



Examination of the Central Lancashire Local Plan

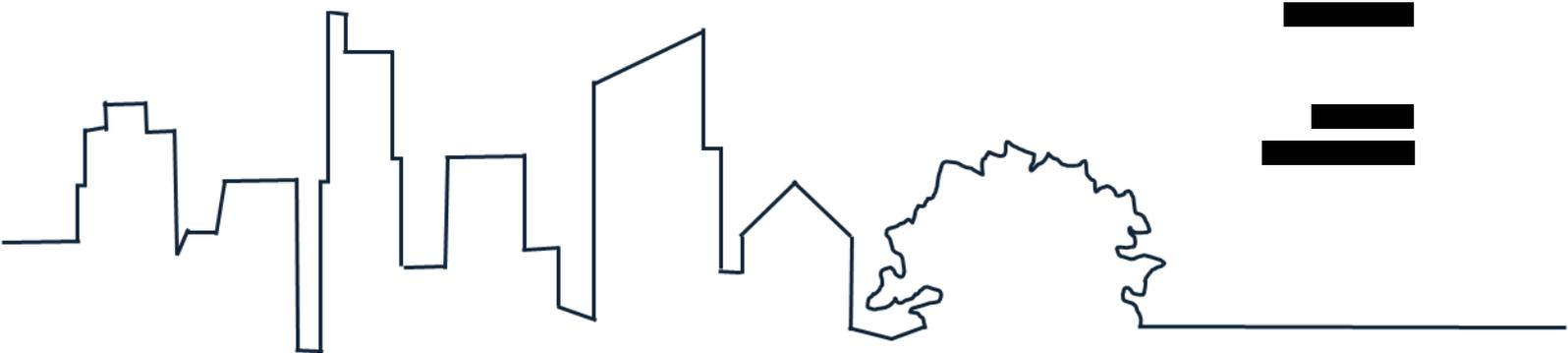
Hearing Statement

Response to the Inspectors Matters, Issues and Questions Matter 12

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 a 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 play 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 our Hearing Statements 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 to deliver additional teaching and learning space as well as ancillary facilities. This will require the construction of a number of new buildings.

| Year | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 |
|-------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| 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 12 – ENVIRONMENT POLICIES

Issue 12 – Does the Plan set positively prepared policies in relation to the environment which are justified, effective and consistent with national policy?

Para 12.2 Are the requirements of Policy EN5 clear and would they be effective? On what basis were sites allocated for Green Infrastructure both within the policy and on the proposals map identified and are they justified.

- 3.1 A large proportion of Cardinal Newman College’s main Larkhill Road site and specifically, all land that is not developed is designated ‘Green Infrastructure’ on the Proposals Map accompanying the Local Plan.
- 3.2 This designation is historic and has been carried forward from the current Local Plan. The designation has been questioned, and representations have been made requesting its deletion on grounds that it is not justified and that it will restrict the ability of the College to grow and provide new buildings in the future. Deletion of the designation has however not been forthcoming.
- 3.3 Having undertaken a high-level review of other parcels of land that the Council have applied a ‘Green Infrastructure’ designation to, we have reached the conclusion that the Council have not adopted a robust criteria-based approach to designating land as ‘Green Infrastructure’ and therefore it is not possible to understand why a particular parcel of land has been designated or not designated. It has also resulted in the designation being applied inconsistently and haphazardly. For example, some school playing fields have been designated whereas other have not.
- 3.4 In the absence of details and an explanation of how and why land has been designated as ‘Green Infrastructure’, the College have no idea as to why the College grounds receives this designation.
- 3.5 The Glossary to the NPPF provides a definition of ‘Green Infrastructure’ as follows:

“a network of multi-functional 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”.

- 3.6 It is the College's view that the grounds do not fit into this definition and therefore that they should not receive a 'Green Infrastructure' designation. The land is not in a multifunctional use, nor does it form part of a linked network of green infrastructure. Rather it is a discrete and self-contained parcel of private land with no public access which is only used by students of the College.
- 3.7 Paragraph 7.23 of the emerging Local Plan provides a list of types of green infrastructure found in Lancashire and thus arguably a definition. The area of land designated 'Green Infrastructure' at Cardinal Newman College does not fall into any one of the types of land described in this paragraph.
- 3.8 Furthermore, whilst the land does contain some trees, not all sites with some trees are designated 'Green Infrastructure'. Similarly, whilst the grounds contains a small ornamental lake, not all land containing a pond or lake is designated 'Green Infrastructure'. This list cannot therefore be considered to provide a robust definition or explanation for why particular parcels of land receive a 'Green Infrastructure' designation nor does it robustly explain or justify the designation of land at Cardinal Newman College.
- 3.9 It is of note that in the Council's Response to the Regulation 19 Consultation to the Plan they justify the 'Green Infrastructure' designation on land at Cardinal Newman College on the basis that it has been rolled over from the adopted Preston Local Plan, that a TPO covers part of the site and planning permission was granted for a MUGA in 2022. It is notably however that they do not justify the designation by reference to the site comprising one of the types of Green Infrastructure listed within paragraph 7.23.
- 3.10 Regarding the roll over, this is not a reason in itself for the designation to remain. It is also important to note that the College were entirely unaware of the designation until relatively recently when an application for the MUGA was progressed. Consequently, they never challenged or made representations to the designation during the previous Local Plan review. Had they known about it and fully understood its implications they would almost certainly have made representations to the adopted Local Plan and challenged the designation.
- 3.11 The Council also seem to be suggesting that the site receives a 'Green Infrastructure' designation due to the presence of protected trees within the grounds and the presence of the MUGA. With regards the TPO, the presence of protected trees is not a reason in itself to designate land as 'Green Infrastructure' and indeed, many parcels of land across the Borough contain protected trees but are not designated 'Green Infrastructure'.

- 3.12 In terms of the MUGA, the suggestion appears to be that the presence of a MUGA triggers and justifies land being designated 'Green Infrastructure'. However, the College are entirely unclear as to why this would be the case, particularly as the MUGA is an artificial not natural surface. Furthermore, there is no public access or community use of the MUGA and it is only available to students of Cardinal Newman College during the college day.
- 3.13 Having regard to these facts, the College is of the view that the designation is inappropriate and unjustified and therefore that it should be deleted.
- 3.14 The College is also extremely concerned that in the future the designation will hinder their ability to secure planning permission for additional accommodation in the grounds thereby prejudicing their ability to meet future need. This is particularly concerning given the College have few other options for accommodating future growth as all other potential development sites have now been exhausted.
- 3.15 It is also worth noting that in recent years that College has been forced to develop on existing staff car parking an option which has also now been pretty much exhausted. It is therefore highly likely that some future growth will have to be accommodated within the grounds.
- 3.16 Designation of the land as 'Green Infrastructure' is at best restrictive and at worst entirely prohibitive. Policy EN5 would clearly apply to any development by the College within the grounds and a proposal for a new building would likely be considered to conflict with this policy. Given this fact, and the fact that the designation would not appear to be appropriate or justified, the College respectfully requests that the designation is deleted.