

Former Superbowl Site- Consultation Responses

Environment Agency



FAO: Marie Smyth
Lincoln City Council
Development Control
City Hall Beaumont Fee
Lincoln
Lincolnshire
LN1 1DF

Our ref: AN/2017/126529/01-L02
Your ref: 2017/1196/FUL

Date: 01 December 2017

Dear Marie

**Erection of 77 no. townhouses to be occupied as 6 bed (C4) Houses in Multiple Occupation
Site Of Former Superbowl Valentine Road Lincoln Lincolnshire**

Thank you for referring the above application, which was received on 20 November 2017.

This is a holding response as we require a site specific topographic survey in order to comment on the adequacy of the flood risk assessment and the proposed finished floor levels.

However, we have reviewed the Geo-Environmental Report dated October 2017 prepared by Delta-Simons. Based on the information provided, we consider that past uses of the site appear to pose low risk to controlled waters. There is limited evidence of this site being part of the Skewbridge Tip and it also appears that the railway embankment on-site has been removed at some stage, which is likely to have removed any associated contaminants. The report shows only low levels of potential contaminants in soil and groundwater. We can therefore recommend the following conditions.

Condition 1

If during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason

Environment Agency
Nene House (Pytchley Lodge Industrial Estate),
Pytchley Lodge Road, Kettering, Northants, NN15 6JQ
Email: LNplanning@environment-agency.gov.uk
www.gov.uk/environment-agency

Customer services line: 03708 506 506
Calls to 03 numbers cost the same as calls to standard
geographic numbers (i.e. numbers beginning with 01 or 02).

Cont/d..

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

Informative

Due to the site's former use being a railway and its location adjacent to a former landfill, some limited unidentified contamination of the ground cannot be entirely ruled out.

Condition 2

No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 109 of the National Planning Policy Framework.

It should be established that any proposed options for infiltration drainage are feasible, can be adopted and properly maintained and would not lead to any other environmental problems. For example, using soakaways or other infiltration methods on contaminated land carries groundwater pollution risks and may not work in areas with a high water table. Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

As you are aware the discharge of planning conditions rests with your Authority. It is, therefore, essential that you are satisfied that the proposed draft conditions meet the requirements of paragraph 4 of the National Planning Practice Guidance (NPPG) (Use of Planning Conditions, section 2). Please notify us immediately if you are unable to apply our suggested conditions, as we may need to tailor our advice accordingly.

In accordance with the NPPG (Determining a planning application, paragraph 019), please notify us by email within 2 weeks of a decision being made or an application being withdrawn. Please provide us with either a link to, or, a copy of the decision notice.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Keri Monger
Sustainable Places - Planning Adviser



Lincolnshire County Council (as Highway Authority and Lead Local Flood Authority)

In relation to the above application I can confirm, in principle, I have no objection. I would make the following comments which will need addressing:

- As a major development it will require draining via SuDs principles, I can confirm the site does not have any particular susceptibility to surface water flooding, however this information wasn't contained within the FRA nor is the detail I would expect for a full application in terms of a drainage strategy. As the site was 100% impermeable surface with a calculated run off (149 l/s), I would expect detail outlining what the proposed betterment/reduction in run off is, together with hydraulic calculations.
- The principle of permeable paving is acceptable as first stage treatment before conveyance to discharge, however suitability of this proposal is reliant on ground conditions, water table levels etc., again no information regarding this is contained in the application (GI report).
- Securement of discharge consent for the life of the development and agreed run off rate will be required together with adoption proposals.

The existing site access which is to become redundant will require reinstating to footway construction, this may require the adjustment of the double yellow lines and the attached Traffic Regulation Order (a consultative process to be carried out by the Highway Authority at cost to the applicant). A small tactile crossing point will also be required.

