

Consultee Comments

Historic England

Thank you for your letter of 11 May 2018 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Lincoln Civic Trust

OBJECTION - We wish to object as it was felt that there was insufficient detail in the application as to the detailed design, the materials and an explanation as to the decision to reduce the number of car parking spaces to be provided.

Lincolnshire County Council, as Education Authority

The County Council has no comments to make on the current reserved matters application for this student accommodation scheme and notes that this also resolves condition 7 of planning permission 2017/0721/OUT in relation to education and residential housing (use class C3) on the site.

Kind regards

Simon Challis
Strategic Development Officer
Corporate Property

Lincolnshire Police

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

There are no further observations beyond the report which was submitted at the time of the application for outline planning permission. I have included an amended copy of that report for your convenience and the information of the developer.

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.

Access to Places of Height

It is important that access to places of height (prevention of suicide) is secured on all levels and should include the provision of substantial windows and locking systems together with fixed and secured 'window restraining' devices. Any points of access to the roof area or other place of height should be secured by way of 'appropriate' fire compliant locking systems.

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.

Yours sincerely,

John Manuel
Force Designing Out Crime Officer

Neighbour Comments

Mr. T. Foley (7 Swan Street)

I am responding to your correspondence dated, 11th May 2013, relating to an Application for Approval of Reserved Matters - both my father and I oppose the application. For the sake of brevity, I adopt the arguments contained within my prior correspondence dated, 26th July 2017 and 28th February 2018 - we also oppose the application based upon the following:

a) Layout

A review of the recently submitted Planning Application documents reveals that a six-storey building incorporating student accommodation and car parking will be developed at the subject site. It is interesting to note that nowhere in the developers submitted documents does it confirm the development of a student building. Rather deceptively, the only documents that make reference to this fact are the Council's 11th May 2018 and Lincolnshire Police's 15th May 2018 correspondence.

The proposed Floor Plans (Ground Floor to Fourth Floor) have been altered and amended, they now depict 118 tiny, tightly packed/condensed single room student apartments and a reduction in the number of kitchens on each floor from three to two.

This is an increase of twenty apartments over the 98 apartments depicted in the Revised Application/Plans for Outline Planning Permission and more than the 105 apartments depicted in the Application for Outline Planning Permission. It is clear that increasing the number of student apartments and decreasing the number of kitchens is simply a way to maximize profits. This over-developed layout will destroy the peace, character and heart of the Cultural Quarter, at the expense of local residents. Such a large over-developed student building should not be permitted - **the developer should be directed to scale back the number of student apartments - no more than fifty should be approved;**

b) *Scale and Height*

The developer's Application for Approval of Reserved Matters reveal no change in the developments scale and height, however, it's still far too large and dominating. It will overlook the Swan Street Apartment building located directly opposite (see the Proposed North and East Elevation Visual). There is also no change to the building footprint/circumference, every inch of the site is occupied by the proposed development, overcrowding other nearby buildings. The application reveals that there will be twenty-six car park spaces at the Lower Ground Floor level, however, one change is the elimination of car park spaces at the Ground Floor level. Student apartments will now replace those missing car park spaces, thereby, maximizing profits for the developer. **The application clearly depicts no reduction in scale and height.** The proposed development needs to be setback from the site boundary and significantly reduced in size and height - **no more than 3-4 storeys, including car park should be permitted;**

c) *External Appearance*

More detailed plans need to be submitted regarding external materials, colours and textures, etc. The Elevation Visuals only contain very basic details regarding external materials and some visuals do not contain any information, including the Roof Plan. In my prior correspondence opposing the applicant's Planning Application I requested that the proposed development be referred for a National Design Review - what is the status of that request?

