

A large, abstract graphic consisting of two overlapping, thick, curved bands. The inner band is light grey and the outer band is light orange. They form a large, irregular shape that resembles a stylized 'O' or a partial circle, framing the central text.

KENT SCIENCE PARK,
SITTINGBOURNE

Transport Appraisal Summary and Critique

Client: The Five Parishes Opposition Group

Project No. 09-023
March 2009

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SITTINGBOURNE**

Transport Appraisal Summary and Critique

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1 INTRODUCTION

1.1 This report has been prepared by Odyssey Consulting Engineers (OCE) on behalf of The Five Parishes Opposition Group. The purpose of this report is to critically review, on highways and transportation grounds, supporting documentation for two planning applications, namely the “4 Hectare” site expansion and the “Phase Two Technology Units” development, at the existing Kent Science Park (KSP) in Sittingbourne, Kent.

1.2 This report considers the proposals at the KSP site in terms of transport sustainability and compliance with local transport policy contained in the 2008 Swale Borough Local Plan. A review is also conducted of the proposals in light of National Transport Policy set out in PPG13 and Regional Policy contained in Regional Planning Guidance for the South East (RPG9).

1.3 This appraisal makes a technical assessment of the Transport Assessment (TA) submitted in support of the applications for development at KSP, produced by JMP Consulting and dated 27 January 2009. Assessment of that TA includes consideration of assumptions made with regards to the existing as well as potential traffic generation of the site, including the modal split of such traffic.

1.4 Consideration is given to the previous refusal, on highway grounds, for planning permission for expansion at the KSP.

1.5 In view of the above, this report includes recommendations in respect of the preparation of representations to the planning applications by the Five Parishes Opposition Group.

2 TRANSPORT ASSESSMENT REVIEW

2.1 A Transport Assessment (TA) has been produced by JMP Consultants in support of the planning application for development at KSP. The application considered by the TA includes the following proposed development on land adjoining the KSP:

- Outline planning permission for 12,000m² GFA B1 Use Class Employment outside of the existing perimeter fence (the “4ha Expansion”);
- Within the above, detailed planning permission for 2,846m² GFA B1 Use Class for the Ecologia headquarters.

2.2 In addition to the above, a planning application has previously been submitted (Application Number SW/07/1111) for expansion at the KSP in the form of the construction of “Technology Units” (B1 use) including associated parking and landscaping. This application, referred to as “Phase 2 Technology Units” falls within the existing perimeter fence and was previously refused in January 2009, on highways grounds. This refusal for planning permission is discussed in more detail later in this section of the report.

Scoping Discussions

2.3 In order to inform the TA referred to in paragraph 2.1, scoping discussions were conducted between JMP and the highway authority, namely Kent County Council (KCC), the minutes of which are included as an appendix to the TA. The thrust of that discussion focussed primarily on highways and traffic issues, including consideration of the baseline traffic (Saturn) model, future modelling years for capacity assessment and identification of the junctions to be analysed. It appears from the minutes of the meeting that comparatively little attention was given to the transport sustainability of the site, with KCC indicating that a Travel Plan would be required for the site (as required by national DfT guidance) as well as consideration given to the

potential improvement of bus services to the Science Park as part of the proposals for expansion.

2.4 It is additionally minuted that Phil Gilbert of KCC “noted that achieving a modal shift would be challenging given the Science Park’s location.”

Comment

2.5 In view of the fact that it appears that KCC were primarily concerned with the traffic and highways issues arising from the proposed expansion of KSP, and that relatively little consideration appears to have been given to the transport sustainability of the site (or lack thereof), the opportunity exists for the planning authority to decide the scheme on sustainability grounds.

Trip Generation and Modal Split

2.6 In order to inform on the existing travel patterns of staff and visitors at the KSP, a traffic survey of those travelling to and from the existing KSP was conducted as part of the aforementioned TA. This survey was carried out on the 20th January 2009. The results of these multi-modal surveys were summarised and, based on an assumed value of 1,200 employees at the site, relevant trip rates per employee were derived for the peak hours, as well as for the full 12 hour survey period. All relevant calculations have been considered and found to be correct in arithmetic terms. For completeness, the resultant derived trips rates are presented in **Table 2.1**.

