
Central Lancashire Local Plan 2023-2041

Representations on Regulation 19 Consultation
Draft





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1. Introduction

- 1.1. Savills (UK) Limited (Savills) is instructed by the Defence Infrastructure Organisation (DIO) to submit representations on the Central Lancashire Local Plan 2023-2041 Publication Draft (CLLP).
- 1.2. The CLLP, once adopted will set out the strategic level of planning policy for the areas Preston, Chorley and South Ribble. This includes matters such as the overarching spatial strategy, how the region will respond to challenges such as climate change, and set out requirements to ensure new development is of a high quality. Importantly the Plan will also make allocations for development.
- 1.3. The policies of the CLLP will eventually replace those within the Central Lancashire Core Strategy (CLCS) which was adopted in July 2012 and fulfils a similar role. Eventually the local plans of each of the 3 constituent areas will be renewed to reflect the spatial strategy of the CLLP when adopted.
- 1.4. These representations will focus on the CLLP, including supporting Policy Map 3.1, as well as the relevant parts of the published supporting evidence base. Given the DIO's role in the disposal of Fulwood Barracks, comments made will concentrate mainly on this Site.
- 1.5. This Regulation 19 consultation on the Publication Draft of the CLLP marks the third formal consultation undertaken as part of the preparation of the consultation. This follows on from the Issues and Options Consultation which closed in February 2020, and the Part One Preferred Options Consultation that ended in February 2023.
- 1.6. The DIO has made representations to each of these consultations as part of its role as a key stakeholder in the delivery of sustainable development in Preston and Central Lancashire more widely. The Site was also submitted as part of a supporting Call for Sites exercise.
- 1.7. As the CLLP has now reached the publication stage, comments made within these representations will be structured around the tests of soundness set out in paragraph 36 of the NPPF.
- 1.8. Paragraph 36 states that plans will be considered to be sound if they are:
 - Positively prepared;
 - Justified;
 - Effective; and
 - Consistent with national policy.
- 1.9. These representations will be structured as follows:
 - Section 2 – Background to DIO and Interests in Preston;
 - Section 3 - Representations on Policy SS4: Strategic Allocation – Fulwood Barracks;
 - Section 4 - Representations on Other Policies of Relevance; and
 - Section 5 - Summary and Conclusions.

- 1.10. The representations are supported by high level evidence on design and viability matters which are included at Appendix A and B, respectively. These are referred to within the representations where relevant.
- 1.11. In terms of site capacity, design work undertaken suggests that the Fulwood Barracks Site can comfortably accommodate a scheme of c. 440 homes, comprising mainly houses rather than flats. This includes the retention and reuse of listed buildings, repurposing of the existing parade grounds as publicly accessible open space, children's play facilities, natural green space, parking to meet relevant standards, and other required infrastructure. This quantum of development is considered to make best use of the brownfield site and ensure there is sufficient development to enable the heritage assets on site to be retained and reused in a viable manner.
- 1.12. It should be noted that all comments are made in order to assist in ensuring the that CLLP is sound in order to set out an appropriate strategic level of planning policy for Central Lancashire. In general, the CLLP is considered to provide adequate policies and guidance. However, where necessary issues of soundness are raised and amendments suggested to resolve these.

2. Background to DIO and Interests in Preston

Defence Infrastructure Organisation

- 2.1. The Defence Infrastructure Organisation (DIO) is the estate expert for defence, supporting the armed forces to enable military capability by planning, building, maintaining, and servicing infrastructure. As such, it forms a part of the structure of the Ministry of Defence (MoD).
- 2.2. The MoD's Strategy for Defence Infrastructure 2015-2030 sets out an aim to achieve a 30% reduction in built assets over the period 2020 to 2040. A review of the UK wide lay down consolidates onto fewer sites focussed around centres of mass.
- 2.3. A key part of the DIO's role is therefore implementing this policy through a process of well-planned and strategic disposals of parts of the MoD estate that have been deemed to be surplus to requirements.

Fulwood Barracks

Site Context

- 2.4. Fulwood Barracks is situated in the Fulwood District of Preston, on Watling Street Road, approximately 2.6 km northeast of Preston City Centre. The site is roughly a 10-minute bus journey from the city centre with bus stops immediately adjacent to it. The journey time from the site to the city centre is approximately 15 minutes by bicycle. The M6 motorway is located to the east of the site which can be reached within a 5-minute drive time. The M6 motorway connects the area to the rest of England and Scotland.
- 2.5. The main entrance to the site is located on Watling Street Road which is adjacent to the south of the site. Watling Street Road is an arterial road leading to the city centre from the northeast. There is also a secondary access from Fulwood Hall Lane to the north of the site which can be accessed through a residential area.
- 2.6. The surrounding area is predominantly residential in nature, with semi-detached houses located to the west of the site which were built in the early 1900s, military terraced housing is located to the north of the site (now owned by Annington Homes), and more residential housing is located to the east of the site which was built between the 1930s - 1960s.
- 2.7. To the east of the site is a former cricket ground, accessible only through Fulwood Barracks. Although no longer in use, it remains maintained by the MOD. The Battle of Preston (1648) is believed to have occurred on the eastern part of the site, possibly on the former cricket ground although this has not been confirmed.
- 2.8. The location is highly sustainable, allowing future residents to meet most of their daily needs within an easy walk, and or through using safe walking and cycling routes, and or public transport, without needing a car.

Site Description

- 2.9. Fulwood Barracks is owned and operated by the MoD as a functioning barracks and is the regimental headquarters of the Duke of Lancaster's Regiment.
- 2.10. The Site has been deemed to be surplus to requirements by the MoD and is currently due to cease being operational and close in 2031. It will then be available for an alternative use, or uses.
- 2.11. The main body of the site is relatively flat, with the northern section descending towards Melrose Avenue and Fulwood Hall Lane. Surrounding the site on the north, west, and south boundaries is a high perimeter wall from the mid-19th century, designated as Grade II listed. This wall was originally constructed to provide a defensible boundary for the Barracks. It is known that the western side of the wall was partially rebuilt in the 1930s when housing was developed. The eastern section of the wall has been completely demolished, with the Barracks boundary now extending further east beyond the recreation ground.
- 2.12. Access to the Barracks Site is from the south, through the historic gatehouse. A lawn separates the gatehouse and perimeter wall from Watling Street Road. The lawn to the south of the gatehouse, along with the gatehouse itself, is referred to as the southern field of fire. The Lancashire Infantry Museum, which is open to the public, is located within the frontage buildings.
- 2.13. There are 16 Grade II listed structures within the Site.
- 2.14. The Site is located within Fulwood Conservation Area.



3. Representations on Policy SS4: Strategic Allocation – Fulwood Barracks

- 3.1. The following section will set out Savills’ position on CLLP Policy SS4: Strategic Allocation – Fulwood Barracks. This includes an assessment of how the policy performs against the tests of soundness set out in the NPPF.
- 3.2. The policy is generally split into 2 parts. The first sets out general points regarding the proposed allocation, including a description of the Site, summary of the development potential, capacity and Site Location Plan.
- 3.3. The second part sets out key development considerations in terms of how the proposed allocation would relate to other policies of the Plan. It should be noted that other policies in the CLLP are still applicable to the allocation and as such are considered in Section 4 of these representations.
- 3.4. The two parts of the Policy are considered below.

Part 1 – Context and Overview

Table 1 - Policy SS4 - Part 1 Soundness Summary

Policy SS4: Strategic Allocation – Fulwood Barracks – Part 1		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	No	Evidence shows that the indicative capacity of the Site should be c. 440 dwellings and the net developable area should be 11.77 hectares. The latest timescales for disposal show that the Site will cease to be operational from 2031.
Effective	No	The boundary of the allocation does not align with MoD ownership which could hinder deliverability.
Consistent with National Policy	No	The current indicative minimum yield is not seeking to make most efficient use of land on a brownfield site. An indicative quantum of development of c. 440 dwellings would make better use of a brownfield site and assist in ensuring the heritage assets on site can be converted into a viable use.

