

## **Consultee Responses**

Anglian Water

### **ASSETS**

#### **Section 1 – Assets Affected**

- 1.1 There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

*“Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.”*

### **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 DIA has been undertaken in consultation with Anglian Water to determine mitigation measures.

We will 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 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.*

### FOR THE ATTENTION OF THE APPLICANT:

#### Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx> Once submitted, we will work with you in developing a feasible mitigation solution. If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

#### Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
  - Development size
  - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
  - Connecting manhole discharge location (No connections can be made into a public rising main)
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
- Feasible mitigation strategy in agreement with Anglian Water (if required)

#### Surface water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution, including:
  - Development hectare size
  - Proposed discharge rate (Our minimum discharge rate is 5l/s. The applicant can verify the site's existing 1 in 1 year greenfield run off rate on the following HR Wallingford website - <http://www.uksuds.com/drainage-calculation-tools/greenfield-runoffrate-estimation>. For Brownfield sites being demolished, the site should be treated as Greenfield. Where this is not practical Anglian

Water would assess the roof area of the former development site and subject to capacity, permit the 1 in 1 year calculated rate)

- Connecting manhole discharge location

- Sufficient evidence to prove that all surface water disposal routes have been explored as detailed in the surface water hierarchy, stipulated in Building Regulations Part H (Our Surface Water Policy can be found on our website)

## **Drainage Board**

Thank you for the opportunity to comment on the above application. The site is within the Upper Witham Internal Drainage Board district.

The Board Objects in Principle to any development in flood plain (Zones 2 and 3). However it is up to City of Lincoln Council as the planning Authority grant planning permission. . It is noted that a Drainage Strategy/Flood Risk Assessment is included in the Application that contains appropriate mitigation.

No development should be commenced until the Local Planning Authority, in consultation with the Lead Local Flood Authority has approved a scheme for the provision, implementation and future maintenance of a surface water drainage system.

- Where Surface Water is to be directed into a Mains Sewer System, Anglian Water must be contacted to ensure the system has sufficient capacity to accept the additional Surface Water.
- Any discharge into a water course will require a consent from the Board under the land drainage Act.
- Existing catchments and sub-catchments to be maintained.
- Surface water run-off limited to 1.4l/s/ha for pumped and lowland catchments.
- Surface water run-off limited to the greenfield rate for other gravity systems
- As a brownfield site, any discharge must be restricted to, at most, 70% of the ACTUAL existing discharge rate.

Regards,

Richard Wright  
Engineering Services Technician

Witham & Humber Internal Drainage Boards,  
Witham House  
J1 The Point  
Weaver Road  
Lincoln  
LN6 3QN

## **Environment Agency**

We have **no objections** to the application submitted, subject to the inclusion of the following conditions on any subsequent planning permission that may be granted.

## **Condition 1**

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) (ref: 1700001887) dated May 2018 and the following mitigation measures detailed within the FRA:

1. Finished floor levels are set no lower than 300mm above existing ground level.
2. Flood resilience and resistance techniques are used.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently agreed, in writing, by the local planning authority.

## **Reason**

To reduce the risk of flooding to the proposed development and future occupants.

We have reviewed the Environmental Statement, principally Technical Appendix 2.6 incorporating the Preliminary Risk Assessment (ref: UK11-23390), dated January 2017.

We consider the proposed development will be acceptable if a planning condition is included requiring the submission of a remediation strategy, carried out by a competent person in line with paragraph 121 of the National Planning Policy Framework (NPPF).

Without these conditions we would object to the proposal in line with paragraph 109 of the NPPF because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

## **Condition 2**

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
  - all previous uses;
  - potential contaminants associated with those uses;
  - a conceptual model of the site indicating sources, pathways and receptors; and
  - potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and

identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

### **Reason**

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 109 of the NPPF.

### **Notes on condition 2 (above)**

The previous use of the proposed development site for uses including railway infrastructure, landfill, industrial buildings and a bus depot presents a potential risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Secondary A aquifer, with shallow groundwater below the site potentially in hydraulic connectivity with the River Witham.

