



OBJECTIONS TO THE KENT SCIENCE PARK PLANNING APPLICATIONS

SW/09/0118 outline 4ha extension to Kent Science Park (“4ha extension”)

SW/09/0093 detailed application for no.2 new B1 units (“2 unit application”)

AUGUST 2009

1. Employee Numbers

We note that in response to our concerns over the actual number of people employed that the Kent Science Park has provided further conflicting figures, suggested that employee numbers are not critical to outcome and that employee figures vary due to seasonal workers.

Whilst we have nothing further to add with regard to our assumed figure of 946 employees, we would question some of the evidence submitted.

- A) The figure of 1,200 employees stated for January in their Draft Travel Plan does not fit with the number of trips generated in the site survey carried out in the same month.

We know that 0 people walked, 8 people cycled, 20 people travelled by bus, 2 by motorbike and 1,011 by car. Discounting the 17 HGV movements as these are unlikely to be employees, this gives us 1,041 total movements including people who were car passengers, visitors to the site and employees undertaking multiple trips. (see Appendix A – Draft Travel Plan Page 21)

The travel plan also tells us that 4% of people are currently car passengers¹, if we factor this in we get $(1,041 / 96\%) * 100 = 1084$ people. It should be noted that this figures does not account for visitors to the site, who would not be insubstantial for a site of this size, nor employees attending external meetings, lunch time trips off site, or all those employees of Ecoloiga would as described in this application arrive at KSP in their own vehicles and subsequently depart to site in company vehicles. There would of course be some employees on holiday or off sick, but these would be easily outweighed by the additional trips mentioned above.

This leaves a discrepancy of at least 116 employees who can not easily be explained.

It is worth noting that JMP have also used a figure of 2,042 two-way vehicles movements on their 'Additional not of transport issues' when adding up the figures in the Draft Travel Plan shows the figure to be 2,115 trips for the January 2009 Survey.

1 – Appendix A – Draft Travel Plan Page 24

- B) The applicant often provides conflicting figures for employment.

February 2009	1,260	JMP Response (Appendix C)
February 2009	1,199	Kent Messenger (Appendix D)
April 2009	1,250	Kent Messenger (Appendix D)
April 2009	1,121	JMP Response (Appendix C)
April 2009	1,108	Paul Sharpe Letter (Appendix E)

We find these discrepancies are common place and given that the park has easy access to this data, we question how these anomalies could have arisen.

- C) We are also perplexed with the statement given to justify the sudden drop in employee numbers, which states “Some of whom were seasonal staff typically only employed during the winter months”. (see JMP Response Appendix C)

We don't find it credible that a science park should even have a seasonal workforce, let alone one that accounts for such a large number of employees, in excess of 8% of the peak.

- D) Finally we do not agree that the exact number of employees is not critical to the outcome. Surely if we are trying to establish occupancy and timeframes until the park reaches a level deemed critical to expansion we need to have a baseline from which growth of employee numbers and therefore occupancy can be based.

