

Planning Statement

20-23 Lincoln's Inn Fields, London, WC2

November 2024

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1. Introduction

1.1 This Planning Statement has been prepared on behalf of Dorrington PLC (the Applicant), in support of an application seeking full planning permission from the London Borough of Camden ("LB Camden"), for the following development at 20-23 Lincoln's Inn Fields, London, WC2 (hereafter referred to as 'the Site'). This forms part of the Applicant's wider holdings encompassing Nos. 15-19 Lincoln's Inn Fields; however these buildings fall outside the remit and formal boundaries of this planning application.

1.2 The Proposed Development seeks to deliver refurbished, high quality and enhanced amenity space for an existing office building within this highly desirable and sustainable location. The proposed works subject of this application form part of the Applicant's wider internal refurbishment of the building(s) following a period of vacancy prior to their acquisition.

1.3 More specifically, planning permission is sought for the following physical alterations:

- Erection of new extension to stair core, lift overrun and accessible WC at roof level, providing level access to a newly extended amenity terrace.
- Installation of new acoustic plant enclosure to conceal existing and replacement energy efficient plant equipment located at rear lower roof.
- Minor roof extension works on both sides to create concealed plant space for larger plant equipment.
- Internal reconfiguration to create a new firefighting and evacuation lift core and lobby.
- Upgrading roof with high performance insulation, waterproofing and finishes to enhance the overall energy efficiency of the building and bring it up to modern standards.
- Re-configuration of existing main entrance steps and installation of new ramp to allow level access into building.
- Re-configuration of ground floor façade fronting Whetstone Park, including replacement of 2no. existing windows with new doors to ensure firefighting access/escape route and access to a new dedicated refuse store; alongside infill of 2no. garage doors with brick to match existing and insertion of 1no. full height window.

1.4 The description of development is therefore as follows:

"Erection of new extension to stair core, lift overrun and accessible WC at roof level; upgrade and extension of existing roof terrace including replacement handrails and escape stair; extension and alteration of lower roof including new plant and acoustic plant enclosure; re-configuration of existing main entrance steps and installation of new access ramp; removal of window and door in lower ground floor lightwell and

installation of replacement door; re-configuration of ground floor Whetstone Park façade, including replacement of 2no. existing windows with new doors to ensure firefighting access/escape route and access to a new dedicated refuse store and infill of 2no. garage doors with brick to match existing and insertion of 1no. full height window; and associated hard and soft landscaping.”

- 1.1 The Site presents an opportunity to provide wholesale refurbishment works to an ageing building in accordance with modern occupier standards, which will enhance the overall employment offer in this highly sustainable location within the Central Activities Zone (CAZ). Critically, the proposals represent a sustainable form of development, where the design teams’ overarching strategy has been to retain and revitalise the existing building.
- 1.2 It is considered that the principle of the proposed refurbishment to provide a higher-grade office environment, minor extension works, and renewed energy strategy are in full accordance with the Development Plan.
- 1.3 The remainder of this Planning Statement provides a full assessment of the proposed development against the National Planning Policy Framework (NPPF), the Development Plan and all other material planning considerations. This Statement should be read in conjunction with the supporting drawings and documents outlined below:
 - Application Form/CIL Form/Ownership Certificates, prepared by Turley;
 - Covering Letter, prepared by Turley;
 - Existing and proposed drawings, prepared by ORMS;
 - Design and Access Statement (DAS) (including Landscape Strategy and Lighting Assessment), prepared by ORMS;
 - Heritage Statement, prepared by Turley Heritage; and
 - Acoustic Report, prepared by RSK Acoustics.
- 1.4 It is considered that the planning application submission provides sufficient information in order to allow the Council to validate and consider the application. The list of application deliverables was shared with LB Camden Officers during pre-application discussions and agreed prior to the submission of this planning application.
- 1.5 The remainder of this report is set out as follows:
 - Section 2 Site and Surroundings: Provides a description of the site and the surrounding area.
 - Section 3 Planning History: Provides a detailed history of all planning applications for the site as set out on LB Camden’s website, and relevant neighbouring applications and decisions.
 - Section 4 Proposals: Provides a detailed description of the proposed development, highlighting the key aspects of the scheme.

- Section 5 Pre-Application Engagement: Details the process undertaken with the Council prior to submitting this application.
- Section 6 Planning Policy Context: Sets out the planning policy framework against which the planning application should be assessed.
- Section 7 Planning Assessment: Provides an analysis of the material planning considerations pertinent to the proposed development and provides a justification for the development and outlines the findings of the supporting specialist reports.
- Section 8 Summary and Conclusions: Summarises the key features and benefits of the proposed development and the reasons as to why planning permission should be granted.

