

Preston North End Training Ground, Dodney Drive, Lea, Preston, PR2 1XR

Proposed allocation for residential development

**REPRESENTATIONS ON CENTRAL LANCASHIRE LOCAL PLAN
REGULATION 19 CONSULTATION AND CALL FOR
SITES SUBMISSIONS**

APRIL 2025



REPORT CONTROL

Document type	Representations on Central Lancashire Local Plan Regulation 19
Project	Preston North End Training Ground, Dodney Drive
Job Number	23-1464

Document Checking

Primary Author	██████████
Contributor	
Reviewer	██████████

Revision Status

Issue	Date
DRAFT	10.04.25
FINAL	



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/1 INTRODUCTION

- 1.1. PWA Planning has been commissioned to prepare representations in relation to a parcel of land located to the north of Dodney Drive, Lea. The aim of the representations is to demonstrate that the site is suitable for residential development with a view to it being allocated for housing in the Central Lancashire Local Plan.

- 1.2. The three Central Lancashire Authorities are currently undertaking a consultation on the preparation of a Joint Local Plan for Central Lancashire including Chorley Borough Council, South Ribble Borough Council, and Preston City Council, as part of the Regulation 19 consultation. The consultation process is running until midnight on Monday 14th April 2025. As part of this consultation it has been identified that there is a significant shortfall in the proposed allocations in the Draft Plan which currently only cover 80% of the identified housing need for the authorities. PWA are promoting a series of sites to be considered for allocation for development in the emerging Local Plan. This Statement covers one of these sites.

- 1.3. These representations should be read in conjunction with the following supporting documents:
 - Ecological Assessment

- 1.4. This document intends to provide an overview of the site and further illustrate why the site should be taken forward as a preferred option and allocated for development within the Local Plan period. It also provides reasons why the Draft Plan is not sound.



/2 THE SITE

Site Description

- 2.1. The site is located on the western fringe of the Preston conurbation approximately 4km from the centre of Preston and currently comprises a greenfield parcel of land that was previously a training facility for the first team of Preston North End. The site contains various existing facilities associated with the Football Club, including a sports hall, training facility building, storage areas, four existing football pitches and the associated carpark. The site is currently used as part of it's youth set up.

- 2.2. The site is approximately 5.5ha in size and is thought to be able to deliver approximately 150no. houses based on the constraints of the site. An extract from Google Maps is shown in Figure 1 below, with the site's approximate boundaries defined by the red line. A Location Plan has also been submitted alongside these representations for further context. PNE no longer have need for the training ground as part of its first team training set up, following the granting of planning permission in 2018 for a new first team training ground the Club in Ingol, Preston and purchase of an existing facility in Euxton.



Figure 1 – Approximate Site Extent (Source: Google Earth)

- 2.3. The site is accessed off Dodney Drive to the south of the site and benefits from excellent accessibility with links to the immediate locality of Preston. Opportunities to access the site via sustainable modes of transport are also available, including bus stops on Greenside



Avenue within 200m of the site providing a regular service into Preston City Centre where links to the wider rail network can be accessed.

- 2.4. The surrounding area of the site is characterised by a mix of suburban dwellings and countryside. The site is located to the north of a predominately residential area of Preston off Dodney Drive, which links the site to the wider road and transport network. The north side of the site is bound by a watercourse, known as Savick Brook, beyond which is Ashton and Lea Golf Club. To the east and west of the site lies agricultural land.
- 2.5. There are no landscape, cultural heritage designations or ecological constraints associated with the site itself or its immediate vicinity. The majority of the site however lies within a Mineral Safeguarding Area. In terms of flood risk, most of the site lies within Flood Zone 2 with some of the northern most area of the site in Flood Zone 3, due to the site's location to the south of Savick Brook.

