

# Savills on behalf of the Defence Infrastructure Organisation

## Examination into the Central Lancashire Local Plan 2023-2041

### Hearing Statement

#### Matter 4

#### (Policies SS3 – SS6 & EC5 & 6)

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Issue 4 – Are the proposed strategic allocations justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?

#### SS4 – Fulwood Barracks

#### 4.4 Why was the site selected as a strategic site? What evidence supports the allocation in terms of:

- **Size**
  - **Capacity**
  - **Layout**
  - **Infrastructure requirements**
  - **Assessment of the effects of development and necessary mitigation**
  - **Delivery**
  - **Viability**
1. While the scale of the development allocated, a minimum of 300 homes, is less than the other strategic allocations, the importance of the redevelopment of the Site means that it takes on a strategic dimension. This is primarily owing to 2 factors.
  2. The first is that importance of the Site in heritage terms given that it contains 16 listed buildings and lies within a conservation area. The redevelopment of the Site following its decommissioning for military purposes, facilitated by the allocation, will play a key role in ensuring that significant number of heritage assets on the Site are preserved for future generations and an alternative viable use is secured for these heritage assets.
  3. The second is the scale of the potential development and area of the Site within Preston. The redevelopment of the Site would have a major impact on the area of Fulwood and represents the largest development by scale and area within the urban envelope. In that sense, it represents a major part of the renewal of Fulwood and north Preston more generally.
  4. These matters, taken together, mean that there is a need for strategic policy direction to guide future development and thus the status as a strategic site is justified.
  5. In terms of evidence to support the allocation, responses are set out in relation to each subheading below.

#### **Size**

6. There is a minor discrepancy between the redline boundary shown within Policy SS4 and the area proposed for disposal by the DIO. This was identified within representations on the Regulation 19 version of the Local Plan. However, no minor modifications were made.

7. In order to ensure that all of the allocation is available, deliverable, and deliverable the red line boundary within SS4 should be amended to reflect that set out within the Regulation 19 representations. The Illustrative Masterplan with the accurate boundary has been included as Appendix A in this Hearing Statement for ease of reference.

### **Capacity**

8. Representations by Savills on behalf of the DIO on the Regulation 19 version of the Local Plan set out an Illustrative Masterplan which showed that the Site is capable of accommodating circa 440 homes whilst preserving heritage assets and their setting and providing appropriate levels of onsite open space and other infrastructure.
9. However, it is noted that SS4's reference to "at least 300 dwellings" would not preclude a development of up to 440 coming forward on the Site. The Council's err towards a conservative figure to ensure that an appropriate number of homes are allocated across the plan period to ensure that housing needs are met is appreciated and as such, the DIO is supportive of the current stated capacity in SS4.

### **Layout**

10. Savills provided an Illustrative Masterplan as part of representations on the Regulation 19 version of the Local Plan. This has been included at Appendix A of this Hearing Statement for completeness.
11. The Illustrative Masterplan has been informed by supporting environmental and technical work including, but not limited to, to drainage, highways and access, heritage impacts, and biodiversity. The outcome of the design work is a scheme that comprises 11.7 hectares of developable area and circa 440 homes, alongside the retention of all existing heritage assets and significant areas of public open space.
12. While high level, reflective of the relatively early stage, the Illustrative Layout shows a scheme that is capable of accommodating all of the requirements of Policy SS4.

### **Infrastructure requirements**

13. In terms of infrastructure requirements, the location of the Site within the built up area of the City and its status as a brownfield site limits the need for significant new infrastructure to facilitate redevelopment for the use proposed.
14. Significant evidence has been produced in relation to technical matters and the need for infrastructure, both physical and community, to facilitate the development. This is set out clearly within the Topic Paper produced jointly by Preston City Council and the DIO.
15. Based on evidence gathered, there are no requirements for infrastructure that would unduly impact the ability to deliver the allocation.
16. It is noted that the updated Central Lancashire Playing Pitch Strategy document remains outstanding which is due to be issued to the Councils in November 2025. As such, we reserve the right to comment on this further upon receipt of this updated evidence.

### **Assessment of the effects of development and necessary mitigation**

17. As previously stated, significant technical work has been undertaken on behalf of the DIO and Preston City Council. This is summarised within the Topic Paper which has been prepared in respect of Draft Policy SS4.
18. The evidence produced is considered to be more than appropriate in terms of justifying Fulwood Barracks as an allocation and demonstrating its deliverability and developability.

### **Deliverability**

19. Section 6 of the Topic Paper specifically discusses the deliverability of the scheme and as per Examination Guidance which is not be repeated here.

20. Nevertheless, it should be noted that as a Government organisation, the MoD has a significant interest in ensuring that the allocation comes forward in the best interests of the community. As sole landowner, it is within the organisation's gift to ensure this.
21. From a legacy perspective the British Army has a history on the Site dating back circa 177 years and is keen to see the structures of historic interest retained for future generations.

