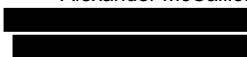


6 March 2017



Central Lincolnshire Local Plan Team  
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**By Email Only**

Dear Sirs

**Central Lincolnshire Local Proposed Post-Submission Main Modifications  
Our Client: University of Lincoln**

We refer to the Schedule of Proposed Post-Submission Main Modifications publicised on 23 January 2017 and thank the Central Lincolnshire Local Plan Team for the opportunity to comment on the draft proposed modifications.

**Background**

The University of Lincoln has made previous representations at both the Submission and Further Draft Stages of the Local Plan. A Hearing Statement which referred to draft policy LP32 was submitted to the Inspector in October 2016. The University and its advisors attended the Hearing Session on 8<sup>th</sup> December 2016 to discuss Policy LP32.

**Main Modifications**

The proposed Main Modification for Policy LP32 – *Lincoln Universities and Colleges* is focused on a new third paragraph which reads as follows:

***“In respect of the University Campus at Riseholme, as identified on the Policies Map, proposals for education, teaching and research buildings and other associated uses will be supported in principle (subject to wider planning policies, including detailed policy requirements for the Campus in any Made Neighbourhood Plan for Riseholme).”***

The University is concerned that the proposed modification does not reflect the discussions at the Hearing on 8<sup>th</sup> December in which the Inspector highlighted that within the current adopted plan further investment in education facilities is represented (Saved Policy CRT6 of the West Lindsey Local Plan (First Review)), however, in the proposed new local plan (at that time), it was silent. Without seeking to pre-empt the Inspector's report, the discussions indicated that at the very least, any new local plan policy would not diminish the current policy framework i.e. it would echo Saved Policy CRT6 and carry over the same Riseholme Campus allocation into the new proposals map (see Appendix 1 and 2 respectively).

The modification proposed is significantly weaker than Saved Policy CRT6 in that its 'in principle' support for the types of development listed in the policy, is "...subject to wider planning policies, including detailed policy requirements for the Campus in any Made Neighbourhood Plan for Riseholme". This proviso is not only ambiguous but is also significantly more restrictive than Saved Policy CRT6 which seeks only to exclude relevant development which would have unacceptable impacts on heritage, traffic and highways. As highlighted in our previous representations on the draft Local Plan and orally at the Hearing in December,



failure to provide a robust policy framework for the University's expansion will undermine investor confidence and consequently weaken the Plan's economic strategy, of which the University is a recognised driver. We have made a number of representations seeking support for a mixed residential/education allocation at the Riseholme Campus and do not seek to reiterate these here however, if the draft Local Plan is adopted with the proposed modification to policy LP32, we have serious concerns about its negative impacts on the University's plans for growth.

We therefore respectfully request that a new third paragraph is refined to reflect the deficiencies discussed at the Hearing as follows (i.e. carry over CRT6 into the new plan):

***Within the Riseholme Park Campus as defined on the Proposals Map development proposals involving the expansion/alteration of existing educational uses will be permitted provided that:***

- i) The development is of appropriate scale with regard to its setting and would not have an adverse effect on the character and appearance of the open countryside, the setting of Listed Buildings or the setting of the Historic Park and Garden and Scheduled Ancient Monuments;***
- ii) The development would not have a detrimental effect on highways safety;***
- iii) The development would not have a detrimental effect on residential amenity by reason of noise and traffic.***

We also have serious concerns about the draft Policies Map. The Modification refers to the University Campus at Riseholme, 'as identified on the policies map' however, the policies map simply shows the extent of the Registered Park and Garden and Green Wedge which goes a significant way beyond the extent of the built campus core. Indeed, much of the land to the north is protected from development, and the land to the south of Riseholme Hall includes a Scheduled Ancient Monument and Medieval Village and so it is not clear to the decision maker where education related development should be focussed (i.e. the current built core).

Unlike policy CRT6 as identified on the 2006 Proposals Map which very clearly defines the extent of the developed campus core (see Appendix 2), reference to the draft Policies Map is confusing and ambiguous to which part of the campus it refers.

On this basis, the University objects to the lack of any amendment to the draft Central Lincolnshire Local Plan Policies Map. An amendment is fundamental in offering the decision maker absolute clarity during the Plan Period.

### **Riseholme Neighbourhood Plan**

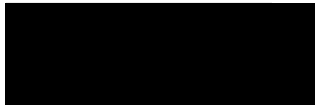
The proposed modification relies heavily on the Made Riseholme Neighbourhood Plan. It is not the role of a Neighbourhood Plan to set Strategic Planning Policy rather, it is to interpret the strategic policies of an adopted Local Plan. An allocation and supporting policy definition within LP32 will provide the strategic policy direction for the Plan Period. To rely on a Neighbourhood Plan to set strategic policy is contrary to NPPF and therefore unsound.

Government guidance confirms that a neighbourhood plan can be developed before, after or in parallel with a Local Plan, but the law requires that it must be in general conformity with the strategic policies in the adopted Local Plan for the area. It is accepted that a neighbourhood plan is not tested against the policies in an emerging Local Plan. However, we question the appropriateness of making reference to the Riseholme Neighbourhood Plan in the draft Local Plan on the basis that if adopted, a number of the policies within it will be superseded by the draft Local Plan e.g. Riseholme is proposed to be deleted from the settlement hierarchy of LP2 as it does not fit the criteria to be listed as a 'small settlement' and Riseholme would be deleted from LP4 as a result of modification to LP2.

Given the importance of the Riseholme Campus, as previously acknowledged by Saved Policy CRT6 of the save West Lindsey Local Plan (2006), at the very least a similar allocation with supporting policy text should be carried over to the new Plan as discussed on 8<sup>th</sup> December 2016.

The University appeals to the Inspector to assist in ensuring the Local Plan offers a robust policy position for continued investment in education facilities at Riseholme over the Plan Period.

Yours sincerely

A solid black rectangular box used to redact the signature of Alexander McCallion.

**Alexander McCallion**

Director  
for and on behalf of Savills (UK) Limited;

## Appendix 1

### MAJOR FACILITIES WITHIN THE DISTRICT - RISEHOLME PARK UNIVERSITY CAMPUS

4.21 Riseholme Park is the University of Lincoln's rural campus where it provides amongst others the agricultural, horticultural and equestrian related courses. The University has developed it into an important educational facility for the County.

#### **POLICY CRT 6 - RISEHOLME PARK CAMPUS (UNIVERSITY OF LINCOLN)**

Within the Riseholme Park Campus as defined on the Proposals Map development proposals involving the expansion/alteration of existing educational related uses will be permitted provided that:

- i. The development is of appropriate scale with regard to its settings and would not have an adverse effect on the character and appearance of the open countryside, the setting of Listed Buildings or the setting of the Historic Park and Garden and Scheduled Ancient Monuments;*
- ii. The development would not have a detrimental effect on highway safety;*
- iii. The development would not have a detrimental effect on residential amenity by reason of noise and traffic.*

#### **JUSTIFICATION**

4.22 Riseholme Park campus has become an important educational facility in the District. The expansion or improvement of this educational facility would be a benefit to the District and the County as a whole.

4.23 This campus-style site is located in the open countryside, this policy is required to set a context for development proposals for the site. The site is also identified as a historic park and garden by English Heritage and therefore requires more careful consideration when development is proposed in order to ensure the character and setting of all of the historical and cultural assets of the site are not harmed.

Appendix 2