Amendments Required

Point 1 – Amend to reflect that cease of use will be in 2031. Text to read: *“is expected to be disposed of within the first ~~five~~ eight years of the plan.”*

Point 1 – The Ancient Battlefield land is not included within the allocation boundary nor the MoD’s ownership as it lies to the east of this. Reference to this should be removed from the description of the Site.

Point 3 - Amend to reflect that cease of use will be in 2031. Text to read: *“Delivery of development on the site is expected from year ~~six~~ eight of the plan”.*

Point 5 – Developable Area – Amend to 11.77ha.

Point 5 – Amount/type of development (indicative) – Amend to a minimum of 440 dwellings.

Allocation Boundary – The allocation boundary includes land that it not under the ownership of the MoD and as such may impact the deliverability of the Site. The boundary should be amended to match the plan provided at Appendix A.

- 3.5. The proposed allocation of the Fulwood Barracks site is welcomed and fits both with the overriding spatial strategy of the CLLP, and also paragraph 125 (c) of the NPPF which states that planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.
- 3.6. Furthermore, the development of the Site, as set out within the proposed allocation would serve to safeguard the designated heritage assets present, for future generations. This accords with the provisions of Section 16 of the NPPF, particularly paragraphs 202 and 219.
- 3.7. Notwithstanding firm support for the allocation of the Site in principle, there are minor changes required to Part 1 of Policy SS4 to ensure that it is justified and effective. These are set out in Table 1 above. Should these changes be made, it’s considered that this part of the policy would be sound.
- 3.8. In terms of the proposed amendments to the net developable area and minimum indicative yield, evidence for this is set out in design work set out at Appendix A. This demonstrates c. 440 homes could be achievable at the Site (through a mix of houses and apartments) with a net developable area of 11.7 hectares.
- 3.9. Whilst the current draft allocation indicatives a site capacity of 300 dwellings as above, design work indicates that the site can accommodate a higher quantum of development at c. 440 dwellings. This suggested increase in site density is considered to make better use of a brownfield site in a sustainable location such as this, particularly noting the need to re-purpose the existing heritage assets on site in order to bring them back into a viable use, whilst at the same time preserving their setting. This quantum of development is considered to strike the right balance in this respect. Further, the suggested masterplan provides the opportunity to further celebrate and enhance the setting of the site in heritage terms.

Part 2 – Key Development Considerations

Table 2 - Policy SS4 - Part 2 Soundness Summary

Policy SS4: Strategic Allocation – Fulwood Barracks – Part 2		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	No	<p>Evidence does not support the retention of the existing 3g pitch in situ.</p> <p>As previously stated, the Ancient Battlefield does not lie within the proposed allocation boundary.</p>
Effective	No	<p>A lack of consideration of viability matters in relation to the need to preserve heritage assets has the potential to impact deliverability. An increased quantum of development would better align with site density aspirations and assist with overall site viability, enabling the heritage assets to be repurposed into a viable use and provide much needed housing in a sustainable location.</p>
Consistent with National Policy	No	<p>The wording of Well-design places (EN1) is unclear as drafted in conflict with paragraph 16 (d) of the NPPF.</p> <p>The wording currently pre-empts the findings of archaeological investigations in conflict with NPPF paragraph 207 which specifies it is for the relevant assessments to draw these conclusions.</p> <p>Paragraph 35 of the NPPF is clear that policies setting out contributions expected from development should not undermine the delivery of the plan.</p>
Amendments Required		
<p>Well-designed places (EN1) – Amend wording as follows to increase clarity for the decision maker: <i>“The actual design and density of housing may also reflect the actual number of housing units considered acceptable on site. Good design could increase the number of units considered acceptable.”</i></p> <p>Planning Obligations (ID2) – Remove reference to the retention of the existing 3G playing pitches.</p> <p>Amenity (EN4) – Remove reference to public open space on the Ancient Battlefield as this does not form a part of the proposed allocation.</p>		



Heritage assets and archaeology (EN13) – Amend text as follows: *“Any planning application and listed building consent application to develop the site will need to be accompanied by an Archaeological Desk Based Assessment and/or the results of an archaeological field evaluation and a detailed Heritage Impact Assessment. ~~The development will likely require a level of archaeological mitigation.~~”*

Housing mix and density (HS6) and affordable housing (HS7) – Amend text as follows:

*Development of the site will be expected to accord with policies HS6 and HS7 delivering an appropriate mix and density of housing and the required percentage, tenure and mix of affordable housing. **The unique challenges associated with the delivery of the Site means that a bespoke approach may be required in terms of housing mix and affordable housing provision. As such, early discussions with the Local Planning Authority are recommended. Deviation from the expected housing mix of affordable housing provision should be clearly evidenced.***

- 3.10. In a similar vein to Part 1 of Policy SS4, the general principles set out are supported. However, some relatively minor amendments are required to ensure accuracy and make the wording clear in order to demonstrate that the policy is justified and consistent with national policy.
- 3.11. These minor amendments are set out within Table 2 with explanation and as such will not be repeated here.
- 3.12. The more substantial soundness matters relate to the reference to the retention of existing 3G pitches on the Site where feasible, reference to existing public open space relating to the Ancient Battlefield, and wording relating to the housing mix and affordable housing provision. These are discussed in turn below.

Retention of Existing 3G Pitches

- 3.13. Prior to a detailed discussion on this matter, it should be noted that reference to 3G pitches as a plural is inaccurate. There is 1 existing 3G mini-football pitch present. However, the other facilities present are a 3G tennis court, and a tarmac basketball court. These would not meet the definition of a 3G playing pitch owing to the dimensions, and surfacing respectively.
- 3.14. Should the policy requirement for retention remain, the wording should accurately reflect the existing facilities set out above.
- 3.15. The two key issues to consider in terms of whether the 3G pitch and other facilities should be retained in situ are as follows:
- Whether evidence suggests that this is an appropriate strategy (it is justified); and
 - Whether the retention would affect the viability of the Site and jeopardise deliverability (it is effective).

Is it an appropriate strategy?

- 3.16. The most recent published evidence on playing pitches for Central Lancashire is set out in the Central Lancashire Playing Pitch Strategy and Action Plan - Stage E Report dated January 2022 and produced by Knight, Kavanagh & Page (KKP). This was effectively an update from previous work also produced by KKP comprising the Central Lancashire Playing Pitch Strategy Assessment Report (September 2018) and Central Lancashire Playing Pitch Strategy and Action Plan (December 2018).
- 3.17. It is prudent to note that in none of the above documents have the facilities at Fulwood Barracks listed. This is a reflection that they are currently a private facility with no wider access.
- 3.18. In terms of the strategy for future 3G provision, the Stage E Report does not specify any recommendations for additional 3G pitches in Preston. Indeed, the only reference is for a need for a full size 3G pitches in Chorley.
- 3.19. There is a recommendation present for the following in relation to Preston:
- “Explore opportunities to create multi-pitch football hub sites where 3G provision is able to support grass pitches as a sustainable community offer within Preston in line with the Councils other strategic documents.”*
- 3.20. The retention of the existing 3G pitch on the Site would clearly not contribute towards achieving this aim given that there are no changing facilities or parking available, and owing to the future development of the Site there would be no space to accommodate grass pitches.
- 3.21. As such, in order to better meet the requirements set out in relevant evidence, it is considered that a financial contribution to a multi-pitch football hub site would be the appropriate method to address current shortfalls. This contribution would need to be subject to the requirements of Reg 122 of the CIL Regulations and viability matters.
- 3.22. It should be noted that the loss of the 3G pitch in its current location would not mean a reduction in opportunities for play and recreation on the Site. The design work at Appendix A demonstrates the opportunity for significant areas of public open space, play space, and kick about areas on land that is currently inaccessible to the public.
- Would it jeopardise deliverability?*
- 3.23. The retention of the existing pitches (3G pitch, tarmac basketball court, and tennis court) and the inclusion of a buffer area between this and housing would result in the loss of 20 homes from a potential development scheme.
- 3.24. Viability work included at Appendix B indicates that this would impact on the viability of the development owing to the loss of homes as a result of retaining the pitch and sports facilities, in addition to the abnormal costs estimated in relation to the conservation and conversion of heritage assets.