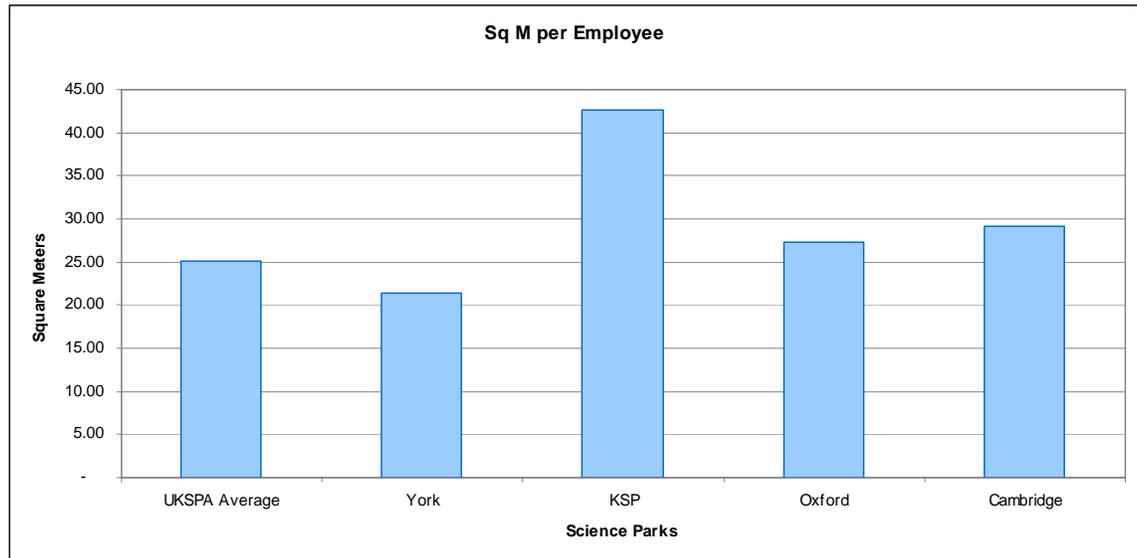
2. Employee Density

The applicant has sought to deride the observations made in relation to employee density with regard to the lettable floor space and the comparisons use of vacant floor space, in a thinly veiled attempt to divert attention away from the key point being made i.e. that the Kent Science Park simply does not compare favourably with its own peer group.

The applicant would rather make use of guideline published by English Partnership than real world data provided by UK Science Parks including the Kent Science Park for the annual UK Science Park Association statistics.

Even using the figures provided in this application i.e. 47,200 sq meters of lettable floor space and the latest employee figures (April 2009) of 1,108 provides an employee density of 42.60m² which even though lower than our initial figures is considerably higher than the average for the UK of 25.17m² for Built and unlet floor space. The average for let space only would be even lower.

	UKSPA 2008 Stats	Average	York	KSP	Oxford	Cambridge
Operational parks (full members)	70					
Total sq meters (Built & unlet)	1,850,000	26,429	27,871	47,200	49,239	145,486
Total sq feet	19,906,000	284,371	300,000	508,057	530,000	1,566,000
Tenants	3,286	47	106	77	60	100
Jobs	73,497	1,050	1,300	1,108	1,800	5,000
Sq m per employee		25.17	21.44	42.60	27.35	29.10



“Critically the point being made here is not the density as such but that the Kent Science Park by comparison with other UK Science Parks has vastly more unlet space for its size.”

Further to this the applicant puts forward that it has the largest concentration of wet laboratories in the South East⁴. We would point out that given that all our examples are UK wide this is somewhat immaterial and we question the applicant’s stance on this facility for which it has been unable to find a tenant for several years. If this facility is so in demand why has it not been let and if it isn’t in demand why are they hanging on to it.

The survey conducted as part of the EIA quite clearly shows the vast disparity in employee density across the site where it was found that around half of the employee base¹ was situated in just 3,103m² i.e. 6.5% of the lettable floor area² with the other 50% situated in around 25,689m² assuming the debatable 61% occupation³. This provides employee densities of 5.60m² and 46.37m² respectively based on 1,108 employees.

1 – Appendix E - 1,108 employees / 75 tenants = 14.77 employees per tenant

Appendix H – 26 tenants surveyed, 2 tenants had 280 employees + (24 tenants * 14.77 = 354) which in total equates to approximately 634 employees or 57%

2- Appendix H Economic Impact Assessment

3 - Appendix C, JMP Response to KHS

4 – Buildings 1100 and 1040 previously occupied by Pfizer account for 5,152m² or around 10% of the lettable floor space

We question the type of employment that is occurring in an environment at the lower end of the employee density scale which appears to be far removed from the figures the applicant have themselves provided from English Partnerships for Science Parks.

Using the figures provided by KSP in their application we can see that while occupancy has reduced by 20% since July 2004, the number of employees has risen by 10%. This has serious implications for the future growth projections particularly in relation to the use of 32m² as an average employee density.

It is apparent that the growth in employment has come from business uses that are more aligned with general office accommodation, and which if allowed to continue would alter the nature of the occupancy growth forecasts which it is assumed are not based on these higher employee densities. The traffic implications for a fully occupied 4 hectare extension have not been adequately contemplated. It is critical that the maximum capacity of the site is contemplated at the outset to reflect the true traffic implications and consequential impact on the local rural environment.