Regards

JC

John Clifton
Principal Development Management Officer
Development Management
Environment and Economy
Second Floor Lancaster House
36 Orchard Street
Lincoln
LN1 1XX



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00024820
Local Planning Authority:	Lincoln City Council
Site:	Valentine Road, LINCOLN - Boultham
Proposal:	Erection of 77 no. townhouses to be occupied as 6 bed (C4) Houses in Multiple Occupation.
Planning Application:	2017/1196/FUL

Prepared by: Pre-Development Team

Date: 30 November 2017

If you would like to discuss any of the points in this document please
contact me on 0345 606 6087 or email
planningliaison@anglianwater.co.uk

ASSETS

Section 1 – Assets Affected

- 1.1 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

- 2.1 The foul drainage from this development is in the catchment of Canwick Water Recycling Centre that will have available capacity for these flows.

Section 3 – Foul Sewerage Network

- 3.1 Development will lead to an unacceptable risk of flooding downstream. A drainage strategy will need to be prepared in consultation with Anglian Water to determine mitigation measures.

We request a condition requiring the drainage strategy covering the issue(s) to be agreed.

Section 4 – Surface Water Disposal

- 4.1 The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option.

Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

- 4.2 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would therefore recommend that the applicant needs to consult with Anglian Water and the Environment Agency.

We will request that the agreed strategy is reflected in the planning approval.

Section 5 – Trade Effluent

- 5.1 Not applicable
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Section 6 – Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

Foul Sewerage Network (Section 3)

CONDITION

No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

Surface Water Disposal (Section 4)

CONDITION

No drainage works shall commence until a surface water management strategy has been submitted to and approved in writing by the Local Planning Authority. No hard-standing areas to be constructed until the works have been carried out in accordance with the surface water strategy so approved unless otherwise agreed in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

Network Rail

FAO – Development Team

Ref – 2017/1196/FUL

Proposal – Erection of 77no. townhouses

Location – Site of former Superbowl, Valentine Road, Lincoln

Thank you for your letter of 7 November 2017 providing Network Rail with an opportunity to comment on the abovementioned application.

With reference to the protection of the railway, Network Rail has concerns regarding these proposals and their impact on the adjacent railway level crossing and must object to this development on grounds of operational railway safety.

Level Crossings

The safety of railway level crossings and crossing users is of paramount concern to us and we would have concerns over any proposals that would increase the usage and therefore the risk of a crossing. In this instance, the site is adjacent to Coulson Road level crossing (NOB2 @32M 300yds) and the proposals include opening up the eastern end of the site to provide a refuse turning head. From the plans provided, it appears that this would open up public access from the site straight on to the level crossing which we consider to be an unacceptable increase in risk without some form of mitigation to enhance the safety of the crossing, which would be at the developer's expense. To enable us to reconsider our objection, agreement must be reached on improvements to the safety of the crossing which include the following measures appropriate for this site;

Option 1: COVTEC audible warning system (cost approx. £50k)

Option 2: VAMOS Overlay miniature stop light system (cost approx. £150k)

Below are some further requirements which must be met;

Drainage

All surface and foul water arising from the proposed works must be collected and diverted away from Network Rail property. All soakaways must be located so as to discharge away from the railway infrastructure. The following points need to be addressed:

1. There should be no increase to average or peak flows of surface water run off leading towards Network Rail assets, including earthworks, bridges and culverts.
2. All surface water run off and sewage effluent should be handled in accordance with Local Council and Water Company regulations.
3. Attenuation should be included as necessary to protect the existing surface water drainage systems from any increase in average or peak loadings due to normal and extreme rainfall events.

It is expected that the preparation and implementation of a surface water drainage strategy addressing the above points will be conditioned as part of any approval.

Fail Safe Use of Crane and Plant

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no materials or plant are capable of falling within 3.0m of the nearest rail of the adjacent railway line, or where the railway is electrified, within 3.0m of overhead electrical equipment or supports.

