



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

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

8<sup>th</sup> September 2021

Dear Mr Manning

Re: Land at Beevor Street, Lincoln Application Ref - 2021/0543/HYB

I write to you on behalf of European Metal Recycling regarding application 2021/0543/HYB for the hybrid application for mixed use development to consist of units for flexible uses classes E, B2 & B8. The application is a full application for the B2 & B8 uses and outline for use class E.

Our site on Beevor Street is located directly to the West of the application site and is a long established and significant waste processing and recycling site, which processes mixed metallic waste from Lincoln and the surrounding areas. The site processes in excess of 50,000 tonnes per annum of ferrous & non-ferrous metal and end of life vehicles.

The scrap metal can then be transported from the site by rail from our rail sidings and taken direct to UK customers or to our facility at Liverpool docks to be exported. The location and proximity to rail sidings is of huge importance to the efficiency of the site and reducing its overall environmental impact.

There is a fundamental failure by the applicant to consider 'agent of change' consequences in accordance with the NPPF paragraph 187 which identifies "*Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.*" This would include any future change or expansion which is not considered. Following case law, any consideration that fails to take this into consideration would be irrational in law and leave the local authority open to legal challenge. It is also indicated the planning authority could become liable for financial losses arising in such circumstances and therefore the Council are asked to confirm they will not consider the acceptability of this development until adequately considering the consequences of the 'agent of change' policy issues. It is noted a complaint by a commercial operator of nuisance from noise would have to be investigated by the Council in the same way as when made by a residential occupier and whilst criteria of acceptability differ, if found to materially interfere with commercial

#### RECYCLING TO CREATE RESOURCE

European Metal Recycling  
Sirius House, Delta Crescent,  
Warrington WA5 7NS  
T: +44 (0)1925 715400 F: +44 (0)1925 713470/80  
E: [ukinfo@emrgroup.com](mailto:ukinfo@emrgroup.com) Web: [uk.emrgroup.com](http://uk.emrgroup.com)

Registered Office: Sirius House, Delta Crescent, Westbrook, Warrington WA5 7NS.  
Registered in England No. 2956623.



use it would be actionable. Any assessment needs to consider the noise emissions arising of use of the EMR site to the full extent of its permitted activities

Furthermore, there is specific National Planning Policy for waste which states that “when determining planning applications for non-waste development, local planning authorities should ensure that the likely impact of proposed, non waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities”.

In terms of waste recycling, at a nation level the Government had a recycling targets of 50% by 2020 and 55% by 2025 which can only be achieved if there are recycling facilities of sufficient capacity available. At a regional level, Local authorities have their own targets to achieve and EMR's facility helps Lincoln to achieve their targets and also ensure that other costs & environmental impacts such as fly tipping of fridges and redundant vehicles is avoided.

Unfortunately the processes involved in metal recycling can be noisy at times and are arguably not compatible with more sensitive uses such as residential or other quieter employment uses as proposed with this application.

Additional points of concern identified by our noise consultants include but are not limited to:

1) The noise survey is well out of date being conducted for less than a day in total during February 2018. There is no evidence it is representative of activity at the EMR site in 2021 or in the future. The periods of measurement are exceptionally short and do not set out what activities (EMR and otherwise) are included. Scrap metal includes a wide range of grades and their noisiness when handled is markedly different for different grades as well as the height of piles when handling and the processing form being undertaken. The survey is simply not reliable or sufficiently informative.

2) The survey misapplies guidance on noise contained within BS8233:2014 which is applied in the noise report to internal office and commercial site spaces for noise arising from "steady" sources. This clearly miss-describes the noise in this case. BS8233 is also clear it does not differentiate pleasant and unpleasant sounds. This is critical to noise annoyance. Furthermore the decibel adjustment made in the noise report to an absolute level of noise as contained within BS8233:2014 but applied by the standard to steady noise, trying to account for its character, is an abuse of the science. The decibel penalties as used are taken from BS4142:2014 and are adjustments used for comparison with masking background sound levels and not absolute noise levels. The latter cannot relate to masking levels and is an obvious misapplication of the science. Such a hybrid method of assessment has been rejected at planning inquiries and is not supported by the main author of BS4142.

#### RECYCLING TO CREATE RESOURCE

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Registered in England No. 2756623.



