

**Our Ref: HB/KN2050/25**



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Regulation 19 Consultation  
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Dear Sir/Madam,

**Central Lancashire Local Plan: Publication Version Consultation (Regulation 19)  
Representations on behalf of Cardinal Newman College**

The following representations are made on behalf of 'Cardinal Newman College' in relation to the Central Lancashire Local Plan: Publication Version consultation.

**Background Information**

Cardinal Newman College is a highly successful Sixth Form College with student numbers continuing to increase in line with demographic trends.

The College is consistently ranked amongst the top sixth form colleges nationally for A Level and BTEC value added. In February 2023, the College was graded Outstanding across the board by Ofsted.

The College's census numbers for 2024/25 were 4,559. The overwhelming majority of the College's intake is from seven districts: Preston, Chorley, South Ribble, Fylde, Ribble Valley, Wyre and Blackburn with Darwin. In 2024, 90% of the College's intake was from this wider recruitment area. The College's intake from its core recruitment area in 2024 was:

Preston	37.9%
South Ribble	14.6%
Fylde	12.2%



There is a duty on Local Authorities under the Education Act 1996 to secure sufficient and suitable education and training provision for all young people in their area who are over compulsory school age but under 19 or aged 19 to 25 and for whom an Education, Health and Care (EHC) plan is maintained. To fulfil this, local authorities need to have a strategic overview of the provision available in their area and to identify and resolve gaps in provision. Lancashire County Council has approached the College to reinforce that additional student demand for places is forecast and needs to be facilitated. This needs to be supported by the planning system for the area and in regional and national funding programmes in order for the Local Authority's duty to be satisfied.

Due to its academic excellence, its happy, safe and supportive environment and its city centre and accessible location, the College is an extremely popular choice for students across Central Lancashire. As a consequence, student numbers are continuing to increase and are projected to increase further in the medium to long term.

In January 2019 the College commissioned a 'Local Market Analysis and Future Learner Projections Report' from the specialist consultancy RCU. This study used estimated numbers of school leaver. It projected significant growth with the College having 4,702 students in 2027/28. The College's growth is currently tracking above the central projections in the report.

The College's own modelling based on cohorts in partner and other local schools shows 4,699 students at census in 2028/29. This may prove to be a conservative estimate as applications for 2025 are currently up 8% on this time last year.

Having regard to this information, it is almost certain that the College will see a further growth in demand for places and an increase in student numbers over the coming years and the Plan period up to 2030 and the effect if this will almost certainly be a need to deliver additional new accommodation and facilities in order to meet this demand.

With this background in mind, it is the College's view that it is essential that the emerging Local Plan specifically recognises the important role that the College (and indeed other colleges within the Central Lancashire area) play in delivering and meeting the demand for further / post 16 education provision. This includes the contribution they all make to supporting Strategic Objective 10 'Education & Skills' of the plan which seeks "To building on the existing education, training and skill attainment at all levels. Supporting the provision of high-quality education facilities and training opportunities offered across the area and vocational and apprenticeship opportunities".

### Representations and Comments

These representations should be read in conjunction with representation made by Cardinal Newman College to the 'Call for Sites' consultation in April 2019 and the 'Issues and Options' consultation in February 2020.



## Proposals Map

### Education Designation

On the emerging Proposals Map, the College (similar to other colleges) receives no specific designation, protection or explicit policy support. This is considered not only a missed opportunity, but also an objectionable omission, particularly given Strategic Objective 10 of the Plan and that the fact that some community, health and education facilities receive a designation on the Proposals Map under Policy HC3. Furthermore, there appears to be no rhyme or reason or logic to who receives a designation and even more perversely, those who need the policy support provided by such a designation most, appear to have been omitted i.e. education facilities and not designated.

The College face a constant pressure to accommodate increasing numbers of students, which inevitably means an ongoing need to improve and expand facilities. In order to do this, they require a supportive local planning policy context and policies within the Local Plan that provide clear and unequivocal support for development proposals that seek to improve, extend and provided new facilities and infrastructure. It is for this reason that we consider that the College (alongside other colleges) should receive a specific education allocation / designation on the adopted Proposal Map.

In the case of the College, it is considered that the education designation should include the full extent of the College's landholding, including the main Lark Hill Road site, St Augustines site, St Francis site, St John Henry site and the Maths Schools site.

This designation should then cross refer to a specific and more focused and positively worked education policy.

### Green Infrastructure Designation

On the emerging Proposals Map, it is proposed that the College grounds be given a 'Green Infrastructure' designation under Policy EN5. It is considered that such a designation is inappropriate and should be removed. There are a number of reasons for this:

- I. Having regard to national policy contained in the NPPF and the definition of Green Infrastructure, which is defines as "a *network of multifunctional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity*", it is clear that the land does not meet this definition.

The land is not part of a network of green infrastructure, it is private land with no public access, and it does not provide benefits to the local and wider community of the area. Having regard to policy contained in the NPPF, it is clear that such a designation is not meant to applied to land like this.



2. The College continues to grow and face accommodation pressures which they will need to address and meet in order to satisfy their duty under the Education Act. In the absence of suitable, available and viable land for to accommodate future expansion needs in the area around the College, the College may be forced in the future to look at delivering additional accommodation within the grounds and land designated 'Green Infrastructure'. Such a designation is at best restrictive to development and at worst would entirely prohibitive.
3. Emerging Policy EN5 would apply to any development by the College within the grounds and it is clear that a proposal for a new building in the grounds could be considered to conflict with this policy.