Summary

- 3.25. The retention of the 3G pitch in situ would not serve to meet the recommendations set out in the KKP evidence in relation to playing pitches. It's considered that this would be best met via a financial contribution to a multi-pitch hub off-site. This could be facilitated by reference to proposed Policy HS5 - Open Space and Playing Pitch Requirements in New Housing Developments.
- 3.26. The retention of the 3G pitch and other sports facilities would also result in the loss of circa 20 homes from the potential yield and thus impact on the viability of the scheme. Indeed, this is supported by viability work included at Appendix B. Given the challenges posed by the need to retain and enhance existing heritage assets at the Site, this is an important consideration.
- 3.27. The design work undertaken shows that even with the potential loss of the existing 3G pitch and other sports facilities, there would be a significant gain in open space for recreation and play on land that is currently not accessible to the public.

Existing Public Open Space

- 3.28. The Amenity (EN4) part of the Key Development Considerations reference the presence of public open space in the form of the Ancient Battlefield within the proposed allocation.
- 3.29. As previously stated, the Ancient Battlefield is not within the proposed allocation but lies to the east of the site. As such, reference of this should be removed for accuracy and to prevent confusion for the decision maker in accordance with paragraph 16(d) of the NPPF.
- 3.30. Notwithstanding this, the Battlefield Site is also not identified as being existing open space that is being protected by proposed policy HC6. As such, its identification as an area of public open space in Policy SS4 is inconsistent with its spatial representation on Policy Map 3.1
- 3.31. For the reasons set out above, references to this area as falling within the proposed allocation should be removed. Reference may be made to the Ancient Battlefield abutting the proposed allocation for contextual reasons, if it deemed necessary to do so.
- 3.32. The main comments regarding housing mix and density (HS6) and affordable housing (HS7) are within Section 4 given that Policy SS4 simply refers to them, rather than outlining a bespoke approach. However, wording is suggested to reflect the fact that a bespoke approach on these matters is likely to be required in relation to SS4 to ensure delivery.



4. Representations on Other Policies of Relevance

4.1. In addition to Policy SS4, there are other policies of relevance to the delivery of the proposed allocation owing to them being spatially relevant, or generally relevant to the type and scale of development proposed.

4.2. These are discussed below.

Policies of Spatial Relevance

4.3. Aside from Policy SS4, the following policies are considered to affect the proposed allocation site on Policy Map 3.1.

- EC7 – Protection of Existing Employment Sites;
- EN5 – Green Infrastructure; and
- EN13 - Heritage Assets and Archaeology.

4.4. These are considered in turn as follows:

EC7 – Protection of Existing Employment Sites

Table 3 - Policy EC7 Soundness Summary

EC7 – Protection of Existing Employment Sites		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	The policy is currently ambiguous as there is a disconnect between the identification of Fulwood Barracks as being subject to it and the wording.
Amendments Required		
Remove the EC7 designation from Fulwood Barracks on Policy Maps.		



4.5. Limb 1 of Policy EC7 states:

“The Councils will seek to protect existing employment sites for employment use.”

4.6. Paragraph 5.14 of the supporting text to the Policy states:

“Employment uses are defined as classes E(g)(i), E(g) (ii), E(g) (iii), B2 and B8.”

4.7. It is acknowledged that Fulwood Barracks is currently identified as an employment site as per policy EP2 of the adopted Preston Local Plan however, the Town and Country Planning (Use Classes) Order 1987 (as amended) is clear that Military Barracks fall under Use Class C2A - Secure residential institutions. As such, Fulwood should not fall under an employment use.

4.8. The protection of Fulwood Barracks for employment uses is therefore confusing for future decision makers and Policy Map 3.1 should be amended to remove this.

EN5 – Green Infrastructure

Table 4 - Policy EN5 Soundness Summary

EN5 – Green Infrastructure		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	No	The identification of much of the Site as Green Infrastructure has the potential to constrain the deliverability of the Site.
Consistent with National Policy	No	There is an inherent contradiction in allocating the Site for development at the same time as affording the Site specific protections from development, for approximately half of it.
Amendments Required		
Amend the EN5 designation on Policy Map 3.1 so that it does not overlap with SS4.		

4.9. The development of the Fulwood Barracks strategic allocation for a minimum of 300 homes, as currently drafted, will result in some of the land currently designated as Green Infrastructure (EN5) on the Policy Map being built upon which is clearly not the intention of the proposed Green Infrastructure policy.



- 4.10. Limb 4 of Policy EN5 states that where there is a loss of some identified green infrastructure, the following apply.
 - “a) The necessity and benefits of the development demonstrably outweigh the adverse impacts upon public amenity and nature conservation value; and*
 - b) Where it is demonstrated that harm cannot be avoided, the NPPF mitigation hierarchy is to be followed, whereby the harm is minimised and appropriate mitigation, compensation and/or enhancement is provided.”*
- 4.11. In terms of limb a), the necessity of the development and its benefits would clearly outweigh the harms given that it would be an allocated site for housing at the time that this policy was adopted.
- 4.12. The test is therefore superfluous at this stage and creates duplication and a lack of clarity in contradiction to NPPF paragraphs 16 (d) and 16 (f).
- 4.13. Limb b) relates to mitigation, compensation and/or enhancement. However, this is already covered in terms of Fulwood Barracks by specific Key Development Considerations set out in Policy SS4. These relate to ecology, public open space, and trees and woodland matter.
- 4.14. At such, limb b) is superfluous in terms of Fulwood Barracks owing to duplication.
- 4.15. It is therefore considered that the Green Infrastructure designation is removed from within the Strategic Site Allocation boundary to increase clarity on the role of the decision maker, and to avoid duplication of requirements.

EN13 - Heritage Assets and Archaeology

Table 5 - Policy EN13 Soundness Summary

EN13 – Heritage Assets and Archaeology		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	The current wording does not reflect the importance that the NPPF places on preservation of all heritage assets for future generations and not just those on the At Risk Register.



Amendments Required

Amend text as follows:

Proposals that seek to repair and/or re-use designated heritage assets ~~registered on Historic England’s ‘Buildings at Risk Register’~~ in a manner appropriate to their special interest will be supported.

- 4.16. The NPPF places great impetus in Section 16 to the protection and enhancement of designated heritage assets, and their settings, for future generations.
- 4.17. As currently worded, support for the repair and / or reuse of designated heritage assets would apply only to those on the ‘At Risk Register’. As currently drafted, this would exclude all Listed Buildings within the Strategic Site Allocation owing to them currently being well maintained by the MoD.
- 4.18. The protection and potential repurposing of such buildings, before they enter a state of risk, would be a proactive response that is reflective of the provisions of the NPPF. The amendments suggested above would ensure that Policy EN13 reflects this.

Policies of General Relevance

- 4.19. There are a range of proposed policies within the CLLP that would be relevant in determining a planning application relating to the proposed allocation at Fulwood Barracks.
- 4.20. In general terms, the policies that seek to focus new development in the most sustainable locations (SS1) and identify the Preston Urban Area as the primary focus for growth and investment (SS2) are considered to be a sound strategic basis for the Plan in accordance with the NPPF.
- 4.21. The purpose of these representations is to identify areas of the CLLP that are not currently sound and to suggest changes to resolve these issues. It is not to outline why policies are sound. In that vein, it should be taken as read that policies that are not referenced below are considered to be sound based on the evidence available at the time of writing. Should new evidence be made available, the right to comment on these policies in the future is reserved
- 4.22. In that context, general policies that are currently not considered to be sound are discussed below, with amendments suggested.