Table 2.1: Vehicle Trips Rates – Kent Science Park (Presented in JMP TA)

Car/ Van Trips	Trips Per Employee (Based on 1,200 Employees)		
	Arrive	Depart	Total
AM Peak (08:00 - 09:00)	0.296	0.013	0.309
PM Peak (17:00 - 18:00)	0.032	0.269	0.301
Interpeak (13:00 - 14:00)	0.055	0.063	0.119
Daily (07:00 - 19:00)	0.853	0.832	1.685

Note: Based on Multi-modal surveys and applied to 1,200 employees.

2.7 The resultant vehicle trips rates presented in the TA were applied to the proposed total number of additional staff owing to the “4Ha expansion”, (namely 390) and the theoretical traffic generation owing to the proposals thus calculated. As such, the TA presents the likely two-way traffic generation (Car and LGV) of the 4Ha expansion (including the Ecologia headquarters) as follows:

- AM Peak Hour (08:00 – 09:00): 119 Movements;
- PM Peak Hour (17:00 – 18:00): 117 Movements;
- Daily (07:00 – 19:00): 657 Movements.

2.8 It has not been possible to independently verify the JMP assumption of 1,200 staff at the site on the day of the survey, however this number is considered to be crucial to the accuracy (or otherwise) of all subsequent trip generation and hence capacity analysis contained within the TA. Given the fact that trip rates have been presented in the TA “per employee”, any over-estimate of staff at the site on the day of the survey, would result in lower trip rates and hence lower traffic generation values when applied to the proposed expansion at the site. In view of this, it is appropriate to consider this matter in more detail. Consideration has therefore been given to the Economic Impact Assessment for the Kent Science Park, produced by the Centre for Strategy & Evaluation Services LLP and published in May 2008. This document, on page 3 at Table 1.2 provides a detailed summary of tenant and employee numbers

at the Kent facility as at December 2007. The results presented in that report are included in **Table 2.2**.

**Table 2.2: Tenant and Employee Numbers – December 2007
(Source: Centre for Strategy & Evaluation Services)**

Sectors	No. of Firms	%	Employees	%
Science Based	23	32.4	167	19.2
ITC Related	11	15.5	135	15.5
Business Services	12	16.9	416	47.7
Other Sectors	25	35.2	154	17.7
Total	71	100.0	872	100.0

2.9 The above values (872 staff) are presented in the aforementioned Economic Assessment report, as being representative of 74% occupancy at the site. Interestingly, that assessment additionally reports an estimated figure of 1,000 employees at the site in 2004, corresponding to 77% occupancy of the park (77 tenants). Based on the above values, the “1,200” employees at the park, put forward in the JMP TA, and corresponding to a reported 61% level of occupancy (paragraph 6.26 JMP TA) appears to potentially over-estimate staff/visitor numbers at the site. As discussed in paragraph 2.7, the accurate representation of the staff/ visitors numbers at the site on the day of the survey are deemed critical in terms of the resultant “trip rate per employee” on which all subsequent capacity analysis is based, with higher assumed staff numbers resulting in lower trip rates, and hence lower theoretical traffic generation values owing to the proposed development.

Comment

2.10 **Selection of higher base level staff numbers at the time of the survey would result in a lower trip rate per employee and therefore lower traffic generation volumes arising from the proposed development. If the numbers of employees is lower than the stated value (1,200), then the resultant trip rate per employee would be higher, and therefore**

additional traffic resulting from the proposed development would correspondingly be greater.

2.11 Table 6.1 of the TA presents a summary of the Vehicle Trip Survey carried out in January 2009. Hourly arrivals and departures are noted and can be used to broadly calculate the accumulation of vehicles on the site. From the period between 7am and 11am arrivals far exceed departures such that an accumulation of approx 600 cars and light goods vehicles would be present. Whilst this takes no account of any vehicles parked in the car park before 7am it gives a good indication, upon which broad assumptions can be made of the number of employees on the site. In our view this information would tend to corroborate the view that the total number of staff present on the site on that day may well have been less than 1,200.