The Preliminary Risk Assessment submitted in support of this planning application provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the Local Planning Authority.

We consider that the Preliminary Risk Assessment is sufficient to satisfy Part 1 of the above condition, in so far as it relates to the risk posed to controlled waters.

We consider that the next phase in fully assessing the risks to controlled waters from the site should be a Phase 2 intrusive investigation. This should aim to provide a thorough investigation of any areas of the site not previously investigated, along with a robust set of field data to assess the current conditions in the areas of the site that have previously been investigated or remediated.

We recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed.
4. Refer to the contaminated land pages on GOV.UK for more information.

### **Condition 3**

Prior to each phase of development being brought into use a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

**Reason**

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 109 of the NPPF.

**Condition 4**

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

**Reason**

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

**Condition 5**

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

**Reason**

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

**Notes on condition 5 (above)**

Given the historical uses of the site and the residual contamination understood to remain in parts of the site, the use of infiltration drainage schemes presents a risk that contamination could be mobilised, leading to pollution of controlled waters. Infiltration drainage will only be approved where it can be demonstrated that such schemes will not lead to other environmental problems.

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

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

### **Information for applicant**

#### Flood resilience and resistance techniques

Please refer to the following document for information on flood resilience and resistance techniques to be included: 'Improving Flood Performance of New Buildings - Flood Resilient Construction' (DCLG 2007).

### **Historic England**

Thank you for your letter of 10 July 2018 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**

We previously provided advice on an application for outline planning permission on this site on 5 April 2017 and on an EIA scoping request on 22 April 2018.

The proposed scheme for demolition of existing buildings at the above site and the construction of purpose built student accommodation with commercial floorspace, car parking, cycle storage and associated landscaping.

#### *Significance*

The site of proposed scheme covers the western part of a large area of proposed development in the city centre bounded by Ropewalk, High Street, Firth Road and Beevor Street. The site lies within the setting of Lincoln Cathedral (listed grade I as one of the 3% of listed buildings which are of exceptional architectural and historic interest) and within the setting of a number of other designated heritage assets, including on the historic hillside on the north escarpment.

A key part of the cathedral's significance and setting, located as it is on the north escarpment high above the Witham gap and lower city, is that it dominates the city, skyline and surrounding landscape. The cathedral is located within the historic townscape on the highly visible north escarpment which forms a central part of the Cathedral and City Centre conservation area and includes Lincoln Castle (a scheduled monument) and many other highly designated heritage assets.

Views to and from the cathedral and the historic hillside contribute greatly to Lincoln as an historic city as well as the setting and significance of the cathedral and other designated heritage assets, and the character and appearance of the Cathedral and City Centre conservation area. These include wider views that encompass large areas of the historic hillside above the lower city in which the cathedral and historic hillside is dominant, e.g. from South Common. Views from the historic hillside on the north escarpment down towards the Brayford and lower city also contribute to the setting and significance of the Cathedral and City Centre conservation area.

As previously advised, Lincoln also possesses an archaeological resource of international importance. The proposed development is located within the alluvial floodplain of the River Witham in an area where the potential for deeply buried deposits and waterlogging are likely to increase the likelihood for survival of sensitive archaeological remains of high significance to the history of the city.

#### *Impact of the proposed scheme*

##### Setting of designated heritage assets

We have no objection to the proposed demolitions. We welcome the reduction in scale and the setting back of the buildings fronting onto Tritton Way to minimise the impact of views of the cathedral and historic hillside from Tritton Way. We advise that your authority should ensure that the proposed tall buildings are not overly obtrusive in longer views of the cathedral and historic hillside, particularly from South Common, and in views down from the historic hillside, either due to the height of individual buildings and also the combined scale and mass of the group of buildings.

We advise that photomontages of the proposed scheme from South Common and from historic uphill Lincoln are provided to more fully understand the impact.

