30 LINCOLN'S INN FIELD

PLANNING, HERITAGE AND DESIGN AND ACCESS STATEMENT

JULY 2022

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1.0 INTRODUCTION

1.1 This Planning, Heritage and Design and Access Statement has been prepared by Montagu Evans LLP on behalf of our client The Honourable Society of Lincolns Inn ('client/applicant'), to accompany a submission of Full Planning Permission to London Borough of Camden ('LBC') relating to proposed development at 30 Lincoln's Inn Fields, WC2A 3PD.

1.2 The proposal has been developed in accordance with national, regional, and local planning policy and designed to take account of the surrounding urban context, neighbour amenity townscape and heritage assets.

1.3 The description of development for this application is as follows:

> *"Installation of condensers; two within roof void and four in external enclosure placed in rear garden. Replacement and refurbishment of windows. Tree/landscaping works"*

1.4 The proposal includes two air source heat pumps (ASHP) within the roof void as well as four ASHPs installed at the rear of the property within a discreet enclosure. The building is currently vacant, and our client has been advised that they are unlikely to secure a let for uncooled office space in this location (see Appendix item 1).

1.5 The plant is proposed as part of a suite of measures that will improve the overall environmental performance of the property as set out in the documents that accompany this planning application. The supplementary information submitted with this application demonstrates that the installation of active cooling is consistent with the Mayor of London's cooling hierarchy. The building has been the subject of thermal modelling which demonstrates that the building overheats with no prospect of securing cooling by means of natural ventilation.

1.6 The ASHPs located within the roof void do not affect the exterior of the building, are not development requiring planning permission and so can be installed without seeking express planning permission. A very minor modification to the roof is required to facilitate airflow by way of installing a modest area of louvres on a vertical part of the roof not visible from the street. This alteration is *de minimis* in terms of its effect on the appearance of the building.

1.7 The rooftop plant and roof modifications are included within this application for completeness.

1.8 Additional external ASHPs are required to obtain the complete cooling of the building. The external plant is located in a discretely positioned enclosure at the rear of the property hidden from view by landscaping.

1.9 The ASHP technology adopted represents a reduction in Co2 emissions of 46.3% and with the upgrade to building fabric, this represents a total reduction in Co2 emissions of 49.7%. This represents a significant planning benefit of the proposals.

1.10 The Planning Statement forms part of a suite of documents which have been submitted to inform this submission. This package is accompanied by:

- The relevant existing and Proposed Drawings and Site Location Plan by Stamos Yeoh Architects;
- Overheating Assessment by 3D Consulting Engineers;
- Energy Report by XCO2;
- Plant noise assessment by Sandy Brown Ltd
- Noise survey and plant noise egress limits by Sandy Brown Ltd; and
- Tree Report by Ruskin Tree Consultancy.

2.0 APPLICATION SITE & PLANNING HISTORY

Application Site

2.1 30 Lincoln's Field ("the Site" / "the Application") is located within the administrative boundary of London Borough of Camden ("LBC").

