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# Response to the Central Lincolnshire Local Plan Proposed Submission

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University of Lincoln

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## 1. Introduction and Background

- 1.1. This report has been prepared as part of the University's response to the Central Lincolnshire Local Plan (Proposed Submission) and follows previous submissions to both the Joint Planning Unit and Central Lincolnshire Joint Strategic Planning Team dating back to September 2010, the most recent being November 2015.
- 1.2. The purpose of this report is to make representations to the Central Lincolnshire Local Plan Team, in respect of a number of policies to be submitted for Examination in Public later this year. The University has since November 2015 engaged with local stakeholders positively. Whilst the importance of the University has been verbally acknowledged, the institution feels the Submission Draft Local Plan ("the Submission Draft") as it stands, does not reflect this importance, nor has it taken on board the University's written representations adequately. Instead of incorporating the University's suggested amendments to the consultation draft plan in the Submission Draft, the Council has indicated to the University that the Inspector will be asked to address the issues raised in the University's representations. We do not believe that this approach is appropriate. In light of the approach adopted by the Local Plan Team, these submissions develop the points made on the University's behalf in November 2015. The two documents should be read together.
- 1.3. The Submission Draft continues to recognise the importance of the University as a key driver in economic growth in the region but the institution feels that it fails to support the University in the delivery of its Estate and academic investment Strategy – this, in the University's view is a flaw which goes to the soundness of the Local Plan in its failure to be plan positive, particularly where the University is concerned.
- 1.4. The University of Lincoln is estimated to be worth more than £300 million to the local economy, doubling local economic growth rates, and creating more than 3,000 new jobs. The National Centre for Food Manufacturing at the University's Holbeach campus is a state-of-the-art training facility, sponsored and updated by the multi-billion pound food industry. The University is leading the transformation of the agri-tech and agri-food industry in the county and supporting the STEM (science technology engineering and maths) and health agenda; industries recognised in the Submission Draft as a key area of economic growth.
- 1.5. The University needs a robust and supportive policy framework if it is to continue to grow over the 15 year plan period and increase its contribution to the Central Lincoln's economy. Local Plan policy support is key to attracting further investment to enable the University to deliver its long term growth strategies and in the short term, deliver a Centre of Excellence, in the guise of the new Lincoln Institute of Agri-Food Technology (LIAT), at its Riseholme Campus.



## Local Enterprise Partnership

- 1.6. The Greater Lincolnshire Local Enterprise Partnership (“GLLEP”) Strategic Economic Plan - is a strategic business investment programme across Lincolnshire, North Lincolnshire and North East Lincolnshire which aims to help create 13,000 new jobs, support the building of 100,000 new homes, help 22,000 businesses grow and increase the size of the economy by £3.2Bn. Lincolnshire has also been successful in securing One public sector Estate programme finance. The University and its Brayford and Riseholme site are key components of GLLEP’s Economic Plan (see 1.7 below).
- 1.7. A core theme of the Strategic Economic Plan is the important role the University of Lincoln will play in driving economic growth noting that *‘the University is at the forefront of supporting innovation in the local business community, growing its research capacity and performance and driving transformational change’*.<sup>1</sup>
- 1.8. The Submission Draft refers to the GLLEP Economic Strategy, in particular in section 2.4.1 (“Our Vision”) and at section 2.5.3 where it is stated that:

*“The Local Plan objectives have evolved from the review of relevant plans and programmes undertaken for the Sustainability Appraisal process. They reflect the aims and objectives of other important strategies that affect Central Lincolnshire’s future. This is to ensure that the Local Plan and other plans are as closely aligned as possible and that strategies support each other. Examples include:*

- *Greater Lincolnshire Enterprise Partnership Strategic Economic Plan*
- *Growth Strategy for Lincoln*
- *Lincolnshire Joint Health and Wellbeing Strategy Lincolnshire Joint Strategic Needs Assessment*
- *Corporate Plans for City of Lincoln,*
- *North Kesteven and West Lindsey Lincolnshire Biodiversity Action Plan*
- *Lincolnshire Local Transport Plan and local transport strategies*
- *Joint Lincolnshire Flood Risk and Drainage Management Strategy”*

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<sup>1</sup> The Greater Lincolnshire Local Enterprise Partnership Strategic Economic Plan, March 2014, page 31.

