

Responses from Residents

Mr. T. Foley (on behalf of owner of 7 Swan Street) First Letter

I am responding to your correspondence dated, 17th July, 2017 in relation to an application for Outline Planning Permission at the above-noted development site. Please be advised that I am the owner of 7 Swan Street, Lincoln, Lincolnshire, LN2 1LF¹ [REDACTED] - he has lived at this address since 2006 (shortly after the premises was built). For the following reasons both my father and I are opposing the subject planning application:

a) Scale and Height

The proposed development is too large, both in scale and height. A review of the Visuals/Floor Plans reveal that setbacks are required - the building footprint/circumference will encroach significantly on much of the surrounding area and **overcrowd other existing buildings** - every inch of the site will be occupied by the proposed development. A review of the Visuals/Floor Plans further reveals a building five-storeys in height (including a basement level car park). It will be larger, taller and both dominate and dwarf the much smaller Swan Street Apartment building, **completely overshadowing it** (see Visuals #5-8). Such an over-sized, tall building would diminish the nature, intent and character of the Cultural Quarter.² **The proposed development needs to be setback from the site boundary and significantly reduced in overall size and height;**

¹ 7 Swan Street is a two-bedroom apartment located on the second floor (one floor below the top floor and Swan Street facing) of the Swan Street Apartment building (containing twelve apartments).

² The area of the proposed development is a/k/a The Cultural Quarter - located in this area is the Usher Gallery, The Collection, Drill Hall and Theatre Royal as well as The Terrace (located on Grantham Street) containing workshops, studios and offices for creative arts businesses (at the intersection of Grantham Street and Flaxengate there is an informational sign welcoming you to the Cultural Quarter).

b) *Highway Safety and Congestion*

The nearby streets that border the proposed development are Swan Street, Grantham Street and Flaxengate. Both Swan Street and Grantham Street will be much more affected by traffic safety and congestion - they are very narrow streets that already have difficulty accommodating large delivery trucks/lorries³ and even average sized vehicles. Installing a two-storey car park (containing 32 car parking spaces) with an entrance located on Grantham Street and Flaxengate (see the Lower and Upper Ground Floor Plans) would cause **severe congestion** and also be a **safety issue for pedestrians** (tourists and locals who tend to walk in the street).⁴ To prevent congestion and ensure traffic safety, **the number of car park spaces should be significantly reduced (only one floor of car parking and one car park entrance on Flaxengate should be granted)**;

c) *Overlooking*

If planning permission is granted, the much taller proposed development will both overlook and significantly overshadow the Swan Street Apartment building (see Visual #7). **My apartments current views⁵ will be eliminated and replaced with the bland façade of the proposed development - THERE WILL BE NO VIEWS.** In addition, the proximity and positioning of **the proposed developments living spaces will create views into my apartment,** therefore, directly causing a **lack of privacy, including obtrusive light intrusion, which can impair sleep, use and enjoyment.**⁶ As previously stated, **Swan Street is a very narrow street - to prevent overlooking, the proposed development, including the upper floors (facing Swan Street) need to be set-back from the site boundary and reduced in height;**

d) *Loss of Light*

The effect of the proposed development will directly reduce the level of natural light entering the Swan Street Apartment building, as well as my apartment which will be cloaked in a constant shadow of darkness (this is confirmed by Visual #7). The proposed development is too tall/large and **far too close to my apartment building; Swan Street is a very narrow street.** To prevent a loss of natural light, **the proposed development, including the upper floors (facing Swan Street) need to be setback from the site boundary and reduced in height;**

³ Swan Street is continuously accessed by large trucks and lorries delivering goods to High Street shops and restaurants that back onto Swan Street - deliveries are also made via Swan Street to Theater Royal for various stage productions.

⁴ See §246-261 of the Town and Country Planning Act 1990.

⁵ At present, my father can see most of the buildings bordering Grantham Street and Flaxengate, including The Terrace, Danesgate House, The Collection, Grantham Street car park as well other buildings and hills in the far distance, etc.

⁶ My apartment is Swan Street facing, located directly opposite the proposed development.

e) *Layout*

A review of the Visuals/Floor Plans reveal that **the proposed development is solely designed for student accommodation.**⁷ The Floor Plans (#1-4) depict 105 tiny, tightly packed and condensed single room apartments, each containing one bathroom and a very small open plan bedroom/living space. **None of the apartments have kitchens; each floor will contain three large shared kitchen/living rooms - a feature unique to student accommodation. The layout is over-developed, designed to maximize space/rent at the expense of local businesses and residents.**⁸ Such a proposed development will destroy the peace, character and heart of the Cultural Quarter. In its current form, the proposed development shows a total lack of consideration to local residents and businesses - **such a large student building should not be permitted in the heart of the Cultural Quarter. No more than fifty apartments should be approved;**

f) *Design*

“Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.”⁹ Unfortunately, **the proposed development does not “look good” and is poorly designed - there are no design flourishes or elements.** “The successful integration of all forms of new development with their surrounding context is an important design objective”¹⁰ - a total re-design is required with actual forethought, respect and consideration given to the local character of existing building designs/architecture and the Cultural Quarter designation. The design fails to understand or appreciate the context of the Cultural Quarter,¹¹ design impacts on how people interact with places. There should be a consideration and implementation of an arts and culture theme, including the setting aside of space for arts businesses, artists and arts institutions;¹²

⁷ See Floor Plans #1-4. A reference to “student accommodation” is also made by Jackson & Jackson Developments in their planning application, however, they have cloaked their true intentions by also referencing “residential units,” “office” and “hotel.” While there is already student accommodation located nearby at “Danegate House” (49 Clasketgate, Lincoln, LN2 1LA), it should be noted that this accommodation already existed well before the area’s Cultural Quarter designation.

⁸ Stem Architects (the architects for the proposed development), are experienced in designing and overseeing the construction of various forms of student accommodation and university buildings in Lincoln, <http://www.stemarchitects.co.uk> (website accessed July 21, 2017).

⁹ Planning Practice Guidance, “The Importance of Good Design,” <https://www.gov.uk/guidance/design#vibrant-neighbourhoods> (accessed July 24, 2017).

¹⁰ *Id.*

¹¹ It is requested that the proposed development be referred for a National Design Review.

