Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Printed on: 28/08/2015 09: <b>Response:</b>	9:05:
2015/4404/P	Jonathan Crow	4 Stone Buildings Lincoln's Inn London WC2A 3XT	28/08/2015 07:53:30	OBJ	Dijection to Applications by Lincoln's Inn 2015/4408/P 'Education centre' 2015/4404/P 'Education centre' 2015/4404/P 'Education centre' 2015/4402/P 'Works to the Great Hall'  1. This is an objection to the above applications. The proposed works are unnecessary and would cause substantial harm both to the setting of Grade II* listed buildings, and to the Conservation Area to which the existing buildings make a positive contribution. 2. I am a barrister member and Bencher of Lincoln's Inn. I work in the Inn, and have done so all my working life. I was on the Inn's Buildings Committee for several years. I am devoted to the Inn and to its legal and physical heritage. It is the responsibility of any generation to preserve and improve its inheritance for future generations. The Inn's current proposals do neither. On the contrary, they would significantly diminish the existing qualities of the Inn. 3. Lincoln's Inn is an oasis of fine architecture and green spaces, surrounded by the towering modern office developments and busy traffic along Holborn, Kingsway and Fetter Lane. In particular, the Library and Great Hall are listed Grade II*. They make an important contribution to the charm of the whole Inn, which is important both from a historical perspective and also for the ambience it offers to those working in or near the Inn, and to the many visitors they attract from outside. 4. The Inn's proposals would cause significant harm: a. They would involve the construction of very substantial and utterly incongruous structures immediately adjacent to the Library and the Great Hall, which are the most important and beautiful collegiate buildings in the Inn. b. They would intrude upon and detract significantly from the garden setting. c. Their design is poor. d. They would involve the demolition of an existing building (the Under Treasurer's House) which currently makes a sympathetic contribution to the whole setting. e. No exceptional circumstances justify the proposals. There cannot be said to be a "clear and convincing j	

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2015/4404/P	John Dagnall	Maitland Chambers 7 Stone Buildings Lincoln's Inn London WC2A 3SZ	27/08/2015 11:36:57	WREP

## Response:

I am a barrister member of Maitland Chambers and my own working room is on the ground floor of 9 Old Square (incorrectly referred to in Planning Applications as Old Buildings) with its windows west-facing and looking out onto the Great Hall (and lawn and east terrace, and also the Library) of Lincoln's Inn. I write this in my own capacity and not on behalf of Maitland Chambers. My room is quiet and I use it for working with documents, making telephone call, and occasionally conducting conferences. I contend that my room is noise-sensitive and the beneficiary of the Council's noise sensitivity policies.

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As far as this planning application is concerned, I have two concerns.

The first concern is as to the final appearance and effect of the above-ground section and roofs of the proposed new construction underlying the present East Terrace on the east of the Great Hall. My understanding is that it is intended that the easternmost section is intended to be a vertical wall and above it going west a slanted section incorporating windows/light and then a horizontal roof going west to the Great Hall also incorporating windows/lights. Such will potentially have a substantial impact on visual amenity which is presently a highly tasteful wall screened by shrubs and flowers. I contend that (and which may be intended in any event) it should be a condition of any planning permission that: (i) the vertical section should have the appearance of a wall without windows/lights and be screened by shrubs/flowers (ii) the sloping roof section should be at a very shallow angle so as to reduce its visual impact and (iii) all windows and lights should be of non-reflective and light absorbent glass and so that there is no external visual impact from them (and in particular from sunlight reflecting from or internal light passing upwards through them).

The second concern is as to the noise, vibration, dust, nuisance, and loss of amenity which I will suffer during the construction period. My understanding is that there will be substantial vehicle and plant movements and work both to a vehicle/plant parking/storage area in front of my room and generally, over the entire construction period. This will result in substantial noise, including continuous noise and impulses/bangs. There will also be very great noise and vibration due to the need to carry out underground excavation, piling and construction works; with the greatest (and probably massive) interference being during the initial excavation and piling period and which works will take effect essentially a relatively short distance from the windows of my room.

The (temporary) loss of amenity in terms of interference with view of historic buildings and garden will be very significant.

However, my much greater concern is noise and vibration and seems will inevitably be very great indeed. The area is usually very quiet. I find the levels of sound recorded in the Sandy Brown acoustic report surprisingly high. In relation to the microphone used for Old Square at Location B (i) it was at high façade level rather than at a lower level equivalent to my working room environment, and would have picked up more external noise from vehicles etc. outside the Inn (there being relatively few vehicle movements within the Inn) including from the relatively loud western Chancery Lane (which I would contrast with the relatively quiet eastern Lincoln's Inn Fields) (ii) it was placed near to a noisy fan

Therefore, I would request all and each of that (1) the Applicant be required to carry out a noise survey at my ground-floor level of 9 Old Square (2) there be added to the maximum noise limits set out in Paragraph 5.3 of the Report, a maximum noise limit in relation to my level of 9 Old Square (3) in any event the maximum noise limits for Old Square be reduced from those in the Report (4) in any event the Applicant be required to provide a full reasoned estimate of actual likely noise levels prior to the

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					Application proceeding (5) in any event the Applicant should have to measure and publish the actual noise levels during the construction phase and (6) in any event the maximum noise limits be set as a strict condition of any planning permission and so that if they are exceeded at any point then that would be treated as a breach of planning control and construction should cease until sufficient effective attenuation and amelioration measures have been devised.  The report also did not mention vibration which seems very likely to cause substantial nuisance and I would contend that the Applicant should produce an anticipated vibration impact report prior to the Application proceeding.  The report also did not mention dust which is also likely to cause nuisance and I would contend that the Applicant should produce an anticipated dust impact report prior to the Application proceeding.  I would point out that no details have been given of proposed noise or vibration or dust attenuation or amelioration measures and these and their verification should also be made a reserved matter prior to any full grant of permission. The level of likely nuisance/impact is such that it would not be right simply to assume that they will be dealt with satisfactorily at the construction stage. I would wish to be notified of the committee date.	