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- 1.9. The University feels that the Submission Draft does not reflect the supportive policies of the Strategic Economic Plan. In the GLLEP, support for the University's continued long-term growth and development is recognised as being fundamental to delivering a strong and stable economic future for Central Lincolnshire. However, there is no equivalent economic support in the Local Plan.
- 1.10. In the short term, the lack of policy support for investment at the University's Riseholme Campus continues to conflict with the next phase of development by the University at Riseholme and across the county. Since November 2015, the University, working closely with the Local Enterprise Partnership has sought to develop plans for development of agri-tech and agri-food. The University is now proposing development of the new Lincoln Institute of 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).
- 1.11. 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 Avian research facility and laboratories in support of West Lindsey's proposed Food Enterprise Development Zones.
- 1.12. 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.
- 1.13. The University is currently preparing a planning application for submission to West Lindsey District Council on this basis which will include an element of sustainable high quality housing to part fund these critical developments. Whilst both West Lindsey District Council and Lincoln City Council have been supportive of the principles of the investment at Riseholme and understand the need to create a capital receipt from some of the land to fund the investment, this support has failed to materialise in draft policy. The Submission Draft, if adopted as drafted, could prevent meaningful development at Riseholme and prevent development of the LIAT Centre. The authorities have encouraged the University to seek changes to the Submission Draft at Examination in Public and/or to advance a case in a planning application that the LIAT is justified by exceptional circumstances. The Institution feels that this puts development at Riseholme in a precarious position and this uncertainty is likely to have funding implications for the development. The authorities' approach is therefore inconsistent with the clear support for growth at the University in the GLLEP's Economic Strategy and the Submission Plan's strategic aim of encouraging and supporting a competitive economy.



## 2. The Test of Soundness

- 2.1. The allocations and supporting policies in the Draft Local Plan will be subject to the tests of soundness under independent examination under Section 20 of the 2004 Act, as set out in the National Planning Policy Framework at paragraph 182.
- 2.2. The mis-match between the Local Plan's economic objectives and the absence of specific policy support for the University's growth undermines the soundness of the Local Plan, in the context of positive and effective plan making. Again building on the University's previous submission in November 2015 we comment on each of the four tests as follows:
- **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 Appendix 1 of this report our analysis of sites where we consider the delivery of housing (within the proposed timeframe) is unrealistic.
  - **Justified:** Whilst the economic strategy of the Submission Draft is justified in general terms as it is largely predicated on the agri-tech/food industry, 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 both at Riseholme, at the Brayford Campus and at its centre for food manufacturing in the south at Holbeach. 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. The plan is also ineffective in its ability to meet the Council's objectively assessed housing need.
  - **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 200 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 NPPF).
- 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.



## 3. Response to the Submission Local Plan

- 3.1. In this section, we set out the University's comments on a number of specific policies in the Submission Draft. As set out below, the Submission Draft is lacking in supportive policies for growth at the University over the plan period. In the short term, the Submission Draft seeks to restrict development at Riseholme, which will prevent the University from bringing forward its plans for the LIAT.

### **Brayford Pool Development**

- 3.2. Investment in the Science and Innovation Park will comprise state-of-the-art University facilities, such as the Joseph Banks laboratories, as well as space for industry partners to develop new offices and research facilities. This unique approach to industry relations will create a symbiotic learning and development environment, and offer students the benefit of closer links with major employers. The Science and Innovation Park is being developed in partnership with the Lincolnshire Co-operative Society.