¹² The North and East Elevation drawings currently depict a coffee shop. The removal of additional car park spaces would allow for the inclusion of arts spaces on the ground floor all of which can be rented to non-profits, including artists and galleries, etc.

g) Appearance

The proposed development is an aesthetically unattractive featureless block, containing a mass of car park spaces and tiny apartments.¹³ Other than a Green Roof,¹⁴ the development fails to improve the public realm with soft/hard landscaping i.e. a network of Green and public spaces;

h) Noise and Disturbance

“Noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment.”¹⁵ Floor Plans #1-4 of the proposed development depict a Swan Street building entrance located at ground level directly opposite my apartment (see also the South and West Elevation Drawing). Having a **105-student apartment building** located right on my doorstep with an entrance located directly opposite **will cause unwanted noise and disturbance at all hours of the night and day preventing and disturbing sleep.**¹⁶ **The building’s proposed Swan Street entrance needs to be re-located to Grantham Street or Flaxengate to provide minimal noise, disturbance and nuisance to the full-time residents of the Swan Street Apartments.** Additionally, if the planning application is granted, the area will be a building site with noise and disturbance for at least the next 1-2 years, severely disrupting the peace, quiet, quality of life, health and well-being of local resident’s lives, as well as affecting the profitability of local businesses.¹⁷ It is also not clear if the proposed Green roof will also be a resident roof deck - if so, further noise and disturbance will be caused by the resident’s use of same;¹⁸

i) Air Quality

The proposed development site is located in an “Air Quality Management Area.”¹⁹ The development will affect air quality, particularly during the construction phase and thereafter when occupied. A building of this size containing 105 individual apartments will cause an increase in unwanted vehicular traffic and create substantial waste pollution;²⁰

¹³ Other Stem Architect projects also resemble this featureless block-type design - this type of architecture fails to appreciate the local surroundings or consider the needs of future generations, it is “faddish” fast architecture - reminiscent of 1970’s architecture. See some of their past designs, including Riseholme Equine Centre, Lincoln Student Village, Gateway and the atrociously designed pedestrian footbridge across Lincoln High Street appropriately called “Blocwork,” “Projects,” <http://www.stemarchitects.co.uk> (accessed July 24, 2017).

¹⁴ From a review of the proposed development plans it is not clear what exactly the Green Roof will be used for i.e. resident roof deck, growing vegetables, etc.

¹⁵ See Planning Practice Guidance, “Noise,” <https://www.gov.uk/guidance/noise--2> (accessed July 25, 2017).

¹⁶ There will be a constant coming and going of students at all hours, late night parties, loud late night conversations and shouting and yelling, etc.

¹⁷ See §215 of the Town and Country Planning Act 1990. “Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making,” see, Planning Practice Guidance, “Health and Wellbeing” <https://www.gov.uk/guidance/health-and-wellbeing> (accessed July 24, 2017).

¹⁸ A Noise Action Plan should be conducted.

¹⁹ Air Quality Management Area No. 2 - PM10.

²⁰ An Air Quality Assessment should be conducted.

j) Conservation of Buildings

The proposed development is located in a Conservation Area (Conservation Area No.1, designated since April 1968) and more recently on April 24, 2017.²¹ In a Conservation Area, "it is the protection of the quality and special interest of the neighbourhood or area as a whole that is intended. The layout of boundaries, roads, vistas and viewpoints, trees and green features, street furniture and surfaces, the characteristic building materials of the area, the mix of different uses, and the design of shop fronts" are all taken into account - "development is subject to stricter regulations."²² Here, Swan Street, Grantham Street and Flaxengate have unique lampposts and Lincolnshire limestone block-street paving, providing the appearance of a pedestrianized area, and also a calming look and feel to the Cultural Quarter. The proposed development of student accommodation at the Grantham Street Car Park site is not consistent or appropriate in keeping with a Conservation Area and Cultural Quarter designation. Student accommodation should not be permitted.

For all the above stated reasons, my father and I are requesting that the subject planning application be denied in its entirety.

Mr. T. Foley (on behalf of owner of 7 Swan Street) Second Letter

I am responding to your correspondence dated, 19th February 2018 in relation to a Revised Application/Plans for Outline Planning Permission at the above-noted development site. As previously stated in my 26th July 2017 correspondence opposing the applicants prior submission (the arguments of which are adopted and restated herein), I am the owner of 7 Swan Street, Lincoln, Lincolnshire, LN2 1LF¹ [REDACTED] he has lived at this address since 2006 (shortly after the premises was built). For the following reasons both my father and I are opposing the revised planning application:

a) Scale and Height

The proposed revised development plans reveal no change in scale and height - the development is still too large. A review of the revised plans reveal that setbacks are still required - the building footprint/circumference will encroach significantly on much of the surrounding area and overcrowd other existing buildings - every inch of the site will be occupied by the proposed development. A further review of the revised plans reveals a building five-storeys in height (including a two-storey level car park).² It will be larger, taller, dominate, overtop and dwarf the much smaller Swan Street Apartment building, completely overshadowing it (see the Proposed East and North Elevation Visual). Such an over-sized, tall building would diminish the nature, intent and character of the Cultural Quarter.³ The revised plans do not depict a scale or height reduction.

¹ 7 Swan Street is a two-bedroom apartment located on the second floor (one floor below the top floor and Swan

² The Proposed Upper Car Park Plan depicts eighteen car park spaces. The previously submitted 3rd July 2017 plans depicted a two-storey level car park at lower and upper ground floor levels (32 car parking spaces), however, the applicant failed to re-submit a Proposed Lower Ground Floor Plan. Therefore, the applicants revised plans should be denied in their entirety as being insufficiently submitted.

³ The area of the proposed development is a/k/a The Cultural Quarter - located in this area is the Usher Gallery, The Collection, Drill Hall and Theatre Royal as well as The Terrace (located on Grantham Street) containing workshops,

however, there is a very slight setback located on the fourth floor (Grantham Street facing) located directly above the Swan Street Apartment building roofline (see the Proposed East and North Elevation visual) - this added setback does **NOT** decrease scale and height. **The proposed development needs to be setback from the site boundary and significantly reduced in overall size and height - no more than 3-4 storeys, including car park;**

b) Highway Safety and Congestion

The nearby streets that border the proposed development are Swan Street, Grantham Street and Flaxengate. Both Swan Street and Grantham Street will be much more affected by traffic safety and congestion - they are very narrow streets that already have difficulty accommodating large delivery trucks/lorries⁴ and even average sized vehicles. Installing a two-storey car park with an entrance located on both Grantham Street and Flaxengate would cause **severe congestion** and also be a **safety issue for pedestrians** (tourists and locals who tend to walk in the street).⁵ To prevent congestion and ensure traffic safety, the number of car park spaces should be significantly reduced (**only one floor of car parking and one car park entrance on Flaxengate should be granted**);