2. Site and Surroundings

- 2.1 The Site forms No. 20-23 Lincoln's Inn Fields, located within LB Camden, and comprises basement plus six storey building in use as a set of commercial office building (Use Class E). The building is bounded by Lincoln's Inn Fields to the south and Whetstone Park to the north. The buildings adjoining the site nos. 15-19 and 24-25 Lincoln's Inn Fields are Grade II listed and comprises 4 and 5 storeys of which nos. 15-19 are also owned by the Applicant.
- 2.2 The building was designed by Wimperis Simpson & Guthrie Arch, constructed in the 1930s primarily using Portland Stone cladding across all floors and crowned by tiled mansard roof. The building typifies the art-deco architectural style of the pre-war period. The rear of the building is less ornate with combination of red and yellow stock brick left exposed (and white glazed brick and faience brickwork within the central internal void space/courtyard and side elevations), whilst the current upper and lower roof levels house a range of plant, access routes and redundant roof structures including the aforementioned roof plant area which had been previously targeted for conversion to residential accommodation.
- 2.3 At ground floor level, the building currently provides little activation or visual interest onto Whetstone Park, which reads as the secondary elevation to the building. The building was also in part substantially altered as part of large 1970s rear extension and part of infill to the listed nos. 15-19 (which do not form part of this application).



Figure 2.1: Figure 1: Neighbouring Heritage Assets / Site Location (Source: Orms Design and Access Statement November 2024)

- 2.4 The building is bounded by listed buildings on either side. Grade II Listed Nos. 24,25,26 and 28 comprises formerly four terraced Georgian and Victorian houses (Nos.24-27) and legal chambers (No.28), Nos. 27 and 28 now linked internally and known as No.28. No.24: early C19 all of which are four storeys, constructed from yellow brick with rusticated stucco ground floor and stone dressings and slate finished mansard roofs.
- 2.5 No. 19 Lincoln's Inn Fields (owned by the Applicant), are redbrick five storey building with ornate slated gabled roof, designed by Phillip Webb and constructed in the mid-1800s is Grade II Listed. No. 18 Lincoln's Inn Fields (owned by the Applicant and

incorporating No. 17) is also Grade II Listed, and comprises two previously separate 4 storey houses built in the late 1800s and designed by Alfred Waterhouse. The buildings which were refurbished in circa 1990 are clad in Portland Stone with 3 slated gabled dormers stone slab chimneys.

- 2.6 Grade II Listed 15 and 16 Lincoln's Inn Fields is located further to the west and also forms part of the Applicants landholding and comprises two, three storey, terraced houses constructed in the mid-1700s from multi-coloured stock brick with tiled mansard roofs
- 2.7 No. 20-23 itself is not listed or included on the Camden Local List. However, it is considered a 'positive' contributor. The site and building are also within the Bloomsbury Conservation Area.
- 2.8 Other notable buildings in the vicinity of the site include:
 - Sir John Soane's Museum - Grade I Listed, constructed 1813
 - New Hall - Grade II* Listed, constructed 1518
- 2.9 In terms of the wider surrounding uses and character, Lincoln's Inn Fields typifies this central and mixed use part of London, and includes a range of commercial (business, retail, food, and beverage), higher education, cultural and residential (including student accommodation) uses, typical of this part of the Central Activities Zone (CAZ).
- 2.10 The site is in one of the most sustainable locations in London being within a 4minute walk of Holborn Station (serving Central and Picadilly Underground Lines), multiple bus routes. The site benefits from a PTAL Rating of 6b (the highest).
- 2.11 The site is located with Flood Risk Zone 1 and therefore has a low probability of flooding.

3. Planning History

3.1 A review of the LB Camden's planning history records shows that the site has an extensive planning history, which is provided in full within **Appendix 1** of this Report.

3.2 The planning history indicates that a series of minor works have been conducted on the office building over the past 25 years, demonstrating a long-established office use (Class E) across the majority of the building since at least 2006. This is however, with the exception of the roof level plant area, which is discussed further below.

3.3 **Planning Permission ref. 2012/1176/P**

3.4 Planning Permission ref. 2012/1176/P was granted in May 2012 for:

“Change of use of ancillary plant room to office building (Class B1) to residential (Class C3) to create 1x1 bed self-contained flat at roof level, with associated single storey extension at roof level, provision of external terrace, reconfiguration of existing external staircase and associated works.”

3.5 The permission approved the change of use of the former plant room on the sixth floor of Nos.20-23 to a single residential unit, as well as internal alterations to facilitate private access to the unit, and minor external alterations to the south elevation comprising of the removal of the existing recess and single storey extension to align the roof structure, and the addition of terrace doors and a rooflight.

3.6 The Officer Report confirmed support for the proposals on the basis that the plant room was 'ancillary' to the office use, and never, in practice, used as part of the office building.

3.7 The Decision Notice attached limited planning conditions that related to the external works associated with the development.