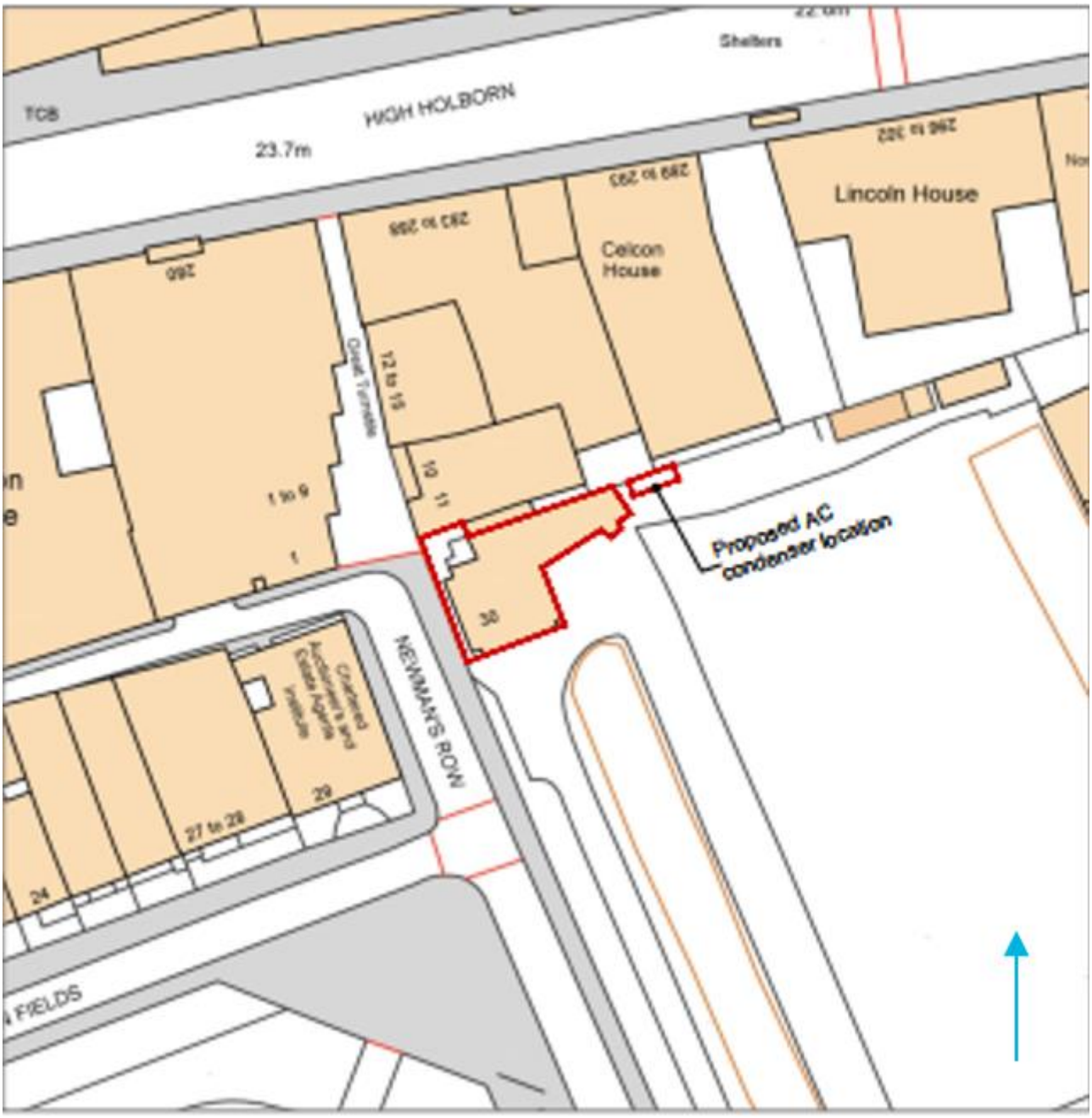

Figure 2.1 – Site plan of the Proposal Site.

2.2 It is not a listed building or locally listed but sits within the Bloomsbury Conservation Area.

2.3 The building is a detached office building constructed in approximately the 1980s. The property has four storeys; basement floor, ground floor, first floor, second floor and third floor. The central bay of the brick elevation projects slightly; the third floor is modestly set back at the corners.

2.4 The square roof plan is pitched on all four edges behind a parapet rising to a central point. The central part of the roof is ‘capped’ with an overlapping tiled roof element. The roof pitches are positioned and angled such that they are not visible from the street or public domain.

2.5 The building is currently vacant.

Figure 2.2 – Image of the front elevation of 30 Lincoln's Inn Field from street view.

Figure 2.3 – Image showing the southern Elevation of 30 Lincoln's Fields.

2.6 The location is adjacent to the inn's boundary wall, approximately 3500mm in height. The area is currently part of the boundary landscaping of the garden but is not in a prominent position and nor does the landscaping here have any particular merit.

Figure 2.4 – Photograph of the rear area (West Elevation) where the enclosure will be located amongst the shrubbery in the picture to right.