c) Overlooking

If planning permission is granted, the much taller proposed development will both overlook and significantly overshadow the Swan Street Apartment building (see the recently submitted Revised Line Drawn Visuals #1-7, in particular, visual #7 as well as the Height Parameter Plan, Elevation B). **My apartments current views⁶ will be completely eliminated and replaced with the bland façade of the proposed development - THERE WILL BE NO VIEWS.** In addition, the proximity and positioning of **the proposed developments living spaces will create views into my apartment,** therefore, directly causing a **lack of privacy, including obtrusive light intrusion, which can impair sleep, use and enjoyment.**⁷ As the Grantham Street facing fourth floor setback is located directly above the Swan Street Apartment building roofline (see the Proposed East and North Elevation visual) it **will NOT prevent overlooking/overshadowing.** As previously stated, **Swan Street is a very narrow street - to prevent overlooking, the windows of the proposed development need to be designed to minimise overlooking; the development needs to be set-back from the site boundary and be significantly reduced in height and each floor level needs to be setback;**

studios and offices for creative arts businesses (at the intersection of Grantham Street and Flaxengate there is an informational sign welcoming you to the Cultural Quarter).

⁴ Swan Street is continuously accessed by large trucks and lorries delivering goods to High Street shops and restaurants that back onto Swan Street - deliveries are also made via Swan Street to Theater Royal for various stage productions.

⁵ See §246-261 of the Town and Country Planning Act 1990.

⁶ At present, my father can see most of the buildings bordering Grantham Street and Flaxengate, including The Terrace, Danesgate House, The Collection, Grantham Street car park as well other buildings and hills in the far distance, etc.

⁷ My apartment is Swan Street facing, located directly opposite the proposed development.

d) Loss of Light

The effect of the proposed development will directly reduce the level of natural light entering the Swan Street Apartment building, as well as my apartment which will be cloaked in a constant shadow of darkness (this is confirmed by Revised Line Drawn Visuals #1-7, in particular, visual #7 depicting a complete loss of light). The proposed development is too tall/large and **far too close to my apartment building. Swan Street will become an unappealing dark and draughty unlit street. The Grantham Street facing proposed fourth floor setback will NOT prevent loss of light. To prevent a loss of natural light, the proposed development, including the upper floors (facing Swan Street) need to be setback from the site boundary and reduced in height;**

e) Layout

A review of the Proposed Plans reveals that **the development is designed solely for student accommodation.**⁸ The Proposed Floor Plans (#1-4) depict 98 tiny, tightly packed and condensed single room apartments, each containing one bathroom and a very small open plan bedroom/living space (a very slight reduction from the 105 apartments previously submitted).⁹ **None of the apartments have kitchens; each floor will contain three large shared kitchen/living rooms - a feature unique to student accommodation. The layout is grossly over-developed, designed to maximize space/rent at the expense of local businesses and residents.**¹⁰ Such a proposed development will destroy the peace, character and heart of the Cultural Quarter. In its current form, the proposed development shows a total lack of consideration to local residents and businesses - **such a large student building should not be permitted in the heart of the Cultural Quarter. No more than fifty apartments should be approved;**

f) Design

"Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations."¹¹ Unfortunately, **the revised/proposed development does not "look good" and is poorly designed - there are no design flourishes or elements.** "The successful integration of all forms of new development with their surrounding context is an important design objective"¹² - a total re-design is still

⁸ See Floor Plans #1-4. A reference to "student accommodation" is also made by Jackson & Jackson Developments in their planning application, however, they have cloaked their true intentions by also referencing "residential units," "office" and "hotel." While there is already student accommodation located nearby at "Danesgate House" (49 Clasketgate, Lincoln, LN2 1LA), it should be noted that this accommodation already existed well before the area's Cultural Quarter designation.

⁹ The Proposed Fourth Floor Plans depict a slight reduction in the number of apartments from 24 to 17.

¹⁰ Stem Architects (the architects for the proposed development), are experienced in designing and overseeing the construction of various forms of student accommodation and university buildings in Lincoln, <http://www.stemarchitects.co.uk> (website accessed 24th February 2018).

¹¹ Planning Practice Guidance, "The Importance of Good Design," <https://www.gov.uk/guidance/design#vibrant-neighbourhoods> (accessed 25th February 2018).

¹² *Id.*

required with actual forethought, respect and consideration given to the local character of existing building designs/architecture and the Cultural Quarter designation. The revised design fails to understand or appreciate the context of the Cultural Quarter,¹³ design impacts on how people interact with places. There should be a consideration and implementation of an arts and culture theme, including the setting aside of space for arts businesses, artists and arts institutions;

g) Appearance

The revised proposed development is an aesthetically unattractive featureless prison-like block, containing a mass of car park spaces and tiny apartments.¹⁴ Other than a Green Roof,¹⁵ the development fails to improve the public realm with soft/hard landscaping i.e. a network of Green and public spaces. If approved, this development would most certainly be in the running for the Carbuncle Cup;

h) Noise and Disturbance

"Noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment."¹⁶ The Proposed Upper Car Park Plan depicts a Swan Street building entrance/reception located at ground level directly opposite my apartment (see also the Proposed East and North Elevation Drawing). Having a **98 unit-student apartment building with 32 car parking spaces** located right on my doorstep with an entrance/reception (open 24/7) directly opposite **will cause unwanted noise and disturbance at all hours of the night and day preventing and disturbing sleep.**¹⁷ **The building's proposed Swan Street entrance/reception needs to be re-located to Grantham Street or Flaxengate to provide minimal noise, disturbance and nuisance to the full-time residents of the Swan Street Apartments.** Additionally, if the planning application is granted, the area will be a building site with noise and disturbance for at least the next 1-2 years, severely disrupting the peace, quiet, quality of life, health and well-being of local resident's lives, as well as affecting the profitability of local businesses.¹⁸ It is also not clear if the proposed Green roof will also be a resident roof deck - if so, further noise and disturbance will be caused by the resident's use of same. In addition, it is also not clear what the purpose of the fourth floor setback is, i.e.

