

## Consultation Responses

Anglian Water



### Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 03456 066087, Option 1 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk).

AW Site Reference:

Local Planning Authority: Lincoln District (B)

Site: Homebase, Lidl Outlet, Toppstiles And Part Of Bhs (Units C, D ,E) St Marks Retail Park Lincoln LN5 7

Proposal: Demolition of the existing buildings and development of the Site for purpose built student accommodation with commercial floorspace, car parking, cycle storage and associated landscaping

Planning application: 2018/1261/FUL

**Prepared by:** Pre-Development Team

**Date:** 23 November 2018

## ASSETS

### Section 1 - Assets Affected

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

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 - Used Water Network

Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. We therefore request a condition requiring an on-site drainage strategy (1) **INFORMATIVE** - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) **INFORMATIVE** - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) **INFORMATIVE** - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) **INFORMATIVE** - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) **INFORMATIVE**: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

### Section 4 - Surface Water Disposal

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.

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

### Section 5 - Suggested Planning Conditions

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

#### Used Water Sewerage Network (Section 3)

Condition Prior to the construction above damp proof course, a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme.

Reason To prevent environmental and amenity problems arising from flooding

**FOR THE ATTENTION OF THE APPLICANT - if Section 3 or Section 4 condition has been recommended above, please see below information:**

**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-runoff-rate-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)

Environment Agency



FAO: Paul Thompson  
City of Lincoln Council  
Development Control  
City Hall Beaumont Fee  
Lincoln  
Lincolnshire  
LN1 1DF

**Our ref:** AN/2018/128190/01-L01  
**Your ref:** 2018/1261/FUL

**Date:** 19 November 2018

Dear Paul

**Demolition of existing buildings and development of the site for purpose built student accommodation with commercial floorspace, car parking, cycle storage and associated landscaping (Resubmission of 2018/0655/FUL).  
Homebase, Lidl Outlet, Topstiles And Part Of Bhs (Units C, D ,E) St Marks Retail Park Lincoln LN5 7EX**

Thank you for referring the above application on 29 October 2018.

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.

We would ask to be re-consulted should you received any further details regarding the remediation strategy due to the sites previous use and contamination potential.

**Condition 1**

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) and the following mitigation measures:

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.

## **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 170 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.

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 170 of the NPPF.

### **Condition 3**

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 170 of the NPPF.

### **Condition 4**

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.

### **Notes on condition 4 (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).

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

Yours sincerely

**Keri Monger**  
**Sustainable Places - Planning Adviser**

Direct dial 020 847 48545  
Direct e-mail [keri.monger@environment-agency.gov.uk](mailto:keri.monger@environment-agency.gov.uk)

Historic England



Historic England

EAST MIDLANDS OFFICE

Mr K Manning  
City of Lincoln Council  
City Hall  
Beaumont Fee  
Lincoln  
LN1 1DF

Direct Dial: 01604 735460

Our ref: P00984711

16 November 2018

Dear Mr Manning

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HOMEBASE LIDL OUTLET TOPPSTILES AND PART OF BHS (UNITS C D E), ST  
MARKS RETAIL PARK, LINCOLN, LINCOLNSHIRE  
Application No. 2018/1261/FUL**

Thank you for your letter of 29 October 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 is for demolition of existing buildings at the above site and the construction of purpose built student accommodation with commercial floor space, 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 advise that your authority should ensure that the proposed taller 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 further variation of the architectural treatment of Block A according to the differing heights of each section: for example by varying the choice and colour of brick for each section as is being proposed for other parts of the scheme. We advise that large sections of metal panels are not used as these would be overly obtrusive in longer views.

##### 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. 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.

Yours sincerely

**David Walsh**

Principal Inspector of Historic Buildings and Areas

E-mail: david.walsh@HistoricEngland.org.uk

### **Internal 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 granting planning permission.

It is noted a Drainage Strategy/Flood Risk Assessment is included within the planning application, which contains appropriate mitigation and states the surface water from the site goes to a culverted watercourse off site. However, this is not part of the surface sewer to sewer that drains a large area and most of it is of a smaller diameter, believed to be 375mm Ø. There will be times when the system is surcharged.