Policy HS6: Housing Mix and Density

Table 6 - Policy HS6 Soundness Summary

Policy HS6: Housing Mix and Density		
NPPF Para 36 Test	Sound?	Summary



Positively Prepared	Yes	
Justified	Yes	
Effective	No	Flexibility should be applied in terms of the housing mix requirements to ensure that site specific issues can be responded to. Otherwise this may impact on deliverability. It may not be possible for repurposed designated heritage assets to fully meet the requirements of M4(2) and therefore the implementation of this policy may render such project undeliverable.
Consistent with National Policy	Yes	

Amendments Required

Amend limb 1 as follows:

1. All market and affordable housing developments of 10 or more dwellings, or on sites of 0.4 hectares or greater, across Central Lancashire must:

- a) Provide a mix of dwelling types and sizes ~~to~~ **that seeks to** address the needs for that location as identified in the Housing Need and Demand Assessments, **or other relevant evidence, as a starting point. Site specific characteristic may justify a divergence from this mix;** and
- b) Build all dwellings to M4(2) accessible and adaptable standard **unless site specific characteristic mean that this is not possible;** and
- c) Build at least 4% of affordable dwellings on sites in Preston and Chorley, and at least 5% of affordable dwellings on sites in South Ribble, to M4(3) wheelchair accessible standard.

- 4.23. As currently drafted, the policy does not allow sufficient flexibility to account for the complexities of delivering a comprehensive redevelopment of a Site which contains many designated heritage assets to be retained.
- 4.24. The strict application of this policy as currently written would therefore serve to limit the deliverability of the Site.
- 4.25. The amendments suggested add a reasonable amount of flexibility to allow the specific characteristics of sites to be reflected in the mix and accessibility standards, whilst maintaining the aim of the Policy overall.
- 4.26. In terms of housing density, draft Policy HS6 outlines that in order to promote the effective use of land the following minimum gross densities are required on all housing developments:
 - Preston City Centre: 86
 - Town, District and Local Shopping Centres: 40
 - Other locations within settlement boundaries: 27



- Outside settlement boundaries: 21

- 4.27. The above figures are indicated to be minimum gross density dwellings per hectare.
- 4.28. It should be noted that the design work undertaken to inform these representations indicates a range of densities of 18.18dph – 26.91dph (gross) which can be achieved for the 300 unit and 444 unit schemes respectively. This calculation relates to the wider site, including the proposed conversion units (total site area of 16.5ha).
- 4.29. Further, in respect of the new build development only (excluding the conversion areas), the 444 unit scheme achieves a density of 35.78dph (gross) (new build site area of 10.2ha).
- 4.30. A redevelopment of the site to provide a minimum of c. 440 units is therefore in accordance with draft Policy SP6 in this respect. Conversely, a smaller scale redevelopment of the site for c. 300 dwellings would result in a density figure of 18.18dph (gross) which is considerably lower than the aspirations of 27dph for other locations within settlement boundaries (relevant to the Site), as outlined within draft Policy SP6 which are noted to be minimum density targets. Notwithstanding this, the flexibility included within draft Policy SP6 to support lower densities in specific circumstances is also welcomed to account for site specific considerations.
- 4.31. As such, an increased site density would make best use of a brownfield site and provide additional much needed homes in a sustainable location. Further, an increased site density would also assist with the viability of the site and enable the heritage assets to be repurposed into a viable use whilst at the same time preserving their setting. The suggested quantum of development at c. 440 dwellings is considered to strike the right balance in this respect and design work undertaken demonstrates the opportunity to conserve, enhance and celebrate the designated heritage assets on site which is supported by providing an increased number of homes.

Policy HS7: Affordable Housing

Table 7 – Policy HS7 Soundness Summary

Policy HS7: Affordable Housing		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	No	Current viability work suggests that flexibility may be required in the policy to ensure deliverability.



Consistent with National Policy	No	Paragraph 35 of the NPPF is clear that policies setting out contributions expected from development should not undermine the delivery of the plan.
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Amendments Required

Addition of new paragraph 16 to read:

In the event that independently corroborated evidence clearly shows that development is unviable, options should be assessed in relation to amendments to the affordable housing tenure mix and / or overall provision of affordable housing in order to ensure deliverability. An acceptable solution should be agreed with the Council based on the evidence available on viability and need for specific affordable housing tenures.

- 4.32. As currently worded, the Policy, whilst referencing viability assessments being undertaken, does not set out what the implications of those assessments may be if a development is found to be unviable.
- 4.33. This creates uncertainty in relation to applicants and decision makers in terms of the correct course of action and may impact the deliverability of aspects of the Plan.
- 4.34. The amendments suggested ensure that there is a clear way forward in this event, which adds clarity and safeguards deliverability.

Policy EN1: Well Designed Places

Table 8 - Policy EN1 Soundness Summary

Policy EN1 (Strategic Policy): Well Designed Places		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	The policy requires clarification in order to assist the decision maker and accord with paragraph 16 (d) of the NPPF.



Amendments Required

Amend limb 3 as follows:

All new dwellings, **but excluding those created via the conversion of existing buildings**, must comply with the nationally described space standards, and higher water efficiency standards (equivalent to 110 litres/person/day).

- 4.35. Nationally described space standards (NDSS) are generally applicable to new build dwellings, rather than the reuse of existing buildings.
- 4.36. In the case of Fulwood Barracks, the repurposing of heritage buildings in a way that retains their significance is unlikely to be possible whilst adhering to the strict requirements of NDSS. This is because the position of external and internal walls are fixed and protected by the listing in many cases and so cannot be changed to reflect the Standards.
- 4.37. The wording of the policy should therefore be changed to make clear that it is only applicable to new-build dwellings, and not new dwellings created by the repurposing of an existing building.

Policy CC1: Climate Change

Table 9 - Policy CC1 Soundness Summary

CC1 (Strategic Policy) – Climate Change		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	No	The current wording does not provide sufficient clarity to applicants on the requirements of the policy, either in terms of climate change mitigation or adaptation.
Consistent with National Policy	No	The current wording relating to climate change mitigation is inconsistent with the forthcoming Future Homes Standard.
Amendments Required		
Amend text as follows:		

1. Development proposals, public realm and infrastructure improvements should maximise opportunities to contribute to the delivery of net zero greenhouse gas emissions (**defined here as a negating the amount of greenhouse gases produced by development in operation, to be achieved by reducing emissions and implementing methods of absorbing carbon dioxide from the atmosphere**) and be designed, constructed and operated to:

a) Address the mitigation of climate change, including where appropriate, measures to:

- i. Reduce greenhouse gas emissions,
- ii. Minimise the need to travel and car dependency,
- iii. Promote active travel and the use of public transport,
- iv. Provide infrastructure to support the transition to zero and low carbon vehicles,
- v. Minimise energy and water use and whole life carbon impacts
- vi. Encourage waste minimisation and prevention
- vii. Maximise energy and resource efficiency and promote a circular economy
- viii. Provide carbon storage and sequestration through nature-based solutions
- ix. Maximise renewable and low carbon energy generation.

b) Address and reduce climate related risks, **specifically the risks of flooding and overheating**, through adaption measures where appropriate in order to:

- i. Improve the resilience of communities, businesses, infrastructure, and the natural environment to climate change impacts **related to increased temperatures and changing rainfall patterns**,
- ii. Integrate green and blue infrastructure to fulfil a range of functions including for flood risk management, sustainable drainage, urban cooling, and biodiversity,
- iii. Prioritise the use of nature-based solutions, helping to protect and restore natural environmental assets.

2. Applications for major development proposals should include an Energy Statement to demonstrate how the ~~net zero greenhouse gas emissions~~ **Future Homes & Buildings Standard** targets will be met, and carbon emissions should be calculated through a nationally recognised Whole Life-Cycle Carbon Assessment (**such as RICS Whole Life Carbon Assessment, Professional Standard, 2nd edition**), demonstrating **meaningful** actions taken to reduce life-cycle carbon emissions, **covering life-cycle modules A, B and C** .