### **The Proposed Development at Riseholme**

- 3.3. The University supports the principle of growth at Riseholme village. Redevelopment of part of the Riseholme campus for residential purposes will act as a pressure release for surrounding villages and reduce the need to expand these settlements further. On this basis, Riseholme should not be restricted with a 15% growth cap as this will inhibit meaningful development and prevent the University from realising a suitable capital receipt from the sale of land to support the LIAT investment.
- 3.4. The proposal is for a rural settlement on the previously developed campus core, anticipating a likely provision of up to 200 units which reflects ongoing consultation with both Historic England and the local community. This reflects a significant reduction in the quantum of housing from the original 750 units proposed and encouraged as a sustainable option by the County Council. Whilst there has been a fundamental shift in the approach to development at the campus with a significant reduction in unit numbers, the corresponding investment in infrastructure required to support the housing has also reduced respectively, and as a result, the envisaged capital receipt is broadly the same.
- 3.5. The Site is close to existing facilities in neighbouring villages and the City of Lincoln. The planning application which is currently being prepared identifies that the site has the potential to offer delivery of a number of benefits, including but not limited to:
- a. The refurbishment of the existing listed buildings;
  - b. The provision of new employment linked to the University;
  - c. The provision of the Head Quarters of LIAT which will include, laboratories, robotics centre, 125 acres of arable farmland for field trials and ground water research. The innovation site will be located at the heart of the agri-tech LDO corridor;
  - d. Continued use of the site, including the educational facilities and heritage assets which may otherwise fall out of use;
  - e. The provision of new housing to meet an identified need for both market and affordable dwellings in the area, together with an appropriate mix of housing types;



- f. The delivery of critical economic support for the University in the form of reinvestment of funds generated from the proposal in the new LIAT facilities;
  - g. Avoiding potential negative impacts on existing communities arising from ad hoc planning and town cramming in other settlements, counter to national policy of sustainable development;
  - h. The opportunity to accommodate renewable energy technologies and accommodate a high level of energy efficiency through design where viable to do so;
  - i. The provision of leisure and recreational uses associated within the wider park;
  - j. The provision of new environmental and other facilities by making effective use of the park, so benefitting the wider community;
  - k. A significant improvement to the local environment by removing poorly designed 20<sup>th</sup> Century buildings and improve the wider setting of the listed buildings;
  - l. Long-term management of the Registered Park & Garden; and,
  - m. A significant improvement to the achievement of the 'core planning principles' outlined in paragraph 217 of the NPPF.
- 3.6. Whilst the University has tried to address the issues raised by the Local Community, there becomes a point where economic viability becomes compromised if unit numbers are overly restricted and therefore the University's ability to realise a meaningful capital receipt is compromised. The University is confident that the density and mix of uses proposed for the Site constitute sustainable development.
- 3.7. The location of Riseholme is at the centre of Lincolnshire which means that the innovation site will be accessible to businesses from across the Local Enterprise Partnership area (the site is adjacent to the junction of the A15 and A46 giving access North, South, South West and North East, with the junctions with the A158 giving access to the East and A57 linking to the West, both within 3 miles). The site is also within 3 miles of the main Brayford Campus of the University giving access to the full range of Schools there and within 2 miles of the Lincolnshire Showground and 8 miles of Hemswell Cliff which will jointly host the Central Lincolnshire Food Enterprise Zone. Riseholme lies at the heart of West Lindsey District Council's Agri-tech corridor Local Development Order (LDO) which runs along the A15 from Grimsby to Lincoln.
- 3.8. The ability to generate a capital receipt on part of Riseholme is fundamental to the University's investment of the LIAT and wider long-term management of the campus. The University must have a supportive planning framework within which it can offer both clarity and certainty both to its own Board, as well as Investors and Joint Venture Partners. At present, the Local Plan offers neither and yet is heavily reliant on the continued growth and success of the University.

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

*"Unless otherwise promoted via a neighbourhood plan, these settlements will accommodate small scale development of a limited nature, proposals will be considered on their merits but would normally be limited to 4 dwellings, or 0.1 hectares per site for employment uses."*



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- 3.9. The University's Riseholme campus is included within the list of settlements under 'small village'. 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.
- 3.10. 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.
- 3.11. As an allocation has not been forthcoming, we propose that the Riseholme Campus is exempted from LP2 but would encourage a specific allocation which we believe is more appropriate to control development at Riseholme.
- 3.12. 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 GLLEP (see Section 1). 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 unsound for the reasons set out in Section 2 above.
- 3.13. On this basis, Riseholme should be removed from the Settlement Hierarchy with development controlled through an allocation. The following wording is again presented for consideration:

## University of Lincoln, Riseholme Park – site area 214 ha

### Development Requirements:

*A comprehensive scheme expressed within a master plan providing for:*

- *A mixed use residential-led development, along with the Head Quarters of the Lincoln Institute of Agri-Food Technology and associated educational uses to create a new rural settlement and diverse community;*
- *Identification of a protected heritage heart to the site and other visually and ecologically important planted areas and landscape screens;*
- *Identification of leisure and recreational uses associated with the wider park;*
- *High standards of design with respond to the local context and promotes local distinctiveness;*
- *Redevelopment of redundant site incorporating the conversion and restoration of listed buildings and heritage assets associated with Riseholme Hall;*
- *Sustainable design, including renewable energy technologies as appropriate and delivery of zero carbon housing where possible;*
- *A planning obligation with provides that money realised from the sale of surplus estate at Riseholme will be reinvested in the University's retained estate to achieve the investment priorities of the University and economic growth objectives of the Local Plan.*

### Reason

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*This allocation is supportive of the University's plans for growth to retain its vitality and reputation for research and academic excellence. It is recognised in that policy that in order to achieve the level of investment required to deliver the ambitious targets of both the University's Corporate Plan and the Central Lincolnshire Local Plan economic growth projections, the University must maximise the value from any surplus property at Riseholme College whilst respecting its historic and ecological significance as well as maintaining educational uses on parts of the site.*

*Redevelopment of the campus will be brought forward under an approved masterplan to be prepared in consultation with both West Lindsey District Council and the local community.*

*The allocation of the land for a mixed-use development allows the University to maintain a presence at the site as the LIAT centre, as well as providing the home of the University's outdoor sport facilities which will be made available for wider community use. The mixed-use site and new urban settlement will also deliver housing on a previously developed site, delivering high standards of design and sustainability including renewable energy generation technologies and facilities to further improve the sustainability of the development.*



## Policy LP3: Level and Distribution of Growth

- 3.14. The University welcomes the inclusion of Riseholme within the Lincoln Strategy Area. The Riseholme campus presents an important opportunity for the University to realise a capital receipt from surplus estate which will be applied to the LIAT Centre at Riseholme and used to leverage funding for the next stage of investment at both Brayford Pool.
- 3.15. The University is concerned that the baseline annual housing figure at 3.3.5 is pessimistic in light of the strong economic growth projection of the Central Lincolnshire LEP. The SHMA (July 2015) notes that there is compelling evidence to suggest that a higher growth rate can be achieved, supported by the ambitions and funding streams available to the LEP. Therefore, the Local Plan should consider a higher housing figure up to 1,780 (identified in the SHMA) to which development at Riseholme would contribute housing early in the Plan Period. With its current housing projections, the Local Plan is considered unsound in that it fails to positively *"meet objectively assessed development and infrastructure requirements..."* In addition, we do not consider that the five year land supply is robust and include at Appendix A and assessment of the 5 year housing trajectory. We consider that a number of the sites are overly ambitious in their delivery which should be revised to take account of market realities and infrastructure delivery. The combination of this shortfall, together with the higher grow rates predicated by the GLLEP suggests the Submission Plan is unsound.
- 3.16. Paragraph 3.3.8 is ambiguous. 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 with the same approach to redevelopment and investment. 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.
- 3.17. If Riseholme is not allocated for University development, we suggest that Policy LP3 is amended to read:
- "The Local Plan facilitates the delivery of 36,960 new dwellings and an appropriate amount of employment land over the plan period 2012-2036 distributed as follows:*
- a. *Lincoln Strategy Area – around 64% (23,654) of the total homes and employment land needed, delivered through a combined strategy of (and in priority order):*
    - (i) *Urban regeneration;*
    - (ii) *Sustainable urban extensions to Lincoln; and*
    - (iii) *Growth **in and around** settlements which serve, and are serviced by Lincoln...*



## Policy LP4: Growth in Villages

*"In principle, settlements within categories 5-6 of the settlement hierarchy will be permitted to grow by 10% in number of dwellings over the plan period except for those settlements identified in the table below where an alternative level of growth is identified.*

*Riseholme: Growth Level 15%: Reason for alternative level of growth LSG (Proximity to Lincoln, Sleaford and Gainsborough – where a settlement is not overly constrained and is within 5km of Lincoln, Sleaford and Gainsborough centres)."*

- 3.18. **Limiting 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 completely 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. This fundamental 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.