2.12 In order to further place the derived trip rates and forecast traffic generation at the KSP site into context, interrogation of the TRICS trip rate database has taken place. TRICS, which is widely considered to be the “industry standard” for this type of exercise, includes the results of numerous vehicle and multi-modal surveys conducted for a wide range of land uses throughout the United Kingdom. By considering the observed trip rates at similar land use sites to those presented for the KSP, it is possible to place the KSP traffic generation into context of what might be considered “typical” for a development of this type.

2.13 Included in the database are B1 developments, including specifically, a survey conducted at the Cambridge Science Park (CSP). This facility, established in 1970 is situated in an “edge of town” location in Cambridge, just to the south of the A14 at its junction with the A1309. This facility accommodates in excess of 100 companies, cumulatively employing 5,000 staff. Incidentally this site is referred to in the JMP TA at paragraph 6.4, where the following statement appears;

“The location and availability of alternatives to car travel at CSP was considered to differ too greatly to KSP’s situation to enable its travel data to be used to represent KSP;”

2.14 The above statement appears to concede that the KSP is situated at a location where “alternatives to car travel” are not considered to be available or viable. It is therefore interesting to note that the resultant TRICS derived vehicle trip rates (per employee) obtained for the CSP, presented in **Table 2.3**, are indeed higher than those derived for KSP, which again casts doubt on the reliability of the assumed base number of employees at the site on the day of the survey.

Table 2.3: Vehicle Trips Rates – Cambridge Science Park (TRICS Database)

Car/ Van Trips	Trips Per Employee		
	Arrive	Depart	Total
AM Peak (08:00 - 09:00)	0.373	0.024	0.397
PM Peak (17:00 - 18:00)	0.026	0.286	0.312
Interpeak (13:00 - 14:00)	0.136	0.09	0.226
Daily (07:00 - 19:00)	1.366	1.259	2.625

2.15 The above trip rate figures for the CSP should additionally be viewed in light of the relatively accessible location of that facility. In view of this it should be noted that the CSP benefits from a good level of exposure to bus services, with buses operating between the town centre and the Science Park at a frequency of 2 buses per hour throughout the day. The local cycle network is additionally operational on the roads surrounding the park, and roads within the park are indeed included in this cycle network.

2.16 The survey at the existing KSP, conducted in January 2009, additionally identified the modal split of visitors and staff to the site. This assessment identified that 95% of trips to the site are conducted in private cars and Light Goods Vans (LGV's). This predominance of private car use at KSP, reflects the obstacles present to accessing the site via means other than the private car. Such “obstacles” can be related to the isolated, and in transport terms, unsustainable, location of the site, which falls outside of the nationally recognised pedestrian catchment “cordon” of 2km's (PPG13). It is again relevant to compare the above modal split with that identified at the CSP. Although the TRICS survey for CSP referred to above did not include an

assessment of modal split, CSP make the following statement on their website (<http://www.cambridgesciencepark.co.uk>) relating to travel surveys of staff/visitors at the site:

“Recent surveys have yielded the following data:

- *71% as sole occupants of cars*
- *9% sharing cars*
- *12% by bicycle*
- *4% walking*
- *3% use public transport”*

Comment

2.17 Concern exists regarding the Trip Rates derived by the JMP TA, since these have been based on an estimated 1,200 employees at the site when additional sources suggest that the actual number of employees is considerably lower. Consideration of trip rates at the Cambridge Science Park (CSP), contained in TRICS, have indicated that although CSP is more sustainably located, in terms of pedestrian, as well as cycle and bus accessibility, that the resultant vehicular trip rates are higher than those derived for the KSP. This places in doubt the methodology of the calculations utilised to obtain the KSP trip rates. The existing modal split at the KSP based on the aforementioned surveys, identified that in the region of 97% of all trips at the site take place via the private car. It is considered that limited opportunity exists to improve cycle and pedestrian accessibility to the site owing to the site’s location. Furthermore, neither the TA, nor the Draft Travel Plan have demonstrated how bus services could be provided to enable a significant proportion of staff at KSP to travel by this mode.