- 3) There is an assumption the sign showing trading hours equates to operating hours. This is not confirmed and is unsafe.
- 4) The assessment relates to ground floor level noise only but the offices proposed are up to 4 storey heights. There is therefore, no assessment of impact at first to third floor level. This will be higher in level as it is not screened to the same extent by the boundary screen.
- 5) Sources of background sound are not appropriately identified or quantified.
- 6) There is no assessment upon external receptors.
- 7) The development is not planned to minimise the effects of noise as required by the NPPF. This could readily be achieved through appropriate orientation, height and layout of some of the buildings.

MAS Environmental, our environmental consultants are preparing a more detailed response on the noise assessment and noise issues which I will issue as an addendum to this letter when available.

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

Yours sincerely



Simon Gillott MRICS  
Property Manager UK

Warren Peppard  
Head of Development Management  
Lincolnshire County Council  
County Offices  
Newland  
Lincoln LN1 1YL  
Tel: 01522 782070  
HighwaysSUDsSupport@lincolnshire.gov.uk

To: Lincoln City Council

Application Ref: 2021/0543/HYB

**Proposal:** Hybrid application for mixed use development to consist of units for flexible use classes E, B2 and B8 (to be considered as full planning permission) and use class E offices (to be considered as outline planning permission)

**Location:** Land at Beavor Street, Lincoln, Lincolnshire, LN6 7DJ

With reference to the above application received 18 August 2021

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

**Requests that the Local Planning Authority request the applicants to provide additional information as set out below.**

#### ADDITIONAL INFORMATION REQUIRED

Could the applicant please advise whether the internal roads are proposed for adoption as public highway.

The submitted plans for the full element of the scheme demonstrate areas dedicated for visitor parking and/ or cycle parking. Dedicated secure, covered cycle parking provision must be provided, independent of any required visitor car parking spaces, to ensure that car parking provision is not prioritised over cycle parking provision by future individual leaseholders/ owners of the units.

The submitted plans for the outline element of the scheme provide a lot of car parking provision. Could further justification please be provided for this level of car parking? Restricting the amount of car parking available on site will often incentivise staff to utilise other transport modes, in addition to Travel Plan measures.

Travel Plan comments as below;

Ref	Travel Plan Reference	LCC Comment
1	Travel Planning Guidance	The primary reader of a Travel Plan is the Travel Plan Co-ordinator (guidance) and/or employee (information) informing them of the developer's commitment and intentions to reduce single occupancy car travel and promote sustainable transport for the site. Whilst planning policy is important it is not required in a



		Travel Plan.
2	TP Administration	<p>The Travel Plan should be monitored for 5 years or one year post final occupation, dependent on the greater.</p> <p>4.4 The document discusses a TPC for the site with TPR's for the different units. Will the 'different units' be required to submit separate travel plans or use the Travel Plan submitted? If the former, the Travel Plans will need to be 'linked' to this Travel Plan and clearly show the relationship between the TPC for the site and the TPR for the business unit.</p> <p>4.6 The TPC will need to liaise with the LCC not the LCoC – all references within document should be amended.</p>
3	Target	Accepting it is difficult to set a 'target' without undertaking surveys, the recommended target of a 10% reduction is accepted.
4.	Measures	The Action Plan (Appendix B) has a comprehensive list of measures some of which are not listed within the document. Some additional ones for consideration: Dedicated Car sharing spaces which could enhance the informal site car sharing scheme; Dr. Bike Sessions; provision of a cycle repair stand; paying cycle mileage rates for staff.
5	Monitoring	LCC will be pleased to welcome the opportunity to work with the TPC using STARS.

**Recommendation:** That consideration is given to the comments provided and a revised Travel Plan submitted for approval.

Could the applicant please confirm the proposals for servicing, deliveries and refuse collection?

We recommend that the shared footway/ cycleway on Beevor Street is continued into the site, alongside the spine road/s. Footways are not required on both sides of the carriageway, so this space could be reallocated within the corridor to provide a shared footway/ cycleway on one side.

Consideration should be given to whether pedestrian/ cycle connectivity could be provided directly into the adjacent Phase 2 LSIP site.

Could the applicant please undertake a Stage 1 Road Safety Audit for the site access onto Beevor Street.

LCC will be requesting a S106 contribution towards pedestrian crossing improvements at the junction of Beevor Street and Tritton Road. We are presently assessing this ask and will communicate this with CoLC and the applicant as soon as possible.