Figure 2.5 – Image of the proposal site across the courtyard to show the long views in the area.

Surrounding Areas

2.7 The site has a Public Transport Accessibility Level (PTAL) of 6b (being highest), representing 'excellent' levels of accessibility. This is mainly because the Site is located in close proximity to the following London Underground Stations and Train Stations:

- Chancery Lane Underground Station;
- Holborn Underground Station;
- Temple Underground Station;
- City Thameslink Train Station; and
- Farringdon Train Station.

2.8 There are also multiple bus routes close to the application site.

2.9 The properties around the site are mostly commercial in nature. Queen's Court Law is located on the other side of the road to the west (in office use). The English Language Studio (Class F1) is located to the north. The nearest residential uses are located within 13 Great Turnstile to the north. Notable institutions close by include Royal College of Surgeons of England, Sir John Soane's Museum and Lincoln's Inn Library.

2.10 The site is not a listed building, but a number of designations are within the vicinity as shown in Figure 2.5. The closest designations are the Western Boundary Wall, Gates And Porters Lodge (Entry List: 1379322)

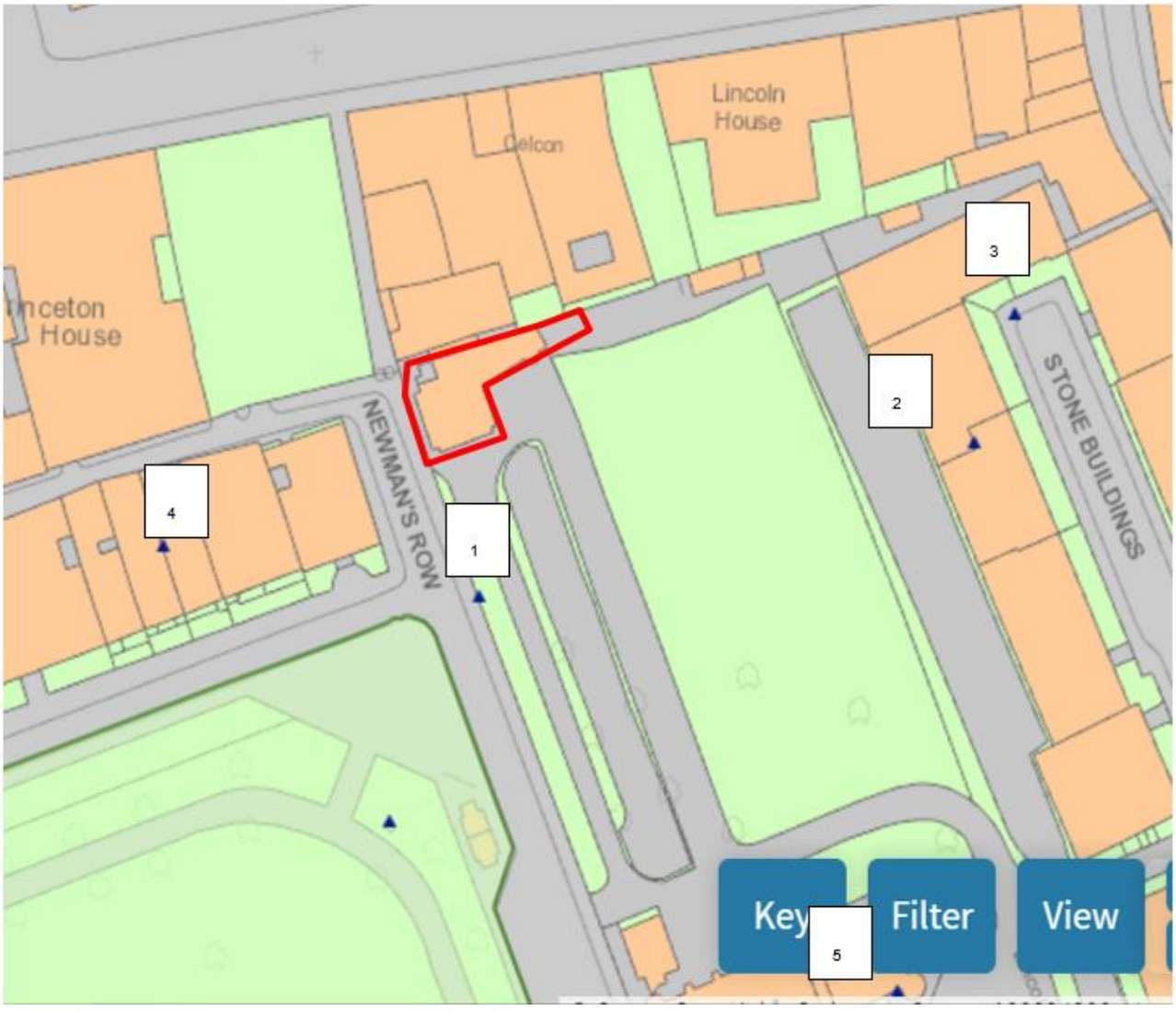

Figure 2.6 – Map showing Listed Buildings close to the address. Site area outlined in red.

No.	Listing Entry	Address	Grade
1	1379322	Western Boundary Wall, Gates and Porters Lodge	II
2	1379318	Numbers 1-7 and Attached Railings and Lamp Holder	I
3	1379320	Fifteen Lamp Posts in the Vicinity of Old Buildings and Stone Buildings	II
4	1379331	(North side) Nos.24, 25, 26 and 28 and attached railings and piers with lamp-holders	II
5	1379299	(West side) New Hall Library	II*

Planning History

2.11 A search was conducted on the LBC Online Planning Register for the planning history of the application site. The search returned results shown in Table 2.1.

Ref	Description	Decision	Decision Date
2016/4035/P	The removal of the existing railings and the installation of new railings and pedestrian gates at the northwest corner of North Gardens.	Granted	06-10-2016
2004/5033/P	The installation of railings and pedestrian gate at the northwest corner of North Gardens as a means of enclosure for 30 Lincoln's Inn Fields.	Granted	14-01-2005