¹³ **I am requesting/demanding that the proposed development be referred for a National Design Review.**

¹⁴ Other Stem Architect projects also resemble this featureless block-type design - this type of architecture fails to appreciate the local surroundings or consider the needs of future generations, it is "faddish" fast architecture - reminiscent of 1970's architecture. See some of their past designs, including Riseholme Equine Centre, Lincoln Student Village, Gateway and the atrociously designed pedestrian footbridge across Lincoln High Street appropriately called "Blocwork," "Projects," <http://www.stemarchitects.co.uk> (accessed 24th February 2018).

¹⁵ From a review of the proposed development plans it is not clear what exactly the Green Roof will be used for i.e. resident roof deck, growing vegetables, etc.

¹⁶ See Planning Practice Guidance, "Noise," <https://www.gov.uk/guidance/noise-2> (accessed 24th February 2018).

¹⁷ There will be a constant coming and going of students at all hours, late night parties, loud late night conversations and shouting and yelling, etc.

¹⁸ See §215 of the Town and Country Planning Act 1990. "Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making," see, Planning Practice Guidance, "Health and Wellbeing" <https://www.gov.uk/guidance/health-and-wellbeing> (accessed 24th February 2017).

outside balcony for use by students - if so, noise and disturbance will also be caused by use of same;¹⁹

i) Air Quality

The proposed development site is located in an "Air Quality Management Area."²⁰ The development will affect air quality, particularly during the construction phase and thereafter when occupied. A building of this size containing 98 individual apartments will cause an increase in unwanted vehicular traffic and create substantial waste pollution;²¹

j) Conservation of Buildings

The proposed development is located in a Conservation Area, Conservation Area No.1, designated since April 1968 and more recently on 24th April 2017.²² In a Conservation Area, "it is the protection of the quality and special interest of the neighbourhood or area as a whole that is intended. The layout of boundaries, roads, vistas and viewpoints, trees and green features, street furniture and surfaces, the characteristic building materials of the area, the mix of different uses, and the design of shop fronts" are all taken into account - "**development is subject to stricter regulations.**"²³ The Central Lincolnshire Local Plan acknowledges the benefit and need of having a Cultural Quarter - para 7.1.2 of the Plan states that, "the regional role of Lincoln has been strengthened with significant projects already implemented or programmed," i.e. the development of a Cultural Quarter. Para 7.5.3 states that, "Lincoln's national and international reputation as a major tourist attraction brings considerable benefit to the local economy attracting visitors and investment into the City. Although successful, there is considerable scope for the further expansion and diversification of this role, not only in relation to the traditional 'uphill' tourist area centred on the Cathedral and castle, but also in relation to other less well known and publicised areas of the City, for example, the Brayford Pool and **emerging Cultural Quarter** centred on the Collection."

Swan Street, Grantham Street and Flaxengate have unique features, including specially designed lampposts and Lincolnshire limestone block-street paving, providing the appearance of a pedestrianized area, and a calming look and feel to the Cultural Quarter. **The proposed development of student accommodation at the Grantham Street Car Park site is not consistent or appropriate in keeping with a Conservation Area, Cultural Quarter designation and the Local Plan.** Such a development diminishes the meaning and classification of the cultural Quarter leading to a reduction in the number of visitors to the area. **Student accommodation should not be permitted.**²⁴

¹⁹ **I am requesting that a Noise Action Plan be conducted.**

²⁰ Air Quality Management Area No. 2 - PM10.

²¹ **I am requesting that an Air Quality Assessment be conducted.**

²² CLLP 16, Conservation Area designation in Central Lincolnshire Local Plan on 24th April 2017.

²³ City of Lincoln Council, "Conservation Areas," <https://www.lincoln.gov.uk/living-in-lincoln/planning-and-building/conservation-archaeology-and-heritage/conservation-areas/> (website accessed on 24th February 2018). See also Local Plan Policy LP25(m)(n), LP26(c)(j)(m)(n)(o)(p) and LP29(c).

²⁴ A more suitable use would be as hotel accommodation.

Here, the applicant has completely ignored the Council's vision for the Cultural Quarter, shown a blatant contempt and disregard to all of the previously submitted objections and has made no real effort in revising its previously submitted application. Reducing the number of student apartments by seven and adding a minor setback on the fourth floor does nothing to increase the acceptability of this development - **real, significant and genuine amendments are required - the application needs to be considered by the Planning Committee.** For all the above stated reasons, my father and I are requesting that the subject planning application be denied in its entirety.

Mrs. M. Hanby (4 Swan Street)

I strenuously oppose this for the following reasons:

There is already so little parking in the area to service the surrounding amenities as it is. The streets are very narrow and it is already difficult to manoeuvre or park nearby to drop off anything at nearby apartments. The proposed development will severely exacerbate the situation with the existing parking taken away.

The lack of access to Grantham street and Swan Street (some of which is cobbled) is already severely restricted. To add to this by having this building with parking on the doorstep will not only create highway safety issues and traffic congestion but the noise and disturbance at all hours of the day and night will be terrible.

My apartment is in Swan Street. Since I purchased this, shortly after the building was completed, we had to endure noise and inconvenience from the Museum apartments as well as The Terrace.

Both of these developments blocked out views and natural light. To have another building built on the only area left will extinguish any remaining natural light and privacy we have left.

I was always of the understanding that the Council has a policy of encouraging this part of town to be a cultural area. If this is so how on earth can a building of this monstrously huge design (height and appearance) fit in with this format and even be considered?

The proposed structure is overbearing. Whether it be a hotel or student premises, it will have a huge impact both with noise, disturbance and loss of amenity to nearby residents and workers. If it were to be a hotel, one has to assume it will run a 24 hour service. If student accommodation, then with the local nightlife so nearby, this will inevitably engender many anti-social issues particularly at night. There is ample student premises next door to the proposed building and adequate hotel accommodation nearby.

In a nutshell this application if granted will create an urban chaos negatively impacting to the local amenity. I ask that you please refuse this application in its entirety.

Miss. S. Reid (8 Swan Street)

I strongly object to this development as a long term resident of the flats on Swan Street, directly facing the current car park. I cannot believe this is being considered, and object for the following reasons:

1. The building would be extremely close to the Swan Street apartments, as well as the apartments on Grantham St and the business at The Terrace. My flat looks out over the car park, and any further high rises would completely block all views and I would lose most of the natural light into my property. I would be completely blocked in.