We note the Environment Agency and Internal Drainage Board's concerns with the proposals and further discussion is required on these matters.

Case Officer:  
Becky Melhuish  
for Warren Peppard  
Head of Development Management

Date: 27 October 2021

Warren Peppard  
Head of Development Management  
Lincolnshire County Council  
County Offices  
Newland  
Lincoln LN1 1YL  
Tel: 01522 782070  
developmentmanagement@lincolnshire.gov.uk

To: Lincoln City Council

Application Ref: 2021/0543/HYB

Proposal: **Hybrid application for mixed use development to consist of units for flexible use classes E, B2 and B8 (to be considered as full planning permission) and use class E offices (to be considered as outline planning permission)**

Location: **Land at Beavor Street, Lincoln, Lincolnshire, LN6 7DJ**

With reference to the above application received 18 August 2021

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)**

The site is allocated within the CLLP as a Strategic Employment Site. This application is a hybrid with units for use classes B2, B8 and E considered as full planning permission and offices considered as outline planning permission.

It is situated in a highly sustainable location with good amenities within the immediate vicinity. There is adequate pedestrian and cycle infrastructure surrounding the site, and bus service provision and infrastructure is conveniently available for site users. The applicant is proposing a good level of private cycle parking provision within the site. Additionally, LCC have discussed with the applicant the provision of Hirebikes within the site, to provide site users and visitors with further sustainable travel options, and improvements to the pedestrian crossing facilities on Beavor Street.

Access to the site is via Beavor Street. The access proposals have been subject to a Stage 1 Road Safety Audit which has found no concerns. Internal roads will be privately owned and maintained and not put forward for adoption as public highway. Refuse collection will take place within the

site curtilage.

Following detailed discussion, private car parking provision has been reduced across the outline element of the site, and travel planning measures to encourage and incentivise modal shift have been strengthened.

The surface water drainage strategy will utilise underground storage cells and attenuation ponds within the site, discharging at a restricted rate of 8.5l/s to a main sewer which ultimately outfalls to Skewbridge Drain North. This has been approved in principle with the responsible bodies.

#### Highway Condition 00

No development shall take place until a Construction Management Plan and Method Statement has been submitted to and approved in writing by the Local Planning Authority which shall indicate measures to mitigate against traffic generation and drainage of the site during the construction stage of the proposed development.

The Construction Management Plan and Method Statement shall include;

- the parking of vehicles of site operatives and visitors;
  - loading and unloading of plant and materials;
  - storage of plant and materials used in constructing the development;
  - wheel washing facilities;
  - strategy stating how surface water run off on and from the development will be managed during construction and protection measures for any sustainable drainage features. This should include drawing(s) showing how the drainage systems (permanent or temporary) connect to an outfall (temporary or permanent) during construction.
- The Construction Management Plan and Method Statement shall be strictly adhered to throughout the construction period.
- Reason: To ensure that the permitted development is adequately drained without creating or increasing flood risk to land or property adjacent to, or downstream of, the permitted development during construction and to ensure that suitable traffic routes are agreed.

#### Highway Condition 27

The permitted development shall not be occupied until those parts of the approved Travel Plan that are identified therein as being capable of implementation before occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented for as long as any part of the development is occupied.

Reason: In order that the permitted development conforms to the requirements of the National Planning Policy Framework, by ensuring that access to the site is sustainable and that there is a reduced dependency on the private car for journeys to and from the development.

#### Highway Informative 03

The permitted development requires the formation of a new/amended vehicular access. These works will require approval from the Highway Authority in accordance with Section 184 of the Highways Act. The works should be constructed in accordance with the Authority's specification that is current at the time of construction. Relocation of existing apparatus, underground services or street furniture will be the responsibility of the applicant, prior to application. For application guidance, approval and specification details, please visit <https://www.lincolnshire.gov.uk/licences-permits/apply-dropped-kerb> or contact [vehiclecrossings@lincolnshire.gov.uk](mailto:vehiclecrossings@lincolnshire.gov.uk)

#### Highway Informative 08

Please contact the 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 within the public highway in association with the development permitted under this Consent. This will enable Lincolnshire County Council to assist in the coordination and timings of these works.