- 4.38. Limb 1 of the policy states that;
- “Development proposals, public realm and infrastructure improvements should maximise opportunities to contribute to the delivery of net zero greenhouse gas emissions...”*
- 4.39. No definition of ‘net zero greenhouse gas emissions’ is provided either within the policy text or the supporting text.
- 4.40. Limb 1 b) of the policy makes reference to *“improving resilience... to climate change impacts”* but does not define what these impacts are either within the policy or supporting text.
- 4.41. Limb 2 states that;
- “Applications for major development proposals should include an Energy Statement to demonstrate how the net zero greenhouse gas emissions targets will be met”*
- 4.42. No definition of the targets referenced is provided or how applications should demonstrate that they should be met.
- 4.43. The policy is also inconsistent with the requirements set out in CC3 (see below). It is advised that this policy be aligned with the requirements of the forthcoming Future Homes & Buildings Standard which is referenced in the supporting text of policy CC3, as the proposed net zero carbon policy is not justified by the supporting evidence base documents.
- 4.44. Policy also requires major development to calculate carbon emissions;
- “through a nationally recognised Whole Life-Cycle Carbon Assessment, demonstrating actions taken to reduce life-cycle carbon emissions.”*
- 4.45. However, no examples are provided of what would be considered acceptable in terms of a methodology or scale of actions taken to reduce life-cycle carbon.
- 4.46. The supporting text (para 8.10) makes reference to ‘energy reduction targets’ but the actual targets are not quoted or defined.
- 4.47. Para 8.10 also quotes an energy hierarchy, but the measures in the hierarchy are in the wrong order. This should read:
- i. minimise energy demand
 - ii. maximise energy efficiency
 - iii. use low carbon technology (onsite)
 - iv. use renewable energy (onsite), and
 - v. utilise other low and zero carbon energy sources (offsite).



4.48. The policy’s supporting text does not provide any additional detail on the above to aid interpretation or ensure effective implementation and it is inconsistent with national policy. The policy is therefore inconsistent with the requirements of NPPF paragraphs 16 (d), and 36 (c) and (d), and as a result could fail a soundness test.

Policy CC3: Reducing Energy Consumption

Table 10 - Policy CC3 Soundness Summary

CC3 – Reducing Energy Consumption		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	No	The current wording does not provide sufficient clarity to applicants on the requirements of the policy.
Consistent with National Policy	No	The current wording relating to on site carbon emissions reduction is inconsistent with the forthcoming Future Homes Standard.
Amendments Required		
<p>Amend text as follows:</p> <p>1. Major development proposals should produce an Energy Statement to show how they will minimise whole life-cycle emissions in line with a nationally recognised methodology (such as RICS Whole Life Carbon Assessment, Professional Standard, 2nd edition) and maximise on site carbon reductions in accordance with the forthcoming Future Homes & Buildings Standards.</p> <p>2. Development design layout, orientation, building materials and the provision of green and blue infrastructure, including tree planting, should support the use of low carbon energy, increase resource efficiency, prevent buildings overheating and support a reduction of urban heat temperatures should, through layout, orientation, building materials and the provision of green and blue infrastructure, including tree planting, aim to</p> <p>a) support the reduction of building energy consumption, b) increase resource efficiency, c) prevent buildings overheating and d) support a reduction of the urban heat island effect</p> <p>Additional detail will be provided in a dedicated Supplementary Planning Document.</p>		

3. *New buildings and development proposals should minimise the consumption of energy, water and other resources and maximise energy and water efficiency, in accordance with other Local Plan policies (CC1 and EN1).*
4. *Energy efficiency improvements and reductions in carbon emissions for existing buildings will be supported and encouraged, in accordance with other Local Plan policies.*
5. *Development proposals that involve substantial demolition should demonstrate that it is not possible to retain, adapt and re-use the existing building. **The demolition and replacement of the existing building should be justified using a combination of economic, social and environmental factors to set out why a replacement building will offer more benefits than the existing structure.***
6. *Natural 'passive' and 'fabric-first' measures should be prioritised to reduce energy use.*
7. *A network of public and private electric vehicle charging facilities across Central Lancashire will be supported.*

4.49. Limb 1 of the policy states that,

“Major development proposals should produce an Energy Statement to show how they will minimise whole life-cycle emissions and maximise on site carbon reductions.”

4.50. This is inconsistent with the CC1 requirement to demonstrate how net zero greenhouse gas emissions targets will be met.

4.51. In addition, no detail is given on what would be considered an acceptable level of on-site carbon reduction, and it is therefore advised that the policy is aligned with the forthcoming Future Homes & Buildings Standard which will regulate emissions from new development through Building Regulations, in the absence of detailed justification within the Local Plan evidence base documentation.

4.52. The second limb is vague and unenforceable as it cuts across a number of different, albeit related, issues without offering sufficient guidance on enforceable standards to justify development. More detail is required on how design strategies can impact the list of issues provided; low carbon energy, resource efficiency, building overheating and urban heat island effect. It is advised that a supplementary planning document be provided to give applicants more guidance, and the policy be reworded to reflect this.

4.53. The third limb repeats the first (minimise consumption of energy and maximise energy efficiency) and references other Local Plan policies without naming the policy or their related targets (water consumption targets quoted in Policy EN1). Again, policy requires rewording to provide relevant clarity and guidance.

4.54. The fifth limb states that;

“Development proposals that involve substantial demolition should demonstrate that it is not possible to retain, adapt and re-use the existing building.”



- 4.55. However the policy does not state the criteria which should be used for assessment or what thresholds need to be achieved to demonstrate that existing buildings cannot be reused.
- 4.56. The supporting text (para 8.21) makes reference to zero carbon targets. This is different to a 'net' zero carbon target and is not defined anywhere.
- 4.57. As above, the policy's supporting text does not provide any additional detail on the above to aid interpretation or ensure effective implementation and it is inconsistent with national policy. The policy is therefore inconsistent with the requirements of NPPF paragraphs 16 (d), and 36 (c) and (d), and as a result could fail a soundness test.

Policy ST2: Sustainable and Active Travel

Table 11 - Policy ST2 Soundness Summary

Policy ST2: Sustainable and Active Travel		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	Amendments required to ensure compliance with paragraph 58 of the NPPF in relation to the appropriateness of planning obligations. Amendment required in order to ensure compliance with paragraph 116.
Amendments Required		
Amend limb 4 as follows: Where evidence shows that it is required, contributions may will be sought towards projects identified within the Central Lancashire Local Cycling and Walking Infrastructure Plan. Amend limb 5 b) as follows: Any unacceptable detrimental impacts (in terms of capacity and congestion) upon the highway network are mitigated to the satisfaction of the relevant Highway Authority;		



- 4.58. As currently written the policy is too vague as to when contributions will be sought towards cycling and walking infrastructure projects. The amendment proposed clarifies that this is related to it being required and justified by evidence. This change ensures compliance with paragraph 58 of the NPPF and The CIL Regulations (122).
- 4.59. Limb 5, as drafted is currently in conflict with the NPPF (paragraph 116) as it would require mitigation for any level of detrimental impact. Even if this was minor. The proposal amendment means that the policy aligns with the NPPF in this regard.

Policy ID2: Developer Contributions and Planning Obligations

Table 12 - Policy ID2 Soundness Summary

Policy ID2: Developer Contributions and Planning Obligations		
NPPF Para 36 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	As drafted it is not clear what actions the decision maker should take if a scheme that is the subject of a planning application is unviable.
Amendments Required		
Amend the policy to add a new limb under limb 4 that state the following: <i>Should a development be shown to be unviable, lesser or no contributions will be required towards the delivery and maintenance of those items listed under limb 2. The level of contribution will be assessed on an individual basis and linked to the extent to which the development is unviable.</i>		

- 4.60. As previously stated, information relating to the viability of proposed allocation SS4 is included at Appendix B. This will not be repeated here.
- 4.61. Notwithstanding this, the viability work undertaken indicates that while a scheme for the redevelopment of the existing buildings alongside some new build homes is viable, there are significant site specific challenges associated mainly with the need to retrofit the designated heritage assets.
- 4.62. This fact means that a degree of flexibility is required in terms of planning obligations, both generally, and in the specific case of SS4 (which is set out above).
- 4.63. While Policy ID2 is correct in identifying that viability assessments could be undertaken on any proposal and show that it is unviable, it is not clear what this finding would trigger in terms of decision making.
- 4.64. The proposed amendment would add clarity regarding the next course of action in order to ensure that development can still be delivered to meet needs, despite any viability challenges.