2. The building will look directly into and overlook my flat, my front room (which has a bay window) and my bedroom. Unacceptable.
3. The area is already extremely busy for such a small space, with the Collection museum, the Usher gallery, the registry office, the Terrace, two apartment blocks, plus delivery for the Theatre, a pub and a restaurant. Congestion would be ridiculous. The increase of noise and disturbance to our residential area would be intolerable.
4. This is meant to be part of the cultural quarter. And I believe this would impact the quiet, touristy, and industrious nature of our area negatively.
5. I believe this will have a terrible impact on the residents of Swan Street and Grantham Street. For me personally, the noise, congestion, loss of light and privacy would be unacceptable and I urge the council to reconsider.

Sarah Forward (Room AF1, The Terrace)

I saw in the Lincolnshire Echo this morning about this planning application

I would like to put forth my strong objections to such an application please, for these reasons:

1. I work in a first floor office of The Terrace on Grantham Street, overlooking the current ground level carpark. I am assuming it is that carpark that the build is being proposed for. If there were a 6 storey building facing my window, not only would it mean the offices are grossly overlooked but I would lose pretty much all natural light.
2. The road is already severely congested throughout the day just with deliveries to all the local businesses, such a small road coming from the Clasketgate one way system would be even worse with all the extra traffic, not to mention all the works vehicles actually during the build!
3. There are so many cars already using Grantham street and Flaxengate for business access- how on earth could you provide such access if you're building on the carpark?!
4. The noise and chaos created in such a build will be a big nuisance for all the tenants of The Terrace. Many require customer access to the building as well as 24hr access themselves.
5. Grantham street / Flaxengate has a high footfall for many reasons: Visitors, customers and clients of The Terrace; The city's Registry Office; The Collection- used by residents, tourists and school children; access to the high street; access to the Bailgate...

I'm sure this would all be vastly interrupted by building in such a busy and confined area.

I'm very disappointed that this application has even been thought of, let alone considered. It would devalue many tenants work environment of The Terrace simply just by being noisy and blocking essential daylight.

Mr. P. Hurst (Rm AF9, The Terrace)

I am the engineering manager of a business located in room AF9 of the Terrace.

Our natural light comes from the location for which the proposed development is planned – this natural light would be significantly reduced by a 6 storey building. Our balcony opens onto the area where the building is proposed. This building would cause

a huge impact on the residents of our office. There would be horrendous noise during construction and additional noise afterwards - especially if it ends up as a hotel. We would be overlooked from a very short distance.

There would be additional congestion on Grantham Street which is already often blocked by delivery lorries on a daily basis.

Additionally 3 mature silver birch trees outside my window would be removed

Mr. J. Wright (73 Nettleham Road) (Initial Response)

I am an adjoining owner to this proposed development, having a small private car park abutting it immediately on the SW. The NE corner of my land shares a boundary with this proposed development, which has a ground floor approx. one storey higher than my land, as the ground falls steeply to the south.

My comments are delayed because I regret I was not informed of this planning application, despite being an adjoining owner

Planning Background

In 1998, the City of Lincoln adopted an admirable **Lincoln Local Plan** that included Policy 19A that dealt with sites at Grantham Street/Flaxengate. This encouraged small scale uses on the **ground floor** of new developments, including small shops, restaurants, cafes, pubs, business etc.

On-site car parking was only to be provided where essential for businesses or housing within the development, and was to be kept to a minimum, and not to conflict with a pedestrian dominated environment

The Lincoln Townscape Assessment was produced in 2012. All current development proposals should take this assessment into account and any subsequent guidance.

The **Lincoln Local Plan** has been superseded, but **The Lincoln City Centre Master Plan** was produced about 5 years ago. Although it does not have statutory status, it should be regarded as relevant guidance. The Council's excellent vision for the area remains much the same as in the 1998 plan, included developing the area as part of the city's cultural quarter, promoting creative industries/incubator business, capacity for home working, and promoting active street frontages through mixed use development and servicing to the rear

The Council's Design Brief on the Applicant's site envisaged along the Grantham Street frontage, a number of 8m wide 3-4 storeys mixed use buildings, to reflect the typical street scene in this area.

Although the relevant statutory plan is now **The Central Lincolnshire Local Plan, April 2007**, which is less prescriptive and has more generic policies, one would have expected that any responsible developer would have made some attempt to reflect the City Council's vision for this area. **Regrettably, this outline application bears no relation at all to the Council's vision, and is a gross overdevelopment of the site, with complete disregard for previous policies for the historic environment and street scene, and for the amenity of and effect on adjoining owners and residents.**

I therefore object for the following detailed reasons:-

City of Lincoln Conservation Area No.1 - Cathedral & City Centre

This application is sited within this area of special architectural and historic interest, the character or appearance of which it is desirable to preserve or enhance. Conservation area protection extends beyond buildings, to include streets, trees, paths and views.

This development should therefore reflect the intention of the conservation area, be sensitive in design, and make a positive contribution to the area. Regrettably it does none of this, and **is a massive overdevelopment of the site, occupying the whole area right up to the pavement and adjoining boundaries. The scale and mass of the building is far too large, it is much too high, and the design is mundane and uninspiring. The design and the intended use does nothing to contribute to the special character of the area**, which is in the Cultural Quarter of the City, and which Lincoln City promotes for its emphasis on theatre, museums, art, music, small shops, cuisine, bars and cafes.

Impact on Adjoining Owner

My land has been owned by my family since the 1930's. It is accessed from Swan Street, which is a narrow and inclined cobbled street that still retains some of the original character. I have recently been considering whether to apply for a development with small ground floor units such as artists and craft workshops and shops, and with a limited residential development above. However, this application is sited virtually on my boundary, and has windows effectively up to 7 floors in height (as it is on higher ground) above and overlooking my site. This will harm my development rights, and effectively damage and reduce my use of my land for residential purposes. **This development needs to be set back much further from my boundary, and there should be no windows facing and overlooking my site, and the height should be much reduced**

Impact on Other adjoining Residents and Properties.

Immediately to the west across the narrow cobbled Swan Street is a 4 storey block of flats, with windows that look east across the applicant's site. This 6 storey proposed development will completely dominate and overtop this existing residential block, cause loss of light, and visual intrusion and loss of privacy, as the proposed windows would look directly into the windows of existing residents.

This development needs to be set further back from the Swan Street pavement, there should be no windows looking directly into the existing residential apartments, and the block should be no higher than 3 to 4 storeys, including car park.