For further guidance please visit our website via the following links:

Traffic Management - <https://www.lincolnshire.gov.uk/traffic-management>

Licences and Permits - <https://www.lincolnshire.gov.uk/licences-permits>

#### S106 Contributions

Prior to occupation of any part of the proposed development:

In order to successfully monitor a Travel Plan the Highways Authority requires a monitoring fee (secured through a Section 106 agreement) to be paid by the developer/occupier to cover officer time and overheads required to coordinate and complete the monitoring process over the lifetime of the Travel Plan. The current charge is £1,000 per annum over 5 years and includes support for the TPC.

Prior to occupation of the outline element of the proposed development, the offices, LCC request S106 contributions as below:

- £10,000 towards upgrading of the pedestrian facilities at the signalised crossing at the junction of Beavor Street and Tritton Road.
- £10,000 towards the provision of a Hirebike station within the site, to cover the capital cost of purchasing the bikes and initial operating costs.

Case Officer:

Date: 11 January 2022

*Becky Melhuish*

for Warren Peppard

Head of Development Management





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

**Our ref:** AN/2021/132198/01-L01  
**Your ref:** 2021/0543/HYB  
**Date:** 03 September 2021

Dear Sir/Madam

**Hybrid application for mixed use development to consist of units for flexible use classes E, B2 and B8 (to be considered as full planning permission) and use class E offices (to be considered as outline planning permission)  
Land at Beevor Street, Lincoln, LN6 7DJ**

Thank you for consulting us on the above application, on 18 August 2021.

#### **Environment Agency position**

In the absence of an acceptable Flood Risk Assessment (FRA) we **object** to the grant of planning permission.

#### **Reasons**

The FRA submitted with this application does not fully comply with the requirements set out in the Planning Practice Guidance, Flood Risk and Coastal Change section, paragraph 030.

In particular, the submitted FRA fails to consider raising finished floor levels to protect against the risks identified.

Although it acknowledges potential flooding of up to 0.5m at the site in case of a defence breach (allowing for climate change), the only mitigation proposed consists of flood resilience measures. The reason given is simply that 'the provision of flood resistance measures for industrial units would not be practical'. Although resilience measures will facilitate recovery after flooding, it would be preferable to prevent internal flooding if practicable to protect people and property.

It is not clear from the submitted drawings whether the buildings are intended to be raised at all above existing site level.

#### **Overcoming our objection**

The applicant can overcome our objection by submitting an amended FRA which covers the deficiencies highlighted above and demonstrates that the development will be safe, not increase risk elsewhere and where possible will reduce flood risk overall.

Ceres House, Searby Road, Lincoln, LN2 4DW  
Customer services line: 03708 506 506  
Email: [LNplanning@environment-agency.gov.uk](mailto:LNplanning@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

Calls to 03 numbers cost no more than national rate calls to 01 or 02 numbers and count towards any inclusive minutes in the same way. This applies to calls from any type of line including mobile.

We would expect as a minimum finished floor levels be raised by 300mm and occupants to have an area of safe refuge to escape to in the event of a sudden onset of flooding.

The FRA should investigate the potential to raise floor levels; if this is not practicable, detailed justification should be provided and the safety of people addressed.

If the developer is in fact intending to raise floor levels, this should be confirmed on the drawings.

Owing to the potential flood risk and danger posed of the site becoming isolated by surrounding flood waters, it is advised that a flood warning and evacuation plan is produced for the development in order to address the residual risks of flooding at site and to confirm the approach that will be taken for safe evacuation of the area.

**Groundwater protection**

We have reviewed the Geo-Environmental Assessment report (ref: 15-0781.03) by Delta-Simons, dated April 2020, with regard to the risk posed to controlled waters. Should the above objection be overcome, we will recommend conditions to ensure any unsuspected contamination is dealt with and to prevent infiltration drainage through any areas of contamination.

Please re-consult us if an amended FRA is submitted. We will provide you with bespoke comments within 21 days of receiving formal re-consultation.

