

Representor ID: 73020
Our Reference: PD10877

Further Representations on Behalf of Kent Science Park

12 January 2017

Introduction

These further comments follow representations already made on behalf of Kent Science Park on 8 August 2016. Those representations related to Main Modifications 7, 13, 59, 99, 230, 231, 234, 235, 299, 300, 334.

We have been scheduled to participate in the Examination in Public as follows:

Tuesday 31 January 2016 at 10.00am (Week One)

Matter 2: Overall Approach 1) Settlement Strategy; 2) Distribution; 3) Two Areas

Tuesday 7 February 2016 at 10.00am (Week Two)

Matter 5: Infrastructure 9) Housing Site Allocations

These further comments relate to both of the above matters and follow the Council's 'Schedule of Responses to public consultation on the Main Modifications' (SBC/PS/117; November 2016) and generally follow the same order as the representations in our 8 August 2016 representations.

Our Further Comments

Main Modification 7 and Main Modification 299

Comment IDs LP1349 and LP1350

Our request for clarification did not seek a material change to the purpose or application of the proposed policy but sought a change to the wording in the interests of clarity. We continue to request that this change be made.

Main Modification 59 and Main Modification 231

Comment IDs LP1352, LP1354, LP1355

We welcome the clarification from the Council that this proposed policy is dealing with the B1a/b sector and is not a list of what can be provided at the Science Park; rather, it is setting out locations that are well-placed to address such needs should they arise. The Council notes that we took the statement / wording of the draft local plan out of context. Our misunderstanding demonstrates that the text is obviously unclear and needs to be amended. The amendment should reflect the Council's clarification.

Main Modification 99, Main Modification 230, Main Modification 231, Main Modification 234, Main Modification 235 and Main Modification 300

Comment IDs LP1350, LP1353, LP1356, LP1357, LP1358, LP1359, LP1360, LP1361, LP1364, LP1365, and LP1366

Whilst we welcomed the Local Plan's recognition that additional development may take place at Kent Science Park, we objected that references to improved access to the Science Park were proposed to be deleted.

In arguing that improved access should be deleted from the draft Local Plan, the Council at least in part relies on the intentions of the previous owner of the site. The Council should recognise that these representations are

made on behalf of the current owner which has different intentions and that those intentions will be of significant benefit to the Borough's economy.

Whilst the Council says that it is inconceivable that infrastructure would be provided before the early review of the Local Plan, that is not the point – given the long timescales in delivering large-scale infrastructure and the need to secure funding for such infrastructure (in a competitive funding environment) it is important – and very helpful to bids for funding – that there is recognition in local policy. We **attach** our client's **submission to the Thames Gateway Commission** which explains the significance of improved infrastructure and the significant benefits to Swale Borough and the Thames Gateway, if not the whole country – that will flow from such investment.

We also **attach a further updated promotional brochure** prepared for a recent presentation made to the Rt Hon Chris Grayling MP (Secretary of State for Transport), Paul Carter (Leader of Kent County Council), Gordon Henderson MP and Andrew Bowles (Leader of Swale Borough Council). At this public meeting in December 2016, all of these key individuals offered strong support for the proposals and the information that is contained in the documents and all understood and agreed that the scheme could deliver huge economic, transport and environmental benefits.

These documents summarise our client's aspirations and note that with funding, KSP can fulfil its ambitions and provide significant economic, social and environmental benefits for future generations. The proposal includes:

- the creation of J5a which would allow a new junction on the M2;
- the creation of the Southern Relief Road that would connect to the existing Northern Relief Road via a new section to be completed. Our client's Thames Gateway Commission submission includes an illustration of where the Southern Relief Road could be created;
- the connectivity of major areas of employment through new roads allowing an exceptional opportunity for growth;
- the creation of 100 hectares (247 acres) of new commercial space to expand KSP, leading to the creation of up to 8,000 jobs; and
- initial costings for J5a and the Southern Relief Road are £80m and is the sum being sought.

Our client therefore continues to object to this modification on the basis that it considers improved access to be essential to the development potential of this location and that such access should have clear support in the statutory development plan.

It should not be the case that this matter is left for a review of the local plan, particularly if such infrastructure can be facilitated by development prior to the next local plan review, and even more so given that such infrastructure could solve other transport capacity barriers to development opportunities, would greatly assist in smoothing traffic flow in Sittingbourne urban area, and environmental improvements (particularly air quality, public amenity, traffic vibration from HGVs, noise and traffic pollution) in the immediate location and elsewhere in the borough.

We therefore request that reference to the A2/M2 link road be retained in the plan and that an additional reference be made to a new M2 junction, not least to support the desire expressed at paragraphs 6.7.78 and 6.7.80 that transport constraints be addressed if expansion of the Kent Science Park is pursued.

Whilst reference was made in the text that is now proposed to be deleted under Main Modification 234 indicating that direct access to the Motorway presents the Park's only opportunity to further grow, any reference to new transport infrastructure requirement should be on the basis that it only be delivered if expansion proposals give rise to a need for that additional infrastructure.

Consistent with our comments above, proposed Policy New Regen 4 should be amended to enable new transport infrastructure to be provided if needed to facilitate new development; at present reference is only made to the existing transport network.

The Modifications also propose the deletion of reference to the Sittingbourne Southern Relief Road ('SSRR'). Provision for the SSRR should be reinstated given that it can, at least in part, be facilitated by expansion of the Kent Science Park which is advocated elsewhere in the Plan.

Main Modification 230 and Main Modification 231

Comment IDs LP1360 and LP1353

In our representations we asked for references to the UKSPA definition to be removed. The Council has said that the wording was drafted in consultation with the previous owners of the Science Park and that the proposed amendment is considered to create uncertainty as to what uses would be acceptable at the Science Park. The Council says that there is sufficient flexibility in criterion 1 through inclusion of the word 'complementary'.

Given that the term 'complementary uses' could include uses outside of the narrow UKSPA definition, we do not see why this proposed policy cannot be amended as we suggest. Furthermore, whilst the Council notes that this definition was agreed with the previous owner of the site, the experience of the current owner is that it acts as an unnecessary and unhelpful restriction when seeking new tenants for space on the site.

Main Modification 234

Comment ID LP1361

In our previous representations we noted that we thought that development was deliverable within the lifetime of the plan. Whilst the Council has signalled that it intends to undertake an early review of the Plan, the 'lifetime' of the Plan is nevertheless to 2031, fourteen years hence. Whilst it is unlikely that expansion of the Kent Science Park will be significantly progressed by the time that an early review takes place (which we assume to be within five years), it is likely to be very well-advanced, if not completed, within fourteen years. We therefore continue to request that reference be made to the potential of the location in the Local Plan, therefore.

Main Modification 230, Main Modification 231 and Main Modification 334

Comment IDs LP1362 and LP1363

We are grateful that the Council is to amend the extent of the site as illustrated on the map.

Concluding Remarks

We would be grateful if our comments above could be taken into account.

Having reviewed the Council's response to our Regulation 19 Representations, we continue to seek the amendments that we proposed in our representations dated 8 August 2016; those amendments are set out in grey boxes in our representations – our proposed additions were in bold text with double underlining and our proposed deletions are in bold text with double strikethrough.