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25<sup>th</sup> August 2009

Mr J Wilson  
Major Applications Officer  
Swale Planning Services  
Swale Borough Council  
Swale House  
East Street  
Sittingbourne  
Kent ME10 3HT

Dear Mr Wilson,

**OBJECTION TO PLANNING APPLICATION**  
**SW/09/0118 Outline application for 4ha extension to Kent Science Park**

I am instructed by the Five Parishes Opposition Group (FPOG) comprising Bapchild, Bredgar, Milstead, Rodmersham and Tunstall Parish Councils in respect of the above referenced application for outline planning permission that is understood to be reported to the Planning Committee meeting to be held on 10<sup>th</sup> September.

As you are no doubt aware, FPOG are so concerned with the proposals to extend the existing Kent Science Park that they have instructed me to act on their behalf is seeking the Government Office for the South East to 'call-in' the application for determination by the Secretary of State as they consider the proposals are in conflict with both National and Local Planning Policy and are of more than local importance.

FPOG's objections are set out in detail in the attached document dated August 2009, and accompanying compendium of references to support the objections and are made in response to the additional supporting material submitted by the applicant's agent, Paul Sharpe Associates (PSA) dated 3rd August. You should also already have received the further objections submitted by Bredgar Parish Council dated 17<sup>th</sup> August which FPOG are in complete agreement with. Further separate responses are understood to be forwarded to you shortly by the other constituent Parish Councils.

FPOG have reviewed the extensive additional material submitted on behalf of the applicants and wish to re-confirm their continuing objections to the proposals to extend Kent Science Park. Before providing our further comments, we wish to point out that whilst we understand that the normal consultation period has been applied by Swale BC for additional and revised material, we consider that given the applicants had 4 months to provide the additional information to the Council, to give consultees only 14 days to comment is inadequate, particularly given the volume of additional material submitted and the time of year, when many are away on holiday.

This response details the totality of the concerns of all constituent members of FPOG and deals with matters relating to the applicants rebuttal of FPOG's original objections, contained in the PSA letter dated 03.08.09 and provides a summary of the views of my clients highway consultants, Odyssey Consulting Engineers of the additional highway material submitted by JMP. In summary, the additional material submitted is not considered sufficient to alter FPOG's view that the proposals are not in accordance with Local Plan Policies B25, RC7, T1 or T2 and should therefore be refused.

### **Comments in respect of PSA rebuttal of FPOG's original objections**

1. **Employee Numbers** – The attached document produced by FPOG sets out in detail my clients continued concerns in relation to the matter of employee numbers. My clients have highlighted the inconsistencies in data submitted by the applicants by referring to the data contained in the Draft Travel Plan regarding employee numbers (1,200) and the trip data for the survey carried out in the same month. The detailed critique is contained in the attached document but in summary, according to FPOG's calculations, there is a discrepancy of 116 employees. This is just one example of inconsistencies of data provided on employee numbers.

The applicants provide in their various supporting reports varying levels of employment across KSP, ranging from 1,108 employees to 1,260 employees. We question therefore how such anomalies can occur.

We also question why there is a seasonal variation in the workforce at KSP which accounts for some 8% of the employees.

Whilst we note that the applicants position is that employee numbers are not critical to the outcome, in our opinion this cannot be the case. On the contrary, the level of employees is highly relevant in establishing the baseline position and extrapolating growth figures for when the Park is likely to become full and expansion required to be implemented.

2. **Employee Density** – We consider that despite the rebuttal comments offered by the applicants, our key point remains valid, that is that the Kent Science Park simply does not compare favourably with other Science Parks in terms of density of employees across the site. Even using the latest figures provided by the applicants, (47,200 sqm and 1,108 employees) this gives an employee density of 42.60m<sup>2</sup> which is still considerably higher than the average for the UK of 25.17m<sup>2</sup> for built and un-let space. The corresponding figure for let space would be even more divergent from the average.

In addition, whilst the applicant emphasizes that KSP has the largest concentration of wet laboratory space in the South East, this is considered immaterial given the examples provided by FPOG are UK wide. Further, if such space is in demand, why is it still un-let and if not, why is it being retained?

It remains apparent that the 10% growth in employment (despite the 20% reduction in occupancy) has come from businesses that are more akin to general office users rather than pure science and technology based businesses. The traffic implications of a fully occupied 4 hectare site extension in our view have not been fully explored. This is critical to ensure that maximum traffic flows are considered at this outline stage to ensure the transport impact is robust.

3. **Vacant Floorspace** – Again the applicant seeks to deride our assumption on lettable floor area with commentary that is quite clearly untrue i.e. not taking account of the 5,212m<sup>2</sup> of glasshouses demolished when the difference in figures was only 884m<sup>2</sup>.

The difference stems from FPOGs choice to use the figure provided in the EIA of 46,000m<sup>2</sup> rather than the 45,116m<sup>2</sup> provided in the 2004 Amion report both of which are subject to the addition of the phase 1 technology units (2,100m<sup>2</sup>) .

We note that the Kent Science Park has is currently showing the lettable floor area on its own website as 46,450m<sup>2</sup> and in the UK Science Park Association Directory 2005-06 it listed an impressive 56,000m<sup>2</sup> which it never had even including non-lettable and demolished space.