As well as consideration of the height and scale of the taller buildings proposed, we consider a reduction in impact could, in part, be achieved by variation of design material and/or sufficient modulation on building facades, particularly the north elevation of Block A. This elevation appears largely homogenous despite three different building heights and risks appearing as an obtrusive screen when seen from the north. We consider that the impact could be reduced by varying the architectural treatment of Block A according to the differing heights of each section.

##### Non-Designated Archaeological Resource

We continue to advise that the approach taken to assessment of archaeological remains should take its cue from the sensitivity of individual assets and groups of assets to the specific types of change associated with development, rather than an atomised approach to the assessment of impact on individual heritage assets. A well informed and nuanced approach to mitigation is required with developments on complex sites such as this based on an appropriate level of prior evaluation supported by initial desk based research.

Your authority should ensure that you have received sufficient information from the archaeological borehole survey and the results of any further archaeological evaluation your specialist archaeological advisor indicates is necessary to inform your determination of this application, prior to determining this application. Without sufficient information at this stage it will not be possible for you take an informed approach to decision-taking regarding the archaeological remains, including human remains, preserved on the site as set out in Good Practice Advice in Planning Note 2 on *'Managing Significance in Decision-Taking in the Historic Environment'* and in published advice *'Preservation of Archaeological Remains'* (Historic England, 2016: <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>).

You should ensure overall that you have sufficient information regarding the archaeological resource preserved on the site, and the design of the proposed foundation structure to enable you to understand the impact the development will have on those remains and make your determination in line with the policies and requirements of the National Planning Policy Framework.

#### *Legislation, policy and guidance*

The statutory requirement to have **special regard** to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses (section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act, 1990) must be taken into account by your authority in determining this application.

The statutory requirement to pay **special attention** to the desirability of preserving or enhancing the character or appearance of the conservation area (s.72, 1990 Act) must also be taken into account by your authority in determining this application.

Our advice is provided in line with the National Planning Policy Framework (NPPF, revised version 2018), the NPPF Planning Practice Guide, and in good practice advice notes produced by Historic England on behalf of the Historic Environment Forum including *Managing Significance in Decision-Taking in the Historic Environment* and *The Setting of Heritage Assets*.

There is a presumption in favour of sustainable development in the NPPF (paragraphs 10 and 11, NPPF). Achieving sustainable development means that the planning system has three overarching objectives – economic, social and environmental (paragraph 8, NPPF). The environmental objective includes contributing to protecting and enhancing our built and historic environment (paragraph 8, NPPF).

Paragraph 189 of the NPPF advises that in determining applications, local planning

authorities should require an applicant to describe the significance of any heritage assets affected. 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. Paragraph 189 also says that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal taking account of the available evidence and any necessary expertise (NPPF, paragraph 190). Paragraph 190 also states that local authorities should take this assessment into account when considering the impact of a proposal on a heritage asset to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

The NPPF goes on to say that when considering the impact of a proposed development on the significance of a designated heritage asset, **great weight** should be given to its conservation, (paragraph 193, NPPF). Any harm or loss to significance, including from development within the setting of a heritage asset, '*should require clear and convincing justification*' (paragraph 194, NPPF).

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. 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 NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

### **Lincoln Civic Trust**

For the following reasons the Civic Trust 'Objects' to the application:

1. The buildings are too overpowering for the site as the rear buildings are 9 and 10 storeys high. It should be noted that the Gateway and the Holiday Inn on the other side of Tritton Road are 8 and 7 storeys respectively. We do note, however, that the buildings are tapered away from Tritton Road which is to be commended but feel the buildings to the rear are too high.
2. We are concerned that the only vehicle access to the site is a small drop-off area to the rear of the site which is wholly inadequate for the number of arrivals and departures that can be expected to be generated by the site. Whilst we understand the zero parking policy that has been adopted, there is no formal way of preventing students from bringing private cars to the city and being realistic, if they can they will which can only lead to an increase in the number of vehicles in the area. This will only add to our major concern that the developments either proposed or accepted for the whole area (Western Growth Corridor, developments in the Science park and the proposed re-development of the retail side of the St Marks Project, will create a traffic gridlock situation in this part of the City.