Excavations/Earthworks

All excavations/ earthworks carried out in the vicinity of Network Rail property/ structures must be designed and executed such that no interference with the integrity of that property/ structure can occur. If temporary works compounds are to be located adjacent to the operational railway, these should be included in a method

statement for approval by Network Rail. Prior to commencement of works, full details of excavations and earthworks to be carried out near the railway undertaker's boundary fence should be submitted for the approval of the Local Planning Authority acting in consultation with the railway undertaker and the works shall only be carried out in accordance with the approved details. Where development may affect the railway, consultation with the Asset Protection Project Manager should be undertaken. Network Rail will not accept any liability for any settlement, disturbance or damage caused to any development by failure of the railway infrastructure nor for any noise or vibration arising from the normal use and/or maintenance of the operational railway. No right of support is given or can be claimed from Network Rail's infrastructure or railway land.

Security of Mutual Boundary

Security of the railway boundary will need to be maintained at all times. If the works require temporary or permanent alterations to the mutual boundary the applicant must contact Network Rail's Asset Protection Project Manager.

Armco Safety Barriers

An Armco or similar barrier should be located in positions where vehicles may be in a position to drive into or roll onto the railway or damage the lineside fencing. Network Rail's existing fencing / wall must not be removed or damaged. Given the considerable number of vehicle movements likely provision should be made at each turning area/roadway/car parking area adjacent to the railway. This is in accord with the new guidance for road/rail vehicle incursion NR/LV/CIV/00012 following on from DfT advice issued in 2003, now updated to include risk of incursion from private land/roadways.

Fencing

Because of the nature of the proposed developments we consider that there will be an increased risk of trespass onto the railway. The Developer must provide a suitable trespass proof fence adjacent to Network Rail's boundary (minimum approx. 1.8m high) and make provision for its future maintenance and renewal. Network Rail's existing fencing / wall must not be removed or damaged.

Method Statements/Fail Safe/Possessions

Method statements may require to be submitted to Network Rail's Asset Protection Project Manager at the below address for approval prior to works commencing on site. This should include an outline of the proposed method of construction, risk assessment in relation to the railway and construction traffic management plan. Where appropriate an asset protection agreement will have to be entered into. Where any works cannot be carried out in a "fail-safe" manner, it will be necessary to restrict those works to periods when the railway is closed to rail traffic i.e. "possession" which must be booked via Network Rail's Asset Protection Project Manager and are subject to a minimum prior notice period for booking of 20 weeks. **Generally if excavations/piling/buildings are to be located within 10m of the railway boundary a method statement should be submitted for NR approval.**

OPE

Once planning permission has been granted and at least six weeks prior to works commencing on site the Asset Protection Project Manager (OPE) MUST be contacted, contact details as below. The OPE will require to see any method statements/drawings relating to any excavation, drainage, demolition, lighting and building work or any works to be carried out on site that may affect the safety, operation, integrity and access to the railway.

Vibro-impact Machinery

Where vibro-compaction machinery is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Local Planning Authority acting in consultation with the railway undertaker prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement

Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed.

ENCROACHMENT

The developer/applicant must ensure that their proposal, both during construction, and after completion of works on site, does not affect the safety, operation or integrity of the operational railway, Network Rail and its infrastructure or undermine or damage or adversely affect any railway land and structures. There must be no physical encroachment of the proposal onto Network Rail land, no over-sailing into Network Rail air-space and no encroachment of foundations onto Network Rail land and soil. There must be no physical encroachment of any foundations onto Network Rail land. Any future maintenance must be conducted solely within the applicant's land ownership. Should the applicant require access to Network Rail land then must seek approval from the Network Rail Asset Protection

Team. Any unauthorised access to Network Rail land or air-space is an act of trespass and we would remind the council that this is a criminal offence (**s55 British Transport Commission Act 1949**). Should the applicant be granted access to Network Rail land then they will be liable for all costs incurred in facilitating the proposal.