This development will also impact on the 4 storey Terrace building immediately to the north across Grantham Street, which houses small artists and craft units, a café, and offices. It will cause gross overlooking and loss of light. **The block should therefore be no higher than 3 to 4 storeys, and windows should be designed to minimise overlooking.**

Effect on the Street Scene

Grantham Street and particularly Swan Street are relatively narrow inner-city streets. This development, right up to the pavement line, will convert adjacent parts of both streets into dark draughty walled in streets, instead of creating a sunny and appealing link between the Strait, the High Street, and the Collection and Usher Gallery. **This oversized block will dominate these streets, and it should be set back and reduced in height**

Use of the building

The applicant asks for outline approval for residential, and/or student accommodation, and/or offices, and/or hotel use. However the plans indicate that the entire block is currently designed for student use, with 105 very small single rooms with bathrooms, but sharing 3 kitchen/living rooms on each floor. This is gross over development. **Although student accommodation is needed, this type of building is highly inappropriate in the Cultural Quarter, and next to existing residential apartments. The area already has a late night culture, and this development will add greatly to night time disturbance on local residents**

A more benign and suitable use would be as hotel accommodation, as it is central to many attractions for visitors, and accommodation for them in this location is at a premium.

Loss of Public and Visitors Car Parking

The current NCP public car park has 30 parking spaces, and is well used, particularly by many visitors to The Collection and The Usher Gallery, and to the attractions of the Steep Hill and High Street. The City of Lincoln's own park next to the Collection is usually full all day, so the NCP car park is the nearest alternative location

I am told that NCP will continue to operate the new car park in the proposed development, which provides 32 car parking spaces on 2 levels. However, it is highly probable that the users of the building, be they students, residents, office staff or particularly a hotel for its guests, will enter into an arrangement with NCP to have many car parking spaces reserved for their use. **Visitors to the Cultural Quarter will therefore find it extremely difficult to park, which will reduce the attraction of Lincoln to the public.**

Relevant Policies in the Central Lincolnshire Local Plan

This application therefore conflicts with many policies in this statutory Local Plan, particularly:-

Policy LP25: The Historic Environment, Conservation Areas

Development within, affecting the setting of, or affecting views into or out of, a Conservation Area should preserve (and enhance or reinforce it, as appropriate) features that contribute positively to the area's character, appearance and setting. Proposals should:

- m. Retain and reinforce local distinctiveness with reference to height, massing, scale, form, materials and lot widths of the existing built environment;
- n. Assess, and mitigate against, any negative impact the proposal might have on the townscape, roofscape, skyline and landscape;

Policy LP26 Design and Amenity

Design Principles

All development proposals must take into consideration the character and local distinctiveness of the area (and enhance or reinforce it, as appropriate) and create a sense of place.

- c. Respect the existing topography, landscape character and identity, and relate well to the site and surroundings, particularly in relation to siting, height, scale, massing, form and plot widths;
- j. Duly reflect or improve on the original architectural style of the local surroundings, or embrace opportunities for innovative design and new technologies which sympathetically complement or contrast with the local architectural style;

Amenity Considerations

The amenities which all existing and future occupants of neighbouring land and buildings may reasonably expect to enjoy must not be unduly harmed by or as a result of development.

- m. Compatibility with neighbouring land uses;
- n. Overlooking;
- o. Overshadowing;
- p. Loss of light;

Policy LP29: Protecting Lincoln's Setting and Character

Proposals for development should seek to make a positive contribution to the built and natural environment and quality of life in the Lincoln area. All development proposals should contribute to the realisation of the following key principles, taking into account the Lincoln Townscape Assessment (2012), and any subsequent guidance:

- c. Proposals within, adjoining or affecting the setting of the 11 Conservation Areas and 3 historic parks and gardens within the built up area of Lincoln, should preserve and enhance their special character, setting, appearance and respecting their special historic and architectural context;

Conclusion

This outline application is a gross and inappropriate overdevelopment of the site. It appears to be designed to maximize development returns, and does nothing to respect or contribute to the vision of the Council or to this area of special character or. It is in conflict with many policies in the Central Lincolnshire Local Plan

It could continue the trend where developers seize every possibility, and if the City then grants approval, then this leads to a street scene that is an ad-hoc collection of unrelated and discordant buildings that are too large and obtrusive. If the Planning Committee approves this development, even with conditions, it will lose the opportunity to improve the area, and future generations will wonder why this important location has been allowed to be despoiled

For all the above reasons, I urge the Planning Committee to refuse to grant planning permission

Mr. J. Wright (73 Nettleham Road) (Response to Revised Plans)

Thank you for informing me on 19 February that the applicant has submitted revised plans for this outline planning application. I have reviewed these, and conclude that the only alterations are very slight revisions on the fourth floor only, with some inseting and a reduction in the number of apartments from 24 to 17.

The lower ground floor plans were not posted, so I assume that there are no changes below the fourth floor. If this is not correct, then please kindly advise me by return.

It appears therefore that these changes are largely cosmetic, and do virtually nothing to reduce the impact and increase the acceptability of this development. Please note therefore that my objection letter dated 31 October 2017 to the original development still stands and applies equally to these revised plans.

Please also note that I wish to make verbal representation to the Planning Committee that will consider this application

My Conclusions to both the original application and to these revised plans are therefore that:-

This outline application is a gross and inappropriate overdevelopment of the site. It appears to be designed to maximize development returns, and does nothing to respect or contribute to the vision of the Council or to this area of special character or. It is in conflict with many policies in the Central Lincolnshire Local Plan

It could continue the trend where developers seize every possibility, and if the City then grants approval, then this leads to a street scene that is an ad-hoc collection of unrelated and discordant buildings that are too large and obtrusive

If the Planning Committee approves this development, even with conditions, it will lose the opportunity to improve the area, and future generations will wonder why this important location has been allowed to be despoiled

For all the reasons stated in my letter dated 31 October 2017, as attached, I urge the Planning Committee to refuse to grant outline planning permission to these revised proposals.

Mrs. A. Draper (4 The Glebe, Upton, Gainsborough)

Yet again we are faced with another disappointing planning application for an unimaginative "box" - It is heart breaking to see the city that you love exploited by developers who want to put up yet another generic block of flats in such a mechanised and soulless way.

That aside, these are the reasons that this planning application should be rejected. This application falls within the C1 area covered by Lincoln Master Plan and described as the "Cultural Quarter."

Height

The most noticeable thing about this proposal is its excessive height (even in the revised version.) The Lincoln Master Plan, states that both Flaxengate and Grantham Street should be a "large percentage of residential 3-4 storeys mixed-use buildings". This proposal is for two storeys of car parking with another four storeys of residential on top - the equivalent of 6 storeys at the lowest point of the site and five at the highest point of the site.

