



LINCOLNSHIRE POLICE

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Your Ref: App. 2019/0390/FUL

28th May 2019

Our Ref: PG//

Development & Environmental Services

City Hall, Beaumont Fee
Lincoln, LN1 1DF

Site of Former Windmill Pine, Beevor Street, Lincoln, Lincolnshire, LN6 7DJ (Multiple Occupancy Accommodation)

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

Historically Student Accommodation can become vulnerable to crime and anti-social behaviour therefore it is important that the best security arrangements and provision are planned for such premises.

The safety, security and general well being of student should be of paramount importance when considering the detail of this application. The following aspects of security should be rigorously applied to this building.

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

Perimeter and Boundary Treatment.

It is noted that much of the site appears to have both natural and physical boundaries but where none exist I would recommended that appropriate fencing and commensurate gating is included to at least 1.8m non-climbable LPS 1175 SR1 (Loss Prevention Standard Security Rating 1) 1.9 Lang & Fulton on 'Modena' style fencing BS1175 SR1 or to similar SBD standard.

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 and access is integrated with the overall security control system envisaged for the development and should seek the opportunity to eliminate unauthorised 'follow through' or 'tail-gating' and gates being left open. All points of access should be covered within the proposed monitored CCTV system.

Vehicular Access & Pedestrian Control

Open pedestrian access with only limited vehicular restriction onto the site should not form part of the design or permeability of this site. The main point of vehicular access (from B&Q) indicates only a modest form of vehicular control with relatively open pedestrian access onto the site.

Subject to the provision of 24/7 manned gate guards it is important that this point of access is controlled.

The principle of access control refers to the design of building and space to actively keep unauthorised people out and would encompass these aims;

- 1) to limit the likelihood that offenders will become aware of that area as a potential target
- 2) to make it more difficult for offenders to navigate into, out of and within an area should they select it as a target
- 3) to increase the physical difficulty of entering a building or space should offenders become aware of the area as a target
- 4) to increase the difficulty *psychologically* for offenders to enter and move around an area without feeling conspicuous (anonymity)
- 5) to remove any excuse for potential offenders to be within a private or semi-private space and maximising the 'users' confidence in challenging non-legitimate users of space.

It is recommended that the front facing security/office (barrier surveillance) is protected by way of appropriate bollards to protect both pedestrians and staff.

Parking Provision

Adequate parking provision is evident, however I would recommend that vehicle spaces are located where possible on the opposite side of access roads away from the immediate building line i.e. bays 7 – 20 and 34 – 84 this would help avoid vehicular and pedestrian conflict, and remove a possible climbing aid.

Cycle Storage and Security

Lincoln City in keeping with many University cities suffers a level of cycle thefts therefore:

- avoid furniture (for example railings) that might be used as ad-hoc cycle racks
- include arrangements 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 darkness¹. A design-focussed and inviting cycle rack/shed would encourage safe and secure bike use where residents feel confident to 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 to the cycle storage 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.

Bulk head anti vandal lighting should be a feature of this design.

External doors and windows

The potential for unwanted guests will be considerable at this location and therefore robust measures should be installed to ensure the security and safety of student residents. Access may be gained via either of the shown entrances and the risk of 'follow through' entry gained. I would recommend that an air-lock style entrance vestibule is incorporated into the design (to help prevent unauthorised follow through access) commensurate with an access control system, with an electronic door release, and visitor door entry system that provides colour images, and clear audio communications linked to each individual unit. Under no circumstances should a trade person release button or similar uncontrolled access method be used.

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

The location of the designated security cameras is noted and I would advise that these cameras have a field of vision that has a primacy to monitor the pedestrian access points indicated.

Should it be considered appropriate a police response monitored system to with installation to EN 50131-1, (PD6662 Scheme for the implementation of European Standards), or BS 8418 for a detector activated CCTV system.

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

All ground floor windows and doors and those that are easily accessible from the ground must conform to improved security standard PAS24: 2016. **All ground floor windows should have window restrainers and effective locking systems.**

Access to Places of Height

It is important that access to places of height 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.

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

Individual Flat or Unit Doors.

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

Student Accommodation – Communal Areas & Mail Delivery

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

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

Under no circumstances would I recommend the use of a 'Trade-man's Button' or other form of security override.

It is further recommended that within and between the floors of the various accommodation block access control measures are provided that restricts access for residents providing additional safety and security meaning that small residential units are compartmentalised. This would give residents control over who they permit in to their respective flat units.

