CABINET

COUNCILLOR MARTIN TENNANT MAJOR PROJECTS AND PROPERTY PORTFOLIO HOLDER

28th JULY 2021 REPORT NO. RP2106

KEY DECISION: YES

REGENERATING RUSHMOOR PROGRAMME – UNION YARD REGENERATION SCHEME

SUMMARY AND RECOMMENDATIONS:

SUMMARY:

This report sets out the further due diligence and financial modelling that has been undertaken since the report considered by Cabinet in April (RP2103) in respect of the Union Yard scheme and updates the project risks. The report principally seeks a recommendation to Council for the funding to proceed with the main build contract and Cabinet approval to enter into contract with Hill Partnerships Limited.

RECOMMENDATION:

That Cabinet:

- Note the outcomes of the further due diligence set out in this report and in the reports by Grant Thornton UK LLP (GT) and Lambert Smith Hampton Investment Management (LSHIM) in respect of development viability and financial modelling;
- 2. Agree to proceed with the Union Yard scheme on the basis of a fixed price contract with the proposed project budget set out at exempt Appendix E comprising the direct and indirect costs and recommend to Council to amend the capital programme accordingly;
- 3. Agree to enter into contract with Hill Partnerships Limited by means of a JCT Design and Build contract for the delivery of the scheme;
- Consider the proposals and cost implications relating to energy efficiency improvements that can be achieved from further changes to the scheme design and agree any variations;

- 5. Agrees to the establishment of a Union Yard Project Board for the next stage of the project. The Board to include the Major Property and Projects Portfolio Holder, the Corporate Services Portfolio Holder and the Leader of the Labour Group to work alongside officers in providing oversight on the delivery of the consented scheme;
- 6. Recommended the Council to delegate authority to the Executive Head of Finance to amend the Treasury Management Strategy and associated prudential indicators in accordance with Council's decision regarding the scheme.
- 7. Note the next steps.

1. INTRODUCTION

- 1.1. The Cabinet meeting held on the 20th April considered a substantial report setting out due diligence work that had been undertaken to date in relation to the Union Street redevelopment, now known as Union Yard. At that meeting, Cabinet agreed to move forward to the next stage of development and the appointment of Hill Partnerships Limited for technical design and site preliminary works. Cabinet also agreed that up to £2.2m Housing Infrastructure Fund grant funding be used to cover the costs associated with RIBA Stage 4: Technical Design and preliminary works associated with the consented scheme in order to minimise delay in the delivery of the scheme.
- 1.2. Cabinet noted the next steps and that a further report would be presented to Cabinet in due course to enable a final decision to proceed with the scheme with a recommendation to Council to approve further capital expenditure required to deliver the Union Street development.
- 1.3. This report sets out the further due diligence and financial modelling that has been undertaken since the April report and updates the project risks. It seeks the necessary financial approvals to proceed with the main build contract and seeks to establish the appropriate project governance required in order to provide oversight and manage risk as the build progresses.

2. BACKGROUND

- 2.1. The regeneration of Aldershot Town Centre is a corporate priority and Union Street is identified as a key site allocation for regeneration within the Rushmoor Local Plan (adopted February 2019) and the Aldershot Prospectus SPD. It has formed part of the portfolio of sites being progressed by the RDP since its inception in late 2018.
- 2.2. Following Cabinet approval (RP2005), a planning application was submitted to the Local Authority by the RDP on the 4th March 2020 for a mixed use scheme comprising 100 residential units, purpose built student

accommodation (PBSA) (128-bed spaces) for the University for the Creative Arts (UCA) and ground floor commercial uses (2,237sqm GEA) focused around a 'Creators Yard'. The submission followed on from a period of public consultation in January/February 2020, with two public drop-in sessions held in Aldershot town centre on the 16th and 18th January. From the responses received to the feedback forms, approximately 80% of respondents supported the proposals that were presented and 97% agreed that Aldershot town centre needs regeneration.