3. Vacant Floor Space

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 5,212m² of glasshouses demolished when the difference in figures was only 884m².

The difference stems from our choice to use the figure provided in the EIA of 46,000m² rather than the 45,116m² provided in the 2004 Amion report both of which are subject to the addition of the phase 1 technology units (2,100m²).

We note that the Kent Science Park has is currently showing the lettable floor area on its own website as 46,450m² and in the UK Science Park Association Directory 2005-06 it listed an impressive 56,000m² which it never had even including non-lettable and demolished space.

4. Realigning the EIA Baseline Situation.

It seems that whilst the applicant is happy to dispute almost every aspect of the EIA including the figures used for lettable floor space, the number of employees and occupancy, they are happy to use the same document to justify the need to expand by 2015.

Given that by the applicants own admission that the park is only 61% occupied (presumably less with the recent staff departures) and the that EIA started with a baseline of 76.3% occupancy even at 5% growth per annum the park does not reach the nearly 2020.

History has shown that the Kent Science Park is not able to deliver anything like the assumed 5% year on year growth figure. In reality in the five years since the Amion report was produced in July

2004 where the park employed 1,000 people and was 75.90% occupied, we have reduced occupancy by 20% down to 61% and the net gain in employment according to the Kent Science Park's own figures is just 108 people.

Whilst we still question the authenticity of the employment figures provided, even using the Science Parks own data, it simply isn't credible that the park will reach the point at which expansion is required for some considerable time to come.

	2007	2010	2015	2020	2025	2030	2035	2040
Total	27,520	29,747	33,873	38,581	43,953	50,107	57,122	65,119
Space available (sq m)	45,116	50,469	50,469	50,469	50,469	50,469	50,469	50,469
Occupancy %	61.0	58.9	67.1	76.4	87.1	99.3	113.2	129.0

Using the Science Parks own data with 2.5% growth which we still consider to be fairly optimistic the park does not reach full capacity until some time after 2030.

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 would seek to make full use of any site before additional green field development is contemplated.

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".

One might draw conclusions from this statement that the applicant has neither the desire or will to make full use of the existing site before embarking on their expansion plans. The applicant has made it quite clear in discussions with us that they are reluctant to further develop and improve the existing site on commercial grounds, because it is simply less expensive to develop on green field land.

The applicant has also stated that "It remains a fact that Kent Science Park has the largest concentration of wet laboratories to rent in the South East which, generally, are in short supply."

Such short supply that they have remained entirely vacant for a number of years now and although the applicant keeps pressing this point the two buildings previously occupied by Pfizer account for 5,162m² representing just 28% of the available unlet space. None of the remaining entirely vacant

buildings 140, 700, 734, 960, 810, 840 and 937 listed by the applicant were classified as laboratory premises in the 2005 property ratings.

By the applicant's own admission the present site has 18,408m² of vacant space which when combined with the proposed phase 2 technology units (3,253m²) provides 21,661m² of available accommodation which dwarfs the current application for 12,000m² outside of the security fence.

The applicant is effectively proposing that the site will grow from its present 28,792m² of occupied space by an additional 33,661m² in the course of just a few years and cited in its recent 'Five Year Vision' document.

A growth rate of 116% in this time frame is quite preposterous and would more than likely take several decades.

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 can not 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.

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) Whilst the Local Plan clearly contemplates expansion outside of the security fence subject to a number of important conditions, we fail to see how it could contemplate anything in relation to 'the scale now proposed' as by definition the Local Plan was prepared before what is now being proposed.

5) As already stated the applicant can not 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.

The applicant states that Swale Borough Council has confirmed this finding, but Swale Borough Council's input during the preparation of the EIA drew the following conclusions on approaches to definition neither of which you will note states 90%

	SIC Based	Common Sense
Knowledge based companies	45 (63.4%)	53 (74.6%)
Employees	707 (81.1%)	378 (43.3%)

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 2,100m² has already been added and the phase 2 technology units alone would add a further 3,253m² providing an overall increase of 12% in lettable floor space in addition to the 18,408m² of vacant space that currently exists.