As part of the University accommodation management processes it is recommended that female or other vulnerable students are accommodated above the lower or ground floors of accommodation blocks.

An effective design feature would be to include raised windows on the ground level which would balance outward surveillance against the opportunity to easily gain access to the window notwithstanding the requirement to have window restrainers.



1.2 Raised window levels in the above student development are used throughout this development making 'reach through' or casual access difficult.

Lighting

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

Bin Storage

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

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

Please refer to *Commercial Guide 2015 & New Homes 2019* which can be located on www.securedbydesign.com

Crime prevention advice is given free without the intention of creating a contract. Neither the Home Office nor the Police Service takes any legal responsibility for the advice given. However, if the advice is implemented it will reduce the opportunity for crimes to be committed.

Yours sincerely,

John Manuel MA BA (Hons) PGCE PGCPD Dip Bus.
Force Designing Out Crime Officer (DOCO)

NHS England

Application Number: 2019-0390

Location: Site of Former Windmill Pine, Beevor Street, Lincoln, LN6 7DJ

Impact of new development on GP practice	<p>The above development is proposing 51 dwellings which, based on the average of 2.2 people per dwelling for the City of Lincoln area, would result in an increase in patient population of 112.</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>Consulting room GP</p> <table border="1" data-bbox="416 689 1050 929"> <tr><td>Proposed population</td><td>112</td></tr> <tr><td>Access rate</td><td>5260 per 1000 patients</td></tr> <tr><td>Anticipated annual contacts</td><td>$0.112 \times 5260 = 590$</td></tr> <tr><td>Assume 100% patient use of room</td><td>590</td></tr> <tr><td>Assume surgery open 50 weeks per year</td><td>$590/50 = 11.8$</td></tr> <tr><td>Appointment duration</td><td>15 mins</td></tr> <tr><td>Patient appointment time per week</td><td>$11.8 \times 15/60 = 3.0$ hrs per week</td></tr> </table> <p>Treatment room Practice Nurse</p> <table border="1" data-bbox="416 1003 1050 1243"> <tr><td>Proposed population</td><td>112</td></tr> <tr><td>Access rate</td><td>5260 per 1000 patients</td></tr> <tr><td>Anticipated annual contacts</td><td>$0.112 \times 5260 = 590$</td></tr> <tr><td>Assume 20% patient use of room</td><td>$590 \times 20\% = 118$</td></tr> <tr><td>Assume surgery open 50 weeks per year</td><td>$118/50 = 2.361$</td></tr> <tr><td>Appointment duration</td><td>20 mins</td></tr> <tr><td>Patient appointment time per week</td><td>$2.361 \times 20/60 = 0.8$ hrs per week</td></tr> </table> <p>Therefore, an increase in population of 112 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	112	Access rate	5260 per 1000 patients	Anticipated annual contacts	$0.112 \times 5260 = 590$	Assume 100% patient use of room	590	Assume surgery open 50 weeks per year	$590/50 = 11.8$	Appointment duration	15 mins	Patient appointment time per week	$11.8 \times 15/60 = 3.0$ hrs per week	Proposed population	112	Access rate	5260 per 1000 patients	Anticipated annual contacts	$0.112 \times 5260 = 590$	Assume 20% patient use of room	$590 \times 20\% = 118$	Assume surgery open 50 weeks per year	$118/50 = 2.361$	Appointment duration	20 mins	Patient appointment time per week	$2.361 \times 20/60 = 0.8$ hrs per week
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GP practice(s) most likely to be affected by the housing development	<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>																												