- 2.3. The planning application was validated on the 6th March 2020 and was considered by Development Management Committee at its meeting on 24 June 2020 and agreed subject to suitable legal agreements to secure the required planning obligations.
- 2.4. Cabinet Report RP2008 set out that the detailed Project Plan associated with the Union Street scheme from the Rushmoor Development Partnership (RDP) was being considered and due diligence was commencing on matters including commercial, property, legal and finance assumptions and procurement options associated with the delivery of the scheme.
- 2.5. Cabinet approved (RP2011) the procurement of demolition works by means of a procurement framework either as a direct award or through a mini competition. The Southern Housing Group Framework was identified as an appropriate route and a Briefing Document was issued to the companies registered on the framework lot. Only one company expressed an intention to submit a proposal, Hill Partnerships Limited, who were subsequently identified as the preferred partner to oversee the works.
- 2.6. The demolition works are underway (contract commenced 1st February 2021) and are due to conclude by the end of October 2021 taking account of further site preliminary works to continue through to construction start on site as approved (RP2103).
- 2.7. The Council is also progressing the technical design phase of works following approval from Cabinet to proceed (RP2103) and has appointed consultancy Bailey Garner as Employer's Agent.

3. PROGRESS UPDATE

- 3.1. Cabinet report RP2103 identified that the following further decisions would be required in order for the Council to make its final decisions to proceed with the scheme:
 - (1) Further certainty in relation to the construction cost;
 - (2) Future lease/sale arrangements with Rushmoor Homes Limited (RHL);
 - (3) Future lease arrangements with registered providers have moved forward;
 - (4) Further work on the options for management and letting of the student accommodation have been progressed; and

- (5) The procurement and contract arrangements in respect of construction and development have been concluded.
- 3.2. In respect of (2) above, RHL have received a formal request from the Council to submit a bid for the 82 private units within the scheme. RHL are currently updating their financial model and will provide this information in due course. It is considered that the original offered sum (£15m) provides sufficient certainty for the purposes of proceeding with the main build contract.
- 3.3. In respect of (3), Cabinet agreed at 8th July to proceed with a disposal of a long lease to Funding Affordable Homes, a Social Impact Investment Company which partners Registered Providers to deliver and manage affordable housing.
- 3.4. Items (1), (4) and (5) are dealt with in the following sections of this report.

Construction costs

3.5. The Council is working with Bailey Garner to develop the employers requirements and specification in order to finalise construction costs on the basis of a fixed price contract. That will be confirmed by Hill Partnerships by the 23 July and will be reviewed by Bailey Garner in their role as Employer's Agent for the Council. This figure will be reported to Cabinet at the meeting but is expected to be within the range of costs factored into the updated due diligence undertaken by GT and LSHIM, described in section 4 below.

Student Accommodation

3.6. Following the University for the Creative Arts (UCA) withdrawal from lease negotiations, the Council undertook further due diligence on student accommodation in order to consider whether there was merit in proceeding in the absence of a long lease with an institution. The outputs from this due diligence were considered as part of the RP2103 report and subsequently passed on to LSH/GT to consider as part of their revised due diligence as covered off below.

Construction Procurement and Contract Arrangements

- 3.7. In respect of (5), the RP2103 report set out that in order to meet a start on site target within the calendar year, the most effective route to take would be a direct award from an appropriate framework i.e. without seeking competitive tenders from some or all framework contractors). Cabinet agreed to move forward with a pre-construction services agreement (PCSA) with Hill Partnerships Limited by way of a direct award via the Catalyst Framework.
- 3.8. It is recommended that the Council utilise the Catalyst Framework to enter into the main JCT Design and Build contract with Hill Partnerships Limited in order to meet the start on site target and ensure that the Council can make full use of external funding secured to assist with the delivery of the scheme.

From a value for money perspective, as part of the due diligence, Gleeds advised that the construction costs proposed by Hill represented value for money. Hill has also been working closely with the RDP on developing the scheme to date, providing input on pre-planning to ensure that the proposals are buildable. As such, comfort can be taken from the fact that the cost schedule has been informed by prior knowledge of the site context and aspirations. The fixed price cost schedule associated with the main build will be validated by Bailey Garner.