Yours faithfully

**Nicola Farr**  
**Sustainable Places - Planning Specialist**

Direct dial 02030 255023  
Direct e-mail [nicola.farr@environment-agency.gov.uk](mailto:nicola.farr@environment-agency.gov.uk)



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

**Our ref:** AN/2021/132198/02-L01  
**Your ref:** 2021/0543/HYB  
**Date:** 19 November 2021

**FAO Marie Smyth**

Dear Marie

**Hybrid application for mixed use development to consist of units for flexible use classes E, B2 and B8 (to be considered as full planning permission) and use class E offices (to be considered as outline planning permission): updated Flood Risk Assessment and Drainage Strategy  
Land at Beever Street, Lincoln, LN6 7DJ**

Thank you for re-consulting us on 2 November 2021 with the updated Flood Risk Assessment (FRA) and Drainage Strategy, following our objection of 3 September 2021.

#### **Environment Agency position**

We have reviewed the updated FRA and consider that it satisfactorily addresses our earlier concerns and meets the requirements of the National Planning Policy Framework.

Subject to the conditions below, we therefore **withdraw** our objection.

#### **Flood risk**

##### **Condition 1**

The development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment (FRA) dated October 2021 completed by Siddle Grimley Hage Limited and the following mitigation measures detailed within the FRA:

- Industrial units (A to E) to have finished floor levels set no lower than 5.1m above Ordnance Datum (AOD)
- Office buildings subject to outline permission (units F and G) to include office space at first floor level and above only, with car parking below
- A safe refuge area to be created in unit A above the ground floor office area
- Flood resilience measures to be incorporated into the proposed development as stated

The mitigation measures shall be fully implemented prior to occupation and subsequently remain in place.

Ceres House, Searby Road, Lincoln, LN2 4DW  
Customer services line: 03708 506 506  
Email: [LNplanning@environment-agency.gov.uk](mailto:LNplanning@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

Calls to 03 numbers cost no more than national rate calls to 01 or 02 numbers and count towards any inclusive minutes in the same way. This applies to calls from any type of line including mobile.

**Reason**

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

**Informative advice**

Due to the potential flood risk and danger posed of the development becoming isolated by surrounding flood waters at this site, it is advised that a flood warning and evacuation plan is produced for the development in order to address the residual risks of flooding at the site and to confirm the approach that will be taken for safe evacuation of the area. We support the recommendation in the FRA that the site should register with our Floodline Warnings Direct service.

Please note that our advice covers fluvial flood risk only.

**Land contamination**

We have reviewed the Geo-Environmental Assessment report (ref: 15-0781.03) by Delta-Simons, dated April 2020, and the revised document dated October 2121, with regard to the risk posed to controlled waters. Based on the available information, we recommend the following conditions.

**Condition 2**

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 174 of the National Planning Policy Framework.

**Condition 3**

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 174 of the National Planning Policy Framework.

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 the Planning Practice Guidance (Use of planning conditions section, paragraph 004). Please notify us immediately if you are unable to apply our suggested conditions, as we may need to tailor our advice accordingly.

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

**Nicola Farr**  
**Sustainable Places - Planning Specialist**



## 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 07929 786955 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk).

AW Site Reference: 178922/1/0129729

Local Planning Authority: Lincoln District (B)

Site: Land At Beevor Street Lincoln Lincolnshire LN6 7DJ

Proposal: Hybrid application for mixed use development to consist of units for flexible use classes E, B2 and B8 (to be considered as full planning permission) and use class E offices (to be considered as outline planning permission)

Planning application: 2021/0543/HYB

**Prepared by:** Pre-Development Team

**Date:** 26 August 2021

### 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

This response has been based on the following submitted documents: FRA April 21 The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. (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.

Anglian Water has reviewed the submitted documents (FRA April 2021) and can confirm that these are acceptable to us at the proposed rate of 8.5l/s. We require these documents to be listed as approved plans/documents if permission is granted.

### 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.

#### Surface Water Disposal (Section 4)

Note to applicant – Surface Water Hierarchy evidence will need to be submitted at 106 application stage before any connection would be permitted.

**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:

**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)

UD-5784-2021-PLN

Dear Sir/Madam

REFERENCE: 2021/0543/HYB

DEVELOPMENT: HYBRID APPLICATION FOR MIXED USE DEVELOPMENT TO CONSIST OF UNITS FOR FLEXIBLE USE CLASSES E, B2 AND B8 (TO BE CONSIDERED AS FULL PLANNING PERMISSION) AND USE CLASS E OFFICES (TO BE CONSIDERED AS OUTLINE PLANNING PERMISSION)

LOCATION: LAND AT BEEVOR STREET, LINCOLN, LINCOLNSHIRE, LN6 7DJ

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

Previously in this area the ground profile was remodelled in a way to have no change to the flood plain it is essential that no ground raising from the current level (4.8-5.0m) is undertaken to change this.