Regards,

Richard Wright

Engineering Services Technician

Witham & Humber Internal Drainage Boards.

## **Lincoln Civic Trust**

OBJECTION - Our objections to the original scheme can be summarised as follows:

- (a) The mass and size of the buildings is too overpowering for the site.
- (b) The design lacked imagination given the historical significance of the area
- (c) No provision for easy and safe access for students to the main University site.
- (d) Vehicle access and provision totally inadequate.

The new application attempts to address items (a) and (b) in that the design of the buildings on the western elevation have undergone a transformation and are quite acceptable. It is pity however that the design principles used have not then been applied to all the buildings to the rear of the site. However, the design change to the rear buildings, with the addition of cladding to the upper storeys does lower the effect of the height of the buildings and that, coupled with the reduction in actual height of the 11 storey buildings across the back is to be commended. However, there is still a proposal for an 11 storey block in the north eastern corner which we will continue to object to.

The application does NOT address our other points. Students accessing the main University site will have to cross the East/West Link Road which is becoming a very busy road and the constant use of a pedestrian crossing will only seek to increase the congestion and furthermore lead to students gambling with the traffic and attempting to cross the road without the protection of the crossing. Whilst we appreciate that the provision of bridge would be expensive, we felt that in the interests of safety it should be considered.

On our last point, we have commented many times that whilst the University and the Council try to discourage students bringing private vehicles to Lincoln, this CANNOT be enforced and many students will still bring cars to the city. The parking provision of 17 car park spaces is totally inadequate for a site of this size without considering students vehicles and although in the new application there is a provision for an additional 22 spaces allocated for use at the beginning and end of the academic year, the provision remains woefully inadequate.

The original outline plan for the whole of St Marks was to include a Multi-Storey car park and it is suggested that the application for this should form part of the current application and the work done in tandem to ensure that there is some form of additional parking provision for the area. We appreciate that it will not stop the students trying to avoid paying car park fees and looking for parking in residential areas. If the applicant is serious about the development of the whole of the St Marks site, then surely this would only bring forward their plans and in so doing show a great amount of good will and alleviate a major problem facing the City.

**The applicant has provided a response to the points raised by the Civic Trust and it is important that Members have sight of their response as it clarifies a number of key points referred to in the officer report:**

We have reviewed the response received by Lincoln Civic Trust, regarding the resubmitted application. The response outlines that the Trust object to the proposals, due to the four following reasons:

- (a) The mass and size of the buildings is too overpowering for the site.
- (b) The design lacked imagination given the historical significance of the area
- (c) No provision for easy and safe access for students to the main University site.
- (d) Vehicle access and provision totally inadequate.

We seek to address each of these in turn, as follows:

(a) The mass and size of the buildings is too overpowering for the site. The Trust will be aware that the scale and massing of the buildings, falls within the parameters of the outline consent, which was granted in 2018. This was based upon a very thorough Heritage Townscape and Visual Impact Assessment (HTVIA) which formed part of the Environmental Statement which form part of the application. This tested an agreed set of key views. This application forms a re-submission of a recently refused application but with amendments to the design. The scale and massing has not been revisited in this re-submission, and the scale and massing did not form the single reason for refusal for the former application.

(b) The design lacked imagination given the historical significance of the area

This application follows the recent refusal for a similar application at the Site. The Trust will recall that the previously submitted application comprised mainly light, buff brick. This was then revised to a Lincoln red brick, prior to committee, in accordance with discussions which had been held with both planning and conservation officers.

The proposed red brick, reflected the industrial heritage of Lincoln, identifying with the historical significance of the area as a former industrial part of Lincoln. Notwithstanding this, the 'red brick' application was then refused at planning committee, despite officer recommendation for approval.