### Stoneygate Masterplan Area

Since the current Core Strategy was adopted, Preston City Council has adopted the Stoneygate Regeneration Framework SPD. The stated purpose of this document is "to assist developers in the preparation and submission of planning applications for the Stoneygate Masterplan Area. The SPD provides guidance about how the Council would like to see its vision for the area..." . The College falls within the masterplan area and the Cardinal Newman College/ Queen Street Character Area where various opportunities for development area identified.

On the emerging Proposals Map, the extent of the Stoneygate Masterplan Area has been substantially reduced and does not include the Cardinal Newman College/ Queen Street Character Area. The College considers that this area should be defined to be consistent with the Stoneygate Regeneration Framework SPD in order to ensure a consistent policy context and avoid future confusion.

### **Education Policy**

The current Core Strategy (adopted July 2012) makes explicit reference to education and has a specific section and education policy, Policy 14 'Education'. The policy is positively worded, is not criteria based and sets out a clear presumption in favour of supporting all education related development.

With particular regard to further education and sixth form provision, Policy 14 is very explicit and states that the LPA will "provide for education requirements by: (d) supporting the growth and development of higher and further education, through close working with the relevant institutions". It thus provides clear and unequivocal support for development proposed by the area's Colleges and critically a much-needed positive policy context against which proposals for education development is assessed. This limits the extent to which objections can be raised to the principle of such development and means that schemes overwhelmingly accord with the development plan and thus receive planning permission in an efficient and effective manner.

It is proposed that this policy is replaced and superseded by emerging Policy HC3 'Community, Health and Education'. Policy HC3 is not an education specific policy, but rather a more general community infrastructure policy. It is considered a wholly unsuitable and unhelpful replacement for Policy 14. Indeed, the effect of Policy HC3 would be to substantially and demonstrably weaken local planning



policy for education development generally and thus the level of policy support afforded to further education providers seeking planning permission for improvements to and the expansion of their facilities. The way the policy is worded also takes not account of the location of most education facilities.

In order to address this matter, it is respectfully suggested that the emerging Plan is amended to differentiate between community facilities, health care facilities and education facilities, all of which are entirely different uses with different impacts and requirements and that an education specific policy is reintroduced.

This policy should be positively worded and set out a strong and clear presumption in favour of supporting all education related development, including but not limited to new buildings, extensions, and improvements to existing facilities and supporting infrastructure.

Such a policy could be worded as follows:

*“To ensure a sufficient choice and supply of education provision to meet current and future needs, the Council will take a positive, proactive and collaborative approach to development proposals relating to the provision, improvement and/ or expansion of new and / or existing education facilities (early years, school and post-16 provision) and will support and give great weight in the decision-making process to such development.*

*Development proposals should accord with other policies in the development plan. Where a proposal does not accord with other policies in the development plan a balanced judgement will be taken having regard to the need for the development, to which great weight will be attached”.*

## **General Comments**

Finally, we wish to make the following general comments, which reiterate representations made to earlier versions of the emerging Plan and which do not appear to have been addressed:

1. Cardinal Newman College is a key and important provider of further/ post 16 education and draws students from across Central Lancashire and beyond. We believe it would be helpful for the Plan to specifically acknowledge their presence and the role they play within the region. In doing so it would help to provide a context to any future development proposals.
2. It is considered that the Plan should be clear in respect of the role the Lancashire County Council has to play in ensuring sufficient and suitable education and training provision for all young people in their area who are over compulsory school age but under 19 or aged 19 to 25. Whilst the County Council’s responsibilities with regard to provision of school places is generally well known, the same cannot be said for their responsibilities with respect to post 16 education. Acknowledgement of this responsibility within the Plan would in the College’s view help to underpin policies for further education development and provide a context for why such development is important and should be given ‘in principle’ support.



3. Neither the adopted Core Strategy nor Preston Local Plan currently identify /allocate land for future education development. Having regard to the College’s likely need for additional accommodation up to 2030, the College believe it is of paramount importance that the emerging Plan allocates land within the vicinity / close proximity of existing buildings to facilitate this future growth. Indeed, to not do so runs the risk of the College being unable to accommodate future growth and potentially having to turn students away.

Government guidance contained in the NPPF, makes specific reference to the need to plan for educational needs. In terms of Plan making, paragraph 20 requires that “*strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

- (c) *community facilities “such as health, education and cultural infrastructure”.*

It goes on to require that “*strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure*” and “*strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area*”.

Paragraph 99 also refers to the importance of ensuring choice of early years, school and post 16 places are available to meet the needs of existing and new communities. It requires that Local Planning Authorities take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in educations. In particular, they are required to:

- (a) “*give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications*”;

There is thus a very clear policy requirement and obligation on local planning authorities to consider and plan for the specific needs of education providers in order to ensure sufficient numbers of education places and also enable existing providers to expand and grow.

The College identified three sites, which they put forward in the 2019 ‘Call for Sites consultation, that it is considered could accommodate some of their growth and expansion. All three sites are considered to be suitable for education use and are within an acceptable distance of the College.

## Conclusions

Having regard to national policy contain in paragraph 36 of the NPPF, it is considered that as currently drafted, the emerging Central Lancashire Core Strategy is not sound as it is not positively prepared; is not justified and is not consistent with national policy. This is because the Plan does not robustly



demonstrate that current and future education needs have been assessed, and a clear strategy put in place for how this need will be met and planning policies against which education developments will be assessed are not consistent with the NPPF or drafted in such a way as to set a clear presumption in favour of supporting such development.

We trust that the information contained in this letter is helpful and we would welcome the opportunity to discuss matters further with you. If you have any queries or your wish to discuss matters further, please do not hesitate to contact me.

Yours faithfully,

[Redacted signature]

[Redacted name]

[Redacted title]

[Redacted address line]

[Redacted contact information]