Noise/Soundproofing

The Developer should be aware that any development for residential use adjacent to an operational railway may result in neighbour issues arising. Consequently every endeavour should be made by the developer to provide adequate soundproofing for each dwelling. Please note that in a worst case scenario there could be trains running 24 hours a day and the soundproofing should take this into account.

Trees/Shrubs/Landscaping

Where trees/shrubs are to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary. We would wish to be involved in the approval of any landscaping scheme adjacent to the railway. Where landscaping is proposed as part of an application adjacent to the railway it will be necessary for details of the landscaping to be known and approved to ensure it does not impact upon the railway infrastructure. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. Lists of trees that are permitted and those that are not permitted are provided below and these should be added to any tree planting conditions:

Acceptable:

Birch (Betula), Crab Apple (Malus Sylvestris), Field Maple (Acer Campestre), Bird Cherry (Prunus Padus), Wild Pear (Pyrus Communis), Fir Trees – Pines (Pinus), Hawthorne (Cretaeagus), Mountain Ash – Whitebeams (Sorbus), False Acacia (Robinia), Willow Shrubs (Shrubby Salix), Thuja Plicatata "Zebrina"

Not Acceptable:

Acer (Acer pseudoplatanus), Aspen – Poplar (Populus), Small-leaved Lime (Tilia Cordata), Sycamore – Norway Maple (Acer), Horse Chestnut (Aesculus Hippocastanum), Sweet Chestnut (Castanea Sativa), Ash (Fraxinus excelsior), Black poplar (Populus nigra var, betulifolia), Lombardy Poplar (Populus nigra var, italica), Large-leaved lime (Tilia platyphyllos), Common lime (Tilia x europea)

A comprehensive list of permitted tree species is available upon request.

Lighting

Where new lighting is to be erected adjacent to the operational railway the potential for train drivers to be dazzled must be eliminated. In addition the location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. Detail of any external lighting should be provided as a condition if not already indicated on the application.

Access to Railway

All roads, paths or ways providing access to any part of the railway undertaker's land shall be kept open at all times during and after the development. In particular, the adjacent railway level crossings should remain clear and unobstructed at all times, both during and after construction to ensure crossing users can exit the area safely and crossing approaches are not blocked.

Network Rail is required to recover all reasonable costs associated with facilitating these works.

I would advise that in particular the **drainage, boundary fencing, Armco barriers, method statements, soundproofing, lighting and landscaping** should be the subject of conditions, the reasons for which can include the safety, operational needs and integrity of the railway. For the other matters we would be pleased if an informative could be attached to the decision notice.

I trust full cognisance will be taken in respect of these comments. If you have any further queries or require clarification of any aspects, please do not hesitate to contact myself I would also be grateful if you could inform me of the outcome of this application, forwarding a copy of the Decision Notice to me in due course.

Upper Witham Internal Drainage Board

Dear Sir/Madam

REFERENCE: 2017/1196/FUL

DEVELOPMENT: Erection of 77 no. townhouses to be occupied as 6 bed (C4) Houses in Multiple Occupation

LOCATION: Former Superbowl Site, Valentine Road, Lincoln, LN6 7BH

Thank you for the opportunity to comment on the above application. The site is within the Upper Witham Internal Drainage Board district the site is adjacent to Board maintained watercourse, Boultham Pump Drain.

The Board Objects in Principle to any development in flood plain (Zones 2 and 3 on the Environment Agency flood maps). However it is up to City of Lincoln Council as the planning Authority grant planning permission. It is noted that a Flood Risk Assessment is included in the Application that contains appropriate mitigation, notably the FFL is to be above 5.5mAOD.

Comment and information to Lincolnshire CC Highway SUDs Support

No development should be commenced until the Local Planning Authority, in consultation with the Lead Local Flood Authority has approved a scheme for the provision, implementation and future maintenance of a surface water drainage system. The Flood Risk Assessment indicates discharge to the existing surface water sewer, as a brownfield site any discharge should be limited to a maximum of 70% the existing ACTUAL rate or the allowable discharge as specified by the relevant body responsible for the surface water sewer whichever is the least.