3.8 A S106 legal agreement was attached to the planning permission on the basis that a residential unit was to be created by the development. A single obligation is included, which requires any future occupant of the residential unit to be notified that they will not be able to apply for a residents parking permit, and will not be able to purchase a parking space owned, controlled or licensed by the Council.

3.9 A Certificate of Lawfulness was issued by the LPA in 2015 (ref. 2015/1597/P). This confirmed that works permitted under the above referenced planning permission (ref: 2012/1176/P) had been implemented to support the provision of a residential dwelling. The evidence submitted by the Applicant at the time confirmed the implementation of the following consented building works:

- Construction of a new apartment wall and apartment entrance door;
- Demolition of existing partitions to create a void for the new residential staircase;
- Partial demolition of the floor slabs to create void for new residential staircase; and

- Installation of new drainage and incoming power to serve new unit.

3.10 The Certificate of Lawfulness confirmed the permission had been lawfully implemented, which would facilitate the conversion of this part of the building to residential use. Namely, the area of intervention is as shown on the consented proposed plans under ref. 2012/1176/P (within the stair core at the sixth floor). The Certificate does not, however, confirm the development was lawfully completed, and as seen on the site visit with LB Camden Officers on the 11th September, remains the case to this day. As a result, the entire building is considered to fall within Class E office use.

4. Proposed Development

- 4.1 The Proposed Development seeks to deliver refurbished, high quality and enhanced amenity space for an existing office building within this highly desirable and sustainable location. The proposed works subject of this application form part of the Applicant's wider internal refurbishment of the building(s) following a period of vacancy prior to their acquisition.
- 4.2 The overriding aim of the proposals are to ensure much needed internal refurbishment/alteration works and minor extensions to the existing property, as well as works to the access points at the front of the site to create a more accessible frontage to the office building; and to provide minor alterations to maximise use at the rear of the building. The proposals therefore provide an excellent opportunity to refurbish and sensitively optimise, what is a currently an underutilised office building, so that it can provide modern, fit for purpose, high quality office accommodation that protects the long-term viable use of the site that will perform at a higher environmental standard.
- 4.3 The strategy seeks to refurbish and provide limited extensions to the existing building at roof level, rather than introduce extensive and potentially intrusive new build or redevelopment, which could harm the amenity of neighbouring occupiers or nearby listed heritage assets and cause a greater environmental impact.
- 4.4 The accompanying Design and Access Statement (DAS) and associated proposed plans and drawings set out the proposals in full detail. The proposals can be summarised as follows:
- **Roof Level Interventions:**
 - Erection of new extension to stair core, lift overrun and accessible WC at roof level, providing level access to a newly extended amenity terrace.
 - Installation of new acoustic plant enclosure to conceal existing and replacement energy efficient plant equipment located at rear lower roof.
 - Minor roof extension works on both sides to create concealed plant space for larger plant equipment within a dummy mansard roof form.
 - Upgrading roof with high performance insulation, waterproofing and finishes to enhance the overall energy efficiency of the building and bring it up to modern standards.
 - **Ground floor Entrance and accessibility/safety Enhancements:**
 - Re-configuration of existing main entrance steps and installation of new ramp to allow level access into building.
 - Internal reconfiguration to create a new firefighting and evacuation lift core and lobby.

- Removal of 1no. window and removal and replacement of 1no. door within the lower ground floor lightwell.
- **Whetstone Park Façade Alterations:**
 - Re-configuration of ground floor façade fronting Whetstone Park, including replacement of 2no. existing windows with new doors to ensure firefighting access/escape route and access to a new dedicated refuse store; alongside infill of 2no. garage doors with brick to match existing and insertion of 1no. full height window.

4.5 The description of development is therefore as follows:

“Erection of new extension to stair core, lift overrun and accessible WC at roof level; upgrade and extension of existing roof terrace including replacement handrails and escape stair; extension and alteration of lower roof including new plant and acoustic plant enclosure; re-configuration of existing main entrance steps and installation of new access ramp; re-configuration of ground floor Whetstone Park façade, including replacement of 2no. existing windows with new doors to ensure firefighting access/escape route and access to a new dedicated refuse store and infill of 2no. garage doors with brick to match existing and insertion of 1no. full height window; and associated hard and soft landscaping”.

5. Pre-Application Engagement

5.1 A formal request for pre-application advice was submitted to the Council in August 2024 (Ref. 2024/3327/PRE), with the Applicant team meeting with LPA Officers in September 2024 to discuss the proposals. This included discussion of the proposed refurbishment works and extension at roof level; the proposed MEP Strategy, alterations at the front and rear of the building, and discussion of the key views of the roof terrace.

