
Central Lincolnshire Local Plan Matter 3 – Spatial Strategy and Distribution of Growth

LP2: The Spatial Strategy and Settlement
Hierarchy (Part 6: Small Villages)

LP3: Level and Distribution of Growth

LP4: Growth in Villages

Central Lincolnshire Local Plan

Examination In Public – Policies LP2, LP3 and LP4



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1. Introduction

- 1.1. This Hearing Statement has been submitted on behalf of the University of Lincoln (the “University”) as part of the Examination in Public of the Central Lincolnshire Local Plan. The Statement highlights and where necessary, expands upon representations submitted by the University at both the Submission and Further Draft stages of the Local Plan (See **Appendix 1 and 2** respectively).
- 1.2. The statement responds to the Inspector’s Questions and explains the reason behind why the draft Local Plan is unsound as it stands.
- 1.3. The Statement is made in respect of land at the University’s Riseholme Campus (Riseholme Park, Lincoln LN2 2LG). To ensure the University can implement its Estate Strategy and planned investment at its Riseholme Campus as the principal economic driver in Central Lincolnshire. An illustrative masterplan is included as **Appendix 3**.
- 1.4. The site is subject to a live planning application **Ref: 134780**: a proposal for sustainable development, which if granted, could deliver much needed housing over the first five years of the Plan Period. A copy of the Parameters Plan is included as **Appendix 4**.

2. Inspectors Questions

Issue 3b – Settlement Hierarchy – Policy LP2

- 2.1. **(Q3) Does it take into account sufficient and appropriate factors? Is this approach justified and is it consistent with national planning policy? Have settlements been appropriately allocated to hierarchy?**
- 2.2. The University of Lincoln owns the unencumbered freehold of approximately 220 hectares of land at Riseholme, which lies approximately 3.5 miles to the north of its Brayford Pool Campus.
- 2.3. The Riseholme Campus is the focus of the University's development of the Lincoln Institute for Agri-Food Technology (LIAT) which will be based in a new, state of the art centre at Riseholme complementing the already established National Centre for Food Manufacturing at Holbeach and the Food Refrigeration and Process Research at Grimsby (creating a 'food corridor' through the LEP region).
- 2.4. The University intends for the LIAT to be hosted at the University's Riseholme Campus and to form part of the mixed-use redevelopment of the campus. The project's location combines agricultural land with buildings in a model farm which will host laboratories, seminar rooms, a modern glasshouse and workshop space to allow both field trials and events and workshops to be held, bringing together scientists, technology companies and end users. It will also provide a specialist precision livestock research facility and laboratories in support of West Lindsey's proposed Food Enterprise Development Zones.
- 2.5. Riseholme is the appropriate location for the development. The campus forms part of West Lindsey District Council's Agri-tech corridor Local Development Order (LDO) which runs along the A15 from Grimsby to Lincoln. The investment is to partially funded through the redevelopment of part of the campus for up to 180 homes which forms part of a live planning application.
- 2.6. The University's Riseholme campus is included within the list of settlements under 'small village' in the Submission Draft. Limiting development to 4 units will undermine the University's capital investment plans and the delivery of sustainable development including the LIAT Centre, improved education/ sports facilities and housing.
- 2.7. The University has always maintained that the Riseholme Campus should be allocated for education/ employment and residential uses, indeed the West Lindsey Local Plan (First Review 2006) allocates the site for Education Use under Saved Policy CRT6. The emerging Local Plan removes even this basic acknowledgement of the existing educational uses.
- 2.8. As an allocation has not been forthcoming, the University has previously proposed that the Riseholme Campus be exempted from LP2 but would prefer a specific allocation which would enable the Committee to retain control over development at Riseholme.