Site Occupancy

2.18 It is interesting to note that the previously referred to Economic Assessment report, stated that 872 staff were employed at the site based on the 2007 KSP tenant directory. The Economic Assessment additionally makes

reference to the 2004 tenant directory at the KSP, which indicated that 83 tenants cumulatively employed “an estimated 1,000 people. Consideration of the above values again calls into question the accuracy of the “1,200” employee value at the park, utilised in the JMP TA. It additionally begs the question as to the requirement for expansion at the site when it appears that sufficient capacity is present at the existing facility (excluding consideration of any future expansion within the perimeter fence), based on recorded occupancy levels.

Committed Development and Highway Capacity Analysis

2.19 It is a requirement, as set out in DfT guidance relating to the production of Transport Assessments to include theoretical traffic flows attributable to “committed development” in the base traffic model, when performing junction capacity analysis. Committed development is development that has been granted planning permission (although not yet constructed/ operational) which would generate traffic and therefore have an influence on junctions surrounding a development site. As such, the JMP TA has included trips attributable to the refused “Phase 2 Technology Units” at the KSP site, in the base flow data. There does however appear to be an omission in the fact that this TA does not quantify and include trips which could be attributed to the full development of the KSP “within the existing boundaries of the site” as set out in Policy B25 of the 2008 Swale Borough Local Plan (discussed in detail later in this report). As such, the “base case” traffic flows are likely an under-representation of base flows on the surrounding highway network. This fact should be taken into account when considering the impact of the KSP proposals on the junctions assessed in the JMP TA, which indicate that various arms/ junctions operate at, or in excess of available capacity. The absence of a Master Plan for the Park to determine a true base is therefore seen as a weakness of the current proposal.

2.20 At Paragraph 7.56 the TA states that “*the additional development traffic to the local highway network does not materially change the situation relative to the do-minimum scenario*”. Paragraph 9.5 goes on to state that it is recognized that “*travel by car will continue to account for a majority of KSP*

employee trips” and that, “the STS seeks to provide and maintain safe and convenient car access to and from the site”. Paragraph 9.1 states that, “even if an assumption is made that all additional trips arising as a result of the development were made by car; this would not materially impact on the operation of the local highway network.”

2.21 Reference to Tables 7.6 and 7.15 of the TA set out the results of capacity analysis for the 2013 traffic flow scenario at the Ruins Barn Road / Broadoak Road junction both with and without development traffic added. It is evident from the PM peak results that the ratio of flow to capacity (RFC) on the road leading from KSP to Ruins Barn Road (i.e. Broadoak Road) is 1.111 at the base scenario and 1.408 at the with development scenario. The resultant queuing is presented in passenger car units (PCU), being slightly greater than the value of a single vehicle given that the majority of the vehicles will be cars. The table shows queues of 36 PCU's at 2013 without development rising to 139 PCU's with development. This clearly demonstrates that there is indeed a material impact arising from the addition of development traffic and the statements made by the TA in respect of the impact on the local highway network are therefore misleading.

2.22 It is understood that no proposals have been put forward for improvement of the Broadoak Road/ Ruins Barn Road junction to seek to accommodate the additional queuing. In the absence of any improvement at the junction it would be logical to assume that drivers confronted with a 140 vehicle queue would simply turn right out of the site access on exit and filter through the country lanes to the south of KSP, adding to the significant level of rat running traffic currently utilising these roads. The nature of the roads, being narrow, having limited visibility and with typically high speed limits, makes them unsuitable for any significant intensification of traffic levels from a road safety and environmental view point.

Existing Bus Services

2.23 Reference is made in the TA to the existing bus services serving the site, namely Chalkwell Routes 343/ 348. These services provide one AM peak

hour service between Sittingbourne town centre and KSP (08:51) and two PM peak hour services in the opposite direction (17:10 and 17:40). In addition to these services, 6 services operate from Sittingbourne to KSP throughout the day, whilst an additional 3 services operate in the opposite direction. The above bus provisions, which have been presented in the TA, are considered in the context of sustainable transport policy further in this section of this critique.

