance of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The use of the area hereby permitted shall be restricted to the hours of 7 am to 5 pm on Fridays and Saturdays, and shall not take place at any time on any other days.

Reason: In the interests of the amenities of the area.

The Council's approach to this application:

In accordance with paragraphs 186 and 187 of the National Planning Policy Framework (NPPF), the Council takes a positive and proactive approach to development proposals focused on solutions. We work with applicants/agents in a positive and proactive manner by:

Offering pre-application advice.

Where possible, suggesting solutions to secure a successful outcome.

As appropriate, updating applicants/agents of any issues that may arise in the processing of their application.

In this instance the application was acceptable as submitted and no further assistance was required.

NB For full details of all papers submitted with this application please refer to the relevant Public Access pages on the council's website.

The conditions set out in the report may be subject to such reasonable change as is necessary to ensure accuracy and enforceability.

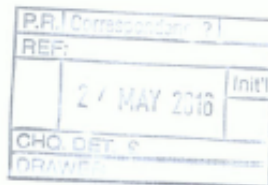
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Chalkwell
A family run business since 1931

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Coach Hire - Bus Services - Commuter Coaches - Coach Holidays and DayBreaks - MOT Garage

Mid Kent Planning Support,
Maidstone House,
King Street,
Maidstone,
ME15 6JQ



May 25th 2016

Dear Sir / Madam,

NOTIFICATION OF AN APPLICATION

APPLICATION REF: 16/503409/FULL
PROPOSAL: Proposed use of highway for Sittingbourne Market.
ADDRESS: The High Street Sittingbourne Kent ME10 4PH
APPLICATION TYPE: Change of use

I would like to raise a formal objection on behalf of Chalkwell Garage & Coach Hire Ltd to the proposed closure of Sittingbourne High Street to allow the relocation of Sittingbourne Market on Fridays.

I am concerned that this application is contrary to the aims of the Draft Swale Transportation Strategy 2014 – 2031 as published on the Council’s website, in that it will have serious adverse effects on the provision of public transport and discourage its use. There is instead an urgent need for a detailed plan and approach regarding all aspects of demand for transport, road use and traffic flows in and around the town centre. Until this has been undertaken and agreed this application to relocate the market stalls into the High Street is premature.

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, and at the Swale Joint Transport Board meeting on 7th March 2016.

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.



Chalkwell-Coach-Hire-Tours @ChalkwellCoach



Chalkwell Garage and Coach Hire Ltd. Registered in England No. 2520842

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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 2002. 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.

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 :-

- This application is at odds with the draft Swale Transportation Strategy (2014 – 2031), in particular one of its four themes – the aim to encourage use of sustainable means of travel as an alternative to the private car (walking, cycling, bus and rail). This relates to the two following points 'increase use of sustainable means of travel'(4.4) and 'to be done to reduce reliance on the private car' (4.7).

Also in section 5 of the Strategy, table 7, under bus services point 15 'Ensure that bus stops are accessible with high kerbs and bus timetables and bus stop clearway markings'.

- Such a closure of the High Street 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.

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- 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 Michael's road suffers from heavy traffic delays, and this is without the 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 continuous parking patrols this will add to the existing highway congestion and delays which 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, or alternatively Station Street / St Michael's Road. 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 detailed comment below regarding the initially suggested alternative route suggested by Swale Borough Council which outlines the additional operating costs that might be caused.

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- 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 as soon as 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 planning application is granted and the High Street is closed 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.

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- 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 via Park Road, Avenue of Remembrance and Central Avenue. Whilst we welcomed the attempt to try and find a potential solution it was impractical. Our response was as follows and these matters have not been addressed.

- 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).*
- With Sittingbourne High Street closed between Station Street and Central Avenue it is likely that this route would be subject to unacceptable traffic congestion and delays.
- Due to the lack of carriageway width in some sections of Central Avenue, for a bus service to operate along this route it would require the removal of the limited-waiting parking bays outside of the Police Station, the re-configuration of the existing 90 degree parking bays outside of Wyvern Hall to 45 degree bays, to reduce the risk of vehicles reversing out into the path of buses travelling on the opposite side of the road. The low trees in the area constitute a hazard for buses and this would need to be addressed regularly.
- Sweep-path analysis would need to be undertaken to ascertain whether any junction re-configuration would be required at the junction with High Street with the reversal of traffic flow in Central Avenue. Central Avenue is not ideal for bus operation.
- We estimate 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.

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EXISTING BUS STOP, REAR OF FORUM, SITTINGBOURNE

The arrangements at the existing bus stop at the rear of the Forum are poor and will only be exacerbated if more services have to be diverted to serve this point :-

(a) Lack of Capacity for Buses – the current bus stop layout can accommodate two stationary buses, but invariably there are three or more buses at this stop at one time, and with the proposed changes to the current High Street services this number will increase. This may well require a re-alignment of the kerb line between the two entrances/exits to the rear service area of the Forum units 10-17, to reduce the width of the footway to allow an additional bus clearway to be installed. This may mean the re-alignment of the kerb on the opposite side of the road to reduce the width of grassed verge to widen the carriageway to allow two-way vehicle movements when buses stop. The additional bus clearway is some distance from the original bus stop and a full safety audit must be undertaken.

(b) Lack of Capacity for Passengers – the current layout of the bus stop does not provide much capacity for passengers waiting for buses. Due to the position of the existing bus shelter and pedestrian guard rail, the footway can become blocked with a moderate number of passengers waiting. During peak times, pedestrians could be forced into the road to manoeuvre around stationary buses, and there is also the risk of collision between passengers and vehicle wing mirrors. Providing an additional bus clearway as above may assist with moving some of the passengers further along the footway. Re-locating East bound bus services (which would have previously served the High Street) to the stop along St Michael's Road, by the former Globe and Engine pub, could cause confusion to passengers and also increase the number of pedestrians having to cross the busy St Michael's Road. For less abled people this additional distance and requirement to cross the road may be very problematic and not well received.

(c) Lack of Shelter for Passengers – although there is a large existing bus shelter, owned by Clear Channel, at the bus stop at the rear of the Forum, due to the number of passengers using this stop on many occasions the shelter becomes full resulting in people standing out in the rain. An additional shelter next to the existing one will be required to assist passengers.

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.

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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 this planning application is granted and the High Street closure goes ahead 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 alternative 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.

There is an obvious risk that we may have to reluctantly 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 where 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 how it relates to its own Draft Swale Transportation Strategy and 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 general lack of support by Swale Borough Council for the provision and further development of bus services in and around Sittingbourne.

The proposed closure of Sittingbourne High Street is counter-productive to the fundamental purpose of regenerating Sittingbourne Town Centre and this Planning Application must not be granted. An

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alternative site should be found for Sittingbourne Market on Fridays and the High Street remain open to buses and general traffic.

Yours faithfully



Clive Eglinton
Managing Director