3. We are concerned that as this is a student development, that all students will have to cross either Tritton Road or the Ropewalk (east/West Link road) to get to and from the University education buildings. Given our comments concerning the growth of traffic in the area, we feel that it would appear that there has been no consideration given to the movement of people. We feel that there should be the provision of a pedestrian bridge or an underpass to assist in getting students from their residences to their place of study.

4. From a design prospective, we feel that proposed buildings lack any imaginative design features and look like a set of city centre office blocks. Given that this is where students are going to live for 3 or more years and the historical engineering significance of the area, we feel that more imaginative designs should be considered. Furthermore, we are unable to make any judgement as to its fit with its surroundings as the adjacent and most significant buildings are the retail part of the St Marks which are under development and detailed plans have yet to be submitted.

We are, therefore, unable to comment on its suitability within the area. I would point out that we did not object to the Outline Planning Application other than to make reference to the traffic problems in the area, as we see this area as right for re-development.

**Lincolnshire County Council, as Highway Authority and Lead Local Flood Authority**

Notice is hereby given that the County Council as Local Highway and Lead Local Flood Authority:

**Requests that any permission given by the Local Planning Authority shall include the conditions below.**

#### CONDITIONS (INCLUDING REASONS) /REASONS FOR REFUSAL

##### HP00

No Block shall be brought into beneficial use until such time as a Travel Plan for that Block has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan for that Block shall be consistent with the Framework Travel Plan submitted as part of the planning application for this development, or any such variation to it as agreed in writing by the Local Planning Authority. Those parts of the approved Travel Plan for that Block (or any such variation to it as agreed in writing by the Local Planning Authority) that are identified therein as being capable of implementation after beneficial occupation of that Block shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of that Block is beneficially occupied.

In order that the Local Planning Authority conforms to the requirements of the National Planning Policy Framework, a Travel Plan has been conditioned to ensure that access to the site is sustainable and reduces dependency on the car.

##### HP33

No development shall take place until a surface water drainage scheme for the site, based on sustainable urban drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the Local Planning Authority.

The scheme shall:

- a) Provide details of how run-off will be safely conveyed and attenuated during storms up to and including the 1 in 100 year critical storm event, with an allowance for climate change, from all hard surfaced areas within the development into the existing local drainage infrastructure and watercourse system without exceeding the run-off rate for the undeveloped site;
- b) Provide attenuation details and discharge rates which shall need to be agreed with the Local Water Authority and the Lead Local Flood Authority;
- c) Provide details of the timetable for and any phasing of implementation for the drainage scheme; and

d) Provide details of how the scheme shall be maintained and managed over the lifetime of the development, including any arrangements for adoption by any public body or Statutory Undertaker and any other arrangements required to secure the operation of the drainage system throughout its lifetime.

The development shall be carried out in accordance with the approved drainage scheme and no dwelling shall be occupied until the approved scheme has been completed or provided on the site in accordance with the approved phasing. The approved scheme shall be retained and maintained in full in accordance with the approved details.

To ensure that surface water run-off from the development will not adversely affect, by reason of flooding, to neighbouring land and property.

HI03

There is a requirement for a new/amended vehicular access. Applicants should note the provisions of Section 184 of the Highways Act 1980. The works should be to the specification and constructed to the satisfaction of the Highway Authority, please contact 01522 782070.

HI08

Please contact Lincolnshire County Council Streetworks and Permitting Team on 01522 782070 to discuss any proposed statutory utility connections and any other works which will be required in the public highway in association with this application. This will enable Lincolnshire County Council to assist you in the coordination and timings of such works.

### **Note to Officer**

Please secure to cycle parking provision shown is available at all times whilst the development is occupied.