Footway and Cycle Access

2.24 The TA produced in support of the proposed development at KSP acknowledges at paragraph 3.31 that pedestrian accessibility to the site is *“not currently considered a viable means of accessing the site”*. Indeed at the same paragraph it is conceded that *“existing pedestrian facilities to access KSP are limited”* and *“are absent from both Broadoak Road and the section of Ruins Barn Road nearest to KSP.”*

2.25 Similarly, external cycle facilities are acknowledged to be “limited” within the vicinity of the site.

2.26 The “limited” options relating to accessibility via the above sustainable means of transport are clearly reflected in the survey results recorded at the site and reported in both the TA and Travel Plan. These surveys identified the modal share of the above means of travel as follows:

- Pedestrian: 0%
- Cycle: 0.8%

Comment

2.27 National, regional as well as local policy supports the modal shift of trips from that of the private car to more sustainable forms of travel, including walking, cycle and bus transport. A reasonable case could be presented that the level of bus services at the site, as presented above do not constitute a viable or realistic alternative form of travel, and as

such the site, in its current form could not be considered sustainable from a transport perspective. Additionally, the TA itself has acknowledged that pedestrian and cycle facilities, and hence accessibility, are limited. No realistic proposals are contained in the TA or TP which appear to significantly improve access to the site via these modes of travel.

National Policy

2.28 As required by DfT guidance relating to the preparation of Transport Assessments, the TA prepared in support of the application for expansion at the KSP contained, at Section 2, a consideration of relevant transport policy pertaining to new development. Included in that consideration was national policy in the form of Planning Policy Guidance Note 13 (PPG13), Planning Policy Statement 1 (PPS1) and 7 (PPS7).

2.29 The Objectives of PPG13 are stated at paragraph 4 of that document as follows:

- *“promote more sustainable transport choices for both people and for moving freight;*
- *promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and*
- *reduce the need to travel, especially by car.”*

2.30 PPG13 acknowledges that for some developments “in some rural areas”, it might be “less achievable” to offer a realistic choice of access by public transport, walking and cycling. Nonetheless, this national guidance discourages development where such “realistic” sustainable access is not achievable. The requirement for “realistic” accessibility of development sites, is repeatedly highlighted in PPG13 as is evident by the following excerpts:

(Paragraph 19) “A key planning objective is to ensure that jobs, shopping, leisure facilities and services are accessible by public transport, walking, and cycling...In preparing their development plans,

local authorities should give particular emphasis to accessibility in identifying the preferred areas and sites where such land uses should be located, to ensure they will offer realistic, safe and easy access by a range of transport modes, and not exclusively by car.”;

(Paragraph 26) “Development comprising jobs, shopping, leisure and services should offer a realistic choice of access by public transport, walking, and cycling. This should be assessed in terms of how easy it is to get to the site comparing the different modes (taking into account journey times, public transport frequency, quality, safety, and access for disabled people). Development comprising jobs, shopping, leisure and services should not be designed and located on the assumption that the car will represent the only realistic means of access for the vast majority of people.”

2.31 Swale Borough Council have effectively made provision for this policy when setting out their own policy regarding development at KSP. Policy B25 of the LP conditions any development by effectively stating that development proposals that do not minimise car journeys and do not maximise use of other transport modes will not be permitted. Further reference to B25 is made later in this report.

2.32 The thrust of PPG13 can succinctly be summed up by the following statement contained at paragraph 3 of that document and quoted at paragraph 2.4 of the JMP TA:

“By shaping the pattern of development and influencing the location, scale, density, design and mix of land uses, planning can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking, and cycling.”

Comment

2.33 The TA boldly quotes relevant sections of National Transport Policy, but does not demonstrate how this policy is to realistically be met.

2.34 In reference to the location of B1 use, PPG13 makes the following statement at paragraph 32:

“Local authorities should adopt a positive, plan-led approach to identifying preferred areas and sites for B1 uses which are (or will be) as far as possible highly accessible by public transport, walking, and cycling.”

2.35 With regards to walking, PPG13 states that *“In preparing their development plans and in determining planning applications, local authorities should:*

- *pay particular attention to the design, location and access arrangements of new development to help promote walking as a prime means of access;”*

Comment

2.36 The proposed development site is not connected to the built up area of Sittingbourne by a footway. Paragraph 3.31 of the TA acknowledges that pedestrian accessibility to the site is not “considered a viable means of accessing the site”. The proposal is therefore considered to fail to comply with a fundamental requirement of PPG13.

