



# Examination of the Central Lancashire Local Plan

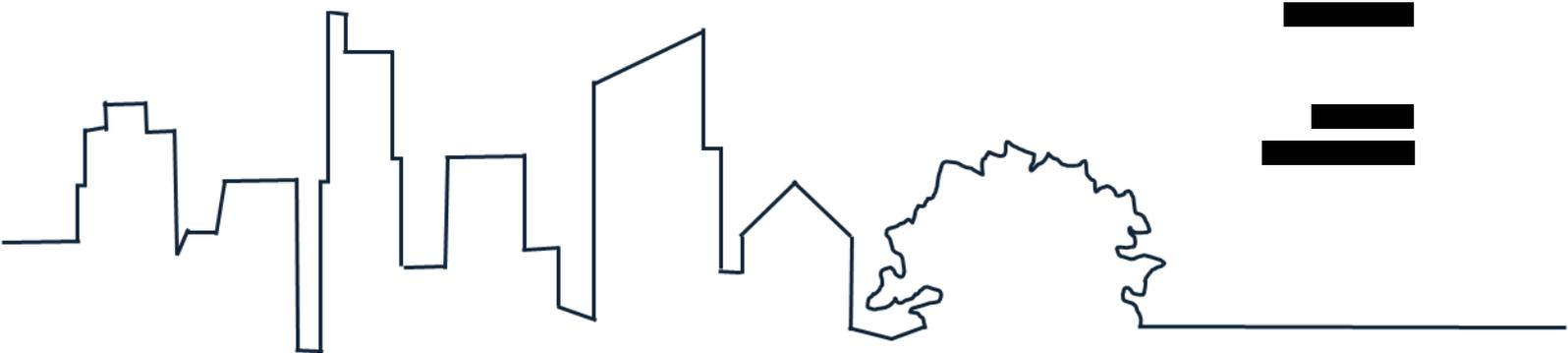
Hearing Statement

Response to the Inspectors Matters, Issues and Questions Matter 11

On behalf of Cardinal Newman College

NOVEMBER 2025

Walsingham Planning



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# I INTRODUCTION

- I.1 Walsingham Planning is instructed by Cardinal Newman College to respond to a number of issues with the Central Lancashire Local Plan and in particular, the deletion of an existing education policy, which provides a positive and supportive planning policy context for new education development,
- I.2 The College are also concerned that the Plan rolls forward a '*Green Infrastructure*' designation covering the grounds without robust explanation or justification.
- I.3 In summary, the College are extremely concerned that the replacement Central Lancashire Local Plan will have unintended negative consequences for new education development at Cardinal Newman College and will make securing planning permission for new accommodation and facilities in the future much more difficult. This is particularly concerning at time when demand for places is projected to increase and there will almost certainly be a need for significant new accommodation over the plan period.

## 2 BACKGROUND AND CONTEXT

- 2.1 Walsingham Planning made representations on behalf of Cardinal Newman to both the Issues and Options Regulation 18 and Publication Regulation 19 Local Plan consultation as well as the 'Call for Sites' consultation in February 2020.
- 2.2 Within these representations we explained the duty on Local Authorities under the Education Act 1986 to provide sufficient and suitable education and training provision and the important role that Cardinal Newman College plays in supporting the Local Authority in meeting this duty. We also provided important information on the projected future growth in demand for places at the College, which will inevitably result in a need for additional accommodation over the Plan period.
- 2.3 We have not repeated this information within this Hearing Statement but respectfully request that this information is reviewed in advance of the Hearing sessions as it provides context and background to the matters and issues that will be discussed.
- 2.4 It is also important to note that since the Regulation 19 representations were submitted in April 2025, the College have reviewed their future growth projections, and these have increased further.
- 2.5 The table below provides updated information and shows that by 2030 the College is projected to need to accommodate 5,000 students. If this growth is to be accommodated the College will inevitably need deliver additional teaching and learning space and ancillary facilities. This will require the construction of a number of new buildings.