5.2 The key comments in relation to the scheme comprised:

- Officers suggested reducing the overall scale, bulk of the proposed lower roof plant enclosure, with a stepped mansard approach recommended that better sets this new element apart (and reduces overall bulk) from the original structure.
- Officers questioned the overall extent and visibility of the then proposed 'pavilion' roof structure which would front the main roof terrace. Increase in height of pavilion needs to be offset by setting-back of mass from Lincoln's Inn Fields.
- Whilst the proposed extension to external amenity space (via the expanded roof terrace) was supported, Officers raised concerns around the design and overall visibility of the new roof balustrade.
- Officers queried the potential perceived bulk of rear mansard extension from Whetstone Park.
- The Council questioned appropriateness of materials to new elements.
- Officers sought for the rationale for the angled plant screen at edge of roof.

5.3 In light of helpful feedback received by Officers at the LB Camden, a series of positive amendments - which are considered to enhance the scheme - have been incorporated into the proposal subject of this application. The submitted Design and Access Statement provides full details of the design development of the scheme, however key enhancements to the proposals as a result of pre-application feedback include:

- Extension of roof terrace set-back from both sides and external walls straightened to create subservience to existing mansard and maintain original geometry. Materiality of external sidewalls to create differentiation and subservience to existing roof mass.
- The 'Pavillion' structure and been replaced with a more functional smaller massed core block, which is set back further with the height of roof and lift overrun lowered to minimise visibility from ground.
- Balustrades angled back and density of vertical elements reduced to minimise visibility from ground.
- Existing rear mansard retained and lift overrun reduced to minimise bulk visible from Whetstone Park.

- Existing slate tiles to be reclaimed and reused on new elements.
- New plant screen to east wing set-back from roof edge and made vertical to give subservience to existing roof. Materiality of plant screen to create differentiation and subservience to existing roof mass.

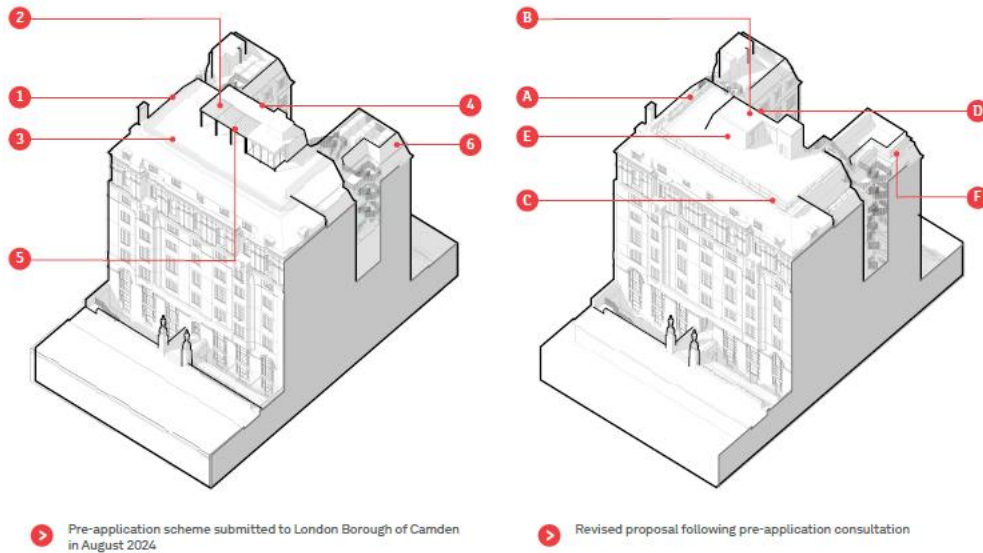


Figure 5.1: Summary of scheme amendments following pre-application feedback (Source: Orms Design and Access Statement November 2024)

6. Planning Policy Context

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that any determination under the Planning Acts should be made in accordance with the development plan unless material considerations indicate otherwise. Consideration of compliance with the development plan is required for all applications, and it is the responsibility of the decision maker as to how weight is applied, or to any other material considerations.

The Development Plan and National Planning Policies

- 6.2 The adopted Development Plan for the site comprises:

- The London Plan (2021); and
- LB Camden's Local Plan (2017).

- 6.3 Other policy documents that are material to the consideration and determination of this planning application include Supplementary Planning Guidance (SPGs) and Documents (SPD's) prepared by LB Camden. This includes the following (not an exhaustive list):

- Employment Sites and Business Premises CPG (2021).

- 6.4 Emerging policy also forms a material consideration, with varying weight dependent upon the stage reached towards adoption. LB Camden is in the process of preparing a new Local Plan, which will replace the current Local Plan. Following issue of a Reg.18 Local Plan, public consultation took place between January and March 2024. Currently, Camden's new Local Plan has a target adoption date of Summer 2026.

- 6.5 On this basis only limited weight would be afforded to any policies given the current draft and pre-submission status of the Local Plan as per paragraph 48 of the NPPF given the early stage of the plan making process. In any event key draft policies are noted in the following section.