2.37 Similarly, with regards to cycling, this national guidance states the following at paragraph 79:

“In preparing their development plans and in determining planning applications, local authorities should:

- *in conjunction with work on the local transport plan, review existing provision for cyclists, in order to identify networks and routes, including those to transport interchanges, along which the needs and safety of cyclists will be given priority, and set out the specific measures which will be taken to support this objective. Generally these routes will use existing highways, but may also include the use of redundant railway lines or space alongside canals and rivers. Linear parks in urban areas may often provide opportunities for cycling routes;”*

Comment

2.38 Other than the provision of cycle parking on site, neither the TA nor the TP commits to any improvement to cycle facilities. Little attempt is therefore made towards policy compliance for this mode of travel.

2.39 PPG13 makes repeated reference to the production and implementation of Travel Plans which aim to effect a shift to sustainable means of travel. The JMP Transport Assessment makes reference to a Travel Plan (TP) applicable to the KSP site, and suggests that the KSP, although not sustainably located in transport terms, will utilise the mechanisms included in the TP to overcome this obstacle. PPG13 however makes the following unambiguous statement at paragraph 89 with regards to Travel Plans in the context of the location of developments:

“However, unacceptable development should never be permitted because of the existence of a travel plan.”

Comment

2.40 Consideration of the proposed development at the Kent Science Park in the context of the above national sustainable transport policy,

indicates that the proposals in their current form are not in compliance with such policy. As such the proposals either need to be amended or indeed rejected on the grounds of policy.

Planning Policy Statement 7

2.41 The TA appears to focus on transport policy that applies to rural areas. Such policy focuses on the need to improve travel choices in rural areas through comprehensive travel plan initiatives, including car sharing. It is however not immediately clear that the KSP falls within what could be classed as a “rural area” and therefore reference to such policies should be treated with caution and are indeed not necessarily relevant.

Regional Policy

2.42 In addition to reference to national transport policy, consideration is additionally given in the JMP TA to regional policy in the form of the Regional Planning Guidance for the South East (RPG9). That document echoes national policy in terms of the promotion of sustainable transport. As such, at paragraph 3.5 (quoted in the referred to TA) the following statement is made:

“Access to jobs, service, leisure and cultural facilities should be less dependent on longer distance movement and there should be an increased ability to meet normal travel needs through safe walking, cycling and public transport with reduced reliance on the car.”

2.43 Policy T1 states that *“Policies should be developed which minimise the distance which people need to travel whilst enhancing choice and ease of access to activities”*. This policy goes on to state that *“development should be planned holistically to minimise the need for movement and to facilitate and encourage safe movement on foot, by cycle and public transport”*.

2.44 Policy T1 of the above document additionally states that plans should ensure that they *“achieve a rebalancing of transport systems in favour of non-car modes as a means of access to services and facilities”*.

2.45 Echoing national policy on the importance of Travel Plans, RPG9 acknowledges the important role that this measure plays in the potential reduction of car based trips. However, at policy T2 the following statement occurs:

“i: in determining land use allocations within development plans, local authorities should take into account the positive role that Travel Plans can have in terms of achieving a more sustainable pattern of movement. However, unacceptable or poorly located development should never be permitted because of the existence of a Travel Plan;”

2.46 The South East Plan is expected to be adopted in Spring 2009 and will replace RPG9. The thrust of sustainable transport policy and encouragement of non-car modes of transport remains a key plank of the Plan.

Comment

2.47 Consideration of the site in the light of regional policy highlights the site’s inappropriateness for development in its current form. Regional transport policy, as is the case with national policy, focuses on the sustainable location of development sites by ensuring that such sites are accessible by means of travel that include walking and cycling. Such policy again highlights that poorly located developments should not be permitted because of the existence of a Travel Plan. As such, it would appear that the expansion at the site is contrary to the general thrust of regional transport policy as contained in Regional Planning Guidance for the South East (RPG9); as well as the emerging South East Plan.

Previous Refusal at KSP

2.48 Swale Borough Council, on 29th January 2008 refused planning permission at land at the Kent Science Park in relation to the application for

the erection of Phase 2 of the “Technology Units” at the Park. The reason for refusal, on highways grounds, read in part as follows:

“The proposed development would be likely to generate a significant increase in traffic in excess of the capacity of the local road network, and would therefore be likely to give rise to harm to highway safety and convenience.”