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 granting planning permission. It is noted that a Flood Risk Assessment is included in the Application that contains appropriate mitigation. Including flood resilience measures to the ground floor.

It is also noted that the attenuated surface discharge rate is limited to 8.5l/s discharging to the Anglian Water system.

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.

Regards

Guy Hird  
Acting Head of Technical & Engineering Services  
Upper Witham Internal Drainage Board



UD-5784-2021-PLN

Dear Sir/Madam

I have been made aware that the Environment Agency have commented on this site stating FFLs and ground levels should be above Design Flood Level. For the reason in the original comments below this would not be advisable. *'previously in this area the ground profile was remodelled in a way to have no change to the flood plain'* this was because the lowest part of Lincoln are very close and loss of flood plain will have a direct effect on these areas increasing flood risk.

I would accept that it would be reasonable to have the offices FFL above flood level but there should be no general ground raising and any industrial units should use flood resistant materials as the normal practice.

Regards

Guy Hird  
Acting Head of Technical & Engineering Services

**Our office is closed to visitors but our staff are still working. Please email or telephone with all enquiries.**

[enquiries@witham3idb.gov.uk](mailto:enquiries@witham3idb.gov.uk)  
[accounts@witham3idb.gov.uk](mailto:accounts@witham3idb.gov.uk)  
[planning@witham3idb.gov.uk](mailto:planning@witham3idb.gov.uk)  
[consents@witham3idb.gov.uk](mailto:consents@witham3idb.gov.uk)

Witham First District Internal Drainage Board  
Witham Third District Internal Drainage Board  
Upper Witham Internal Drainage Board  
North East Lindsey Drainage Board

Hi

Many thanks for the below consultation. The County Council has no comments to make in relation to education as the scheme would not have any impact on schools in the locality.

Kind regards

Simon

Simon Challis  
Strategic Development Officer  
Lincolnshire County Council  
County Offices, Newland, Lincoln LN1 1YL

Dear Ms Smyth,

Application ref: 2021/0543/HYB  
Our ref: 367825

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours faithfully

Loz BurrIDGE  
Natural England

### **Consultee Details**

Name: Ms Catherine Waby

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

Email: Not Available

On Behalf Of: Lincoln Civic Trust

### **Comments**

OBJECTION. We have commented on the whole of this site on numerous occasions before and our main objection is the access issue. This area is locked by railway lines surrounding it on three sides and hence the only access point is from Tritton Road. If the effects of all the applications in this area are linked and the vehicle movements are collated, they will show a traffic nightmare scenario as they all have to filter on to Tritton Road. The proposed bridge over the railway as part of the Western Growth corridor is still a long way from being certain and there are no proposals to alleviate the situation. We note that the provision of public transport and cycle routes but regrettably most people visiting this site WILL arrive by private transport as many will live outside of the Lincoln catchment area and need their transport in the course of a days work. We feel that until the transport situation is properly addressed, that no further applications for this area should be accepted. A direct link from the site out to the western bypass should be considered.

We would also echo the concerns of the business at the far end of the site who by the nature of the enterprise, will generated noise and dust and must be taken in to consideration when assessing the application.



## LINCOLNSHIRE POLICE

POLICE HEADQUARTERS  
PO Box 999  
LINCOLN LN5 7PH  
Fax: (01522) 558128  
DDI: (01522) 558118  
email  
john.manuel@lincs.pnn.police.uk

Your Ref: 2021/0543/HYB

20<sup>th</sup> August 2019

Our Ref:

Mr K Manning (Planning Manager)  
City Hall, Beaumont Fee,  
Lincoln, LN1 1DF

### **Town and Country Planning Act 1990 Consultation on**

**Land at Beever Street, Lincoln, Lincolnshire, LN6 7DJ**

**Hybrid application for mixed use development to consist of units for flexible use classes E, B2 and B8 (to be considered as full planning permission) and use class E offices (to be considered as outline planning permission)**

Thank you for your correspondence and the opportunity to comment on the proposed scheme. Lincolnshire Police do not have any objections to this development, but I would like to make the following general recommendations in relation to the safety and security of this development.