## Policy LP21: Green Wedges

- 3.19. The University's Riseholme Campus lies within an area designated as "Green Wedge". This is not a national designation and is not the same as Green Belt. A large proportion of the campus is listed on the national register of Parks and Gardens. Given the substantial benefits from redevelopment at Riseholme, along with the duty of the Council to plan positively to meet its housing needs, taken with the highly unusual circumstances of the campus in its links with wider economic benefits from continued support for the University, we feel that it is appropriate for the Green Wedge allocation at Riseholme to be reviewed, particularly given the site is protected by its statutory Listed Parks and Gardens status.
- 3.20. The University is concerned with a blanket 'Green Wedge' allocation on the majority of its campus and requests that this is reduced to follow the line of Riseholme Lane which would reflect a general rounding off of the Green Wedge limit.
- 3.21. We also consider that the draft Green Wedge policy is possibly inconsistent with the NPPF because it is more restrictive than the Green Belt test.

## Policy LP31: Lincoln's Economy

*"Development proposals for Lincoln should support the strengthening of Lincoln's economy, contributing toward the delivery of objectives as set out in the Growth Strategy for Lincoln 2014 – 2034.*



*In principle, development proposals will be supported where they:*

- a. *Seek to enhance the overall offer that the Lincoln Urban Area provides in terms of the range and quality of employment uses including skills and innovation;*
- b. *Support and enhance Lincoln's role as a key destination for tourism and leisure;*
- c. *Maintain and enhance Lincoln's status as a significant provider of retail services;*
- d. *Protect and enhance the quality, attractiveness, character and assets of the Lincoln area, and the city centre in particular, as a place to visit, work and live;*
- e. *Support and enhance boating activities on the Brayford Pool and/or the focus of the Brayford Pool and Lincoln's waterways for cultural, leisure and educational development, provided it does not detract from their open character.."*

3.22. The University support the principle of Policy LP31 but remain concerned over the lack of status afforded to the University as a key economic driver in Central Lincolnshire and the absence of a suitably flexible and supportive policy within the Local Plan.

3.23. Lincoln is not like other towns and cities within Lincolnshire given the economic advantages presented by the University of Lincoln. The draft Local Plan evidence base is quite clear on the distinct advantages of the University in driving growth during the Plan Period, and is a central foundation of the region's own economic growth trajectory. Therefore to achieve the strategic economic objectives of the Local Plan, the University must be afforded a suitably robust planning framework within which to deliver its own development plan.

3.24. We suggest that Policy LP31 is amended to read:

*"Development proposals **within the Lincoln Strategy Area** should support the strengthening of Lincoln's economy, contributing toward the delivery of objectives as set out in the Growth Strategy for Lincoln 2014 – 2034. "*

3.25. It is important that the Local Plan recognises the clear and direct link between the University's Riseholme Campus and Brayford Pool and therefore the competitiveness of Lincoln as a place to invest. Any capital receipt realised through the sale of land at Riseholme will be ring-fenced and reinvested in:

- a. The new LIAT Centre;
- b. the retained heritage assets and parkland at Riseholme;
- c. a new University Sports Hub with wider community access; and
- d. the next phase of investment at Brayford Pool and used to leverage further investment/Joint Venture opportunities.



- 3.26. As we have previously noted, to ignore the importance of Riseholme in creating a capital receipt for reinvestment in retained facilities at the campus and at Brayford Pool, undermines the University's ability to implement its investment programme thus limiting the University's growth and the continued economic advantages this brings to Central Lincolnshire.