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Planning History

- 2.6. A search of Preston City Council's planning register has been carried out to understand the site's planning history. The relevant applications are detailed below.
- 06/2020/0149 Two storey building, 2 no.store,1 no. security hut and ancillary infrastructure, following demolition of single storey southern extension to the sports hall. Approved.
 - 06/2011/0375 *Erection of 2.4m high weld mesh fencing.* Approved 22nd June 2011.
 - 06/2010/0332 *Renewal of planning permission (06/2008/0514) for siting of temporary portable building and siting of 1no. additional temporary portable building.* Approved 17th August 2010.
 - 06/2008/0514 *Siting of temporary portable building.* Approved 31st July 2008.
 - 06/2005/1265 *Erection of 9 metre high steel frame tensile building to provide indoor training academy facility for Preston North End FC.* Approved 6th February 2006.



- 06/2004/1021 *Erection of 12 metre high PVC fabric clad steel frame structure to provide Indoor Sports Academy for Preston North End FC.* Refused 6th December 2004.
- 06/1989/0391 *Erection of replacement spectators stand.* Approved 11th May 1989.
- 06/1976/0838 *Erection of sports hall.* Approved 16th November 1976.

Site Allocation in the Draft Plan

- 2.7. The site is allocated in the draft plan as Green Infrastructure. Draft Policy EN5 applies, as can be seen in Figure 2 below by the green dashed lines. The spotted area relates to a mineral safeguarded area.



Figure 2: Site Allocation in the Draft Policy Map of the Draft Central Lancashire Local Plan

- 2.8. The site has effectively become surplus to PNE requirements, following the approval of the training ground facility at Ingol, and the subsequent purchase of existing facilities at Euxton.
- 2.9. The site is proposed to be allocated as Green Infrastructure in the draft Local Plan. Policy EN5 sets out requirements for the protection, enhancement, and integration of green infrastructure in new developments.
- 2.10. Policy EN5 requires that developments prioritise the protection, quality, connectivity, and multi-functionality of green infrastructure, along with the ecosystem services it provides. The design of new development should contribute to improving, expanding, and maintaining



green infrastructure, particularly by enhancing accessibility and connectivity between features.

- 2.11. Depending on the context and scale, developments should protect and enhance the existing green infrastructure, incorporate diverse green features that reflect the local and historic landscape character, and ensure strong connectivity between both existing and new elements. A Habitat Management and Monitoring Plan (HMMP) is required to help secure long-term green infrastructure outcomes. Proposals should also include features that benefit local wildlife, such as swift bricks, bat and bird boxes, boundary hedgerows, and hedgehog highways.
- 2.12. Where development leads to the loss or degradation of green infrastructure, or impacts its connectivity, it must clearly demonstrate that the need for the development outweighs any adverse effects on public amenity and nature conservation. In such cases, the mitigation hierarchy outlined in the NPPF must be followed: harm should be avoided where possible, or else minimised with appropriate mitigation, compensation, or enhancement.
- 2.13. The NPPF 2024 is clear that local plans must “significantly boost the supply of housing” and be informed by robust evidence of housing needs. Central Lancashire, and Preston in particular, is currently only planning to meet 80% of identified housing need, however evidence suggests that the sites included to help deliver this need, will not deliver in the way the authorities anticipate. In this respect, further allocations are required.
- 2.14. The Dodney Drive site is a logical and deliverable candidate for housing allocation. It sits within an established urban context, is well-related to existing infrastructure, and is not constrained by environmental or amenity concerns. Allocating it for housing would contribute to meeting identified shortfalls in a sustainable, plan-led manner, while preventing future speculative development elsewhere.
- 2.15. Retaining this designation would hinder sustainable development and compromise the Plan’s ability to meet housing needs in accordance with national planning policy. The site should therefore be de-allocated as Green Infrastructure and instead be formally allocated for residential development in the new Central Lancashire Local Plan. This would support housing delivery in a sustainable location, and help ensure the Plan’s soundness at examination.



/3 CENTRAL LANCASHIRE DRAFT LOCAL PLAN

- 3.1. As part of the consultation process, we have reviewed the Draft Plan and have provided representations under separate cover. In relation to the sites and the representations we have made it is thought that additional allocations in Preston City Council should be welcomed. A summary of the representations is provided below.