d) *Means of Access*

Absent from the developer's application for Approval of Reserved Matters is information detailing: *"means of access to, and service roads for the development, including road widths, radii and sight lines, space for loading, unloading and maneuvering and turning of service vehicles and their parking; space for parking and maneuvering."* **Therefore, the application should be denied in its entirety as being insufficiently submitted.** Both Swan Street and Grantham Street are extremely narrow streets - a proposed development of such magnitude will cause major congestion, be extremely disruptive for local residents and a safety issue for pedestrians;

e) *Landscaping*

Other than details regarding the installation of a green roof (see Landscaping Details) no other details have been provided regarding a scheme of landscaping for the proposed development, including information regarding: *"surface treatments, walls, fences, or other means of enclosure, including, materials, indications of all existing trees and hedgerows on the land, and details of any to be retained, together with measures for their protection in the course of development."* **Therefore, the application should be denied in its entirety as being insufficiently submitted;**

f) *Effects on Trees*

Without a valid reason, none of the trees in the area of the proposed development should be removed. The applicant should be directed to incorporate the existing trees into the proposed development - if any trees do require removal, new tree plantings should then occur;

g) *The Reserved Matter for the scale of the development shall be for development no greater than the parameters shown in the drawings listed within Table A*

The application for Approval of Reserved Matters does not include updated drawings for Visual No. 0006 and 0007 as indicated in Table A. The applicant should be directed to provide these updated visuals;

h) *Archaeological Work/Foundation Design*

Has a programme of archaeological work been undertaken and a foundation design devised by the applicant in compliance with the National Planning Policy Framework? A report of the findings of the evaluation and subsequent assessment impact are not contained within the list of Planning Application Documents made part of the Application for Approval of Reserved Matters;

i) *Points of Extraction/Stationary External Plant or Machinery*

The Application for Approval of Reserved Matters does not include details of the space(s) and location(s) of any points of extraction and stationary external plant or machinery required to serve the building. The applicant should be directed to provide a detailed response, including a noise impact assessment for any and all stationary external plant or machinery;

j) *Safe and Secure Cycle Parking/Storage/Electric Vehicle Recharge Points*

The proposed Ground Floor Plan and Lower Car Park Plan Visuals do not depict details of safe and secure cycle parking/storage or electric vehicle recharge points within the building. The applicant should be directed to provide a detailed response regarding same;

k) *Written Scheme of Investigation*

Pursuant to §12 of the National Planning Policy Framework the applicant is required to secure the implementation of an appropriate programme of archaeological work undertaken by a competent person/organization in accordance with a Written Scheme of Investigation (WSI). Has the applicant submitted a WSI?

l) *Parking*

Has the applicant submitted proposals for the parking of construction vehicles; the layout of the site compound and construction working and delivery hours?

m) Site Contamination/Remediation Scheme/Scheme of Drainage

Has the applicant completed an investigation and risk assessment to assess the nature and extent of any contamination on the site, as well as, detailed remediation and drainage scheme?

n) External Lighting

Has the applicant submitted details of the design of external lighting for the proposed development, including an assessment of the offsite impact of the lighting?

o) Noise and Disturbance

Lincolnshire Police's correspondence dated, 15th May 2018 states that, "historically Student Accommodation can become vulnerable to crime and anti-social behavior." The applicant's increased building size to 118 student apartments located right on my doorstep will most certainly cause unwanted noise and disturbance at all hours of the night and day, preventing and disturbing sleep. The building's entrance still remains directly opposite my Swan Street apartment (see the proposed West Elevation Visual) - **this entrance needs to be relocated to Grantham Street or Flaxengate AWAY from the residential apartments located directly opposite.** In my prior correspondence opposing the applicant's Planning Application I requested that a Noise Action Plan be conducted for the proposed development - what is the status of this request?