## Policy LP32: Lincoln's Universities and Colleges

- 3.27. The further dilution of this policy, since the previous consultation has unfortunately watered down any assistance the policy was intended to offer the University in the redevelopment of its assets to support continued investment. The policy also fails to recognise the University in its own right. Many other local authorities have University specific policies and best practice examples have been discussed and supplied to the Joint Planning Unit. Unfortunately these have not been taken account of in this Submission Draft.
- 3.28. The University has a capital programme for development of the Brayford Campus and a 10 year masterplan approved by Lincoln City Council in 2013. Capital funding is already in place for £130 million to cover projects up to 2018, including the provision of two new academic buildings, a 500 bed student halls of residence and a technology centre on the new Science and Innovation Park. The 10 year masterplan includes the delivery of further academic buildings including phase 2 of the library, a second social sciences building, and institute for Lincolnshire Health developed with the Lincolnshire Health Trusts, and an additional science building to accommodate expansion of the School of Pharmacy. At Riseholme, the University will be investing in a new University sports hub, teaching space and the LIAT Centre – the principal driver of the agri-food and agri-tech economy in the county. Redevelopment of some of Riseholme Park is essential to realise a capital receipt upon which the University can leverage appropriate funding for Phase 2.
- 3.29. The University is seeking to expand its global reach and further partnership opportunities following the success of its partnership with Siemens and its School of Engineering. Whilst there is apparent political support for the University's continued growth ambitions, the weakness of the planning framework within the Submission Draft limits the confidence the University can offer investors and funding bodies. Without a stronger planning position, the University has profound reservations about its ability to deliver its estate strategy, particularly in respect of its Riseholme Campus which is fundamental to the next Phase of investment and growth of the wider agri-food and agri-tech sector, the principal economic driver of the Local Plan growth ambitions.
- 3.30. Within this context, the University respectfully suggests the re-wording of Policy LP32 to read:

*When considering development proposals, the Central Lincolnshire districts of West Lindsey, Lincoln City and North Kesteven will support development proposals which facilitate the continued growth of the University of Lincoln to maximise the economic benefits the University brings to Central Lincolnshire and within the Lincoln Strategy Area. Support will be given to:*

- *Deliver more efficient and flexible academic buildings and high-quality urban design on the existing Brayford Pool Campus in accordance with the University's adopted masterplan;*
- *Develop the Lincoln Science & Innovation Park as a high quality location for knowledge based industries and with functional and physical linkages between the Park and the University of Lincoln;*



- *Deliver a masterplanned approach to the redevelopment of the University's Riseholme Campus to create a new rural settlement as part of retained University facilities including the new Lincoln Institute of Agri-food Technology Centre. A planning obligation will be sought which provides that money realised from the sale of surplus estate at Riseholme will be reinvested in the University's retained estate to achieve the investment priorities of the University.*
- *Assist in the disposal of ad-hoc properties declared surplus by the University's Estate Department and in accordance with the University's Estate Strategy and Corporate Plan.*

## Reason

*The University of Lincoln is an institution of both national and international repute and is of major importance for Lincoln's economy. It supports growth and provides a centre for learning, research and business, as well as links to a global knowledge network. The University's planned growth is both encouraged and supported by the Central Lincolnshire districts of West Lindsey, Lincoln City and North Kesteven. It is recognised by each of the three authorities that the University must use its research advantage, particularly in world-class sciences and engineering, to provide a catalyst for value-added enterprises focused on innovation and commercialisation. This will provide high skilled and high-value employment, rooted in the local economy, which is less vulnerable to economic downturn.*

*In recent years the University has grown, in terms of student numbers and floor space. It wishes to continue to grow, with an emphasis on providing extra floor space to improve facilities during the period covered by this Plan. The University is recognised internationally as having a distinctive reputation for a strong ethos of partnership with employers and students and for providing a research engaged academic experience which has a personal student experience at its heart. Such partnership working will be the driving force behind further expansions at Lincoln Science Park and Brayford Pool as the University continues to move up the Higher Education league table.*

*The Local Plan objective is to support the University to retain its vitality and reputation for academic excellence. It is recognised that in order to achieve the level of investment required to deliver the ambitious targets of both the University 's Corporate Plan and the Central Lincolnshire Local Plan economic growth projections, the University must maximise the value from surplus property at its Riseholme campus. The University will maintain a presence at the site as the Head Quarters of the Lincoln Institute of Agri Food Technology with 125 acres of arable land for field trials as well as providing the home of the University's outdoor sport facilities which will be made available for wider community use.*