Spatial Vision

- 3.2. PWA agrees with and broadly supports the vision for sustainable growth outlined in the Plan. However, the vision is not supported by the land use allocations which are contained within the Plan, either in terms of quantum of development which will be delivered or the spatial location of the proposed allocations.
- 3.3. The plan must go further in addressing the region's housing shortfall, ensuring that policies actively promote housing delivery rather than restrict it.
- 3.4. This is particularly relevant given that the authorities are seeking to take advantage of the transitional provisions provided at Annex 1 Paragraph 234(a) of the Framework and so do not propose to meet the full local housing needs and seeks examination of the plan against the requirements of the previous Framework. It is acknowledged that under these provisions, the housing requirement must be no less than 80% of local housing need. The plan indicates a housing requirement which meets these provisions. The plan needs to be able to demonstrate that it then makes sufficient land use allocations to ensure that these requirements are achieved. Indeed, when the housing requirement is below the actual need, it is even more crucial that the proposed land use allocations included in the draft plan have been fully assessed for deliverability. The loss of even a modest number of sites would mean that actual delivery would likely fall well below 80% of local housing need and thus further compound the lack of supply of new homes.
- 3.5. PWA is aware that some of the sites proposed for allocation are constrained by access and other technical / ownership issues which will likely prevent development. The degree of rigour of the allocation process, particularly in considering the technical constraints, appears to be limited. This suggests that the authorities will be unable to meet the required 80% detailed within the plan which brings clear questions as to its soundness. Planning for the



bare minimum is neither in the best interests of Central Lancashire, nor does it align with the NPPF which seeks to boost the supply of housing.

- 3.6. In our opinion additional land use allocations, particularly for new housing, are required to ensure the plan remains sound and can ensure delivery of at least 80% of the local housing need is achieved in housing within the Local Plan area.
- 3.7. The Plan supports economic growth and employment, particularly in relation to town centres, strategic employment sites, and investment in infrastructure. However, this is not always clearly linked to the need for corresponding housing growth. The economic projections published as part of the evidence base for the plan indicate a much higher level of housing should be planned for, particularly when you factor in the National Cyber Force HQ development. These alone indicate a greater level of housing should be planned for, asides for the questions on the deliverability of some of the sites the authorities are currently relying on within the plan period.

Strategic Objectives

- 3.8. Strategic Objective 3 'Sustainable Communities' should be reworded to ensure that the key focus is around ensuring that the policies of the plan help to deliver a sufficient supply of homes and to support the Government's objective of significantly boosting the supply of homes (NPPF 2024 Para 61). The objective should expressly indicate a desire to boost the supply of new homes, as a clearer indication of the Councils' intentions to support economic growth and ensure adequate homes are available to meet all needs.
- 3.9. Similarly, Strategic Objective 4 on Economic Prosperity should be revised to emphasise the intrinsic link between economic success and adequate housing provision. PWA argues that employment growth must be matched by a diverse and sufficient housing supply in order to attract and retain skilled workers, reduce commuting pressures, and ensure long-term economic sustainability. Housing and economic objectives should be pursued in tandem, reflecting evidence in the Housing Need Statement which confirms the requirement for each authority to meet its own housing need.

Spatial Strategy



- 3.10. PWA considers the proposed spatial strategy to be insufficient in supporting sustainable growth, noting that the Plan allocates land for only 80% of the identified housing need, which risks undermining both economic development and housing affordability.
- 3.11. PWA feels the spatial strategy does not go far enough in supporting growth. Despite acknowledging the need for housing, the plan includes a housing requirement which is around 80% of the local housing need and hence then allocates land to meet this requirement. This approach limits opportunities for both economic expansion and housing affordability.
- 3.12. Not only does the Plan not align with the revised NPPF 2024, which the transitional provisions allow for, it fails to meet the objectives of significantly boosting the supply of housing delivery, which were enshrined in the earlier version of the Framework. Policy SS1 (Development Patterns) fails to allocate sufficient land to meet housing needs in full, instead relying on previously allocated sites with no substantial new allocations. The spatial strategy does not provide flexibility should existing allocations fail to deliver, increasing the risk of housing shortages.
- 3.13. To address these issues, PWA recommends increasing housing allocations to fully meet local needs and carrying out a full Green Belt review. These actions are essential given the clear shortfalls anticipated in the plans housing delivery.