5. Summary and Conclusions

- 5.1. These representations have been produced by Savills on behalf of the DIO in relation to the Central Lancashire Local Plan 2023-2041 Publication Version (Regulation 19) consultation.
- 5.2. The DIO's interest centres on Fulwood Barracks. This is currently an operational MoD facility, but is scheduled to cease operations and be disposed of by 2031. Representations have been submitted to all previous consultations by the DIO that reference the opportunity afforded by this Site in terms of a residential allocation.
- 5.3. In general the CLLP is a well-considered Plan with a sound spatial strategy and emphasis on ensuring sustainable patterns of development. The allocation of Fulwood Barracks as a strategic allocation under Policy SS4 is particularly welcomed.
- 5.4. However, there are a number of changes required to policies within the CLLP in order to ensure that it is sound, in terms of being justified, effective, and in accordance with national policy. Amendments have been set out throughout this representation that it's considered would make the Plan sound in this regard.
- 5.5. Based on this position, Savills would respectfully request to be kept informed on progress of the CLLP and Savills reserve the right to participate in the Examination in Public of the Plan in due course.
- 5.6. Should you have any questions on these representations please contact Matthew Dawber or Rebecca Housam at Savills.
- 5.7. Savills would welcome further engagement with the LPA to discuss these representations further.



Appendices



Appendix A

Illustrative Masterplan



- Red Line Boundary
- Restored/Converted Existing Barracks Buildings
- Proposed New Buildings
- Primary Site Access
- Secondary Site Access
- Tertiary Connection
- Pedestrian/Cycle Only Access
- 1 Adjacent Existing Open Space
- 2 Historic Parade Ground Structure
- 3 Existing Community Park

Fulwood Barracks

on behalf of DIO

Rev.	Date	Note	By

01 Illustrative Masterplan

Drawn by
KZ/ML/BC

Checked by
ML/VD

Scale
1:2,000 @A3

Drawn on
09/04/25

Revision
-

Job
SNUD418688





Appendix B Viability Annexe

Viability Annexe

Fulwood Barracks, Preston





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4.	Summary and Conclusions	15

1. Introduction

- 1.1. Savills (UK) Limited (Savills) is instructed by the Defence Infrastructure Organisation (DIO) to submit representations on the Central Lancashire Local Plan 2023-2041 Publication Draft (CLLP).
- 1.2. This viability annexe has been prepared to support the representations that have been prepared by Savills.
- 1.3. This viability annexe will be structured as follows:
 - Section 2: Overview of the Site and Masterplan
 - Section 3: Viability Appraisal
 - Section 4: Summary and Conclusions

2. Site Overview and Masterplan

Site Context

- 2.1. Fulwood Barracks is situated in the Fulwood District of Preston, on Watling Street Road, approximately 2.6 km northeast of Preston City Centre. The Site is roughly a 10-minute bus journey from the city centre with bus stops immediately adjacent to it. The journey time from the Site to the city centre is approximately 15 minutes by bicycle. The M6 motorway is located to the east of the Site which can be reached within a 5-minute drive time. The M6 motorway connects the area to the rest of England and Scotland.
- 2.2. The main entrance to the Site is located on Watling Street Road which is adjacent to the south of the Site. Watling Street Road is an arterial road leading to the city centre from the northeast. There is also a secondary access from Fulwood Hall Lane to the north of the Site which can be accessed through a residential area.
- 2.3. The surrounding area is predominantly residential in nature, with semi-detached houses located to the west of the Site which were built in the early 1900s, military terraced housing is located to the north of the Site (now owned by Annington Homes), and more residential housing is located to the east of the Site which was built between the 1930s - 1960s.
- 2.4. To the east of the Site is a former cricket ground, accessible only through Fulwood Barracks. Although no longer in use, it remains maintained by the Ministry of Defence (MoD). The Battle of Preston (1648) is believed to have occurred on the eastern part of the Site, possibly on the former cricket ground although this has not been confirmed.
- 2.5. The location is highly sustainable, allowing future residents to meet most of their daily needs within an easy walk, and or through using safe walking and cycling routes, and or public transport, without needing a car.

Site Description

- 2.6. Fulwood Barracks is owned and operated by the MoD as a functioning barracks and is the regimental headquarters of the Duke of Lancaster's Regiment.
- 2.7. The Site has been deemed to be surplus to requirements by the MoD and is currently due to cease being operational and close in 2031. It will then be available for an alternative use, or uses.
- 2.8. The main body of the Site is relatively flat, with the northern section descending towards Melrose Avenue and Fulwood Hall Lane. Surrounding the Site on the north, west, and south boundaries is a high perimeter wall from the mid-19th century, designated as Grade II listed. This wall was originally constructed to provide a defensible boundary for the Barracks. It is known that the western side of the wall was partially rebuilt in the 1930s when housing was developed. The eastern section of the wall has been completely demolished, with the Barracks boundary now extending further east beyond the recreation ground.

Viability Annexe

Fulwood Barracks, Preston



- 2.9. Access to the Barracks Site is currently from the south, through the historic gatehouse. A lawn separates the gatehouse and perimeter wall from Watling Street Road. The lawn to the south of the gatehouse, along with the gatehouse itself, is referred to as the southern field of fire. The Lancashire Infantry Museum, which is open to the public, is located within the frontage buildings.
- 2.10. There are 16 Grade II listed structures within the Site.
- 2.11. The Site is located within Fulwood Conservation Area.

Site Photos

- 2.12. Following an inspection of the Site, we provide below photos of the Site.



Existing heritage buildings



Existing heritage buildings



Parade square / car parking



Museum / front entrance



Sports area



Pitches

Site Masterplan

- 2.13. Masterplans for the Site have previously been undertaken by HTA who prepared two masterplan options, both of which retained all the existing listed buildings on Site.
- 2.14. Option 1 included a total of 254 new build houses and the conversion of the listed buildings into 138 units. The listed buildings were mostly developed into flats. A copy of Option 1 is included below.

Viability Annexe

Fulwood Barracks, Preston



Viability Annexe

Fulwood Barracks, Preston



2.15. Option 2 included a total of 254 new building houses and the conversion of the listed buildings into 76 units, predominantly houses. A copy of Option 2 is included below.



Viability Annexe

Fulwood Barracks, Preston



- 2.16. Savills Urban Design Studio have undertaken a review of the existing masterplans and provided an updated masterplan that improves the design and layout arrangements. The updated masterplan also considers and explores housing mix across the Site.
- 2.17. As aforementioned, there are 16 Grade II listed structures within the Site. There is therefore an importance in integrating new housing into the heritage setting of the Site without disrupting its character, whilst also facilitating adaptive reuse of historic buildings, and designating areas for new development while safeguarding key heritage assets.
- 2.18. Savills Urban Design Studio's revised masterplan is included below.

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- Red Line Boundary
- Restored/Converted Existing Barracks Buildings
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Fulwood Barracks

on behalf of DfID

OR
Illustrative Masterplan

Drawn by KZ/ML/BC	Checked by ML/VO	Scale 1:2,000 @A3
Drawn on 06/04/25	Revision -	Job SNI/04/19628



- 2.19. The revised masterplan comprises 444 homes. This is split between a mix of 365 new build dwellings and the conversion of the listed buildings in 79 units. The net acreage for the site excluding the retained converted buildings is c. 10.20 hectares
- 2.20. Across the 364 new build units, this results in a density of 35.78 dwellings per hectare. A copy of the revised masterplan is included at **Appendix 1**.
- 2.21. This scheme comprises a higher number of units than the previous masterplans for the site which ranged between 330-392 homes, or 22-32 dwellings per hectare.
- 2.22. We feel that an increase in the unit numbers that could be delivered on site to 444 is appropriate as the density is more aligned to what we would expect from a market facing scheme. In addition, we have identified that the site can efficiently deliver over 400 units which will also contribute to housing needs in the area. To add to this, the suggested increase in site density is considered to make better use of a brownfield site in a sustainable location such as this, particularly noting the need to re-purpose the existing heritage assets on site in order to bring them back into a viable use, whilst at the same time preserving their setting. We have below provided an accommodation schedule for the revised masterplan.