The scheme which is now before the Council seeks to incorporate both the historical red brick, as well as a palette of different brick colours, to introduce variation in design. The red brick still identifies with the industrial heritage, whilst the lighter tones reflect recent additions to the cityscape, including Cygnet Wharf and the Gateway Building.

(c) No provision for easy and safe access for students to the main University site.

Pedestrian routes were approved as part of the outline consent, and are to be brought forward with the wider site. This set the appropriate location for any new crossings in addition to those ones which are already established.

Much of the city centre and areas around Brayford Pool give priority to pedestrians. St. Marks benefits from strong pedestrian links to the High Street, with vehicle access via Ropewalk. The pedestrian routes are further set out within the pedestrian route analysis within the Design and Access Statement.

Once again this matter was considered in the determination of the refused application and was not considered to raise grounds for refusal of planning permission.

(d) Vehicle access and provision totally inadequate.

This application is supported by a Transport Statement. The TS which was submitted with the refused application was assessed by the County Council on behalf of the City Council and no issues were raised as to its content or analysis. We have no reason to believe that vehicular access is not acceptable not least because the Existing access to the St Marks car park will remain and the student accommodation development is proposed to be car.

### **Lincolnshire Fire and Rescue Latest Response**

The following email is in relation to correspondence received from the applicant in relation to the bollards within the development and officer proposals to utilise conditions to deal with the provision of fire hydrants and the access within the site:-

**From:** Ysanne Spafford

**Sent:** 23 November 2018 14:03

**To:** Thompson, Paul (City of Lincoln Council)

**Cc:** Peter Kontowski; Stephen Moore; Debbie Robinson

**Subject:** RE: 2018/1261/FUL Homebase, Lidl Outlet, Topps Tiles And Part Of Bhs (Units C, D ,E) St Marks Retail Park Lincoln LN5 7EX

Hi Paul

Thank you for your email in response to my letter dated 5 November 2018.

Lincolnshire Fire and Rescue remove our objection in relation to hydrant provision as we are now satisfied this will be addressed.

We are in agreement with the further condition to address the requirements for the construction of routes. Access route should comply with The Building Regulations 2010 as explained in my letter.

With reference to the fire engineering consultants comment. Lincolnshire Fire and Rescue are not in a position to carry a key for the bollards. We will contact the Building Control Approved inspector about this matter.

Kind regards

Ysanne Spafford  
Fire Safety Inspector  
Lincolnshire Fire and Rescue

## Lincolnshire Fire and Rescue Original Response

**LINCOLNSHIRE FIRE AND RESCUE**

Chief Fire Officer: Nick Borrill



My Ref: YS  
Your Ref: 2018/1261/FUL

Head of Planning  
Lincoln City Council  
City Hall  
Beaumont Fee  
Lincoln  
LN1 1DF

Lincolnshire Fire and Rescue  
Skegness Fire Station  
Churchill Avenue  
Skegness  
Lincolnshire  
PE25 2RN

Sent by email to [developmentteam@lincoln.gov.uk](mailto:developmentteam@lincoln.gov.uk)

5 November 2018

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990  
PLANNING CONSULTATION - Demolition of existing buildings and development of the site for purpose built student accommodation with commercial floorspace, car parking, cycle storage and associated landscaping (Resubmission of 2018/0655/FUL). | Homebase, Lidl Outlet, Topps Tiles And Part Of Bhs (Units C, D ,E) St Marks Retail Park Lincoln LN5 7EX**

I refer to the planning application reference 2018/1261/FUL. The Fire Authority object to the application on the grounds of inadequate access and water supplies.

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

- Drawing number 1152-002 Rev P4 shows lift out bollards at the entrance to the site. It is likely that these bollards will be locked in place for security reasons. This would impede Lincolnshire Fire and Rescue when responding to a fire incident.