Balanced Housing Growth Market (Chapter 4)

- 3.1 Policy HS1 does not align with the requirement to significantly boost housing supply in NPPF. The policy acknowledges the need for new housing but only seeks to meet 80% of the identified housing requirement, which is wholly insufficient. NPPF 62 states that local plans should meet as much housing need as possible. By not planning to fully meet local housing needs, the policy exacerbates affordability issues and limits the economic potential of Central Lancashire. Furthermore, there is no flexibility built into the policy, if existing allocations underdeliver, there is no clear mechanism to release additional sites, creating a risk of persistent undersupply.
- 3.14. To make Policy HS1 sound, PWA recommends increasing housing allocations to fully meet Local Housing Need (LHN), building in flexibility to release additional sites if needed and



allocating the site at Dodney Drive for housing. The site should be allocated under Policy HS4.

Summary

- 3.15. In summary, PWA submits that the Draft Plan, while making positive steps toward supporting economic growth, does not go far enough in addressing the pressing need for housing delivery in accordance with the NPPF. The proposed approach, allocating only 80% of the identified housing need, is likely to fall significantly in delivering the number of houses across the plan period.
- 3.16. A failure to fully meet housing need not only risks worsening affordability and constraining economic growth, but also places undue reliance on a limited number of existing sites, with little flexibility should these fail to come forward.
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- 3.17. Strategic Objectives should be revised to reflect the fundamental link between housing delivery and sustainable economic development, ensuring that the Plan clearly prioritises meeting local housing needs.
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- 3.18. The Dodney Drive site represents a logical and deliverable solution to help meet Preston's unmet housing need. Its allocation would support the objectives of the NPPF, help deliver a more balanced spatial strategy, and respond to the evolving character of the local area. PWA urges the Council to positively consider additional housing allocations, including the Dodney Drive site, to ensure the soundness of the Plan and deliver genuinely sustainable growth for the region.



/4 PROPOSED SITE ALLOCATION

- 4.1. As demonstrated by the preceding text, the site has the potential to deliver in the region of 150 new homes in an area suitable for housing development due to the surrounding housing development and its sustainable location. No environmental or technical issues have been identified which would preclude residential use. In short, the site is suitable, available and deliverable, and would comprise an appropriate housing allocation delivering much needed homes.
- 4.2. The proposed site allocation would result in the loss of green infrastructure in the form of a privately used open space. While this loss is a material consideration, the Central Lancashire draft Local Plan proposes to allocate only 80% of the identified housing need. In this context, the contribution of additional housing land, especially in sustainable, accessible locations, carries significant weight. The unmet housing need in Central Lancashire strengthens the planning balance in favour of development, and supports the case that the need for housing demonstrably outweighs the loss of this green function, particularly in light of evidence that the authorities are unlikely to be able to meet the 80% need figure with the allocations identified within the plan..

Technical Constraints

Highways and Access

- 4.3. A proposed residential scheme could be accessed safely and efficiently via the existing access. The site benefits from being located in a sustainable location with linkages to the local services and amenities situated in the vicinity of the site.
- 4.4. The proposed allocation is well located to encourage journeys by bus via a number of bus services available in the vicinity of the site and will have a minimal impact on the operation of the local highway network, nor is there any evidence to suggest that the proposals would have an adverse effect on road safety or the number of accidents in the vicinity.
- 4.5. The proposals for a residential development will provide a sustainable development in transport terms and the scheme should be considered acceptable in accordance with the Framework.



Ecology

- 4.6. An Extended Phase 1 Habitat Survey was carried out on the site when a prior application was submitted with the site, despite its date, it is considered to give some context and is submitted with these representations. The assessment was carried out to understand if the development site possessed any ecological value. It was noted in the report that development will result in the loss of amenity grassland and bare ground only, meaning no specific habitat mitigation is considered necessary. This makes sense considering the use as a football training ground.
- 4.7. The habitat in the wider site, such as hedgerows and trees on the site boundary, are of greater value for wildlife, but will be unaffected by the proposed allocation and controlled through the planning application process.