All drainage routes through the Site should be maintained both during the works on Site and after completion of the works. Provisions should be made to ensure that upstream and downstream riparian owners and those areas that are presently served by any drainage routes passing through or adjacent to the Site are not adversely affected by the development.

Drainage routes shall include all methods by which water may be transferred through the Site and shall include such systems as "ridge and furrow" and "overland flows". The effect of raising Site levels on adjacent property must be carefully considered and measures taken to negate influences must be approved by the Local Planning Authority.

Regards

Guy Hird
Engineering Services Officer

Witham First District Internal Drainage Board
Witham Third District Internal Drainage Board
Upper Witham Internal Drainage Board
North East Lindsey Drainage Board
J1 The Point,
Weaver Road,
LINCOLN,
LN6 3QN.



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Your Ref: App. 2017/1196/FUL

8th November 2017

Our Ref: PG//

Development & Environmental Services

City Hall, Beaumont Fee
Lincoln, LN1 1DF

Re: Former Super-bowl Site Valentine Road, Lincoln, Lincolnshire

Thank you for your correspondence and opportunity to comment on the proposed development.

Lincolnshire Police has no formal objections to the planning application in principle but would recommend that the attached recommendations are implemented.

External Doors and Windows

Building Regulations (October 1st 2015) provides that for the first time all new homes will be included within Approved Document Q: Security – Dwellings (ADQ).

Approved document Q applies to all new dwellings including those resulting from change of use, such as commercial premises, warehouse and barns undergoing conversions into dwellings. It also applies within Conservation Areas.

This will include doors at the entrance to dwellings, including all doors to flats or apartments, communal doors to multi-occupancy developments and garage doors where there is a direct access to the premises. **Where bespoke timber doors are proposed, there is a technical specification in Appendix B of the document that must be met.**

Windows: in respect of ground floor, basement and other easily accessible locations.

The secured by design requirement for all dwelling external doors is PAS 24:2016 (doors of an enhanced Security) or WCL 1 (WCL 1 is the reference number for PAS 23/24 and is published by Warrington Certification Laboratories).

All ground floor windows and doors and those that are easily accessible from the ground must conform to improved security standard PAS24:2016. **Window retainers should be provided on all windows that are accessible.**

The potential for unwanted guests will be a consideration at this location and therefore robust measures should be installed to ensure the security and safety of residents. An air lock style (double access point) communal entrance (help prevent unauthorised follow through access) that allows an access control system, with an electronic door release, and visitor door entry system that provides colour images, and clear audio communications linked to each individual unit. This can be built internally to the main communal entrance.

Under no circumstances should a trade person release button or similar uncontrolled access method be used.

Parking Provision

I have that the proposed parking provision does not appear to benefit from any overlooking natural surveillance and therefore vehicles may be susceptible to vehicle crime. I would recommend that any overlooking properties have cable end windows ideally from active rooms that can provide both a deterrent and surveillance of the parking areas.

An approved and effectively sited CCTV system can be provide mitigation against the lack of surveillance but should not be seen as a complete solution and should be used in conjunction with other measures.

Individual Flat or Unit Doors.

Flat entrance door-sets should meet the same physical requirements as the 'main front door' i.e. PAS24:2016. The locking hardware should be operable from both sides of an unlocked door without the use of the key (utilising a roller latch or latch operable from both sides of the door-set by a handle). If the door-set is certified to either PAS24:2016 or STS 201 Issue 4:2012 then it must be classified as DKT.

Cycle Storage Structure (if to be included)

Generally pedestrian access doors-sets to commercial units should be certified to LPS 1175 security rating 2. The access controlled door should be designed in such a way that the hinges and door-sets are of a non-lift nature and non-tamper proof. The door locks must be operable by way of a thumb screw turn to avoid any person being accidentally locked in the cycle storage area.