4. OUTCOME OF FURTHER DUE DILIGENCE AND FINANCIAL MODELLING

- 4.1. Further due diligence and financial modelling was required principally as a result of the UCA withdrawing from lease negotiations in respect of the 128 student bedspaces within the approved scheme. In addition, the Council was able to provide further clarification on the disposal value associated with the affordable housing element of the scheme and confirm that a commercial unit within the High Street frontage was now proposed to be absorbed within the student accommodation offer as communal space.
- 4.2. The student accommodation which has been previously offered to the UCA was proposed to be on a 25 year lease with a 15 year break option at £543,995 per annum. This offer has now been withdrawn. This element was previously valued at 5.5% having regard to the covenant being offered and the security of income which provided an estimated capital value of £8,730,000.
- 4.3. LSH was provided with the following reports commissioned by the Council to assess the potential rental value for the student accommodation:
 - Aldershot Market Summary by Savills Student Accommodation
 - Management Proposal by CRM Students
 - Delivery of Purpose Built Student Accommodation (PBSA) by Avison Young
- 4.4. In considering the above reports, LSH has revised the capital value to £9,811,907 on the basis that a better income can be achieved via a direct let model via an operator. The yield has shifted out to 6% based on comparable evidence within the market.
- 4.5. With regard to the residential element of the scheme, LSH has noted that the affordable provision on site will now be 18 units as opposed to 20. As such, there is additional value achieved from the 2 units that now comprise part of the private accommodation, intended to be disposed of to RHL.
- 4.6. The offer for the affordable element of the scheme is marginally lower than the value factored into earlier due diligence work and this has been reflected in the revised position.

- 4.7. It has been decided to switch a commercial unit on the ground floor to a communal room for the Student Accommodation as the advice we have received is that this would a benefit to a potential Student Accommodation operator/purchaser. The loss of this commercial unit on High Street has a nominal impact on the commercial element of the scheme and this loss is outweighed by the benefit gained from the student accommodation element of the scheme through the introduction of a communal space in terms of appeal and rental value.
- 4.8. In summary the changes outlined above have the below impact for financial modelling purposes:
 - Student Accommodation: The value of the student accommodation has increased from £8,727,723 to £9,811,907 due to the UCA withdrawing from the lease and new assumptions made on the basis of a management contract.
 - Commercial Accommodation: The value of the commercial accommodation has fallen from £2,061,333 to £1,845,849 due to Unit 13 being removed from this element and allocated as part of the student accommodation.
 - Affordable Housing: A further tender exercise has been undertaken and the offers for the affordable housing now relate to 18 units, with the highest offer being £2,950,000.
- 4.9. These changes have resulted in an improved Gross Development Value (GDV) (assuming Rushmoor Homes will purchase the private residential units) of £35,807,756 up from £35,287,339.
- 4.10. The revised LSH report (at Exempt Appendix A) sets out an updated risk register in light of the above changes. A key change here is the fact that the Council holds the occupancy risk on the student accommodation. This increased risk has been reflected in moving the yield out to 6% rather than 5.5% as previously proposed.
- 4.11. The risk register will be adopted into the formal risk register for the project and will be reviewed regularly as part of the governance process. The latest version of the project risk register is appended (Appendix C).
- 4.12. Grant Thornton has taken the above assumptions and undertaken financial modelling (Exempt Appendix B) on the basis of two confirmed scenarios:
 - Scenario 1 The Council delivers the Project, in which the private and affordable residential units are sold to the open market and commercial/student units are retained by the Council for rent. Financed by Public Works Loan Board (PWLB)
 - Scenario 2 The Council delivers the Project, in which the private residential units are sold to Rushmoor Homes Limited, the affordable housing units are sold to the open market and the commercial/student units are retained by the Council for rent. Financed by PWLB.