2.49 The above reason for refusal additionally made reference to various local (Swale Borough Council) policies contained in the Swale Borough Local Plan, including those considered below:

2.50 The Swale Borough Local Plan, at Policy E1, states the following:

“The Borough Council expects all development proposals to:

- 1. Accord with the policies and proposals of the Plan unless material considerations indicate otherwise;*
- 7. Meet the highest standards of accessibility and inclusion so that all potential users, regardless of disability, age or gender can use them safely and easily;*
- 8. Cause no demonstrable harm to residential amenity and other sensitive uses or areas;*
- 9. provide safe vehicular access, convenient routes and facilities for pedestrians and cyclists and, where appropriate, enhance public transport facilities and services.”*

Comment

2.51 The above policy states the requirement for developments to meet the “highest standards of accessibility” including safe provision for pedestrian and cyclists. The proposed KSP site does not accord with these requirements, with no enhancements proposed to improve accessibility for either cyclists or pedestrians.

2.52 The Swale Borough Local Plan additionally makes specific reference at paragraphs 4.37 and 4.38 to the Kent Science Park. At paragraph 4.38 the Local Plan states the following with reference to expansion of the site:

“To meet shorter term demands to provide additional business floorspace, the Council considers that the reasonable utilisation of existing land and buildings within the security fence should be pursued in the first instance.”

2.53 The Swale Borough Local Plan goes on to state that to meet requirements that cannot be met in this fashion (in other words “within the security fence”), the Council will require a *“site development plan to be agreed”*. In line with this, Policy B25 of the Local Plan 2008, states that the full potential for expansion of the site will need to be *“considered in detail by, and set out in, a Master Plan to be agreed by the Council.”* This Master Plan would address the following matters:

- The overall development footprint and phasing of expansion;
- A schedule of uses that will be permitted on the current and expanded site;
- Implementation of works to improve the transport network, as identified by a completed Transport Assessment together with a Travel Plan to minimise car journeys and maximise use of other transport modes.

2.54 Policy B25 goes on to state that pending the preparation of the Master Plan, that planning permission will be granted for “limited expansion” of the site outside of the current site boundary provided that it is demonstrated that *“the proposed development is not more appropriately undertaken within the existing boundaries of the site”*, and that the *“proposed development can be satisfactorily served by the existing transport network and any necessary improvements to that network as identified by a Transport Assessment together with a Travel Plan to minimise car journeys and maximise use of other transport modes.”*

Comment

2.55 Consideration of the site, in the Swale Borough Local Plan identifies the need for a detailed Master Plan which would assist identification for the need of any proposed expansion, the phasing of such, as well as the opportunities to contain such proposed development within the confines of the existing development. It has not been demonstrated that the production of such a Master Plan has been undertaken. Furthermore, the reason for refusal for the “Phase 2” development at KSP described in paragraph 2.32 above, was on highway grounds owing to the likely generation of traffic in excess of the capacity of the local road network. In this regard Policy B25 considered above makes reference to “any necessary improvements” to the network as identified by the TA accompanying an application for planning permission. In view of this, reference is made to the scoping discussions between JMP and KCC referred to previously in this report. Reference is made in the minutes of that meeting to a “proposed scheme” which would improve flow to and from the minor arms (Tunstall Road and Cromer Road) of the Ruins Barn Road junction. The view was expressed by KCC officers at the meeting that such highways improvements would “conflict with current policy” in that it would likely assist “rat running” in the lanes in the immediate area.

3 TRAVEL PLAN

3.1 The TA quotes at paragraph 6.4, based on existing travel patterns (without the TP), that 97% of trips to the new 4 ha Expansion would be by car, with only 3% by non-car modes.

3.2 The TP seeks to achieve more than 10% of staff and more than 15% of visitors by non-car modes.

3.3 Given the lack of physical measures to improve the accessibility of the site by non-car modes, the claims set out in the TP are considered to be optimistic and unrealistic.

3.4 Given the forecast level of queuing on Broadoak Road on the approach to its junction with Ruins Barn Road in the evening peak, any buses travelling between the site and Sittingbourne at that time would equally be caught up in the significant delay this would cause, but would have no means to avoid it. This would make it less conducive for both new and existing employees and visitors at the site to travel by public transport, particularly at the end of the working day, which in turn would make the targets set out in the draft TP less achievable.