*Redevelopment of the campus will be brought forward under an approved masterplan to be prepared in consultation with both West Lindsey District Council and the local community.*

- 3.31. In the alternative, and without prejudice to our suggested policy, if the Inspector is unable to support such a policy, we suggest draft Policy LP32 is amended as follows:

*Development proposals will be supported where they support ongoing development of higher and further education establishments in the City, provided that these will be integrated with, and contribute positively to their surroundings.*

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*University/College related development proposals will be supported where the development would facilitate their continued growth and assist in maximising the economic benefit the Universities/Colleges bring to Central Lincolnshire.*

*Support will be given to deliver more efficient and flexible academic buildings and high-quality urban design on the existing Brayford Pool Campus in accordance with Lincoln University's adopted masterplan.*

*Support will be given to deliver the Lincoln Science & Innovation Park as a high quality location for knowledge based industries and with functional and physical linkages between the Park and the University of Lincoln:*

*Redevelopment of University/College land and assets will be supported where such redevelopment demonstrably outweighs any harm to ensure the future growth of the institution.*

- 3.32. The University appeals to the Inspector to assist in ensuring the Local Plan does not stifle growth at the University and restrict its investment plans at Riseholme, which are critical to the success of the LIAT and the wider agri-tech and agri-food industry in the county.

**University of Lincoln**  
**May 2016**





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## Appendices

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## Appendix A

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# Response to the Further Draft Local Plan

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Allocation	Housing Trajectory					Total	Shortfall	Commentary
	Year 1 2016/2017	Year 2 2017/2018	Year 3 2018/2019	Year 4 2019/2020	Year 5 2020/2021			
CL525 (Spa Road, Lincoln)	0	0	50	100	100	250	-	There is a large industrial factory to the East of the site. The Site is predominantly within Flood Zone 3 with elements in Zone 2. To achieve the 5 year supply planning consent must be granted within the next 18 months to allow 1 year on site to deliver 50 dwellings by year 3. Site is bound by industrial uses apart from Residential to the north. No live applications on the site and no evidence of recent pre-developer discussions so unlikely to achieve trajectory (previous application withdrawn in 2011). Local developers have experienced sales of 60 dwellings per year on popular / well sought after developments – 100 per year is unrealistic given the location of the site.
Savills View	0	0	0	50	50	100	150	
CL704 (Newalk Road, Lincoln)	0	0	150	0	0	150	-	Site is located within Flood Zone 3 – this is likely to restrict the number of dwellings that can be implemented on site. The 5 year land supply identifies 150 dwellings on the site to be constructed and released to the market in the third year. The SHELAA identifies the site as having the capacity to accommodate 46 dwellings only – the difficult access arrangements to the site are likely to impede development and deliverability of the site. The phasing of the development is more likely to be achieved over a 2-3 year period. No evidence of any pre-application discussion or planning application submitted.
Savills View			23	20	0	46	104	
CL428 (South East Quadrant, Canwick, Lincoln)	0	40	80	160	120	400	-	The Site has potential to accommodate a large urban extension however as identified within the SHELAA the site would require significant highways investment to unlock the development, not least the delivery of the Eastern Bypass. This is
Savills View	0	0	0	0	60	60	340	

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								likely to take considerable time to design and implement therefore we consider the proposed housing delivery trajectory to be unrealistic. The development would require the highways and infrastructure to be in place prior to the development commencing. We also consider the rate of delivery is ambitious and would require significant improvements in the market to be able to develop and dispose of 160 units per year. We consider 60 units per annum to be realistic based on market evidence. With a planning application not yet submitted and without a start date for the eastern bypass housing is unlikely to be delivered here until the end of the 5 year period, with momentum building in the 6 to year period.
CL706 (Thoresway Drive), Lincoln	0	20	20	23	0	63	-	The 5 year land supply identifies 63 dwellings on the site to be constructed and released to the market. The SHELAA identifies the site as having the capacity to accommodate 55 dwellings – the site benefits from having demolition consent for the existing school and is subject to a live application for outline planning permission for 32 units (2014/0858/O).
Savills View		12	20			32	31	
						Total Shortfall	625	