



Skanska Residential Development

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12 September, 2012

Dear Cabinet Members,

**B&NES MOD CONCEPT STATEMENTS
PUBLIC STATEMENT REGARDING MOD ENSLEIGH
CABINET MEETING 12 SEPTEMBER, 2012**

In April 2012, Skanska Residential Development UK Limited (Skanska) acquired the freehold of Ensleigh South and has appointed a full design team to prepare a residential led development for high quality residential development (circa 40 units).

Whilst we welcome the overarching objectives the Concept Statement and seek to meet the broad principles through our imminent planning application, we have significant concern that in its current form, the Concept Statement is flawed and in parts too prescriptive which will ultimately delay investment in the site.

We wish to lobby members to defer adopting the Draft Concept Statement for MOD Ensleigh site until a series of concerns within the Statement are tested and resolved. If members endorse the adoption of the Statement at this time, you will significantly undermine the ability to secure the redevelopment of the site in a phased manner and prevent the site from positively contributing towards the Council's 5 Year Housing Land Supply.

Our concerns, as set out below, have been expressed to officers:

▪ **Delivery through a Single Masterplan**

The MOD's Disposal Strategy has divided the site into two distinct plots, with associated delivery programmes of disposal and vacant possession over a number of phases, including the South site already having been sold to Skanska (in advance of publication of the Concept Statement).

This phased strategy prohibits the ability to deliver a holistic approach to the redevelopment and delivery of associated community infrastructure to service the site, in the short term.

As drafted the Concept Statement is predicated on a single planning application across all the land parcels (including the playing fields) which could in reality only be achieved through a single developer/landowner. The commercial reality is a number of developers could deliver this site over a period of time reflective of land interest, vacant possession, market conditions, phasing and infrastructure delivery implications.

Whilst we appreciate a comprehensive approach in appropriate for the north site, Ensleigh South is very different in development terms to the north site, as it can come forward immediately to meet housing delivery requirements and is not restricted by the vacancy programme for the north site. This site should be permitted to come forward independently, following on from the precedent set of development on other sites along Granville Road.

This multiple planning application approach and phased redevelopment is entirely appropriate for a site of this size subject to the ability of each application coming forward to demonstrate how it is consistent with, contributes to the deliver of the site infrastructure and principles of Concept Statement. Without the Council



adopting such an approach to planning, you will sterilise this important previously developed site in the short/medium term.

- **Education**

With the above in mind of allowing development to proceed on the South site, it is important that the education aspirations for a primary school, set out in the Concept Statement, do not hinder development at Ensleigh South.

The Council has not to date presented any evidence to justify the requirement to provide a primary school and contributions to early years provision, play services and youth services as set out in the Statement. Without any robust evidence base to substantiate the need for a primary school Members should seek to defer the adoption of the Concept Statement in its current form.

Based on national standards and advice set out in the Department of Education Guidelines for Local Authorities and Buildings Bulletin 99 (2nd Edition) there is no statutory requirement for a 210 place primary school based on the level of housing proposed (i.e. 350 units). Incorporating such a request without exploring all the alternative options, extensions of existing neighbouring schools, smaller intake in school facility (i.e. 105 or 120 space school) etc will jeopardise the ability to deliver much need homes on this important previously development site and positively contribute towards the Authorities overarching 5 Year housing land supply.

We do not believe the necessary and appropriate work has been undertaken, and believe a deferral will allow the Council and landowners to collectively work through these issues and identify a commercially deliverable solution and phased approach to an appropriate level of community infrastructure – which if justified and reasonable, does not stall development at Ensleigh South.

- **EIA development**

The updated Statement states that the Council's consider that an EIA will be required. This statement is premature. There is no evidence of screening, or explanation as to how the Council has arrived at this opinion, in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

In addition, to these fundamental concerns above there are a series of more detailed comments regarding matters such as 'access and movement', 'sustainability' which are considered too prescriptive as currently drafted which have been raised with officers.

In summary, Skanska as one of the combined landowners at Ensleigh has an important role to play in delivering new homes to meet the Council's 5 Year Housing Land Supply on this previously development strategic site. However, it is current form the Concept Statement is unsound and will prohibit a commercially viable, phased approach to redevelopment coming forward in a timely manner with a legal mechanism to deliver the necessary/appropriate associated community infrastructure.

Regards,

Sebastian Loyn

**Project Development Manager
Skanska Residential Development**