3.5 Paragraph 7.13 of the Travel Plan presents a practical difficulty of bringing public transport buses onto the site due to security procedures. It suggests that it may be feasible to make certain services dedicated to KSP passengers, but this would prevent visitors from the site using the service together with other members of the public using this section of the service. This is likely to make it less attractive for an operator to provide additional services to the site. Reference, is made at paragraph 9.10 of the TA to a new lay by adjacent to the main entrance which buses could use. However, it is not made clear how buses would turn around and what effect this would have on journey times.

3.6 No assessment has been carried out within the TA to illustrate where current employees travel from. A study previously carried out by Babbie regarding wider development opportunities in the area in August 2004, identified that 73% of the KSP staff live outside of the Sittingbourne urban area whilst 54% live outside of Swale Borough. No meaningful assessment is made of how these staff would realistically travel to and from the site by public transport.

4 CONCLUSIONS

4.1 This report has been prepared on behalf of The Five Parishes Opposition Group in order to critically review supporting documentation for two planning applications, namely the “4 Hectare” site expansion and the “Phase Two Technology Units” development, at the existing Kent Science Park (KSP) in Sittingbourne, Kent.

4.2 This report considers the proposals at the KSP site in terms of transport sustainability and compliance with national, regional as well as local transport policy, as well as providing a technical assessment of the Transport Assessment (TA) submitted in support of the applications.

4.3 Throughout the report, comments have been made in bold which are in effect concerns either with a technical aspect of the TA, or where the development is considered not to be in compliance with sustainable development and transport policy. The foremost of these comments are summarised below:

- Scoping discussions with KCC, relating to the 4 ha expansion, appear to have been primarily concerned with the traffic and highways issues, whilst relatively little consideration appears to have been given to the transport sustainability of the site, including the sites compliance (or otherwise) with national, regional and local policy;
- Questions exist regarding the Trip Rates derived by the JMP TA, since these have been based on an estimated 1,200 employees at the site when additional sources suggest that the actual number of employees might be considerably lower. Application of survey results to higher base level staff numbers would result in lower traffic generation arising from the proposed development. If the numbers of employees is lower than the stated value (1,200), then the resultant trip rate per employee would be higher, and therefore additional traffic

resulting from the proposed development would correspondingly be greater;

- The TA produced in support of the application for expansion at KSP acknowledges that pedestrian and cycle facilities are “limited” and that pedestrian accessibility to the site is not “considered a viable means of accessing the site”. The proposal is therefore considered to fail to comply with a fundamental requirement of PPG13. No realistic proposals are contained in the TA or TP which appear to significantly improve access to the site via these modes of travel;
- Consideration of the proposed development at the Kent Science Park in the context of the national sustainable transport policy, indicates that the proposals in their current form are not in compliance with such policy;
- Regional policy highlights that poorly located developments should not be permitted because of the existence of a Travel Plan. As such, it would appear that the expansion at the site is contrary to the general thrust of regional transport policy as contained in Regional Planning Guidance for the South East (RPG9); as well as the emerging South East Plan;
- Consideration of the site, in the Swale Borough Local Plan identifies the need for a detailed Master Plan which would assist identification for the need of any proposed expansion, the phasing of such, as well as the opportunities to contain such proposed development within the confines of the existing development. It has not been demonstrated that the production of such a Master Plan has been undertaken;
- The TA does not therefore present a baseline scenario which is consistent with policy, which would enable the true impact of the 4 ha development outside of the security fence to be assessed;
- Contrary to the view expressed in the TA, there would appear to be a significant impact arising from the proposed development at the existing junction of Ruins Barn Road with Broadoak Road, for which no mitigation is put forward. The delay arising from this would encourage drivers to exacerbate the use of an

existing network of rat runs to the south of the site, via narrow country lanes that are considered to be unsuitable for this purpose, not least , on road safety and environmental grounds;

- The claims made in the TP to increase the proportion of staff and visitors travelling to and from the site by non-car modes are not proven and are considered to be unrealistic.