¹ Source: Lincolnshire Research Observatory 2011 Census Data

High quality care for all, now and for future generations

	As such, Portland Medical Practice, Brayford Medical Practice and University Health Centre may be affected by the development.
Issues to be addressed to ensure the development is acceptable	<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>The 3 practices that cover the site of the development are part of the Imperium Primary Care Network. Primary Care Networks are groups of practices that work together in partnership and with other health and social care organisations to deliver more integrated services to their patient populations. PCN's have been introduced nationally to address issues around flexibility, resilience and vulnerability which are currently experienced by many practices across the country. They comprise of extended clinical teams with a broad range of skills, including GP's, pharmacists, district nurses, and other community providers. These networks will transform the way people receive health care and will result in a move away from patients automatically accessing medical services at their closest GP practice.</p> <p>Calculations have show that all 3 practices that form Imperium have a high level of patients per square meter (ppm^2), the lowest of which is 19ppm^2. Experience shows that as practices approach the 15ppm^2 threshold they typically experience difficulties around their premises and clinical resources. Growth in area population as a result of this development would increase this figure and put further pressure on the practices.</p> <p>Brayford Medical Practice and University Health Centre are both landlocked sites with no opportunities to expand. Portland Medical Practice has have confirmed they are currently fully utilising their building, but that they have the potential to extend.</p> <p>To mitigate the impact this development would have on the Imperium group, the s106 funding would be used at Portland Medical Practice to build an extension for additional clinical rooms. These rooms will be multiuse and as such used by the extended clinical teams (such as phlebotomists, physiotherapists, paramedics, etc) in addition to the practices GP's. These extended clinical teams would see patients from all practices in the Imperium group and would be able to treat some of the patients that have historically been seen by GP's, thereby freeing up GPs to deal with more complex cases.</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>

Fairly and reasonably related in scale and kind to the development.		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%					48
	Total per resident					275
	Total per dwelling (resident x 2.2)					605
	<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 applying average national list sizes to these groups and identifying the required area and furnishings, a total cost of £275 per patient is determined. This figure is multiplied by 2.2 (the average number of persons per dwelling for City of Lincoln) to provide a funding per dwelling of £605.</p>					
Financial Contribution requested	The contribution requested for the development is £30,855.00 (£605 x 51 dwellings.)					

Vicky Allen
Primary Care Support Medical & Pharmacy
June 2019

Marie Smyth
City of Lincoln Council
Development Control
City Hall Beaumont Fee
Lincoln
LN1 1DF

Our ref: AN/2019/129071/01-L01
Your ref: 2019/0390/FUL
Date: 12 June 2019

Dear Marie

**Erection of 51 no. townhouses; 42 no. to be occupied as 6 bed C4 Houses in Multiple Occupation with 2 no. 9 bed and 7 no. 13 bed to be occupied as Sui Generis Houses in Multiple Occupation. Creation of 99 parking spaces with vehicular access from Beevor Street and new pedestrian link to Tritton Road between Morrisons car park and the drain.
Site Of Former Windmill Pine Beevor Street Lincoln Lincolnshire LN6 7DJ**

Thank you for referring the above application, which was received on 23 May 2019.

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

Condition 1:

The development shall be carried out in accordance with the approved flood risk assessment dated May 2019 and the following mitigation measures it details:

- Finished floor levels shall be set no lower than 5.80 metres above Ordnance Datum (AOD)
- The development shall have at least two storeys

Reason

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

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Condition 2:

Prior to each phase of development approved by this planning permission no development 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:

Environment Agency
Nene House (Pytchley Lodge Industrial Estate) Pytchley Lodge Road, Kettering, Northamptonshire, NN15 6JQ.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

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.

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, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework.

The previous use of the proposed development site as part of an engineering works presents a 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 adjacent to Main Drain which is monitored for purposes of the Water Framework Directive and lies over a Secondary A aquifer.

The Geoenvironmental Appraisals submitted with the application demonstrate that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. We believe 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.

Condition 3:

Prior to any part of the permitted 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 if remediation is needed, 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 National Planning Policy Framework.

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, and 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. This is in line with paragraph 170 of the National Planning Policy Framework.

Condition 5:

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 170 of the National Planning Policy Framework.

Information for ApplicantGroundwater and Contaminated Land

We have reviewed the Phase 1 Geoenvironmental Appraisal, dated April 2019 and the Phase 2 Geoenvironmental Appraisal, dated May 2019 prepared by Patrick Parsons and consider that some additional site investigation is warranted to assess the potential risk posed to controlled waters.

We note that no groundwater samples have been collected and no samples have been tested for volatile organic compounds that could be present given the site's former use. We therefore recommend that groundwater samples are collected on a minimum of two occasions from sufficient locations that enable groundwater conditions below the site to be adequately characterised. The samples should be tested for all potential contaminants of concern.

We consider this is justified given the site's history, location with respect to controlled waters and the size of the site versus exploratory locations to date. There are also oily sheens on groundwater and putrid odours noted in the report from the Phase 2 Investigation, that we consider are worth further investigation. Based on the results, further work may be required.

We recommend that developers:

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 our [Guiding principles for land contamination](#) for the type of information that we require 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

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 condition, as we may need to tailor our advice accordingly.