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 requires that fire hydrants conforming to BS750-2012 be installed within 90m of each premises entrance 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



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the water companies. Fire hydrant acceptance testing will be carried out by a Hydrant Inspector on completion and a standard hydrant marker "H" plate will be fitted nearby. Following adoption the Fire Service will be responsible for the ongoing maintenance and repairs for the lifetime of the fire hydrant.

Should you wish to discuss this matter, please do not hesitate to contact me on the telephone number below.

Yours faithfully

A handwritten signature in black ink, appearing to be 'M. J. ...', written over a light grey rectangular background.

Lincolnshire Fire and Rescue  
Fire Safety Inspector

Telephone: 01754 898980  
Email: [fire.safety@lincoln.fire-uk.org](mailto:fire.safety@lincoln.fire-uk.org)

CC. Water Officer LFR  
DDC CFP & Risk LFR

**NHS England**  
**Application Number: 2018/1261**  
**Location: Homebase, Lidl Outlet, Topstiles and part of Bhs, St Marks Retail Park, Lincoln, LN5 7EX**

<b>Impact of new development on GP practice</b>	<p>The above development is proposing 10 student accommodation buildings of between 4 and 10 storeys in height, totalling 1,372 single occupancy rooms.</p> <p>The calculations below show the likely impact of this new population in terms of number of additional consultation time required by clinicians. This is based on the Department of Health calculation in HBN11-01: Facilities for Primary and Community Care Services.</p> <p><b>Consulting room GP</b></p> <table border="1"> <tr><td>Proposed population</td><td>1372</td></tr> <tr><td>Access rate</td><td>5260 per 1000 patients</td></tr> <tr><td>Anticipated annual contacts</td><td><math>1.372 \times 5260 = 7217</math></td></tr> <tr><td>Assume 100% patient use of room</td><td>7217</td></tr> <tr><td>Assume surgery open 50 weeks per year</td><td><math>7217/50 = 144.3</math></td></tr> <tr><td>Appointment duration</td><td>15 mins</td></tr> <tr><td>Patient appointment time per week</td><td><math>144.3 \times 15/60 = 36.1</math> hrs per week</td></tr> </table> <p><b>Treatment room Practice Nurse</b></p> <table border="1"> <tr><td>Proposed population</td><td>1372</td></tr> <tr><td>Access rate</td><td>5260 per 1000 patients</td></tr> <tr><td>Anticipated annual contacts</td><td><math>1.372 \times 5260 = 7217</math></td></tr> <tr><td>Assume 20% patient use of room</td><td><math>7217 \times 20\% = 1443.3</math></td></tr> <tr><td>Assume surgery open 50 weeks per year</td><td><math>1443.3/50 = 28.867</math></td></tr> <tr><td>Appointment duration</td><td>20 mins</td></tr> <tr><td>Patient appointment time per week</td><td><math>28.867 \times 20/60 = 9.6</math> hrs per week</td></tr> </table> <p>Therefore an increase in population of 1372 in the City of Lincoln area will place extra pressure on existing provisions, for example- extra appointments requires additional consulting hours (as demonstrated in the calculations above.) This in turn impacts on premises, with extra consulting/treatment room requirements.</p>	Proposed population	1372	Access rate	5260 per 1000 patients	Anticipated annual contacts	$1.372 \times 5260 = 7217$	Assume 100% patient use of room	7217	Assume surgery open 50 weeks per year	$7217/50 = 144.3$	Appointment duration	15 mins	Patient appointment time per week	$144.3 \times 15/60 = 36.1$ hrs per week	Proposed population	1372	Access rate	5260 per 1000 patients	Anticipated annual contacts	$1.372 \times 5260 = 7217$	Assume 20% patient use of room	$7217 \times 20\% = 1443.3$	Assume surgery open 50 weeks per year	$1443.3/50 = 28.867$	Appointment duration	20 mins	Patient appointment time per week	$28.867 \times 20/60 = 9.6$ hrs per week
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<b>GP practice(s) most likely to be affected by the housing development</b>	<p>Due to the fact that patients can choose to register at any practice that covers the area of the development, and there are no waiting lists for patients, all practices that provide care for the region that the development falls within are obliged to take on patients, regardless of capacity.</p>																												