Table 2.1 – Planning History of 30 Lincoln's Inn Field Chepstow Crescent.

3.0 THE PROPOSED DEVELOPMENT

3.1 This section provides a summary of the development proposal that will be submitted via the Planning Portal for London Borough of Camden Council Planning Authority to assess. The description of the proposed development is as follows:

> *"Installation of condensers; two within roof void and four in external enclosure placed in rear garden. Replacement and refurbishment of windows. Tree/landscaping works"*

Design

3.2 This section provides a summary of the development proposals. The description of the proposed development is as follows:

- **Two new air source heat pumps** installed within the roof void and associated provision of louvre grills for ventilation purposes, on the top and the lower part of the roof cap;
- **Refurbishment to windows** included new fixtures to create further longevity and sturdiness. The windows will outperform current new build standards for energy efficiency;
- **Four new air source heat pumps in the rear garden** enclosed in an attenuated louvre made from demountable screens on brick plinth. This will be placed alongside the existing rear boundary wall; and
- **Tree/landscaping works** at the rear of the property including relocation of existing oak tree to be removed or relocated south by 2 metres and permeable paving around the existing storage huts. There will be landscaping that will create screening for the rear AHSPs formed of shrubbery by planting in front and around the enclosure.

3.3 The air source heat pumps located within the roof void do not affect the exterior of the building, are not development requiring planning permission and so can be installed without seeking express planning permission. A very minor modification to the roof is required to facilitate airflow by way of a modest area of louvres on a vertical part of the roof not visible from the street. This alteration is de minimis in terms of its effect on the appearance of the building.

3.4 The rooftop plant and roof modification is included within this application for completeness.

3.5 Additional external air source heat pumps are required to obtain the complete cooling of the building. The external plant is located in a discretely positioned enclosure at the rear of the property hidden from view by landscaping.