- 4.13. GT has modelled a comparison between the outputs shared in March 2021 of the original scenarios i.e. where it was assumed the UCA operate the student accommodation and the revised scenarios i.e. where an management operator model is assumed.
- 4.14. Furthermore, GT was asked to consider the impact of a cost increase on all construction costs in order to reflect present uncertainty in the market related to labour/materials. The total capital expenditure modelled for the scheme in options 1(a) and 2(a) is set out in Exempt Appendix E.
- 4.15. To ensure a like-for-like comparison to the original scenarios, GT has assumed a 15 year operational term across all financial models run, at which point the Council could opt to dispose of the asset or choose to refinance/re-purpose the asset.
- 4.16. In summary, all 4 scenarios plus the construction cost sensitivities appear to be financially viable on the basis they provide a positive cashflow and Net Present Value (NPV), however, these are dependent on the Council achieving the assumed Terminal Value (proceeds received on a disposal at the end of the 15 year operational term) on the retained properties. The indicative cashflows based on the agreed assumptions for each scenario are set out in Appendix D of the GT report and range from £374,000 to £944,000 per annum. Actual cashflows will be different and will fluctuate year-on-year. Treatment of any cash surplus must take into account market conditions/project risks. Based on Government guidance at the time of writing this report, the Council would not be able to use surplus cash to support other council services but can provide a funding source for other regeneration projects.
- 4.17. The report notes that the Council carries development risk and operational risk on the student accommodation and retail units. As noted above in respect of the LSH report, these risks will be adopted into the Project risk register and managed through the asset life cycle.
- 4.18. In their due diligence report that supported the Cabinet Report of 20 April 2021, LSHIM recommended that if a Direct Delivery option is selected, that a fixed price contract is entered into with the main contractor to prevent costs increasing unreasonably.
- 4.19. By way of background to this, there are two contract procurement options that could be considered for this project which are a fixed price contract and an open book contract.
- 4.20. A fixed price contract typically involving a single stage, lump sum fixed price tender. At the point of entering into contract, cost certainty is high, together with high levels of certainty regarding programme. This form of contractual arrangement also exhibits the ability for the client to pass project risk to the contractor at an early stage. Consequently, due to the contractor normally taking the risk associated with design, design flexibility is low. The ability to fast track the project is also constrained.

- 4.21. An open book arrangement involves reimbursing the contractor for the subcontract packages that are market tested, together with a percentage addition for overheads and profit, and also preliminaries. Preliminaries could be redlined and fixed at the outset. This type of contractual arrangement typically has very low levels of cost certainty because it is not until procurement of the supply chain is completed that the out-turn cost is known. Similarly, there is little programme certainty. This type of cost plus reimbursement contract therefore does not transfer significant risk to the contractor other than the ability to deliver the project within a programme, if the preliminaries are fixed. As the subcontractor procurement will be let as and when working drawings are produced, there is much greater design flexibility, and design can change and be accommodated right up to the point at which sub contract packages are let.
- 4.22. As demolition is underway and planning permission has been secured, we are in a position where early open book arrangements are combined with a lump sum fixed price contract, effectively using a two stage approach. During the demolition period, Hill are securing prices for sub contract works which will then be converted into a lump sum fixed. This blends elements of both approaches highlighted above and aims to transfer the risk to the contractor at the acceptance of the fixed price stage.

Energy and Sustainability Enhancements

- 4.23. At the request of the Cabinet a further report was commissioned to consider what further measures may be introduced into the current development plans for the Union Yard project to enhance its performance in relation to energy and sustainability through further reducing the buildings carbon emissions and improving its energy performance.
- 4.24. The current building design and specification proposed already meet the key regulatory and local planning policy targets, achieving a 48.51% improvement over current Part L 2013 regulations.
- 4.25. The attached report (see Appendix D) sets out that further enhancements through fabric efficiency (roof/windows) and improvements to building services, renewable provision and lighting would improve the performance to 56.30% over current Part L 2013 regulations. The estimated costs associated with these improvements in their entirety is £764,000 over and above the present build cost. A breakdown of each element is provided within the report.
- 4.26. The introduction of a new communal heating system (e.g. air source heat pumps) would bring with it further improvements to efficiency but would also result in sunstantial project delays through the need for planning resubmission and design adjustments. Given that the Council has approved the commencement on technical design it is not recommended to proceed with this option.

4.27. Officers view is that the additional build costs outweigh the value achieved by the additional improvement of around 8% but recognise Members desire to accelerate their commitments in the Council's climate change strategy. Cabinet is therefore asked to consider the attached report and confirm how it wishes to proceed in terms of enhancements summarised in para 4.25 that could be secured through the design and specification of the scheme.

Project Resources

- 5.1 Grant Thornton and LSHIM previously identified that whatever routes the Council take, it will need to make sure that it has access to the appropriate level of skills and expertise to act as an effective client. The regeneration programme has been revised and the internal project team is being strengthened through the addition of interim additional senior resource with substantial previous experience of delivering complex regeneration schemes. The Council will also need to appoint additional project management in addition to Bailey Garner and other external technical advisors to make a full development management function as required.
- 5.2 LSHIM provided a breakdown of the estimated costs associated with this. On the basis of a direct delivery, the indicative costs associated with a Development Management function are likely to be as follows:
 - Senior Development Manager (Director Level) up to £150k per annum
 - Development Manager (Associate Level) up to £70k per annum
 - Project Manager up to £50k per annum
 - Project Administrator up to £30k per annum
- 5.3 Set against an estimated delivery timescale of 2.5 to 3 years, this gives rise to an order of cost of approx. £750k £800k (plus accommodation/expenses). In addition, the Council would need to resource the following:
 - Clerk of Works up to £40k per annum (assumed over 2 years)
 - Client Representative up to £200k per annum (assumed over 2 years)
 - Quantity Surveyor up to £25k (one off cost)
 - Legal Services up to £60k (initial costs relating to contract documentation and state aid/subsidy control advice)
- 5.4 The above costs are factored into the due diligence and pricing that has been undertaken.