Landscape and Visual Impact

- 4.8. The site lies to the south of the Guild Wheel, a walking and cycle network in Preston. There will be a visual impact on the viewing experience of all users that have views of the development during its operational phase which would be permanent. However, when considered as a whole, including consideration of the existing use and development that exists and new planting as part of a landscape scheme which will become established in time, views into the development will be softened.
- 4.9. It is considered that when assessed as a whole, the scheme would provide significant benefits, including the enhancement of the landscape value of the site that would outweigh any impacts on limited views of the site. The scheme is considered to be acceptable in landscape terms.

Trees

- 4.10. A Tree Survey could be conducted to assess the presence of trees in the area and identify measures which must be taken should a residential scheme be progressed. A detailed Arboricultural Impact Assessment assessing the final layout would be submitted with a future application, however it is considered the site could be developed to result in limited impacts on any trees.

Summary



- 4.11. The site is available and deliverable as a housing allocation. The Site is in a highly sustainable location and would make a sensible housing allocation to meet future housing in the wider Central Lancashire area.
- 4.12. It is proposed that the site outlined in red on the accompanying plan be allocated for housing in the Central Lancashire Local Plan.
- 4.13. According to the draft Local Plan Policies Map, on Preston's Urban Area Map the site lies within an area of Green Infrastructure, which seeks to protect such sites through the provisions of Policy EN5.
- 4.14. Given the existing use of the site the contribution it makes to this policy is considered to be limited, particularly given the private ownership which limits access to the site for use by the public.
[REDACTED]
- 4.15. A well-designed residential use, with supporting ecological and amenity space would help contribute better to the surrounding green infrastructure and open space through both enhancement versus [REDACTED] the existing condition and through the availability of communal space within a development.
- 4.16. Finally, the site is well-located in terms of access to public transport; with bus stops that provide regular services to Preston city centre. From here, services from the bus station and train station run throughout Lancashire and beyond.
- 4.17. In summary, it is considered that the site would contribute towards sustainable development which is an important attribute in plan making in ensuring development takes places at the right time in the right place, to help deliver growth and demand within a Local Plan's area.
- 4.18. Sustainable development is broadly defined in Paragraph 8 of the NPPF as having three overarching objectives:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*



b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 4.19. In terms of economic benefits, the allocation of the site would offer the opportunity to provide support for existing businesses and suppliers in the area, contributing to the local economy. The proposed allocation would also make a positive contribution to the housing land supply in the Preston City Council region.
- 4.20. The social aspect of sustainability is met, given the site is well connected to the settlement the city of Preston, with local amenities and services with access from the public transport network. The scheme would also contribute to affordable dwellings through its development.
- 4.21. Turning to the environmental aspect of sustainability, the site is not subject to any statutory ecological designations, Tree Preservation Orders, heritage assets or protected species.



/5 CONCLUSIONS

- 5.1. As demonstrated in the supporting assessment work for this document, the site has the potential to deliver approximately 150 new homes to contribute to the housing supply for Preston, with no environmental or technical issues identified which would preclude residential use.
- 5.2. Collectively, it is considered the site can be considered to contribute towards sustainable development, ensuring development continues to take place in a well-planned manner, adjacent to existing settlements where demand exist. The site therefore is considered to represent an appropriate location for development for the following reasons:
- The site is located sustainably close to existing services, notably public transport;
 - The site is not subject to any national or local designations which would prevent its development, [REDACTED]
 - The landowners are willing and ready to see the site developed and hence the site is available to provide land for housing in the short to medium term; and [REDACTED]
 - There are no known technical or environmental constraints which would preclude its development for housing as represented by the supporting technical documents submitted with these representations.
- 5.3. It is requested that the site be considered for allocation for housing in this stage of the Local Plan process. In the absence of additional allocations, for the reasons explained, the plan is unsound.



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