3.6 The ASHP technology adopted represents a reduction in Co2 emissions of 46.3% and with the upgrade to building fabric this represents a total reduction in Co2 emissions of 49.7%. This represents a significant planning benefit of the proposals. The delivery of the primary objective of the project, to cool the buildings can be met with minimal impact on carbon emissions and energy usage.

3.7 The project also incorporates other energy efficiency measures such as low energy lighting and energy saving controls on space conditioning and lighting.

4.0 PLANNING POLICY FRAMEWORK AND STATUTORY PROVISION

4.1 The Application has been designed in accordance with adopted and emerging development plan policies, and other relevant guidance. This section provides a summary of the planning context and Section 6 provides an assessment of the Application against the policies and guidance contained within these documents.

Statutory Framework and the Development Plan

4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies of the Statutory Development Plan, unless other material considerations indicate otherwise.

4.3 Section 72 of the Planning (Listed Buildings and Conservation Areas) 1990 Act requires that, in the exercise of planning functions with respect to buildings and land within a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

4.4 For the purposes of determining this application, the development plan comprises:

- London Plan (March 2021);
- Camden Local Plan (July 2017); and
- Policies Map (Last updated August 2021).

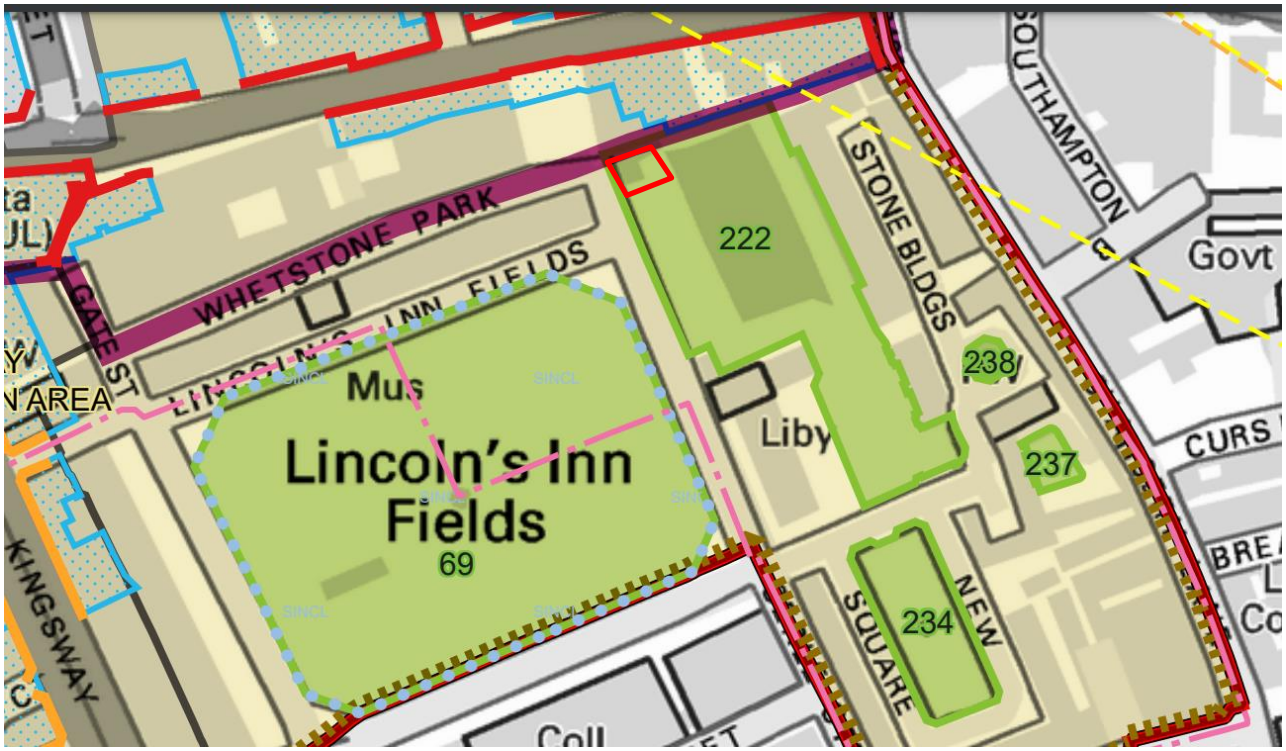

Figure 4.1 – Extract from the Camden Policy Map (last updated 2021).