National Planning Policy Framework (2023)

- 6.6 The Government's national planning policies for England are set out in the National Planning Policy Framework ('NPPF') (2023). Supporting the NPPF is the online national Planning Practice Guidance ('PPG' or 'NPPG') (2024), and the most recent National Design Guide (2019). This is also a relevant material consideration when assessing the site.

Adopted Policies Map Designations

- 6.7 Figure (6.1), below, is an extract from LB Camden Policies Map, showing that the site falls within the following designations:

- Bloomsbury Conservation Area;
- Archaeological Priority Area; and

- Central Activities Zone (CAZ).

6.8 The site is therefore not formally designated for residential development, but as it falls within the CAZ, meaning that there is an active designation for employment uses within the site.

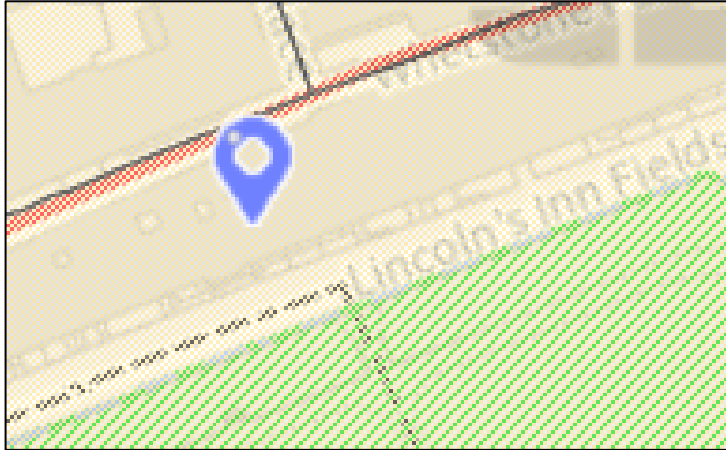


Figure 6.1: Extract of Camden Adopted Policies Map (2017)

6.9 All individual policies from the development plan related to the application site's designations are assessed in the next chapters.

7. Planning Assessment

- 7.1 This section of the Planning Statement provides an assessment of the relevant planning considerations against the adopted Development Plan and relevant material considerations, the respective site designations, and its location within a conservation area.

Principle of Refurbishment and Optimisation of Office Floorspace

- 7.2 London Plan Policy E1(A) (Offices) states that improvements to the quality, flexibility and adaptability of office space should be supported by refurbishment developments. Policy E1 (C) further notes that city business and other specialist functions are encouraged in the Central London office market including within the Central Activities Zone (CAZ), to which the site is located within.
- 7.3 Local Plan Policy E1 (Economic Development) ensures that Camden will support businesses of all sizes (including businesses), and that industries will be protected by safeguarding existing employment sites and premises where these provide additional employment and other benefits.
- 7.4 Local Plan Policy E2 (Employment Premises and Sites) reaffirms Camden's commitment to maintaining employment floorspace by, *inter alia*, protecting premises and sites that are suitable for continued business use. The policy also explicitly supports development of premises or sites for continued business uses within the CAZ will be supported.
- 7.5 The Employment Sites and Business Premises CPG adds that Camden will support the retention and / or re-provision of employment space in other parts of the Borough, particularly where this consists of space that is suitable and affordable for micro and small businesses and particularly where this space is suitable for growth for other important sectors and business clusters.
- 7.6 Draft Local Plan Policy E12 (Offices) confirms proposals involving additional office floorspace and refurbishment of existing stock within parts of the CAZ where there is an established commercial, or mixed-use character will be supported.
- 7.7 As noted in the previous section of this statement, the site is well located with a mixed-use area of the CAZ. The proposals are part of a wider programme of full refurbishment of this existing office building to provide high quality, modern office accommodation befitting of the site's excellent location within the city. The minor alterations and extensions proposed, will ensure the building can continue to provide high quality, safe accessible office accommodation that is fit for purpose and operates in more sustainable way than the existing condition. The principle of alteration and refurbishment of the building to protect its long-term employment use, is therefore in full accordance with London Plan Policy E1, Local Plan Policies E1 and E2 and draft Policy E2.

Design

- 7.1 Planning policy at all levels encourages high quality design. NPPF Paragraph 126 states the need for the creation of high-quality places and buildings is fundamental to what the planning and development process seeks to achieve.
- 7.2 London Plan Policies D3 (D) (Optimising Capacity through the Design-led Approach) and D5 (Inclusive Design) note proposals are expected to respond to local context through their layout, orientation, scale, appearance and shape, with buildings of a high standard of sustainable design and architecture whilst achieving safe, inclusive environments.
- 7.3 Camden Local Plan Policy D1 requires high quality design in all development. The policy requires development to, *inter alia*, respect local context and character; preserve or enhance the historic environment and heritage assets; incorporate sustainable design and construction practices; comprises details and materials that are of high quality and complement the local character; integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; is inclusive and accessible for carefully integrates building services equipment.
- 7.4 Draft Camden Local Plan Review Policy D1 provides a similar thrust in the push for securing high quality design architecture from development proposals.