6 RISKS AND LEGAL AND FINANCIAL IMPLICATIONS

Risks

6.1 The Council has a risk register in place for the scheme and this is reviewed regularly by the Project Office. As the project moves into delivery it will be

- important for the risk register to be updated reflecting new circumstances and increased levels of risk resulting from the Council undertaking the role of developer and potentially being the sole funder for the scheme.
- 6.2 The decision to move ahead to the next stage of development of the scheme should be taken after balancing the benefits of the scheme against the substantial costs and risks as set out throughout this report.

Legal Implications

- 6.3 Cabinet report RP2103 covered off a number of legal implications with regard to the chosen delivery route for the scheme.
- 6.4 The Council has entered into contract with Homes England in respect of the £5m of HIF funding. The contract sets out the milestones that the Council needs to meet in order to secure the funding. The inability to meet these milestones would result in the Council defaulting on its legal obligations and put at risk the funding drawdown.
- 6.5 The Council has retained the services of Browne Jacobson to assist with contractual matters relating to the delivery of the project.

Financial and Resource Implications

- 6.6 The report sets out the outcome from the due diligence undertaken on the Union Street scheme and provides members with a significant update on the delivery and financing options for the scheme.
- 6.7 There are a number of significant financial implications that the Council will need to consider in agreeing to proceed with a project of this value.
- 6.8 The scheme will utlise £5m of HIF grant funding. The Council need to ensure adequate risk mitigation measures have been put in place to ensure eligibility criteria are met throughout the scheme.
- 6.9 The Council will be entering into a significant long-term commitment with capital expenditure of up to the proposed budget set out at Exempt Appendix E to be financed. The Council's capital expenditure is predominantly financed from prudential borrowing as other sources of finance are limited. The Council already has undertaken £102m of external borrowing to finance the capital programme to date. Further borrowing will need to be undertaken to finance the Union Yard scheme and any additional capital expenditure plans. The affordability of the Council's capital programme was considered as part of the Capital Strategy approved by members at their meeting on 25 February 2021.
- 6.10 Members are advised that approval of the Union Yard scheme will increase the level of external borrowing required to finance the capital programme. Whilst the assessment is that the additional borrowing is affordable, members should be aware of the revenue implications of additional

borrowing and the cumulative impact this may have on affordability of future decisions in the Council's Regeneration and Property and Major Works programmes.

- 6.11 The Council's Treasury Management Strategy (TMS) for the current financial year was approved by Council at their meeting on 25 February 2021. This sets out the Council's capital expenditure and financing plans and the borrowing strategy. The TMS did not take into account any capital expenditure or financing associated with the Union Yard scheme as the due diligence process had not concluded at the time of preparing the strategy. Therefore, the TMS and associated prudential indicators will need to be amended should the Council decide to approve the capital scheme. It is noted within the decision box that delegation is given to the Executive Head of Finance to amend the Treasury Management Strategy and associated prudential indicators in accordance with Council's decision regarding the scheme.
- 6.12 Changes to the PWLB Lending Terms in November 2020 require the Council to confirm that its capital expenditure plans are compliant. The PWLB Lending Terms defines 4 activity areas that the government will support through PWLB lending. This includes Regeneration activity with one or more of the characteristics defined below:
 - the project is addressing an economic or social market failure by providing services, facilities, or other amenities that are of value to local people and would not otherwise be provided by the private sector
 - the local authority is making a significant investment in the asset beyond the purchase price: developing the assets to improve them and/or change their use, or otherwise making a significant financial investment
 - the project involves or generates significant additional activity that would not otherwise happen without the local authority's intervention, creating jobs and/or social or economic value
 - while some parts of the project may generate rental income, these rents are recycled within the project or applied to related regeneration projects, rather than being applied to wider services
- 6.13 Access to PWLB lending is dependent on the Council ensuring that it does not undertake capital expenditure in relation to investment assets primarily for yield. For the avoidance of doubt, the Council will not be able to purchase any investment assets regardless of how the acquisition is financed if it is to access PWLB borrowing throughout funding cycle of this scheme. The Council's Executive Head of Finance (Section 151 Officer) is required to confirm the organisation does not plan to buy investment assets primarily for yield prior to undertaking any PWLB borrowing.
- 6.14 The report outlines the need to appoint a client team and engage appropriate external advisors to enable the scheme to progress to the next stage. Indicative costs have been provided by LSHIM. It is likely that a proportion of these costs can be capitalised as the scheme progresses and have been included in the scheme cost estimate.