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

Please consult us on the details submitted to your authority to discharge this condition and on any subsequent amendments/alterations.

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

Jen Moffatt
Sustainable Places - Planning Adviser

Direct dial 020 847 53488

Direct e-mail jennifer.moffatt@environment-agency.gov.uk



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 066067, Option 1 or email planningliaison@anglianwater.co.uk

AW Site Reference: 148248/1/0060832

Local Planning Authority: Lincoln District (B)

Site: Site Of Former Windmill Pine Beevor Street
Lincoln Lincolnshire LN6 7DJ

Proposal: Erection of 51 no. townhouses; 42 no. to be occupied as 6 bed Houses in Multiple Occupation with 2 no. 9 bed and 7 no. 13 bed to be occupied as Sui Generis Houses in Multiple Occupation.

Planning application: 2019/0390/FUL

Prepared by: Pre-Development Team
Date: 28 June 2019

ASSETS

Section 1 - Assets Affected

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

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Canwick Water Recycling Centre which currently does not have capacity to treat the flows the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.

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. A full assessment cannot be made due to lack of information, the applicant has not identified a foul connection point. 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.

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 - 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 No drainage works shall commence until a foul 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.

Surface Water Disposal (Section 4)

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 - 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)

Dear Sir/Madam

REFERENCE: 2019/0390/FUL

DEVELOPMENT: ERECTION OF 51 NO. TOWNHOUSES; 42 NO. TO BE OCCUPIED AS 6 BED C4 HOUSES IN MULTIPLE OCCUPATION WITH 2 NO. 9 BED AND 7 NO. 13 BED TO BE OCCUPIED AS SUI GENERIS HOUSES IN MULTIPLE OCCUPATION. CREATION OF 99 PARKING SPACES WITH VEHICULAR ACCESS FROM BEEVOR STREET AND NEW PEDESTRIAN LINK TO TRITTON ROAD BETWEEN MORRISONS CAR PARK AND THE DRAIN.

LOCATION: SITE OF FORMER WINDMILL PINE, BEEVOR STREET, LINCOLN, LINCOLNSHIRE, LN6 7DJ

Revised comment following the availability of the Flood Risk Assessment.

Thank you for the opportunity to comment on the above application. The site is within the Upper Witham Internal Drainage Board district adjacent to the Board maintained Skew Bridge North Drain (24201).

The Board Objects in Principle to any development in flood plain (Zones 2 and 3 on the Environment Agency flood maps). However it is up to City of Lincoln Council as the planning Authority grant planning permission. It is noted that a Flood Risk Assessment is included in the Application that contains some appropriate mitigation, it is noted the proposed FFL is 5.8m.

Comment and information to Lincolnshire CC Highway SUDs Support

No development should be commenced until the Local Planning Authority, in consultation with the Lead Local Flood Authority has approved a scheme for the provision, implementation and future maintenance of a surface water drainage system. As a brown field site any discharge must be limited to the 70% of the ACTUAL existing rate. The FRA provide some information, but there is no information on the existing ACTAL drainage system that serves the site.

Comment and information to Agent/Applicant

Under the terms of the Board's Byelaws, the prior written consent of the Board is required for any proposed temporary or permanent works or structures in, under, over or within the byelaw distance (6m) of the top of the bank of a Board maintained watercourse. The applicant has been in communication with the Board and an appropriate clear strip has been left.

Regards

Guy Hird
Engineering Services Officer

Upper Witham Internal Drainage Board J1 The Point,
Weaver Road,
LINCOLN

Hi Marie

Many thanks for confirming that the DAS is now available online. The County Council has no comments to make on this application in relation to education.

Kind regards

Simon

Simon Challis
Strategic Development Officer
Corporate Property

Lincolnshire County Council | County Offices | Newland | Lincoln | LN1 1YL

From: Harvey Dowdy <[REDACTED]>
Sent: 25 June 2019 18:58
To: Manning, Kieron (City of Lincoln Council) <Kieron.Manning@lincoln.gov.uk>
Subject: Planning Application Ref: 2019/0390/FUL Spike Point Student Accommodation, Tritton Road, Lincoln (site of Former Windmill, Beevor Street, Lincoln). Objection.

Dear Mr Manning

Further to our recent telephone conversation, I am writing to confirm the University's objection to the proposed development.