4.5 The site falls under the following designations:

- Bloomsbury Conservation Area; and
- Open Space: No. 222 (Lincolns Inn).

4.6 The designations of the Immediate Surrounding area are:

- To the Immediate north - Growth Area; and
- To the Immediate North - Central London Frontage.

Relevant Planning Policy
Principle of Development

4.7 The London Plan 2021 Policy E1 (Offices) encouraged improvement works to the existing city's office stock. The policy specifically mentions:

> *Improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.*

Sustainability and Cooling

4.8 LBC Policy CC1 (Climate change mitigation) encourages proposals to factor in climate change mitigation and adaption measures within the borough as it acknowledges that overheating is a potential future public health risk. Additionally, LBC Policy CC2 (Adapting to climate change) requires development proposals to seek climate change adaption measures where possible. It specifically encourages as listed in the policy:

> *measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy*

4.9 Policy SI 4 (Managing heat risk) delves into further detail regarding managing overheating risk. Although it mostly refers to major and/or new developments, it does not recommend active cooling measures without evidence-based need. London Plan paragraph 9.4.5 refers to using guidance by the CIBSE for assessing and mitigating overheating risk, specifically TM52 for non-domestic buildings. The Overheating Assessment prepared to accompany this application has assessed the overheating potential for the building in accordance with CIBSE TM52.

4.10 Furthermore, the Energy Efficiency and Adaptation SPD (2021) encourages natural cooling measures to be designed in where possible.In the event that active cooling is needed, the SPD states that there needs to a clear need evidenced d after all preferred measures that are in line with London Plan cooling hierarchy have been considered. The Overheating Assessment that accompanies the application demonstrates that even with windows open the building fails significantly against overheating criteria.

Amenity

4.11 At a national, regional and local level there is a requirement to prevent unacceptable harm to amenity arising from new development. Paragraph 170 of the NPPF seeks to prevent new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution.

4.12 London Plan Policy D13 (Agent of Change) sets out the Agent of Change principle where it places the responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the proposed new noise-sensitive development.

4.13 London Plan Policy D14 (Noise) establishes that measures should be taken to reduce, manage and mitigate noise from the new development while improving and enhancing the acoustic environment or appropriate soundscape.

4.14 LBC Policy A1 (Managing the impact of development) expects proposals to make and display efforts to mitigate any negative impacts to surrounding amenities in the area. The council will include the following factors when assessing the application:

- *visual privacy, outlook;*
- *sunlight, daylight and overshadowing;*
- *artificial lighting levels;*

- *transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans; impacts of the construction phase, including the use of Construction Management Plans*
- *noise and vibration levels;*
- *odour, fumes and dust;*
- *microclimate;*
- *contaminated land; andimpact upon water and wastewater infrastructure.*

4.15 Policy A4 (Noise and vibration) states that the council will not grant permission for proposals that generate above acceptable noise concerns or development sensitive to noise in locations with high noise levels.

4.16 The Amenity SPD (2021) requires proposals that include external air extraction/conditioning to be submitted with an Acoustic Report to show the potential impact to amenity of the immediate area. The SPD recommends reports to use the guidance of *'BS4142 Method for rating Industrial and Commercial Sound'*.

Arboriculture, Landscape and Open Space

4.17 London Plan Policy G7 Trees and woodlands established that where possible, existing trees of value are retained and if removal is needed, adequate replacement needs to be placed within the vicinity.

4.18 LBC Policy A3 Biodiversity specifies the council's approach towards trees. The Council seeks to resist any removal of trees and expects said trees to be protected during the construction phase as it states:

> *require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction' and positively integrated as part of the site layout*

4.19 LBC Policy A2 Open space requires for the protection of open space including provisions in management and protection of existing green infrastructure that may be within the allocated space.