### **Lincolnshire Fire and Rescue**

It is the opinion of the Fire Authority that in order to remove the objection the following measures are required:

- Access to buildings for fire appliances and fire fighters must meet with the requirements specified in Building Regulations 2010 Part B5. These requirements may be satisfied with other equivalent standards relating to access for fire-fighting, in which case those standards should be quoted in correspondence. Lincolnshire Fire and Rescue also requires a minimum carrying capacity for hard standing for pumping appliances of 18 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2010 part B5.
- Lincolnshire Fire and Rescue recommends that fire hydrants be installed within this development at the developer's expense. However, it is not possible, at this time, to determine the number of fire hydrants required for fire-fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

## Lincolnshire Police

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

History demonstrates that 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.

The safety, security and general well-being of students should be of paramount importance when considering the details of this application.

It is disappointing that there does not appear to be any reference within either the Design & Access statement or other plans, to the steps that the developers will be taking to address public safety and security within this development.

Lincolnshire Police do not have any objections to this development however I would like to make the following general recommendations in relation to the safety and security of this development.

### **Landscaping & Street Furniture**

**Seating:** any seating installed should be of a solid construction within a linear bench design; intended ideally for a single seat/person. Long single benches should not be used as they are likely to encourage and facilitate rough sleeping.

**Street Furniture:** the permeability and open 'public' access together with street furniture that may allow an opportunity for anti-social behaviour and other undesirable activities not complimentary to its intended or desired purpose should be avoided.

Benches, planters and any low level brick construction should make use of studs and bar to prevent their use by skate boarders.

## Vehicular & Pedestrian Access

Achieving an acceptable standard of vehicle control should be carefully planned for any potential future access points of to be build within this development.

There are several key locations within the development that might potentially allow vehicular access to this and further phased developments, including:

- a) The pedestrian point of access from Beevor Street.
- b) The main entrance in Beevor Street.
- c) The two pedestrian points of access from Rope Walk.

The following are the required standards for installing approved vehicle restricting access systems such as rising bollards) at these locations; thus assisting to restrict unfettered vehicular access to further phases of this development.

Bollards – Install ‘Active’ Vehicle Security Barriers (VSB) compliant with BSi PAS 68:2013<sup>1</sup> or IWA 14-1-2013<sup>2</sup> Part 1 standards. These standards specify the essential impact performance requirement for a VSB and a test method for rating its performance when subjected to a single impact by a test vehicle.

IWA 14-2-2013 Part 2<sup>3</sup> provides guidance for the selection, installation and use of VSBs and describes the process of producing operational requirements. The BSI equivalent for installation processes is PAS 69:2013<sup>4</sup>.

Rising bollards should have been successfully tested to PAS 68-2:2013 *Performance Specification for vehicle security barriers – rise and fall bollards*

Static bollards provide passive protection to areas of a development or building that either are not required to have protection against an attack by a vehicle (e.g. to keep an outward opening fire door) clear of obstruction), or where there is no means by which a vehicle may have access but a substantial barrier is still required. These type of bollards may be tested to BSi PAS170-1:2017.

A range of other vehicle mitigation measures are applicable to address a vehicle borne movement as an alternative to traditional bollards e.g. substantial planting bollards, raised or decorative kerbs, steps, seating or substantial decorative art and signage, etc.

## Cycle Storage and Security

Whilst Lincoln is a relatively low crime area the City does suffer a level of cycle thefts therefore:

- avoid furniture (railings) that might be used as ad-hoc cycle racks.
- ensure that arrangements exist to promptly remove cycles or component parts that are left in situ. Suitable signage should be deployed to inform user of this process.