Dwelling Type	No. of Homes		Split
	New	Converted	
<i>Flat/Maisonette</i>			
1 bed	12	11	5%
2 bed	49	22	16%
3+ bed	0	0	0%
Total	61	33	21%
<i>Houses</i>			
2bed	30	0	7%
3bed	106	10	26%
4+bed	76	30	24%
Total	212	40	57%
<i>Bungalows / Cottages</i>			
2bed	46	5	11%
3+bed	46	1	11%
Total	92	6	22%
GRAND TOTAL	365	79	100%
TOTAL NUMBER OF DWELLINGS			444

- 2.23. We have used this masterplan to provide a high level appraisal of the Site, to assess the schemes viability.
- 2.24. Notwithstanding this, we have also undertaken an appraisal for a 300 unit scheme, as the draft policy notes “at least 300 dwellings” for Fulwood Barracks. For this appraisal, we have adopted Illustrative Masterplan Option 2 of the original masterplans noted above, but reduced the number of dwellings from 330 to 300.



3. Viability Appraisal

3.1. We have undertaken a high level appraisal for the revised masterplan as well as a 300 unit scheme to assess the schemes viability.

Appraisal Inputs

3.2. We have provided below our assumptions that have been adopted in the appraisals.

Gross Development Value:

3.3. We have undertaken a review of new build housing developments in Fulwood to ascertain a Gross Development Value for the proposed scheme.

3.4. There has been a considerable amount of housebuilder activity across Fulwood over recent years with sales agents still reporting strong demand for new build housing in the area.

3.5. The below table provides an overview of the new build comparable schemes we have reviewed.

Development	Housing Mix	Average value per sq. ft.
D'Urton Manor, Fulwood - Storey Homes	2, 3, 4 & 5 bedroom homes	£284
D'Urton Grange, Fulwood - L&Q	2, 3 & 4 bedroom homes	£274
Romans Green, Lightfoot Lane, Fulwood - Barratt	2, 3 & 4 bedroom homes	£308
The Green, Ingol, Fulwood - Rowland	3 & 4 bedroom homes	£273
Cotton Woods, Ingol, Fulwood - Bellway	2, 3 & 4 bedroom homes	£272
Tabley Green, Lightfoot Lane, Fulwood - Redrow	3, 4 & 5 bedroom homes	£274

3.6. This shows average values between £272 - £308 per sq. ft. being achieved across comparable evidence.

3.7. We have adopted values between £280 - £330 across the proposed scheme.

3.8. We have adopted a marginally higher value per sq. ft. across the converted units on the basis that these will be unique properties within listed buildings and therefore are likely to command a higher value per sq. ft.

Affordable Housing:

3.9. Central Lancashire Local Plan 2023 – 2041 that is currently in publication draft, includes a policy dedicated to affordable housing - Policy HS7 - which sets a target of 30% affordable housing to be provided on sites in Tiers 1, 2 and 3 of the settlement hierarchy.

- 3.10. In relation to the tenure split it notes that Preston should provide a split of 76% Social Rent and Affordable Rent and 24% Affordable Home Ownership including First Homes. Of these 76% Social Rent and Affordable Rent, 52% should be Social Rent and 24% should be Affordable Rent.
- 3.11. For the purposes of our assessment, we have assumed that all the affordable would be provided as Affordable Home Ownership including First Homes, with the homes available for 70% of the MV.
- 3.12. Due to the re-use of the listed buildings that will be vacant at Fulwood Barracks, we are of the opinion that Vacant Building Credit will apply.
- 3.13. The Planning Obligations, Paragraph: 026 Reference ID: 23b-026-20190315 notes that: *National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace.*
- 3.14. Paragraph 65 of the National Planning Policy Framework also notes that: *Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.*
- 3.15. Based on this, we have assumed that Vacant Building Credit would be obtained on the Listed Buildings and have therefore not accounted for these units in our calculations for affordable homes. We would also note that it is likely that there will be additional Vacant Building Credit gained against the buildings that are proposed to be demolished on Site, however this is to be confirmed.
- 3.16. For the purposes of this appraisal we have assumed 30% affordable against the new build homes. We have assumed that these dwellings would be delivered as shared ownership (at 70% of Market Value) across the dwellings.

Build Costs:

- 3.17. We have reviewed the Building Cost Information Service (BCIS) to ascertain a build cost per sq. ft. for the dwellings and used our own knowledge of costs for similar schemes that we have been involved with in the local area.
- 3.18. We have adopted build costs between £160 - £190 across the different house types. We have included higher build costs for the conversions compared to the new build.
- 3.19. We have also included a 10% contingency on these base build costs.

Abnormal Costs:

- 3.20. We have not been provided with any detailed costings for the development but have included an allowance for abnormal costs within the appraisal. We have included a cost of £15 per sq. ft. which we consider to be reasonable for a development of this scale and nature.
- 3.21. In the appraisal option where the pitches are retained we have included a cost for resurfacing the pitches. This is because when development comes forward, the pitches will have likely reached the end of their lifecycle and will therefore need resurfacing if they are to be retained.
- 3.22. We have had regard to Sports England costings for Artificial Grass Pitches (AGPs) and have included a cost of £400,000 within the appraisal to resurface the two AGPs that are the site.

Community Infrastructure Levy (CIL) and Building Safety Levy (BSL):

- 3.23. Preston City Council is a charging authority under the CIL Regulations.
- 3.24. We understand that the local planning authority are undertaking work on CIL testing in parallel to the Local Plan viability study. This is also noted in Aspinal Verde's Central Lancashire Local Plan Viability report, dated February 2025. We have therefore not included CIL in our assessment at this stage but will engage with the local authority through this testing process.
- 3.25. For the BSL, we have had regard to the current Levy Rates provided as part of the 'Building Safety Levy: Technical consultation response' that was updated on the Government website on 24th March 2025.
- 3.26. In Annex A, the Levy Rates for previously developed land in Preston is £7.59 per sq m. Exemptions from the levy will include:
- Affordable Homes
 - Homes on sites of fewer than 10 homes
 - Homes built by non-profit Registered Providers (including non-social housing)
- 3.27. For the appraisals, we have calculated the proposed BSL charges based on the Gross Internal Area (GIA) of the proposed development. For the options that include affordable housing, we have excluded these GIA's from our calculations.

Other appraisal inputs:

- 3.28. We have made an allowance for professional fees, marketing fees and sales agent and legal fees within our appraisals.
- 3.29. We have also made an allowance for finance in the appraisals.
- 3.30. We have included a profit margin of 20% on GDV in the appraisals. We have included a reduced profit of 18% on GDV in the affordable appraisals on the basis that there is less risk associated with these units as these will be sold by a Registered Provider.

Timescales:

3.31. We have also made an allowance for pre-construction for site demolition and remediation. We have assumed a sales rate of 6 per month assuming two points of sale could be achieved on site.

Appraisals

3.32. We have undertaken five residual development appraisals to assess the viability of the masterplan. We have used Argus Developer Software which is an industry wide software for undertaking development appraisals. These different appraisals that we have run are as follows:

- Option 1: 444 units delivered as market homes
- Option 2: 424 units delivered as market homes
- Option 3: 444 units including 30% affordable housing across the new build homes
- Option 4: 424 units including 30% affordable housing across the new build homes
- Option 5: 300 units delivered as market homes

3.33. Two of these appraisals assess the impact of retaining the pitches on the Site. Savills Urban Design Studio have undertaken analysis of the impact of retaining these pitches on the number of homes that could be delivered on Site. Taking account of a 20m offset from residential plots, retaining the pitches results in a loss of approximately 20 homes. We have therefore run two appraisals (Option 2 and 4) which have 20 fewer houses.