Roof Level Interventions

- 7.5 As noted in the proposals section, the principal area of physical alterations is focused around the rationalisation and reconfiguration of the upper and lower roof levels of the building. These currently contain a mix of informal poor quality roof structures and ad hoc areas of plant, alongside an underutilised roof terrace with existing railings.
- 7.6 In line with the requirements of the London Plan (Policy D3) and Local Plan (Policy D1) additional built form at the upper roof level has sought to be kept to the minimum typical requirements associated with stair core and lift access alongside Accessible WC provision. The new structure will be clad in a mix of metal, PPC Aluminium and Steel Panelling, alongside re-used existing slate roof tiles to ensure the built form reads a lightweight function addition. The proposed mass has been set back as far as possible with heights kept to the minimum required to ensure visibility is kept to a minimum, which will ensure in the majority of the key townscape the tallest structures are only glimpsed, and critically from Lincoln's Inn Fields on the upper most part of the lift overrun is visible (refer to supporting Heritage Statement for further assessment).
- 7.7 The new plant enclosure will then wrap around either side of the building providing a high-quality visual screen to the existing retained (and rationalised) and new energy efficient plant, ensuring all building services are screened from public views and integrated successfully into the building in line Local Plan Policy D1. Again, a high-quality palette of modern materials is proposed to ensure the new plant roof form reads as a modern, well designed but ultimately subservient addition to the existing roof form and upper-level massing of the host building.
- 7.8 The proposed enclosure enables the extension and formalisation of the existing external amenity terrace, which would benefit from new safe, hard landscaped finishes alongside

on-site greening by way of moveable planters. The proposals would therefore ensure a significantly enhanced high quality amenity area is provided accessible to occupiers of the building.

Ground floor Entrance

- 7.9 Light touch physical alterations are proposed to the main entrance of the building, to ensure the entrance is accessible to all users through the creation of a new accessible ramp and associated hand railings. In design terms the ramp will largely be screened from views by the existing boundary wall and proposed enhanced black metal hand railings reflecting the character and appearance of the building and wider character of Lincoln's Inn Field.

Whetstone Park Façade Alterations

- 7.10 The proposed revisions to the rear façade of the building facing Whetstone Park, will see the infilling of the currently blank poor quality garage doors, with new high-quality brick and a new floor to ceiling glazed window. This combined with the functional secondary doors required to ensure means of escape and firefighter access and improved access to basement services (to not the existing building service strategy will not change under this proposal) will add an element of visual interest and activity to what this back of house character street.
- 7.11 Regardless, the proposals are considered to deliver a modest overall improvement to this area of the site whilst the alterations by virtue of their small-scale nature will complement the existing character of the street in line with the Local Plan (Policy D1) and draft Local Plan (Draft Policy D1).

Accessible Design

- 7.12 London Plan Policy D5 notes that design should be inclusive in nature, be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort.
- 7.13 In order to allow for less abled users to access the site an accessible ramp is proposed on the Lincoln's Inn Fields facing entrance, indeed further to this the existing roof level of the building will also benefit from lift access ensuring all users of the building can access all levels for the first time.
- 7.14 The proposals therefore demonstrate an inclusive approach to design that ensures that the building is much better equipped to facilitate less abled users by allowing equal access to the entire building, in accordance with London Plan Policy D5.

Summary

- 7.15 In summary, the proposals whilst relatively minor in nature, will deliver a series of small scale, sensitive alterations and additions that will ensure the building is upgraded to meet the latest standard for high quality officer accommodation, improving both safety and accessibility. The proposals will sensitively integrate into both the host building and with local surrounding context and are considered to represent high quality design that will ultimately enhance the business function of the site. The proposals are in full accordance with the NPPF (paragraph 126) and the relevant parts of London Plan Policies D3 and D5, Local Plan Policy D1 and draft Local Plan Policy D1.