4.20 Tree SPD requires for Tree Surveys to be submitted for trees within certain designations (i.e conservation areas or TPOs). Tree Protection Plans of existing trees should be considered.

Design

4.21 London Plan Policy D4 (Delivering Good Design) notes that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation in advance of a planning application submission or demonstrate they have undergone a local borough process of design scrutiny

4.22 LBC Policy D1 (Design) expects for all proposals to adhere to high design standards that incorporate sustainable design and construction in the design stages. Design needs to be sympathetic to the local surroundings and character.

4.23 High quality and inclusive design are encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development and should contribute positively to making places better for people. Part 12 of the NPPF outlines the requirement for good design in order to achieve well-designed places.

Heritage

4.24 London Plan Policy HC1 (Heritage Conservation and Growth) notes that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

4.25 LBC Policy D2 (Heritage) outlines the council's approach to development within conservation areas. It requires that:

- *development within conservation areas preserves or, where possible, enhances the character or appearance of the area.*
- *development is resisted where it leads to the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area.*
- *development is resisted outside of a conservation area where it causes harm to the character or appearance of that conservation area. This policy outlines the council's approach to development of listed buildings. It requires that:*
- *development is resisted where it leads to the total or substantial demolition of a listed building.*
- *development is resisted for proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.*
- *development is resisted where it would cause harm to significance of a listed building through an effect on its setting.*

4.26 London Plan Policy HC1 (Heritage Conservation and Growth) notes that development proposals affecting heritage assets, and their settings, should conserve:

> *"Where appropriate the Council will have regard to the feasibility of installing air-handling equipment so that the position, particularly in visually sensitive locations and in the proximity of residential accommodation, will protect local amenity and preserve the appearance of the Conservation Area."*

Supporting Planning Guidance

4.27 The adopted development plan is supported by Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG) at the regional and local level.

4.28 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this Application. Of particular relevance are:

- Character and Context (2014); and
- Draft Energy Assessment Guidance (2020).

4.29 At the local level, LBC has adopted a number of SPDs and planning policy guidance notes. LBC has a number of adopted supplementary planning policy documents which are material considerations in respect of the Application:

- Energy efficiency and adaptation (January 2021);
- Trees CPG (March 2019);
- Employment sites and business premises (January 2021);
- Design (January 2021);
- Air Quality (January 2021); and
- Amenity (January 2021).

4.30 The Site falls entirely within the Bloomsbury Conservation Area as defined by the Policies Map. Considerable importance and weight attaches to the conservation of these assets in the decision-making process, and the judgment in respect of the duty is taken on the end state of the development.

National Guidance

4.31 At the national level, the revised National Planning Policy Framework (the "NPPF") was revised and published on 20th July 2021, setting out the Government's approach to planning matters, and is a material consideration in the determination of planning applications. This is supported by the National Planning Practice Guidance (NPPG), which provides further guidance on key planning matters.

Sustainable Development

4.32 At the heart of the NPPF there is a presumption in favour of sustainable development (paragraphs 10 and 11). For decision-taking (section 2 of paragraph 11), this means:

- "*approving development proposals that accord with an up-to-date development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:*
    - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
    - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

4.33 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development, and paragraph 12 confirms that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making.

5.0 PLANNING POLICY ASSESSMENT

5.1 This section of the report considers the proposals in the context of adopted planning policy, and other relevant guidance.

5.2 Section 38 (6) states that applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan has been outlined in Section 5.0.

5.3 As set out above, the ASHPS located within the roof do not affect the external appearance of the building and so are not development requiring planning permission. The modifications to the roof cap to provide air flow to the units are not visible from any location within the public domain and are in any event *de minimis* in their impact on the external appearance of the building.

5.4 We draw the Council's attention to the above point due to the outcome of the Burroughs Day v Bristol City Council 1996 in which the judgement considered what might be material in terms of the external appearance of the building. The impact of works on the appearance of the building as a whole are relevant, with any changes needing to be visible from a number of vantage points including public viewpoints from the street where visibility was solely from the air or from a particular single building in that case was not sufficient to be considered a material change to the appearance of the building.

