

The Parishes Opposition Group

Planning Services
Swale Borough Council
Swale House
East Street
Sittingbourne
Kent
ME10 3HT
Attention: James Freeman
Jim Wilson
Richard Allen

c/o Waterside
Highsted Valley
Nr Sittingbourne
Kent
ME9 0AD

24th March 2009

Five Parishes Opposition Group (“FPOG”) - Objection to applications

- 1. SW/09/0118 outline 4ha extension to Kent Science Park (“4ha extension”)**
- 2. SW/09/0093 detailed application for no.2 new B1 units (“2 unit application”)**

Dear Mr Freeman, Mr Allen and Mr Wilson,

We, the Five Parishes Opposition Group, object to the above mentioned applications on the grounds that the applications does not conform to Swale Borough Council's recently adopted Local Plan (Feb 2008) and Government policy PPG13. In particular the application for 4ha extension does not comply with policies B25 (1), B25 (2), B25 (4) or PPG13.

Our objections comprise this covering letter plus 3 attached documents:

- a) Executive Summary; Transport Appraisal Summary and Critique, by Odyssey Consulting Engineers, appointed advisors to the FPOG.
- b) A Transport Appraisal Summary and Critique, by Odyssey Consulting Engineers.
- c) Five Parishes Objections, including our analysis of employment on the Kent Science Park using published data provided by Kent County Council and Swale Borough Council's Economic Impact Assessment (“EIA”) of Kent Science Park (“KSP”).

We believe the Ecologia unit can be located within the existing SECURITY FENCE of the Kent Science Park, this application therefore contravenes policy B25 (1), there is no clear business need for a 4ha extension. The proposed development will therefore have an adverse impact upon the environment, including the rural road network and AONB contravening policy B25 (2). The application if approved will set a precedent for further development OUTSIDE the SECURITY FENCE.

We were so concerned about the impact on traffic as a result of these applications the group appointed professional consultants Odyssey Consulting Engineers to review the applicants Traffic Assessment (“TA”) and Travel Plan (“TP”). It is clear that the applicants TA and TP have not addressed the extra traffic demands put on the surrounding road network, in fact we would say the 4ha extension in no way satisfies B25 (4) and PPG13 and the 2 unit application in no way satisfies PPG13:

- 1) The TA and TP give virtually no consideration to transport sustainability to KSP.
- 2) Trip rates in TA are underestimated as they are based on an overstatement of current employees in KSP.
- 3) No footpaths or pavements exist to get to KSP.
- 4) No cycle routes exist to get to KSP.
- 5) There are no meaningful improvements to public transport to get to KSP i.e. buses.
- 6) Poorly located developments should not be permitted by virtue of the existence of a travel plan.
- 7) No master plan for KSP, therefore impossible to understand the true “final” traffic impact.

- 8) Applicants TA states Ruins Barn Road and Broad Oak Road queue would increase from 33 vehicles to 126 vehicles. There are no measures in address this staggering increase or the major impact of additional traffic on the surrounding rural road network.
- 9) No assessment has been undertaken in the TP of where current staff and visitors travel from to get to KSP. Given that a substantial number live further a field than Sittingbourne or Swale, it is unrealistic to believe they use public transport options to get to KSP, therefore the applicants statement of significant modal shift in the future are unrealistic.
- 10) Finally so serious are these issues we believe it is highly questionable as to whether they are capable of being mitigated.

Additionally if Highsted Road is closed off as a result of the Swanstree Avenue extension the impact on the Cromers Road/Woodstock Road/Ruins Barn Road junction would need to be considered, putting this junction and the surrounding rural road network under considerable strain. The applicant's proposal to install two 30mph signs plus a small section of curb realignment on Ruins Barn Road in NO WAY addresses the traffic issues relating to these applications.

The Planning Inspector rejected a 6ha expansion at the Local Plan Inquiry, he was very clear in his criticism of the Kent Science Park, that they had not utilised the space WITHIN the SECURITY FENCE to its best advantage or optimum level. There has been little if any change to the use and scale of development WITHIN the SECURITY FENCE since the Planning Inspectors Report.

According to the EIA, KSP comprises 47,100sqm (507,000sqft) of offices and lab space on a 22ha site. In our experience commercial employment sites are built to a conservative 40% capacity of floor space. Clearly KSP have not done this to date. We do not consider 4 ha extension to be 'limited expansion' viewed in the context of potential scope, if this application is approved, future development say 40% of 4ha footprint could trigger 32,000 m² (c344,000sq ft) of floor space in two storey development. Based on Research and Development use, with Kent Highway Service's parking standards applied at 1 car space per 35sqm of floor space and 1 commercial vehicle space per 200sqm floor space, would generate a minimum of 1000 cars and 160 commercial vehicles. This is a huge increase in traffic. Therefore the provision in Policy B25 for a site Master Plan should be produced by KSP prior to the determination of the 4 ha extension.

We dispute the comments set out in the applicants Consultation Statement. Representatives of FPOG attended the Kent Science Park's public consultation on 26th June 2008, at Tunstall Village Hall. We are very disappointed that Kent Science Park has clearly not understood the needs, concerns and aspirations of local residents. In fact we would go far to say that KSP's representatives back tracked on a number of key factual points and at worst completely contradicted themselves including their development aspirations. There was clearly no support from the residents for these applications or their future development proposals. It was evident that of the 81 tenants cited by the Kent Science Park, 20 were "brass plate" businesses that were not actually onsite in the park. Our website has had more visitors on it in the same timeframe as the KSP "Have Your Say" site from 25th June –Dec 2008. Their visits per month ranged from 146 to 570 whereas ours for the same period range from 1949 to 2570 and for February we had 5832 visitors.

The recent Kent Science Park Economic Impact Assessment highlights significant items; i) a drastic reduction in the number of people employed locally, ii) 50% of KSP occupied, iii) 50% of employees situated in 6.5% of available space.

Finally it is also worth noting that departure from Government Policies on sustainability could result in the application being called in by GOSE. We have in fact started dialogue with GOSE in this regard.

In view of the foregoing observations we consider that the applications should be refused.

Yours sincerely

Cllr Monique Bonney

Chairman of the Five Parishes Opposition Group

www.fiveparishes.org.uk