Heritage

- 7.16 The National Planning Policy Framework (NPPF) contains guidance in relation to development proposals affecting heritage assets. In particular, Paragraph 208 notes that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset [or their setting], this harm should be weighed against the public benefits of the proposal including where appropriate, securing its optimal viable use.
- 7.17 In accordance with London Plan Policy HC1 (Heritage Conservation and Growth), consideration will also need to be given to the impact of any development on the nearby Grade II listed buildings. Proposals located in close proximity to heritage assets, and their settings, should conserve their significance by being sympathetic to the asset's significance and appreciation within their surroundings.
- 7.18 Local Plan Policy D2 (and draft Local Plan Policy H2) further notes that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and Listed Buildings. The Policy confirms the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset, unless the public benefits of the proposal convincingly outweigh that harm.
- 7.19 The proposals are supported by a Heritage Statement, prepared by Turley. In summary, the proposed development has been carefully designed and at a high quality of materials and detailing in order to respect the distinctive form and character of the host building (positive contributor) on Site, and also to deliver an enhanced amenity for the occupiers / users of this property that would support its current and continued use. This would integrate comfortably with the existing roof form and wider roofscape of the local townscape.
- 7.20 In this way, the proposed development would overall sustain the significance - character and appearance - of the surrounding Bloomsbury Conservation Area (sub area 9) as a designated heritage asset. These proposals would also sustain, and not harm, the significance – special interest and setting - of the identified statutory listed buildings within that surrounding townscape area and some shared local views. The special historic interest and setting of the nearby Lincoln's Inn Fields park and garden would also be unharmed by these proposals.
- 7.21 This application would therefore be compliant with the relevant legislative, national and local planning policy concerning heritage assets and the historic environment, including the Planning (Listed Buildings and Conservation Areas) Act 1990 with regard to the protection of listed buildings and conservation areas, the NPPF 2023 and as supported by NPPG, the Mayor's London Plan 2021, the LB Camden Local Plan 2017, and other supplementary planning documents / guidance on this matter.

Biodiversity and Greening

- 7.22 London Plan Policy G6 (Biodiversity and Access to Nature) states that development proposals should manage impacts on biodiversity and aim to secure biodiversity net

gain, with this forming an early consideration in the development of any subsequent planning proposal.

7.23 Local Plan Policy A3 and draft Local Plan Policy NE1 & NE2 require development to enhance biodiversity.

7.24 It is also noted that due to the provisions of Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), Biodiversity Net Gain (BNG) will become a mandatory requirement on all minor proposals from 2 April 2024.

7.25 The “De minimis exception” set out in Reg. 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024 applies in this case, which establishes:

“The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the first and second conditions.

(2) The first condition is that the development does not impact an onsite priority habitat.

(3) The second condition is that the development impacts—

(a) less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and

(b) less than 5 metres in length of onsite linear habitat.”

7.26 Given that the entirety of the building comprises built form or existing hardstanding and therefore assigned a zero score in the statutory biodiversity metric, the surfaces are exempt from the BNG requirement. However the expanded amenity roof terrace will incorporate element of soft landscaping via movable planters in line with the aspirations of the London Plan (Policy G6), and adopted (Policy A3) and draft Local Plan Policies (draft Policies NE1 and NE2)

Amenity

7.27 London Plan Policy D3 (Optimising Site Capacity Through the Design Led Approach) states that when considering the experience of a potential development, the amenity of others must be considered, especially when considering outlook, privacy, daylight and sunlight.

7.28 At the local level, Local Plan Policy A1 (and draft Local Plan Policy A1) requires all proposals to protect the quality of life of occupiers and neighbours and states permission will only be permitted where a development does not cause unacceptable harm to amenity (including visual privacy, overlooking, overshadowing and daylight /sunlight).

Visual Privacy and Overlooking

7.29 The proposed roof terrace will repurpose and expand the existing flatted roof terrace area at sixth floor which is informally used as a terrace, roof access and fire escape. By virtue of the location of the terrace (fronting the Lincoln’s Inn Field and therefore not

directly facing any buildings in sensitive use such as residential Class C3), an acceptable separation distance will be maintained between any sensitive occupiers' properties.

- 7.30 On this basis, it is considered the proposals would not generate any adverse impacts upon the existing amenity of neighbouring sensitive occupiers with regards to visual privacy and overlooking in accordance with London Plan Policy D3 and Local Plan Policy A1 (and draft Policy A1)

Noise

- 7.31 London Plan Policy D14 states that in order to reduce, manage and mitigate noise to improve public health and quality of life, development proposals should aim where possible to mitigate and minimise the existing and potential adverse impacts of noise associated with new developments.
- 7.32 Similarly, Local Plan Policy A4 states the Council will seek to ensure that noise and vibration is controlled and managed. The Policy notes that planning permission will only be granted for noise generating development, including any plant and machinery, if it can operate without causing harm and minimise impact to local amenity.
- 7.33 A Plant Noise Assessment has been produced by RSK Acoustics, and based on the environmental noise survey, the Report concludes that with mitigation measures, the predicted noise level from the proposed plant to the nearest sensitive balcony located at 17-19 Lincoln's Inn Fields would fall within LOAEL Green category in which the rating level is predicted 10dB below representative sound levels, should the design incorporate atmospheric side attenuators and a louvred plant screen.
- 7.34 Furthermore, the sound resulting from the proposed development would be largely unnoticeable at the receptor location to the extent that it would not impact the character of the acoustic environment, nor cause any changes in behaviour and attitude.
- 7.35 Accordingly, the proposals are considered to be in compliance with London Plan Policy D14 and Local Plan Policy A4.