- 2.9. The principle of an exemption has been established within the allocation of land at Hemswell Cliff (ref: CL4673). The assessment of this site notes that the residential development will form part of the development of one of the new Local Development Orders for the Food Enterprise Zone at Hemswell Cliff which is being delivered to support growth in the rural economy. The Local Plan must recognise the need for a similar approach at Riseholme to allow the University to deliver its investment in the LIAT which will underpin the entire Greater Lincolnshire Local Enterprise Partnership's Economic Plan. To limit growth at Riseholme will jeopardise the focus on commercialising research and development in the agri-food sector and put the entire project at risk. The Submission Draft is therefore contrary to NPPF policies 18, 19 and 20 which seek to build on the country's inherent strengths to be globally competitive, support sustainable economic growth and proactively meet the development needs of business, supporting an economy fit for the 21st century and is therefore unsound.
- 2.10. The University has previously stressed that it is operating in a highly competitive market as UK universities strive to offer attractive destinations to study in order to ensure student numbers are maintained at a viable level. It is an international market, with universities in the UK and abroad competing with one another to attract international students in addition to domestic students. For most UK universities, the income derived from student fees make the most significant contribution to turnover and surplus. These in turn enable universities to invest in the academic staff who drive the world class research which generates international reputation and impact. Research, particularly in engineering, food manufacturing and healthcare, is dependent on critical mass of well-qualified staff and Lincoln is involved in international competition to recruit the best staff.
- 2.11. Any attempt to attract additional students/staff and research/investment is critically dependant upon the University's ability to provide state-of-the-art teaching and research facilities to successfully compete with those on offer at other leading universities. It is therefore important the University of Lincoln is able to grow and develop to be able to continue to compete, and thus sustain its significant economic contribution to the city and the region. These factors are key to the University's estate strategy and projected investment programme both at Brayford Pool and Riseholme. The £130 million of investment planned in the campus over the next few years will maintain the University's position only. If the University is to meet its ambitions to grow further it will need to invest more money and must find ways of realising capital from its existing assets as well as attracting investment from both funders and business partners. In order to achieve this, the University must have a supportive planning framework within which it can offer both clarity and certainty to its own Board as well as Investors/partners alike.
- 2.12. On this basis, Riseholme should be removed from the Settlement Hierarchy with development controlled through an allocation. We have included as Appendix 4 a copy of the Parameters Plan which forms part of the application for outline planning permission should the Inspector feel it appropriate to set these parameters within a specific allocation. Our suggested wording for a specific allocation can be found at pages 9 and 10 of Appendix 1 and pages 12 and 13 of Appendix 2.

Issue 3c – Level and Distribution of Growth

- 2.13. **(Q10) Is it appropriate to aim around 88% of the growth in the Lincoln Strategy Area, Gainsborough and Sleaford when a significant part of the plan is rural?**
- 2.14. Yes, if the sites demonstrate a connection supporting the Growth of Lincoln, Gainsborough and Sleaford. The University believes that the Plan should treat proposals within the Lincoln Strategy Area differently if they demonstrate a connection supporting Lincoln as the district's 'engine of growth'. Riseholme is integral to the University's growth ambitions and both the Riseholme Campus and Brayford Pool Campus should be treated consistently when it comes to redevelopment and investment. The University approaches its estate as a whole, rather than as a series of distinct silos. Both campuses are fundamental to the University's continued growth with Brayford Pool providing state of the art teaching space and Riseholme providing the land to offer field based study at the LIAT Centre, together with the planned supporting function of outdoor sports facilities. An allocation at Riseholme is the most practical way of providing a sound planning framework upon which the University can implement its investment strategy. A significant element of residential development at Riseholme will be essential to achieving this. Such an allocation would positively and effectively support the Local Plan's economic objectives and help to supply additional housing in the early plan period.

Issue 3f – Growth in Villages – Policy LP4

- 2.15. **(Q31) Policy LP2 states that medium villages will accommodate a 'limited amount of development' and small villages 'small amounts of development' unless "...otherwise promoted via a neighbourhood plan..." Is this consistent with paragraph 184 of the Framework which requires neighbourhood plans to be in general conformity with, and reflect the strategic policies of the Local Plan?**
- 2.16. No, this is in direct conflict with the NPPF. Paragraph 184 states that Neighbourhood Plans should reflect the policies of the Local Plan. Neighbourhood Plans should not undermine the strategic objectives of the Local Plan and it is therefore wrong for Neighbourhood Plans to determine the quantum of development where the Local Plan sets an alternative level of development.

Issue 3g – Category 5 and Villages – Policy LP4

- 2.17. **(Q36) Is the proposed level of growth for each of the category 5 and 6 villages appropriate and justified having regard to their size, role, function and accessibility to employment, services and facilities?**
- 2.18. The University has repeatedly appealed to the Central Lincolnshire Joint Strategic Planning Committee (and its predecessor the Joint Planning Unit) that **to limit Growth at Riseholme (LP4 limits growth at Riseholme to 15%) fundamentally inhibits the University's future investment at Riseholme and its ability to deliver the LIAT Centre.** Restricting growth will also reduce the speed at which further investment at Brayford Pool can be achieved. Such an approach directly contradicts the Economic Needs Assessment, one of the principal Evidence Based documents which notes "With an expectation that the University will grow and that levels of business engagement will increase in the coming years, it will continue to be one of the most important local economic assets over both the short and longer term" (paragraph 7.9) and therefore has very real implications on the ability for the University to contribute to economic growth as forecast by the Local Plan.
- 2.19. This oversight makes the economic policies of the Local Plan unsound. The restriction on growth at Riseholme jeopardises the delivery of a sustainable mixed use development and the delivery of essential housing. Residential development at Riseholme would, in any event be sustainable development for the reasons set out at paragraph 3.5 (page 7) of Appendix 1.