Lighting within cycle storage area; automatically activated passive infra-red lighting should be considered rather than permanent lighting to which other users become accustomed and therefore activation would not draw any attention. Lighting units should be vandal resistant energy efficient light fittings.

Communal Areas & Mail Delivery

Where communal mail delivery facilities are proposed and are to be encouraged with other security and safety measures to reduce the need for access to the premises communal letter boxes should comply to the following criteria.

- Located at the main entrance within an internal area or lobby (vestibule) covered by CCTV or located within an 'airlock style' entrance hall.
- Be of a robust construction (Federation Technical Specification 009 (TS009)
- Have anti-fishing properties where advised and appropriate.
- Installed to the manufacturers specifications.
- Through wall mail delivery can be a suitable and secure method.

Lighting

Lighting should be designed to cover the external doors and be controlled by *photoelectric cell* (dusk to dawn) with a manual override. The use of low consumption lamps with an efficacy of greater than 40 lumens per circuit watt is required; it is recommended that they be positioned to prevent possible attack.

Bin Storage

Internal communal bin and bicycle stores within blocks of flats must have no windows and be fitted with a secure door set that meets the same physical specification as 'front door' and specifically Section 2, paragraphs 21.1 to 21.6 and 21.8 to 21.13.

This will ensure that such stores are only accessible to residents. The locking system must be operable from the inner face by use of a thumb turn to ensure that residents are not accidentally locked in by another person. A bicycle store must also be provided with stands with secure anchor points or secure cycle stands.

External bins stores and home composting containers (supplied to meet 'Code for Sustainable Homes' 'Was 3') should be sited in such a way that they cannot be used as a climbing aid to commit crime.

Utilities

In order to reduce the opportunities for theft by 'bogus officials' the utility meters should, where possible, be located to the outside of the dwelling at a point where they can be overlooked. This will negate the need for an official to enter the building in order to read a meter, which will in turn reduce the opportunity for distraction burglary. Where possible utility meters in multi occupancy developments should be located on the ground floor between access controlled doors (air lock system) so that access can be restricted to the meters.

Note 33.1: Where a utility provider refuses to provide external meters, and there is an obvious (historic) risk of distraction burglary within the location, the developer should consider an alternative supplier.

Please do not hesitate to contact me should you need further information or clarification.

Please refer to *New Homes 2016* which can be located on www.securedbydesign.com
Crime prevention advice is given free without the intention of creating a contract. Neither the Home Office nor the Police Service takes any legal responsibility for the advice given. However, if the advice is implemented it will reduce the opportunity for crimes to be committed.

Yours sincerely,

John Manuel MA BA (Hons) PGCE Dip Bus.
Force Crime Prevention Design Advisor

Lincoln Civic Trust

OBJECTION

Whilst we agree with the development of an existing site we have some concerns.

Our Concerns are:

1. The placing of a residential site in a totally commercial area
2. The overall mass of the structure and its proximity to the railway line
3. The condensed nature of the site for 462 students
4. Access to the site from Tritton Road
5. The volume of traffic generated in theory on a 24 hour basis

We appreciate that the current use of the site is as a car park, but this is predominately for commuters into the city and hence is only a problem at rush-hours whereas the proposed use of the site will in theory be on 24 hours basis for vehicle movements. Tritton Road again worries us as we have seen the developments with the St Marks Centre, the Science Park, the Western Growth Corridor and the Sports Direct proposals all bringing additional traffic onto the road which as a major artery for the city centre, blighted by the number of entrances and exits onto the road, already struggling to cope with the current volume of traffic. This proposal, however small the increase is, will only seek to make matters worse. What is needed is a direct route away from the area out towards the Eastern By-Pass and until this is achieved the area will be more gridlocked than is experienced at the moment.