Secure bicycle parking should be made available within an appropriate roofed building, with all round surveillance that is within view (no more than 100 metres) of occupied buildings or CCTV, using ground bolted cycle stands. Construction should be of Galvanised steel bar (min thickness of 3mm) filled with concrete and a – minimum foundation 300mm with welded anchor bar. This facility should have adequate vandal resistant, dedicated, energy efficient lamps illuminated during hours of darkness<sup>5</sup>. A design-focussed and inviting cycle rack/shed would encourage safe and secure bike use where residents feel confident to

<sup>1</sup> British Standards Institution Publically Available Specification (BSi PAS 68:2013)

<sup>2</sup> International Workshop Agreement Part 1 (IWA 14-1:2013)

<sup>3</sup> International Workshop Agreement Part 2 (IWA 14-2:2013)

<sup>4</sup> British Standrads Institution Publically Available Specification (BSI PAS 69:2013)

<sup>5</sup> [www.bikeoff.org/design\\_resource](http://www.bikeoff.org/design_resource)

leave their cycles. If this is not achieved evidence strongly supports that cycle use will be reduced and residents will find alternative means to store cycles, i.e. in rooms or corridors.

Internally 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.

It is noted that the current proposed cycle storage areas do not appear to comply with the above criteria which is designed to provide protection, security and safety for users.

### **Two-wheeled motor vehicle parking**

External parking stores for motor-cycles, mopeds and scooters should be covered, located close to and in view of the main building and be provided with secure anchor points certified to Sold Secure Silver Standard. Secure containers for crash helmets and waterproof clothing are recommended.

### **CCTV – Public Domain.**

The range and scope of any CCTV system on this site may be directly related to the proposed minimum staffing levels (i.e. reception and/or security staff).

Such a scheme should be designed to monitor all vulnerable areas and be fit for purpose. Any system should be to a minimum standard of BS EN 50132-7:2012<sup>6</sup> Police Response is dependent on the system being installed to BS 8418:2010.

A useful reference to help achieve this goal is the "CCTV Operational Requirements Manual 2009 ISBN 978-1-84726-902-7"<sup>7</sup>

### **Litter Bins**

Avoid the use of litter bins around critical/vulnerable areas of the premises i.e. do not place litter bins next to or near glazing, support structures and most sensitive or critical areas. In addition make sure they are covered by your CCTV and operators. Ensure that there is additional and prompt cleaning (effective housekeeping) in these areas.

### **Bin Storage**

Internal communal bin and bicycle stores within blocks of flats must have no windows and be fitted with a secure door set that meets the same physical specification as a 'front door' and specifically Section 2, paragraphs 21.1 to 21.6 and 21.8 to 21.13. (This is meaningless to the average reader – what does the guidance come from?)

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. (Is this what you said earlier that I queried?)

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

### **Landscaping**

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<sup>6</sup> British Standard European Norm (BS EN) 50132-7:2012 covers CCTV surveillance systems for use in security applications.

<sup>7</sup> Published April 2009 by the Home Office Scientific Development Branch available via the following link [CCTV OR Manual](#)

Any landscaping should be kept to a maximum growth height of 1 metre, whilst any trees should be pruned up to a minimum height of 2 metres; thereby maintaining a clear field of vision around the development. Trees when fully grown should not mask any lighting columns, CCTV installations or become climbing aids.

### **Communal Areas & Mail Delivery – Entrances and Reception Areas.**

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

The proposal of a reception area that is in full view with good natural surveillance, clear lines of sight is supported as good practice and will add to the safety, security and reassurance of residents.

### **Windows**

All ground floor windows and those that are easily accessible from the ground must either conform to PAS 24:2016<sup>8</sup> or equivalent standard. At ground floor or accessible levels, lower hinged forward tilting window sets are to be recommended with **window restraining devices** making access difficult.

All ground floor and easily accessible glazing should incorporate one pane of laminated glass to a minimum thickness of 6.8mm or glass successfully tested to BS EN 356:2000<sup>9</sup> to category P2A, unless it is protected by a roller shutter or grille as described in paragraphs 52 (what para 52?) above. With effect from January 1<sup>st</sup> 2011 all laminated glass must be certificated to BS EN 356 2000 rating P3A unless it is protected by a roller shutter or grille.