3. Conclusion

3.1 Which NPPF test of soundness it fails and why?

3.1. The approach to policy LP2, LP3 and LP4 is unsound for the following reasons:

- **Positively Prepared:** The University considers that whilst the Local Plan sets out clear strategies for growth which are embedded in sound evidence and to an extent reflect the objectives of the Local Enterprise Partnership, failure to provide policy support for the University's continued growth undermines those objectives. Further, the University does not consider the Plan is sound on the basis of the deliverability of some of the sites identified in Lincoln and therefore the ability to deliver a five year housing land supply is flawed. We set out at paragraph 3.15 of Appendix 1 our analysis of sites where we consider the delivery of housing (within the proposed timeframe) is unrealistic.
- **Justified:** The economic strategy of the Submission Draft is justified in general terms as it is largely predicated on the agri-tech/food industry. However, it fails to properly reflect the University's contribution to that sector's growth. The lack of policy support for the University's short term and long-term plans has not been justified. Without appropriate and explicit policy support for the University, particularly at the University's Riseholme Campus, the University cannot deliver LIAT and the full extent of the Agri-tech and food sustainability investment program. With regard to the LIAT, the Submission Draft positively discourages development at Riseholme, and no provision is made for a mixed-use development of the kind proposed by the University. Riseholme is the only asset in the University's ownership that can provide the extent of ancillary land required for practical teaching and research purposes. Restricting development in this location is directly contrary to the economic strategy of the Submission Draft. This policy of discouraging development at Riseholme has not been justified.
- **Effective:** Without a supportive policy position the University cannot deliver its wider investment strategy at Riseholme. Part of the funding for the LIAT must come from value realised from surplus land at Riseholme. A clear planning position is also required by the University to leverage wider investment from stakeholders and agri-tech/food companies, and from debt finance. The capital realised from redevelopment of the campus core will only go some way to achieving the overall funding package required and provide a sound investment basis for the University's future growth plans.
- **Consistent with national policy:** We do not consider the plan adequately supports the University in delivering its role as the principal economic driver in Central Lincolnshire. The clear case for allocating the Riseholme Campus includes the following general and specific factors:
 - a. The proposed allocation would clearly assist the Council in meeting its objectively assessed need for housing, by providing up to 180 units of market and affordable housing (see paragraph 17, 47, 50 and 52 of the Framework).
 - b. The proposed allocation would see the redevelopment of brownfield land and only more limited development on some greenfield land. The re-use of brownfield land is supported by the Framework and the Planning Practice Guidance.

- c. The creation of a new rural settlement is a response that is recognised in the Framework as one which can properly be considered. In this case, it would no doubt alleviate the pressure for housing development on other sites, thus avoiding town cramming.
- d. The allocation and development on the site would facilitate the improvement and continued use of heritage assets, as well as enhancements to the listed buildings and their wider setting (see paragraph 17 and 126 of the Framework).
- e. Quite apart from the intrinsic merits of the Riseholme Campus, it is relevant to note of this Site that it is capable of delivering wider economic benefits to the community area. The proposal for a mixed-use development will secure further economic benefits in the form of the creation of jobs linked to the University. But in addition, and most importantly the funds will be used by the University for investment in its campus with all the attendant economic benefits that the University brings to driving forward the Agri-Tech and Agri-Food industry through the LIAT at Riseholme.
- f. Redevelopment of the campus will include new facilities for use by both the University's students and residents of Riseholme.

How can the Local Plan be amended to ensure soundness?

3.2. In order for the Local Plan to be found sound, the following amendments are necessary:

- Allocate the Riseholme Campus. Suggested wording has respectfully been suggested at paragraph 2.10 of this Hearing Statement which would exempt the Riseholme Campus from policy LP2 and LP4 allowing the University to implement its investment plans at Riseholme, cross funded by the delivery of up to 180 residential units.

Savills (UK) Limited
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