It is very clear from the applicant's own proposed elevation drawings that the "upper ground floor" is level with (or possibly even slightly higher than) the highest part of the site on the north-west corner. If highest part of the site is taken as being "ground level", then the proposed "upper ground floor" is undoubtedly the ground level/first storey. The commercial unit and upper ground floor car park are clearly on ground level/ first storey.

I feel that interpreting this proposal to be "3-4 storeys" in the way that the applicant has done (i.e putting a car park and commercial unit on the first storey and then adding another four storeys of residential on top) is rather disingenuous to say the least and certainly should not be permitted.

The important factor here is that the proposed exterior appearance and actual overall height is that of a 5-6 storey building and this causes problems that planning policies are aimed at mitigating.

The master plan for both Flaxengate and Grantham Street also states that "Residential development to incorporate capacity for home working utilizing basements and dormers."

This statement regarding "basements" combined with "three to four storeys" suggests

that the planners have already carefully considered that this is a sloping nature of the site and the other buildings and expect basements to be included and regarded as a storey. (for example like the Neustadt Court buildings). I would suggest that this also means the lowest part of the proposed site should be a maximum of four storeys including the basement and a dormer) with a maximum of three storeys including dormer on the highest part of the slope - similar to that of the apartments on the junction of Grantham Street and Swan Street.

The vast majority of buildings in the surrounding areas of Grantham Street, Swan Street, Clasketgate and Flaxengate will be dwarfed and overshadowed by this proposed building. Only Danesgate House and The Terrace are higher (the proposed building is probably actually taller than The Terrace when the slope is taken into consideration). The surrounding buildings are much smaller scale than the proposal with their design often utilising the sloping site and the space within their pitched roofs. The applicant appears to have totally discounted the scale and height of the majority surrounding buildings in the area choosing instead to model their building's height on the exception.

Character and Style

As mentioned previously, the master plan for both Flaxengate and Grantham Street states "Residential development to incorporate capacity for home working utilising basements and dormers."

This statement is a clear indication of how planners see the character of the area and envisage its future development. This statement (regarding using dormers) indicates that the planners wish developers to take their cue from the majority of the surrounding buildings which are generally more traditional in style and have pitched roofs - many making use of dormers or utilising the roof space by incorporating velux-type windows. All the buildings along Swan Street are small scale with pitched roofs, as are the majority of buildings in Clasketgate and the Royal British Legion building on the corner of Flaxengate and Clasketgate. All the buildings on the western stretch of Grantham Street have pitched roofs.

This planning application does not respect the character of either the surrounding historic buildings or the new more recent additions such as The Collection or The Terrace which also have pitched roofs.

While the The Terrace isn't everyone's cup of tea, it is clear that it has been carefully designed to reflect its surrounding buildings by creating a series of outlines of traditional terraced houses using a variety of materials, heights and pitched roofs. The Collection, again is not to everyone's taste but it is made from beautiful Ancaster Stone, has as a low profile making use of the gradient and has a stepped roof with pitched sections.

The question needs to be asked where has the applicant taken their inspiration from for this building's style? How does this proposal fit in to its surroundings? This applicant seems determined to disregard the true character of the Cultural Quarter instead choosing to take their "inspiration" for height and "style" from the nearby flat-roofed "square", over-sized, buildings of Danesgate House, Akrill House

and Lincolnshire County Council's Crown House - all of which are universally disliked and widely regarded as eyesores . If the applicant is permitted to go ahead and take their cue from these few post-war "mistakes" they will just be repeating the errors of the past rather than moving forward.

Trees and Greenery - part of the character of the Cultural Quarter is the amount of greenery and trees. A quick look on Google satellite clearly demonstrates the amount of trees in this area. Trees are an integral part of this area and character. There is a lot of use of hard materials in this area - brick and stone both on the buildings and paving. Without trees it could be oppressive and unpleasant but fortunately this hardness is broken up and softened by the trees and greenery, giving it a pleasant feel. Removing the trees and building right up to the boundary will give it a clinical feel.

Frontages and Car Park Entrances

Planners want to see activate frontages. While car park entrances may be called "active" they are hardly inspiring.

From a safety point of view, having vehicles exiting from a car park over a pavement is a hazard. To reduce risk there should only be one exit/ entrance (preferably on Flaxengate to keep traffic away from the shop units where pedestrians are more likely to be browsing or wandering)

"Corridors"

The relationship between the application site and the surrounding roads and buildings seems to have been totally overlooked or ignored.

The roads around the site are narrow, so the height and scale of the proposed building will no doubt turn the routes around it into dark tall-sided "corridors." The height of the proposal combined with the narrowness of Grantham Street and the height and dark colour of The Terrace will turn this area into a gloomy unwelcoming place.

This proposal will make Swan Street and Grantham Street in particular, very unpleasant to walk down. They will become dark and intimidating alleyways and people will choose to avoid walking along them especially at night. Also we know that such places are more likely to be used for criminal activities, urination and littering. Planners have stated that they want to encourage walking routes in this area particularly east west. This will not create pleasant walkways.

A fundamental premise of planning is that developers need to carefully consider height and character in relationship of any proposal in relation to its surroundings as well as the impact it could possibly have on the future of that community - this fails miserably on all of the above.

This applicant has also submitted a separate application for large scale "emergency" temporary student accommodation development on a different site. It appears that this outline application on Grantham Street has been submitted for the same reason - on spec to see if they can get some large-scale quick -fix student accommodation.

I feel that the applicant has only considered their own requirements without due thought or regard for anything else or anyone else.

An application for this site needs more careful thought and consideration because this building will not be temporary - it will affect the whole area and local community for many years to come.

Not only that but they will undo all the hard work that has been done in the area in recent years to keep character and move away from the square blocks and it could be detrimental to the future of the area by acting as a precedent for more eyesores.

Responses from Other Consultees

Anglian Water

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. No evidence has been provided to show that the surface water hierarchy has been followed as stipulated in Building

Regulations Part H. This encompasses the trial pit logs from the infiltration tests and the investigations in to discharging to a watercourse. If these methods are deemed to be unfeasible for the site, we require confirmation of the intended manhole connection point and discharge rate proposed before a connection to the public surface water sewer is permitted. 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 The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included within your Notice should permission be granted.

“An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer.

Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence.

Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991.”

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.