Other Amenity Considerations

- 7.36 As noted above, the proposed roof terrace will repurpose the existing flat roof, whilst the new access core and extended plant enclosure will introduce only a limited amount of new massing and built form (largely screened in public views), all of which is either set well back or focused to the flank elevations of the building (which do not face onto any sensitive occupiers).
- 7.37 On the basis the proposals represent small, scale minor massing additions which have been sensitively designed to ensure they are recessed and focused to areas of the site well away from any neighbouring sensitive occupiers, it is considered the proposals are unlikely to have detrimental impact, in terms of overshadowing and daylight/sunlight, in accordance with London Plan Policy D3 and Local Plan Policy A1.

Energy and Sustainability

- 7.38 Local Plan Policy CC1 confirms the Council requires all development to minimise the effects of climate change and encourages all development to meet the highest feasible environmental standards. Accordingly, whilst the proposals only minor in nature, the

rationalisation and upgrade of building services and plant equipment will ensure it is heated and cooled in a more energy efficient way. Similarly, the proposals included only limited new build intervention and extensions, limited to operational massing associated with improved, accessible and safe access to each level of the building (inc. enhanced roof terrace) and the plant enclosure screening all equipment from public views. The re-use of materials will also be considered throughout construction including the re-use of existing roof slate, and plant equipment which is required to continue to align with modern office occupier requirements.

- 7.39 The proposal will incorporate a number of sustainable enhancements and design principles which accord with the requirements for minor development (for development of less than 500sqm) as set out within Local Plan Policy CC1.

Fire Safety

- 7.40 London Plan D12 states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. Developments where appropriate should submit a Fire Statement, that details means of escape, identifies features that reduce the risk of life, and construction details relevant to fire safety.
- 7.41 In this instance, the existing passenger lift in Stair 6 will remain in the redeveloped building. While it does not meet current guidance for firefighting shafts in new buildings, it is permissible as part of the existing arrangement.
- 7.42 An additional firefighting and evacuation lift will be provided in the core, whilst an existing staircase will be upgraded to function as a dedicated escape stair. The Fire Engineer's (Trigon) overarching approach is set out within the supporting Design and Access Statement (DAS).
- 7.43 As such, the proposals align with the relevant building regulation standards and ensure that the highest standard of fire safety is achieved, in full accordance with London Plan D12.

8. Summary and Conclusions

8.1 This Planning Statement has been prepared on behalf of Dorrington PLC (the Applicant), in support of an application for full planning permission to LB Camden for the:

“Erection of new extension to stair core, lift overrun and accessible WC at roof level; upgrade and extension of existing roof terrace including replacement handrails and escape stair; extension and alteration of lower roof including new plant and acoustic plant enclosure; re-configuration of existing main entrance steps and installation of new access ramp; re-configuration of ground floor Whetstone Park façade, including replacement of 2no. existing windows with new doors to ensure firefighting access/escape route and access to a new dedicated refuse store and infill of 2no. garage doors with brick to match existing and insertion of 1no. full height window; and associated hard and soft landscaping.”

8.2 Prior to submission of the application, pre-application engagement was undertaken with LB Camden to discuss the strategy for refurbishing the building to ensure it meets the highest standards, whilst also optimising the layout of high-quality office space provided. Several positive refinements were made to the design of the proposal as a result of this engagement.

8.3 The proposed design will provide a thorough refurbishment and renovation of both the interior and exterior of the building, maintaining the strong links to the surrounding context while improving the appearance at roof level and accessibility of the site throughout.

8.4 The proposals will deliver a number of benefits which comprise:

- Refurbishment, optimisation, and limited extension of existing office floorspace in a highly accessible and sustainable location therefore securing its long-term viable use as a set of high-quality commercial offices;
- Delivery of formalised high-quality amenity terrace for occupiers of the building;
- Sustainability improvements – including replacement and rationalisation of existing un-efficient plant systems alongside using sustainable building materials;
- Enhanced accessibility and safety strategies including a new accessible ramp for the main entrance, lift access to the amenity terrace and formalised supporting facilities including shower/changing facilities and lockers to encourage sustainable travel.

8.5 Overall, proposals would constitute sensitive, high-quality improvements to the appearance, maintenance and functionality of this important building, while conserving and sustaining the significance of the neighbouring heritage assets. By refurbishing and repurposing the existing sixth floor roof terrace and plant enclosure to provide enhanced amenity space for the office workers (alongside the light touch enhancements to the main and secondary entrances), the proposals will deliver important sensitive enhancements to the building.

8.6 The proposals will ultimately enable the office function of the building to be secured, whilst maintaining the existing streetscape, aligning with the key policy objectives in the London Plan and the Local Plan. On this basis, full planning permission should be granted.

In summary, the proposals for the site are considered to be in accordance with the planning policies of the NPPF, London Plan and Camden Local Plan, and we therefore respectfully request that planning permission is granted.

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