Appraisal Outputs

3.34. The appraisals result in the following residual land values:

Appraisal	Residual Land Value (rounded)
Option 1	£1,450,000
Option 2	£820,000
Option 3	£615,000
Option 4	£55,000
Option 5	£1,210,000

3.35. All of our appraisals result in a positive land value, indicating that none are unviable.

3.36. However, due to the low land values that the appraisals produce, there will be concerns around the deliverability of 30% affordable housing, as well as the impact on housing numbers and viability if the pitches are retained. This is because this appraisal (Option 4) results in a land value of £55,000 which is marginally viable.

3.37. We have also reviewed the Aspinall Verdi's Central Lancashire Authorities Land Value Paper dated January 2025 which provides information on Benchmark Land Value (BLV) Assumptions. It appears that

Fulwood Barracks sits on the boundary of low (£150,000 per net developable acre) and medium (£210,000 per net developable acre). On this basis, this would result in a BLV between £4,350,000 - £6,090,000 for Fulwood Barracks. All of our appraisals fall below this BLV.

- 3.38. In addition to this, Fulwood Barracks is also situated in an area that sits on the boundary of lower/medium zones but also near higher values zones and therefore a stricter application of BLV is potentially blunt.
- 3.39. Option 5 comprises a scheme of 300 units as the draft policy notes “at least 300 dwellings” for Fulwood Barracks. Whilst this also produces a positive land value, the land value is lower than the 444 unit scheme that we have tested. A less dense scheme therefore puts more constraint on viability.
- 3.40. As such, an increased site density would make best use of a brownfield site and provide additional much needed homes in a sustainable location. Further, an increased site density would also assist with the viability of the site and enable the heritage assets to be repurposed into a viable use whilst at the same time preserving their setting. The suggested quantum of development at c. 440 dwellings is considered to strike the right balance in this respect and design work undertaken demonstrates the opportunity to conserve, enhance and celebrate the designated heritage assets on site which is supported by providing an increased number of homes.

4. Summary and Conclusions

- 4.1. This Viability Annexe has provided a high level assessment of the viability of Savills proposed masterplan for Fulwood Barracks.
- 4.2. Savills have undertaken five residual development appraisals to assess different options. These included:
- Option 1: 444 units delivered as market homes
 - Option 2: 424 units delivered as market homes
 - Option 3: 444 units including 30% affordable housing across the new build homes
 - Option 4: 424 units including 30% affordable housing across the new build homes
 - Option 5: 300 units delivered as market homes
- 4.3. Options 2 and 4 comprise a lower number of dwellings because these options assume that the pitches that are currently on the Site are retained. Option 5 comprises considerably less dwellings at 300 units.
- 4.4. All of the appraisals resulted in a positive land value, but this is excluding any applicable CIL levy. Notwithstanding this, none of the appraisals achieve the prescribed BLV as stated in Aspinall Verde's Central Lancashire Authorities Land Value Paper dated January 2025.
- 4.5. On this basis, we would note concerns around the delivery of 30% affordable housing on the Site and also the impact that retaining the sports pitches has on the viability of the scheme. We would also note concerns towards the impact of CIL on the conversion and redevelopment of the site.
- 4.6. The masterplan also proposes the retention of the parade grounds as public open space. The provision of the pitches in addition to this will result in a high level of open space across the development within a scheme that is also looking to preserve significant local heritage interest. This will all have an impact on the viability of the scheme.
- 4.7. As aforementioned, the Site is a significant heritage asset and therefore flexibility over planning contributions will be critical to the successful sensitive redevelopment. In addition to this, an increased quantum of development would better align with site density aspirations and assist with overall site viability, enabling the heritage assets to be repurposed into a viable use and provide much needed housing in a sustainable location.

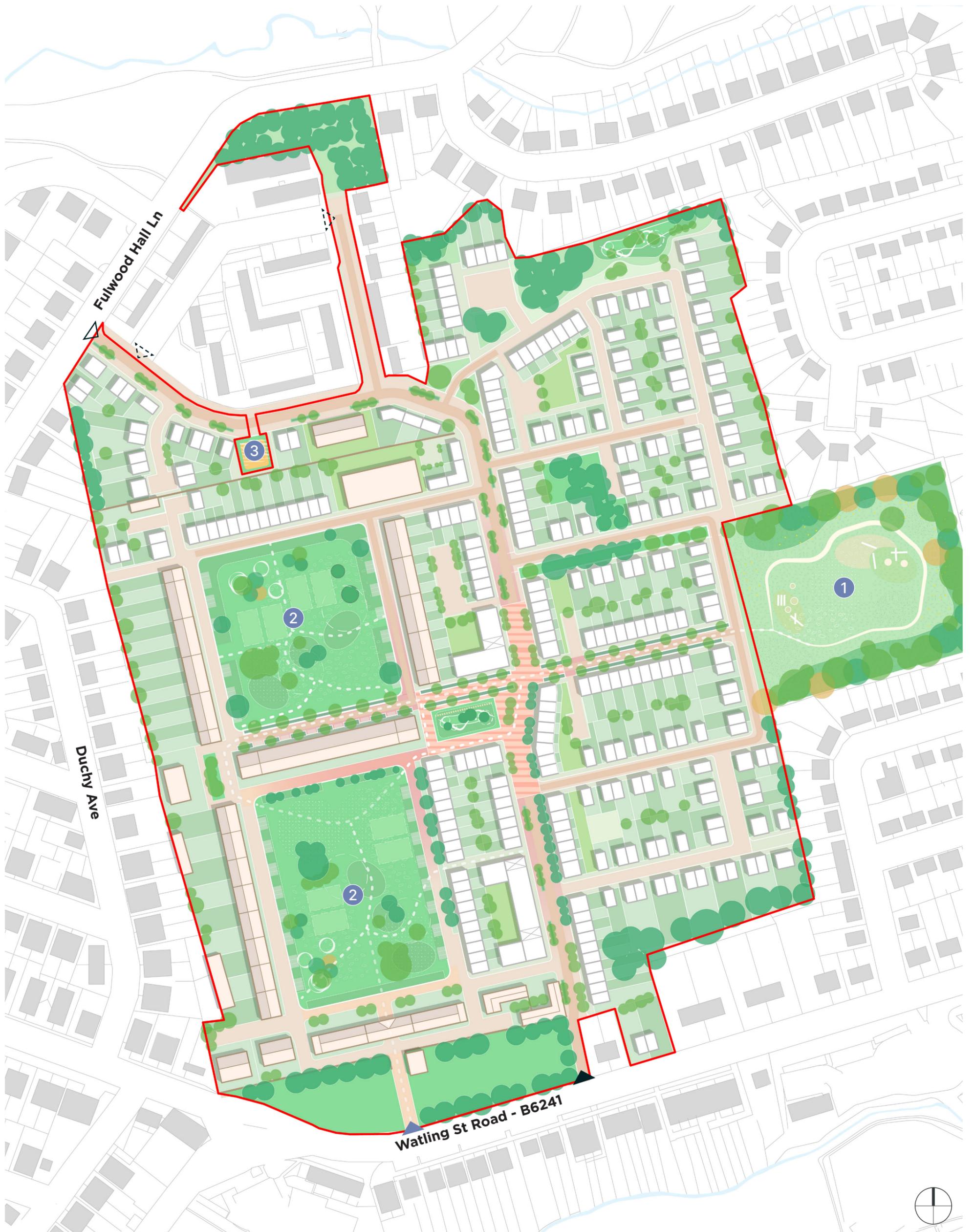
Simon Turner MRICS
Director



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Appendix 1



- Red Line Boundary
- Restored/Converted Existing Barracks Buildings
- Proposed New Buildings
- Primary Site Access
- Secondary Site Access
- Tertiary Connection
- Pedestrian/Cycle Only Access
- 1 Adjacent Existing Open Space
- 2 Historic Parade Ground Structure
- 3 Existing Community Park

Fulwood Barracks

on behalf of DIO

Rev.	Date	Note	By

01 Illustrative Masterplan

Drawn by
KZ/ML/BC

Checked by
ML/VD

Scale
1:2,000 @A3

Drawn on
09/04/25

Revision
-

Job
SNUD418688



Matthew Dawber
Associate Director

Rebecca Housam
Director