While a member of University staff has had some contact with the developer who asked for information regarding some technical matters, we wish to make it clear that the University has neither encouraged this development nor more specifically has it engaged in any dialogue with the developer with a view to entering into any arrangement with them in the future.

The University has presented to Officers and Members of the Lincoln City Planning Committee on a number of occasions and has been open and transparent with them as to the University's plans for student growth and therefore the demand for student accommodation in the short to medium term.

We advised Members in December last year that the University's demand would be satisfied for the period to c. 2025 by the approval of the development at St Marks (December 2018) – the final development needed to complement those already approved at Cygnet Wharf, 179 High Street, Valentine Court and Viking House.

Having scrutinised the Design and Access Statement submitted as part of the application in addition to the point raised above re: the University's lack of involvement to date, we are unable to recognise the levels of demand stated and would assert in particular that their statement at Para 5.1 (see below) does not reflect the current situation.

There is a well-documented shortage in purpose built student accommodation across the city – highlighted by the erection of temporary accommodation on the University's campus to house the 2011-clearing intake. The applicant understands that there is potentially a particular shortage in accommodation, and a therefore a need for high-quality accommodation for the growing student population as described in paragraph 2.1

The University is particularly concerned that this application would not only deliver student accommodation which would be surplus to demand (and therefore create voids elsewhere), it would also be sited on land which could otherwise be used for employment. The University works very closely with Lincoln City Council and with LSIP to ensure that there are sufficient sites available to facilitate business development. This in turn will support the retention of graduates and post-graduates within the City and support the local economy.

I would be grateful if you could acknowledge receipt of this letter.

Yours sincerely,

Harvey Dowdy



Mrs. Harvey Dowdy | Director of Estates

Estates
University of Lincoln, Brayford Pool, Lincoln, Lincolnshire. LN6 7TS
tel: +44 (0)1522 837021 | mobile: [REDACTED]

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Consultee Details

Name: Ms Catherine Waby

Address: St Mary's Guildhall, 385 High Street, Lincoln LN5 7SF

Email: lincolncivictrust@btconnect.com

On Behalf Of: Lincoln Civic Trust

Comments**OBJECTION**

We feel that the proposal seeks to make use of a redundant piece of 'brownfield land' and as a principle we do not object. However, firstly, to describe the rather non-descript blocks as townhouses, stretches the imagination and we feel the designs could be more creative. In our opinion the proposal is too concentrated and creates an unnecessary 'high density' of people living in the area. Secondly, given that there is provision for 99 car parking spaces which we commend as we have said many times, today students do have private transport and will seek to bring them, we are concerned that the access road between Morrisons and B&Q was not designed as a thoroughfare but, as a car park feeder road and hence needs improving. Furthermore the resultant increase in traffic fed onto Beevor Street coupled with the Western Growth Corridor proposal is going to create a major bottleneck where Beevor Street meets Tritton Road and a proposal to improve the junction needs to be provided.

Keith,

As I understand it this development is of townhouses designed to BS 9991 with ground and three upper storeys with a top floor height of 8.7 m with a category 2 sprinkler system to BS 9251. If this is the case then Lincolnshire Fire and Rescue would have no objections to the extended hose distances to the three premises 41, 42 and 48 as indicated on the plan attached

Marie

Please ask Keith for a copy of the plan in discussion should you require it and please let me know if you require anything further from Lincolnshire Fire and Rescue.

Debbie

Debbie Robinson
Fire Safety Officer

Lincolnshire Fire and Rescue
County Emergency Centre
South Park Avenue
Lincoln
LN5 8EL

From: Wright, Daryl (City of Lincoln Council)

Sent: 31 July 2019 13:51

To: Smyth, Marie (City of Lincoln Council) <Marie.Smyth@lincoln.gov.uk>

Subject: RE: 2019/0390/FUL Former Windmill Pine site

|

Hi

My only concerns would be if the access to Hamilton house is restricted during the progress of works that would affect our ability to trade efficiently throughout the work, upon completion of the works if the B&Q road is to be used for access to the students is this road suitable for this further traffic and who will be responsible for maintaining this road?

It would also need to take into consideration that the building is not designed where it will create a security risk to the council depot such as walls, trees etc. being located in such a way where making access over the fence will be made easier.

I would also have reservations that there would be an increased security risk to the depot as it would become very secluded with an increased access for foot traffic if this is to be used as access to the complex

Daryl Wright

Void Team Leader