#### **External Secure Areas**

The proposed perimeter fencing detail of the site if not shown should be tested and certified to LPS 1175 Rating 2 to a minimum height of 2000 mm, the vehicular gate should be to the same standard.

Security fencing materials may include welded mesh and expanded metal available in numerous coloured coatings, which are sometimes used in conjunction with timber. Railings of various designs can be used to good effect and all fencing types can be fitted with toppings to deter climbing. It is recommended that security fencing should be effective without creating a 'fortress' impression it is accepted that certain business locations such as this site may actively seek to promote the security of their premises and hence utilise fencing that creates a strong visual deterrent.

If planting is required adjacent to the boundary the use of thorny shrubs should be considered. Examples of this type of planting include pyracanthus, berberis and hawthorn.

Signage should make it clear that access to the secure area is restricted and provide direction to:

- Public and private or restricted areas

- Public entrance / reception area

Any fixed bollards should ideally be successfully tested and certified to BS 68:2007 'Specification for Vehicle Security Barriers'

The design, height and construction of any gates within a perimeter fencing system should match that of the adjoining fence and not compromise the overall security of the boundary.

#### **CCTV (If Included)**

There is a requirement that CCTV systems provide an effective deterrent and when necessary obtain identification images to improve the chance of an offender being identified and convicted.

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 of BS EN 50132-7:2012 *CCTV surveillance systems for use in security applications*. Police Response: BS8418:2010

A useful reference to help achieve this goal is the *CCTV Operational Requirements Manual 2009* ISBN 978-1-84726-902-7 Published April 2009 by the Home Office Scientific Development Branch available at this link [CCTV OR Manual](#)

#### **Intruder / Attack alarms systems**

A suitably designed, fit for purpose, monitored intruder alarm system must be installed. For police response, the system must comply with the requirements of the ACPO Security Systems policy, which can be at the following link: Security Systems Policy PD 6662:2010

#### **Lighting**

Lighting should be designed to provide a uniform spread of light with clear colour rendition. Lighting incorporated within the perimeter protection should be designed including 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 have left designated areas.

#### **Car Parking Provision**

It is recommended that the developers design the parking provision to the standards and specifications of the 'safer parking Scheme' which will help ensure the safety and security of the parking areas and allow users to have confidence to use the facility.

Details can be obtained from the British Parking Association (BPA) website [www.parkmark.co.uk](http://www.parkmark.co.uk) who managed the scheme on behalf of the Police Service in the UK.

Additional guidance and information can be obtained directly from the Lincolnshire police Designing out Crime Officer (DOCO).



## Windows

All ground floor windows and those that are easily accessible from the ground must either conform to PAS24:2012 'Specification for enhanced security performance of casement and tilt and turn windows for domestic applications.

All ground floor and easily accessible glazing should incorporate one pane of laminated glass to a minimum thickness of 6.8mm (*See Glossary of terms*) or glass successfully tested to BS EN 356:2000 *Glass in building. Security glazing - resistance to manual attack* to category P2A unless it is protected by a roller shutter or grille as described in paragraphs 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.

## Cycle & Motorcycle Storage

Secure motorcycle and cycle storage should benefit from all around surveillance from active or occupied buildings and there should be a provision of secure ground anchors (for motorcycles) and the location facility should be well lit during hours of darkness.

Bicycle storage should be ideally contained within a secure roofed building which would be lit and secured during operating hours.

The use of accredited products such as 'Cycle Pods' is to be recommended which offer a higher standard of cycle security and therefore encourage the increased use of cycles.  
[www.cyclepods.co.uk](http://www.cyclepods.co.uk)

## Roller Shutters and Grilles

Grilles and shutters can provide additional protection to both internal and external doors and windows. The minimum standard for such products, when required, is certification to

- LPS 1175 Security Rating 1 or
- WCL 2 Burglary Rating 1

For roller shutters, the above minimum-security ratings are generally sufficient where:

- a shutter is required to prevent minor criminal damage and glass breakage or
- the shutter is alarmed, and the building is located within a secure development with access control and security patrols or
- the shutter or grille is intended to prevent access into a recess or
- the door or window to be protected is of a high security standard.

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

Yours sincerely

John Manuel  
Force Designing Out Crime Officer (DOCO)  
[john.manuel@lincs.pnn.police.uk](mailto:john.manuel@lincs.pnn.police.uk)