4. **Re-aligning the EIA Baseline Situation** – Whilst the applicant is happy to dispute many of the figures from the EIA including figures relating to lettable floor space, the number of employees and occupancy, they are content to use the same document to continue to justify the need to expand the site by 2015. According to the figures presented in the attached objections from FPOG, the Park, using the applicants own figures will not reach capacity until almost 2020 based on a 5% per annum growth rate. Figures are presented in the attached objections from FPOG that demonstrate the park is unlikely to reach capacity until sometime after 2030, thereby making the current application premature.
5. **Redevelopment of the site within the existing security fence** -The applicant has stated that the Local Plan Policy B25 does not require that all development to fully take up existing space within the security fence before proceeding beyond. Whilst the Policy may not implicitly say so either way, it would be our opinion that the Local Planning Authority should seek to make full use of any brown field site before additional green field development is contemplated. We would remind the Council that the Policy does say “The proposed development is not more appropriately undertaken within the existing boundaries of the site, as defined by the proposals map”.
6. **Further undeveloped land and development opportunities** -The applicant is clearly motivated on commercial grounds not to consider the re-development of the many poor quality single storey buildings on site. Whether the site were to expand beyond the security fence or not, we are disappointed at the applicant’s attitude towards the less glossy aspects of the site and their reluctance to actively manage the site within the security fence to its best advantage.
7. **Wealth Creation** - The applicant states that they are not in a position to either endorse or reject the data provided and would not appear to give this point any merit what-so-ever. However FPOG consider that this is a significant finding and that in a scenario where the Local Borough is seeking to endorse the Kent Science Park above almost every other employment opportunity in Swale on the grounds that it is responsible for creating highly skilled, highly paid employment, it is undoubtedly of concern to learn that this isn’t actually the case.

**8. Limited Expansion** - The applicant has stated that FPOG has not challenged some of the reasons brought forward by the applicant therefore we must implicitly agree with case being made. We are unclear as to which point it is that we did not take heed with.

1) The applicant's argument that 4ha is less than 6ha was in our opinion a rather lame argument. One cannot simply assume that any number less than the 6ha rejected by the Local Plan Inspector would constitute a 'Limited' expansion.

2) We have extensively argued that the existing highways network is incapable of supporting this application regardless of any traffic mitigation that might be undertaken. A view backed up by Odyssey Consulting Engineers.

3) Our position is one where we do not support the 4ha application on any level, so we see no reason to enter into a discussion on the merits or otherwise of its location.

4) As already stated the applicant cannot simply adjust the EIA baseline backwards by 20% and then assume the outcome to be the same. The applicant also makes no mention that this was only on the basis of sustained 5% year on year growth rate which history has shown to be unachievable.

**9. Classification** - We reiterate the findings of the Economic Impact Assessment. "it could be argued that the definition of KSP as a science park remains in part an aspiration rather than a current reality"

**10. Knowledge Based Employment** - The applicant has defended its claim that 90% of tenants (not employees) at KSP are defined as 'Knowledge Based'. FPOG would argue that the whole concept of 'Knowledge Based' employment is open to debate with no defined industry standard and depending on your interpretation it could result in widely differing sets of figures.

**11. Rationalisation of Tenant Base** - We have a situation where the two 'Call Centres' and the 'Primary Care Trust' both qualify as knowledge based companies. These three tenants alone account for more than a third of people employed at the park. Simply labelling low skilled, low paid jobs as 'Knowledge Based' in order to continue to justify their existence on the site would seem to be a pretty flimsy argument and certainly not an overriding one in the decision to expand or not.

**12. Conclusions** - In conclusion the Kent Science Park's continued reliance on the EIA to justify expansion by 2015 is tenuous to say the least.

Firstly the EIA assumed a far higher occupancy as its baseline scenario than has proven to be the case with the obvious implication that the period to full occupancy extends outwards significantly.

Secondly the applicant has chosen to use the upper end of the growth predictions which in our view are highly optimistic and quite possibly unattainable. Given the applicants poor track record in delivering growth with a 20% reduction in occupancy in the last five years, it does not appear credible that this outcome could be achieved.

Finally the EIA does not take account of any development within the security fence of which 2,100m<sup>2</sup> has already been added and the phase 2 technology units alone would add a further 3,253m<sup>2</sup> providing an overall increase of 12% in lettable floor space.

## **Transport Issues**

We enclose a further report prepared by Odyssey Consulting Engineers in response to the additional transport and traffic material submitted by the applicants prepared by JMP. The main conclusions from Odyssey's report are as follows:

*"This report has been prepared by Odyssey Consulting Engineers (OCE) on behalf of The Five Parishes Opposition Group in order to critically review the JMP report entitled "Response to OCE Critique" produced in May 2009.*

*It is considered that fundamental concerns relating to each of the considered issues, listed below, still remain:*

- *Impact on the local highway network;*
- *Pedestrian/ cycle/ bus linkages to the KSP site;*
- *Travel Plan measures and modal shift targets;*
- *Policy compliance.*

*In view of the above, it is our contention that the development proposals at the KSP will have a detrimental effect on the surrounding highway network, and are in conflict with sustainable transport policy. As such the proposals should be resisted".*

For the above reasons, combined with the objections submitted in March 2009 to the original application, my clients continue to object to the application for the 4 hectare extension to the Kent Science Park and trust that the members of the Planning Committee will agree. We consider that the application is premature and fails to comply with all the relevant criteria of Local Plan Policy B25 relating to shorter term need expansion. Furthermore we consider the application fails to comply with policies RC7 (Rural Lanes), T1 (Providing Safe Access to New Development) and T2 (Essential Improvements to the Highway Network).

Yours sincerely,

**Nigel Abbott**  
**BA (Hons) MA MRTPI**  
**Town Planning Consultant**

Encs – Objections and separate appendices to Kent Science Park Planning Applications by FPOG (August 2009)

Report on Transport Issues prepared by Odyssey Consulting Engineers (August 2009)

Cc Ms Monique Bonney – FPOG Chair