<sup>1</sup> Source: Lincolnshire Research Observatory 2011 Census Data

	As such, Portland Medical Practice, Abbey Medical Practice, Brayford Medical Practice and The University of Lincoln Health Service may be affected by the development.																																															
<p><b>Issues to be addressed to ensure the development is acceptable</b></p>	<p>This development would put additional demands on the existing GP services for the area and additional infrastructure would be required to meet the increased demands.</p> <p>Lincolnshire West Clinical Commissioning Group (LWCCG) would align the s106 funding from this development with The University of Lincoln Health Service. This Practice is the closest to the development site and as all of the individuals who will reside in the development will be students, it is extremely likely that they will opt to register at the University Practice.</p> <p>The current building configuration at The University of Lincoln Health Service means that they would not be able to accommodate such a dramatic increase in patient numbers without considerable investment in their infrastructure. To mitigate the effect of this development, the Practice would use the s106 funding to develop additional consultation space. This would be done through either an expansion to the premises or a reconfiguration of the space in the existing building.</p> <p>This of course would be subject to a full business case and approval by NHS England, with any proposed expenditure taking place when the s106 funds are released by the developer as per the agreement and within the agreed timescale for expenditure of the funds.</p> <p>I am aware that when outline application 2016/0096 for this site was submitted and approved, there was no mechanism in place for the Council to consult with NHS England on applications relating to student accommodation and as a result of this it may be difficult to request a s106 contribution for health care based on the full number of 1,372 students as documented in this application (2018/1261.) However, application 2016/0096 was submitted to provide accommodation for 1,100 students, whereas 2018/1261 has been submitted for 1,372 student units. As such, NHS England requests that should our submission to secure funding for the entire development not be successful, that a request for funding relating to the increase in student numbers between these 2 applications be considered.</p>																																															
<p><b>Fairly and reasonably related in scale and kind to the development.</b></p>	<table border="1" data-bbox="448 1211 1375 1473"> <thead> <tr> <th></th> <th>Average list size per GP</th> <th>Required m2</th> <th>£ per m2</th> <th>Total cost</th> <th>£per person</th> </tr> </thead> <tbody> <tr> <td>GP team</td> <td>1,800</td> <td>170</td> <td>2,300</td> <td>£391,000</td> <td>217</td> </tr> <tr> <td>GP furnishings</td> <td>1,800</td> <td></td> <td></td> <td>£20,000</td> <td>12</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>229</td> </tr> <tr> <td colspan="5">Contingency requirements @ 20%</td> <td>46</td> </tr> <tr> <td colspan="5">Total per resident</td> <td>275</td> </tr> <tr> <td colspan="5">Total per dwelling (resident x 1)</td> <td>275</td> </tr> </tbody> </table> <p>The table above shows the contribution formula which is based on the needs of a Primary Care Health Team and associated administration support. By identifying the required area and furnishings, a total cost of £275 per patient is determined. This figure is then multiplied by average occupancy figures (in this case 1 as the rooms are single occupancy) to provide a funding contribution of per dwelling of £275.</p>							Average list size per GP	Required m2	£ per m2	Total cost	£per person	GP team	1,800	170	2,300	£391,000	217	GP furnishings	1,800			£20,000	12						229	Contingency requirements @ 20%					46	Total per resident					275	Total per dwelling (resident x 1)					275
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<b>Financial Contribution requested</b>	<p>The contribution requested for the development is £377,300.00 (£275 x 1,372 rooms.)</p> <p>However, as discussed above, in the event that securing funding for the total number of students is not successful NHS England would request that as a minimum a s106 contribution to health provisions of £74,800.00 (£275 x 272 students) is awarded for the 'uplift' in student numbers since application 2016/0096 was approved.</p>
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**Vicky Allen**  
**Primary Care Support Officer- Medical & Pharmacy**  
**November 2018**