The proposed student building will also attract crime to the Cultural Quarter area, including the Swan Street apartment building. This is confirmed by Lincolnshire Police's above-noted correspondence, which states that, "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." What measures will the applicant take towards other nearby residents, regarding crime prevention and noise and disturbance? Will the applicant pay for a new entrance, CCTV and soundproof windows at the Swan Street apartment building? For all of the above noted reasons, **student accommodation should not be permitted;**

p) Loss of Light

There will be a significant loss of light caused by the proposed development. The development will reduce the level of natural light entering the Swan Street apartment building, including my apartment, which will be cloaked in constant darkness (see the proposed West Elevation Visual). The proposed development is far too tall/large and too close to my apartment building. The proposed development needs to be reduced in height and set back from the site boundary;

q) Overlooking

The much taller/larger proposed developments living spaces will create views into my apartment, causing a lack of privacy and obtrusive light intrusion. **The windows of the proposed development need to be re-designed to minimize overlooking.**

The Application for Approval of Reserved Matters is severely deficient in many required areas and should be denied in its entirety. The applicant's sole interest is profit at the expense of local residents and the Cultural Quarter, of which it has shown no regard.

The development of a student building WILL destroy the Cultural Quarter. I feel that all parties involved in the granting of Outline Planning Permission have failed to truly envision what the Cultural Quarter could have become. Every city, including Lincoln, needs a cultural area where a creative industry/hub is located, including museums, art centres, galleries and artist studios, etc. Living in Chelsea, New York and also working in the arts industry, I know this only too well - Chelsea is a vibrant arts centre containing over 300 art galleries, museums and artists - attracting millions of tourists and investment every year. Lincoln had the opportunity to likewise create a similar area in the Cultural Quarter, attracting tourists and investment - the development site would be much better suited to a Lincoln Museum of Modern Art¹ or an arts center/art galleries. A large student building does not belong here. The Council should carefully rethink their approval before it's too late.

¹ This could be along the same lines as Nottingham Contemporary - funding from various sources and donated artwork could be arranged.

Richard Tibenham (Greenlite Energy Assessors)

Thank you for recent communication concerning the Consultation on application for Approval of Reserved Matters for the proposed development at Grantham Street, Lincoln.

With respect to my initial communication dated 25.03.18, I am delighted to see that either as a result of my comments, or due to other factors, a more conservative stance has been taken to glazed areas and resultant solar gains, as included in the latest architectural drawings. I believe this will have a significant benefit to the welfare of occupants, the long term energy demands of the building and the capital build costs.

I note from the current drawings that the building is proposed to be used for student accommodation. As such, I don't anticipate the inclusion of mechanical cooling and the resultant energy demands from such systems under this usage. Without the use of mechanical cooling, the potential for summertime overheating risks is increased.

As noted in my previous communication, whilst the building regulations include criteria to mitigate high solar gains, there is no policy within the building regulations to police overheating risks. The mitigation of overheating risks remains the responsibility of the *developer and design team*. Being high density student accommodation, with only single sided natural ventilation, the building falls under a high risk building type with respect to overheating risks. This occurs due to the high density of internal gains in the building, low external surface area to volume ratio, and more importantly, the limited ability to achieve cross-flow natural ventilation. In order to ensure that new infrastructure in the town is fit for purpose during periods of high external temperatures, such as those that we are currently experiencing, and under more demanding future climate change scenarios, I would advocate that a suitable performance standard of summertime thermal comfort is included within the design brief, such as that defined within CIBSE Technical Memorandum 59.

The London Plan already includes such policy, in the interests of ensuring that the local built environment serves the community well. Whilst I recognise that these issues are on the fringes of current planning policy, with the housing market in the state of disfunction it is in, consumers are often left with limited choices. For this reason, I believe that planning authorities or the building regulations should help ensure that buildings do not incur excessive summertime temperatures. With the building regulations currently not regulating this issue, it falls on the planning authority to help ensure that good standards are met if the developer is otherwise not interested in doing so.

These opportunities are normally only viable during the initial design and build stage of the building, or during deep refurbishment. Hence, once a building is built, this normally sets the energy demand and the thermal comfort performance of the building for several decades. With the forecast for future weather scenarios including higher summertime temperatures, I believe that building in resilience at the build stage is a sensible approach in all parties medium-long term interests.

I intend for these comments to be taken as my personal viewpoint and recommendation. I remain largely ambiguous to the development in principle. If you would like to engage further on the matter, I would be most interested in doing so.