### **External doors**

The secured by design requirement for all dwelling external doors is PAS 24.2016 or equivalent (3<sup>rd</sup> party tested - 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).

### **Access Control**

In the case of a residential unit between four and nine units above plus that share a communal entrance such as this development, the entrance doors must include an electronic door release system and entry phone linked to each unit. **Tradesperson door release buttons or any other system that allows unauthorised access are not permitted.**

An integrated access system throughout the development (University) using vandal proof resistant proximity readers (such as 'biometric swipe cards') would allow for any security issues following student or staff exclusions. Consideration should be given to the use and

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<sup>8</sup> 'Specification for enhanced security performance of casement and tilt and turn windows for domestic applications'

<sup>9</sup> *Glass in building. Security glazing - resistance to manual attack*

application of prevailing biometric and voice recognition technology; this should be discussed with the CPDA at the earliest opportunity,

This area should be well illuminated and welcoming with the entrance area having a clear view of the approaches to the entrance.

Where a separate automatically opening door is required for disabled access, use should be made of a proximity reader and/or biometric swipe card technology.

An 'air lock' system can be utilised whereby there are two sets of automatic doors; the first opening will allow a visitor through with the provision to control sighted access from the reception or by remote camera / intercom system. In such an environment it is not uncommon for unwanted access to be gained by way of 'follow through' (or tailgating) access, placing staff and students at risk of crime and anti-social behaviour.

### **Boundary Lines and Gating**

The detailed provision and design of the fencing and gating indicated will provide an adequate level of boundary control and help create a good defensible and secure zone within the student complex. It is important that any gating is commensurate in height with the boundary fencing system, access is integrated with the overall security control system envisaged for the complex and should seek the opportunity to eliminate unauthorised 'follow through' or gates being left open. All points of access should be covered within the proposed monitored CCTV system.

### **Signage**

Effective use of directional and informative signage can do much to reduce the opportunity for any persons accessing the site and not knowing where they should be. Site maps and clear directions to a security office or reception will reduce any opportunity for unwarranted trespass on the site.

Likewise an effective identity card / badge system for all persons on the premises can significantly enhance security.

### **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.

The provision of external ledges or elements of the building line that could be used as a platform should be avoided, particularly at places of height, and would effectively contribute to reducing the means to access such places.

### **Lighting**

Lighting should be designed to provide a uniform spread of illumination with clear colour rendition. Lighting incorporated within the perimeter protection should be designed so as to be fit for its use with CCTV. Security lighting, such as metal halide units, should be installed in all areas where surveillance is considered important, such as entrances, main pedestrian access routes and parking facilities. All fittings shall be vandal resistant and positioned out of reach.

Where there is no surveillance, informal or formal, lighting can only assist an offender; in such circumstances, appropriate 'switching off' of lighting should be considered after staff members and residents have left designated areas.

A good lighting system can be cost effective and ensure that there will be a witness to any intrusion. It should allow staff, students and visitors to feel secure and safe within their living environment. Importantly it should make intruders feel vulnerable and that there is an increased likelihood of being challenged.

External lighting must be switched using a photo electric cell (dusk to dawn) with a manual override.

Lighting has a great effect on the commission of crime; increased and appropriate lighting in areas of darkness can reduce the public's fear of crime and reduce the opportunity for an offender to commit crime. As much use as possible should be made of natural light and

### **Block A**

It is noted that there will be further consultation with regard to the proposed use and development of the lower levels of Block A as plans progress in respect of future phases of the St Marks development. This is particularly important in relation to the overall levels of access and vehicle mitigation.

Should the applicant / developers require further detailed advice or information please go to [www.securedbydesign.com](http://www.securedbydesign.com) and access the current "SBD Commercial Guide 2015 V2" and/or the "Resilient Design Toolkit for Counter Terrorism".

Yours sincerely,

John Manuel  
Force Designing Out Crime Officer