### **Viability**

22. Evidence on viability has been produced by both the Council in the form of the Main Viability Report (IT05) and by Savills on behalf of the DIO as part of Regulation 19 representations.
23. The results of both analyses suggest that the viability position is currently marginal when based on standard assumptions. This is to be expected given the increased costs associated with repurposing heritage assets, of which there are many on the Site, within a Conservation Area such as this.
24. Section 6 of the Topic Paper specifically discusses the deliverability of the scheme and as per Examination Guidance which is not be repeated here

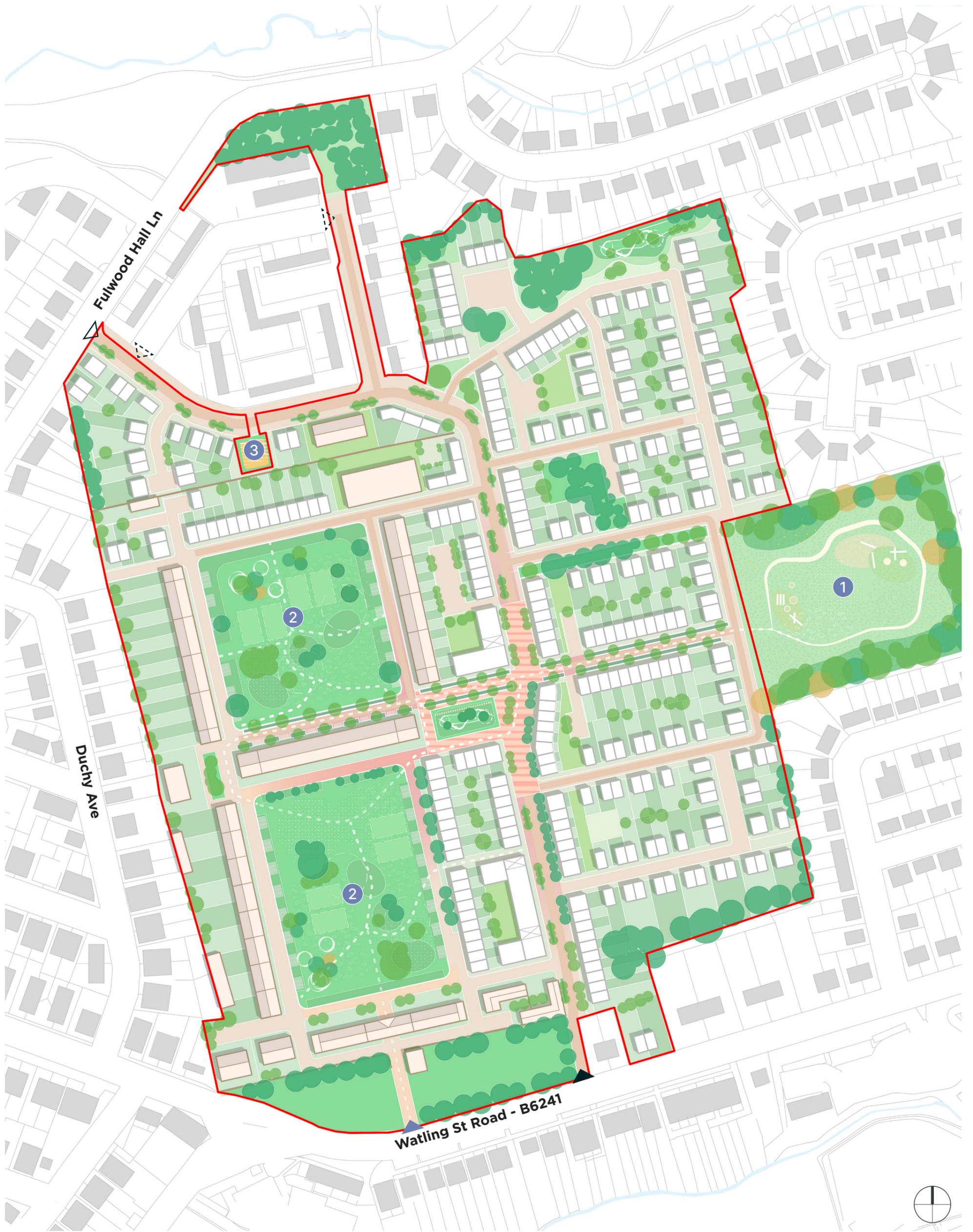
### **4.5 Does the policy provide sufficient information on site specific constraints and requirements such as the physical and social infrastructure that may be required as part of the development?**

25. Yes. The Policy has been written in a way that makes clear the site specific constraints associated with the Site, most notably in terms of heritage assets, existing open spaces, access points, landfill buffer zones, and flood risk.
26. Policy SS4 also sets out specific requirements in relation to further work to determine detailed mitigation strategies and to ensure that these are accommodated within development.
27. The site specific requirements should be read in conjunction with further requirements in relation to environmental constraints (discussed in the DIO response to Matter 12). Together these policies ensure that there are sufficient requirements in place to ensure that constraints are overcome before development can take place.
28. Further details of these constraints and requirements are within the Topic Paper for Draft Policy SS4, which has been prepared jointly.

### **4.6 Does policy SS4 provide clear direction as to how a decision maker should react to a development proposal? Are the Council's proposed modifications to the policy needed for soundness? Are there other necessary modifications to the policy?**

29. Yes, the policy provides clear direction in relation to how a decision maker should react to a planning application for development on the draft allocated site.
30. In addition to this, the policy is clear to a future developer in terms of what specific information is required to support an application, in addition to more general plans and reports.
31. The minor amendments, while not crucial, are needed to ensure that the wording is factually accurate and based on available evidence, and therefore justified.
32. As previously stated, a further modification is required to amend the red line boundary to reflect the boundary set out in Appendix A of this Hearing Statement and to ensure that the allocation is deliverable and therefore effective.

**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  
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Job  
SNUD418688