Historic England (Received Prior to Works being undertaken by the Applicant)

Thank you for your letter of 22 November 2017 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

This outline application is for the erection of a six storey building on Grantham Street, Lincoln - to include 2 levels of car-parking with 4 storeys above. The application site currently provides surface car-parking and is bounded to the east by Flaxengate, to the north by Grantham Street and to the west by Swan Street. The development site lies within Cathedral and City Centre conservation area and within the setting of highly designated heritage assets including Lincoln Roman Colonia (scheduled monument). There is also the potential for archaeological remains of national importance within the site.

This proposal affects the character, appearance and significance of the conservation area and has the potential to affect the significance of heritage assets within it. We note that very limited information has been included with the application and that no assessment of significance has been submitted. As you are aware paragraph 128 of the Government's National Planning Policy Framework (NPPF) advises that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

We therefore strongly recommend the applicant submits further information to address this important issue. Any assessment would need to consider the potential impact of the development, particularly in terms of its scale, height, massing and design on the significance of heritage assets which are affected. This could usefully include visualisations/photomontages to convey any impacts from key viewpoints. Particular consideration should be given to potential impact on views when looking from higher ground to the north down the hill, across the development site.

We would highlight that on the archaeological evidence immediately available it is evident that impacts upon archaeological remains of national importance (paragraph 139) are a key issue requiring pre-determination analysis of previous excavation results and further survey and investigation (paragraphs 128/129/132/134/135 and 139 of the NPPF). In this regard we also refer you to the advice of Alastair MacIntosh, City Archaeologist

Policy

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The courts have held that considerable importance and weight must be given to this consideration.

The importance attached to significance with respect to heritage assets is also recognised by the Government's National Planning Policy Framework and in guidance, including the Planning Practice Guidance. Significance can be harmed or lost through development within its setting, any harm or loss to significance 'should require clear and convincing justification' (paragraph 132, NPPF).

Paragraph 131 of the NPPF reminds us that in determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness

In accordance with paragraphs 132 and 134 of the NPPF it will be for your authority to consider the justification put forward for this scheme, and to balance all planning matters, including any public benefit that may accrue from the proposal, and attaching appropriate weight to heritage matters as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 Act and the NPPF.

Position

On the basis of the submitted information, we do not believe that the application contains sufficient information to enable either Historic England or your authority to make a proper assessment of the significance of the heritage asset affected or the impact of what is proposed, as highlighted above.

Whilst it will be for your authority to weigh up all planning considerations, on the basis of the information submitted, we do not believe that a clear and convincing justification has been made for this proposal, as required by the NPPF.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We strongly recommend that further information is sought on the significance of the heritage assets affected, including archaeological remains of potentially national importance, and that the impact of the proposal on the significance of heritage assets affected is fully assessed.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 128, 131, 132-134, 135, 137, 139 and 141 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. Please consult us when further information is submitted as outlined above.

Lincoln Civic Trust

OBJECTION - This project is on land that is within the main Conservation Area of the City and as such needs to be developed in a very sensitive way. We agree that it is a prime site for redevelopment, but the Committee feel that this application is inappropriate.

It was felt that the overall mass was too large, the height unacceptable and that there was a distinct lack of creative design. The design of the proposed building resembles a non-descript office block which, when given the area it is in, ought to be making a statement.

Grantham Street and Swan Street are relatively narrow inner-city streets and the height and mass of the block will overpower them and the surrounding area. Instead of blending with the general street scene it will dominate it and hence we feel it is inappropriate and an overdevelopment of the site. We do however congratulate the foresight of the designer in incorporating a car park within the lower half of the structure. This is something we feel should be included in all major inner-city developments.

Lincolnshire County Council (Education Authority)

Given the nature of this application and the openness of the end use of the upper floors of the building, it has not been possible to assess education impact in this instance. In light of this, the County Council suggests that the below condition is included to ensure that any future education impact is mitigated once the final use of the upper floors are established:

No development shall commence until a scheme to provide for the impact of the development upon primary, secondary and further education has been submitted to and approved in writing by the Local Planning Authority.

No education provision will be required for student housing or one bed flats as these do not have an educational impact. Should the development be residential, the impact will need to be resolved at the reserved matters stage.

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

No objection in principle, any adjustments to the existing access will require agreement with the highway authority. The existing streetlight on Grantham Street may require relocation.

HI03 - Prior to the submission of details for any access works within the public highway you must contact the Divisional Highways Manager on 01522 782070 for application, specification and construction information.

Lincolnshire Police (Force Crime Prevention Design Advisor)

Thank you for your correspondence and opportunity to comment on the proposed development. I would request that you consider the following points that if adhered to would help reduce the opportunity for crime and increase the safety and sustainability of the development.

Historically Student Accommodation can become vulnerable to crime and anti-social behaviour therefore it is important that the best security arrangements and provision are planned for such premises, this is particularly so when such a development is very central to a bustling city centre.

The safety, security and general well being of student should be of paramount importance when considering the detail of this application. The site is centrally located and has an entrance that exits onto a busy area of Lincoln, within the centre of Lincoln nightlife? The following aspects of security should be rigorously applied to this building.

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

External doors and windows

The potential for unwanted guests will be considerable at this location and therefore robust measures should be installed to ensure the security and safety of student residents. I have some concerns that access may be easily gained via either of the shown entrances and the risk of 'follow through' entry gained. I would recommend that an air-lock style entrance vestibule is incorporated into the design (to help prevent unauthorised follow through access) commensurate with 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. Under no circumstances should a trade person release button or similar uncontrolled access method be used.

An Industry standard approved CCTV system should be installed covering all communal points of entry and lobby areas. This system must be able to capture and record all persons using the entry system.

The secured by design requirement for all dwelling external doors is PAS 24:2016 or Bespoke equivalent (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. **All ground floor windows should have window restrainers and effective locking systems.**

I would recommend that all ground floor and easily accessible windows have at least one pane of laminated glass.

Car Park (Lower Levels)

Whilst not clear in the plans I would ask that there is no opportunity for uncontrolled or unrestricted access from the car parking area to the accommodation levels of this development. I would also recommend that access control for both pedestrians and vehicles is such that the underground (lower level) parking areas do not become a focal point for anti-social or criminal activity due to the possible ease of access.

Effective lighting and monitored CCTV should form part of the overall safety and security of this development and as such measures to ensure effective policing of this development are important to ensure the safety of residents and users.

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.

Homes of Multi-Occupancy / Student Accommodation – 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.

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.

Bin Storage (not seen)

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.

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

Please refer to *Commercial Guide 2015 & 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.