<b>Year</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>	<b>2027/28</b>	<b>2028/29</b>	<b>2029/30</b>
Student Nos	4,279	4,427	4,553	4,727	4,804	4,860	4,903	5,000

- 2.6 To do this it is essential that the new Local Plan provides a positive and supportive planning policy context for new education development and that unnecessary and unjustified barriers to development are removed.

### 3 RESPONSE TO MATTER 11 – HEALTHY AND INCLUSIVE COMMUNITIES

Issue 11 – Does the Plan set out a positively prepared strategy and policies for healthy and inclusive communities, which is justified, effective and consistent with national policy?

**Para 11.3 – Does the approach in HC3 provide an effective framework for retaining existing, and allowing new community, health and education facilities, including potential extensions to existing facilities? Is it justified for the policy to cover such a wide range of different types of use? Will it ensure the future needs of different types of facilities will be met?**

- 3.1 Cardinal Newman College are of the firm and unequivocal view that Policy HC3 does not provide an effective framework for allowing new education facilities, including extensions to existing facilities.
- 3.2 Whereas the current Central Lancashire Core Strategy contains a specific policy for education development (Policy 14), Policy HC3 applies to a wide range of entirely different uses, including community facilities, health care facilities and education facilities.
- 3.3 All three uses are entirely different and will raise very different planning issues and considerations. They are also likely to be sited in entirely different locations. It is not appropriate or effective therefore to have a single all-encompassing policy covering all three types of use. The emerging Plan should therefore be amended and a bespoke education Policy similar to Policy 14 inserted.
- 3.4 Cardinal Newman College are of the view that to be effective, planning policy for education development should not only be contained within a specific education policy but the policy should also be positively worded and set out an explicit presumption in favour of supporting new education development. The policy as currently drafted is considered to be very weak and the words “*the Council will seek to ensure...*” unhelpful and ambiguous.
- 3.5 Furthermore, Policy HC3 as drafted currently contains what can only be described as three somewhat random criteria that all new education (and community and health) development will need to satisfy. A future proposal for new accommodation by Cardinal Newman College will thus either need to demonstrate that (a) it is located within a town, district or local centre

- or is identified within a masterplan for an allocated site; or (b) it is necessary to meet a demonstrable local need and (c) is accessible by active travel / public transport.
- 3.6 As the College is located outside of the town centre and no land around the College has been allocated for education development, Cardinal Newman College will never be in a position to satisfy criteria (a). Therefore, by default, the College will always need to demonstrate a proposal accords with part (b) and (c). Whilst development will likely accord with part (c) on account of the College being accessible by public transport, development won't necessarily comply with part (b) as need is not a local one but a much wider regional one.
- 3.7 Notwithstanding this fact, it is unclear where the criteria are derived from and what they are seeking to achieve. They also do not appear to be directly applicable or relevant to further education development but rather only to school development.
- 3.8 We note that in the Council's Response to the Regulation 19 consultation on the Plan they reference the fact that the supporting text states that "*the Council will also support improvements to existing.... Post 16 facilities not listed above*". This is not considered helpful, and it is our experience that commentary in the supporting text to a policy carries far less weight than the Policy itself. As such, we are of the view that to be effective this positive support must be incorporated into main text of Policy HC3.
- 3.9 Having regard to these matters, Cardinal Newman College are of the view that the policy is not fit for purpose and that future education schemes will no longer benefit from a clear, positive and supportive education policy within the development plan. The needs of the Cardinal Newman College and other further education schemes will thus not be met by the policy, and the policy will afford local objectors an opportunity to argue development is contrary to the development plan and thus should be refused. The policy may thus have unintended consequences and make securing planning permission for new accommodation in the future more difficult.
- 3.10 In addition, Policy 14 of the adopted Core Strategy does not contain criteria against which development is to be assessed. It is unclear therefore why the new policy needs to be criteria based.
- 3.11 The replacement of Policy 14 with Policy HC3 thus appears a retrograde step. It also means that Cardinal Newman College and other education providers will need to rely upon national policy contained in paragraph 100 of the NPPF to justify their proposals.

- 3.12 Accordingly, we respectfully request that Policy HC3 of the Local Plan is amended to remove any reference to education development and that a separate education policy is inserted into the plan. 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 infrastructure.