6.15 Land assembly costs of approx. £9.5m have already been incurred as a cost of the regeneration to date. The financial modelling undertaken for the Union Yard scheme has indicated it may not be possible to recoup this funding in the short term or medium term. The Council will as part of later decisions on the scheme need to consider the final treatment of land assembly costs to ensure the capital financing costs are considered. In the meantime debt interest on borrowing to date included in the MTFS should be dealt with as a cost of regeneration and whether provision will need to be made in the Council's revenue budget for recovery of the land value.

Equalities Impact Implications

6.16 There are no known specific equalities impact implications arising from this report.

Alternative Options

- 6.17 The Cabinet could consider not proceeding with the recommendations set out within this report and choose to cease any further activity on site with a view to having more certainty within a volatile market. There will always be unknown circumstances, uncertainties and element of future visioning required with any major regeneration scheme that takes over 2 years to build and such a delay would put at risk the ability to draw down and make use of the external funding that has been secured to support delivery of the scheme by March 2022.
- 6.18 A further alternative to consider would be to revisit the scheme mix and seek a variation through the planning process. This is not recommended by officers as it would add significant timescales on delivery to account for scheme re-design, validation and determination followed by the conclusion of a revised legal agreement before planning permission could be issued. That would result in the Council having to relinquish the £5m of funding allocation from the HIF as it would not be feasible to meet milestones set out within the agreement.
- 6.19 A further option would be to dispose of the site with planning permission in place and a requirement to build out the scheme. However, the current scheme viability it would be unlikely to secure a purchaser at a value that would represent good value for money as the Council has demonastrated that the scheme can achieve a surplus if held for 15 years and then disposed at the terminal values indicated. A further alternative would be to sell the land unincumbered but this would not guarantee the approved scheme was built and there would be no influence over any further schemes put forward.

7 CONCLUSIONS AND RECOMMENDATIONS

7.1 This development is a major part of the Council's regneration programme and delivery of the 'Place' priority within the Council's Business Plan and critical to the regeneration of Aldershot town centre.

- 7.2 The due diligence demonstrates that all 4 scenarios modelled over 15 years demonstrate the scheme to be financially viable on the basis they provide a positive cashflow and Net Present Value (NPV) albeit these are dependent on the Council achieving the assumed Terminal Value (proceeds received on a disposal at the end of the 15 year operational term) on the retained properties. Positive cashflows were maintained even with the inclusion of construction cost sensitivities.
- 7.3 Whilst the due diligence assumes retention of the majority of the development, as with any of its property assets the Council will have opportunity to review the approach to holding or sale of the completed scheme at any point.
- 7.4 Taking the due diligence, assessment of risk and further information set out in this and earlier reports it is recommended that the Cabinet agree that the scheme proceed and recommend the Council to make the necessary changes to the capital programme to make funding available for the delivery of the scheme.

BACKGROUND DOCUMENTS:

Cabinet Reports RP2005, RP2008, RP2011 and RP2103

Council Meeting 25th July 2019 - Agenda Item no. 5(3) Rushmoor Development Partnership – Approval of Business Plan

APPENDICES

Appendix A (Exempt) – LSHIM Development Delivery Addendum July 2021 Appendix B (Exempt) – GT Due Diligence Report on Union Street, Aldershot July 2021

Appendix C - Project Risk Register July 2021

Appendix D - Energy Improvement Document (Darren Evans) May 2021

Appendix E – (Exempt) – Union Yard Project Budget Parameters (July 2021)

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