5.5 In the Burroughs Day case, the works were not visible from any street or from any window, except from the top two floors of an office building or from the air, and while the external appearance was affected, the ruling held that it was not materially so. In summary, the judgment listed factors to be taken into account in deciding that alterations to a building were material: it must be seen from outside the building; roof alterations must be seen from the ground or from within a neighbouring building; the degree of visibility must be material and materiality must take into account the nature of the building and be judged in relation to the building as a whole.

5.6 This is relevant in the current case. The roof mounted plant does not affect the appearance of the building at all. The vertical roof louvres are not visible from the street and will be barely perceptible from surrounding buildings. The works affect a very small area of the building and are not considered material when judged against the building as a whole.

5.7 The enclosure in the rear garden will also be discreet. The enclosure will be made up of two parts. The base will be formed of brick a similar colour to the existing boundary wall that will allow it to blend into the existing wall. The top of the enclosure will be made of aluminium powder coated in a dark green colour which will allow it to blend in with surrounding existing foliage as shown in the Figure 2.4. Nevertheless, the application provides the details of the roof void plant for completeness.

Principle of Development

5.8 The client has chosen to refurbish the office building in accordance with London Plan Policy E1.

5.9 As set out in the Overheating Assessment report by 3D Consulting Engineers Ltd the office is vulnerable to overheating significantly within the summer months. The thermal modelling undertaken demonstrates that the building overheats even in a variety of scenarios with windows open to a variety of degrees, including fully open at 90 degrees.

5.10 The applicant has also received advice from Savills setting out the deficiencies of the building and the need for cooling to ensure that the vacant building can be brought into use with a new tenant. This letter is enclosed at **Appendix 1.0**.

Sustainability and Cooling

5.11 As set out in the Overheating report by 3D Consulting Engineers, the building is at particular risk of overheating.

5.12 Energy Efficiency and Adaptation SPD (2021) refers to all proposals to use the Cooling Hierarchy when choosing adaptive measures:

1. **Minimise internal heat generation through energy efficient design –** The distribution of heat infrastructure within the development will be designed to reduce the lateral pipework lengths within the internal spaces to reduce heat loss. Insulation of a fabric/material is measured by their u value. The report concludes that the replacement of windows with double glazing will lessen the U-value;
2. **Reduce the amount of heat entering a building in summer** – changing the external appearance of the building may have a negative impact on the heritage asset therefore the proposal avoids as much external changes as possible. The existing design already maximises daylight entering in all habitable spaces. The improved proposed glazing with good light transmittance will increase light into the building and therefore less usage of artificial light;
3. **Managing the heat within the building through exposed internal thermal mass and high ceilings** – The Energy statement reports that the thermal mass of the building will absorb and store excess heat and will release its heat in the cooler evenings to allow for cooler internal spaces;
4. **Passive Ventilation** – The Overheating report tested 3 window opening scenarios and found that the building was still particularly vulnerable to significant overheating;
5. **Mechanical Ventilation** - The building is being fitted with a mechanical ventilation HVAC system to serve all zones; and
6. **Active Cooling** – The proposal seeks to incorporate low energy lighting by LED or CFL bulbs. Furthermore, after partaking a Renewable technology feasibility study, the Energy Statement recommend the installation of Air Source Heat Pumps (ASHPs) would be the best technology for the existing envelope.

5.13 The Overheating Assessment demonstrates that even with windows opened at the full capacity (of a 90-degree angle, ventilation is insufficient to enable the building to be cooled down to an acceptable level. ASHPs were specified to provide heat and cooling to the building with significant carbon emissions savings.

5.14 The energy strategy for the building saves 3.3% from energy demand reduction (achieved through energy efficiency measures and new windows). Savings from the installation of ASHPs come to 46.3%, with an overall cumulative carbon emissions saving over the baseline of 49.7%.

Amenity

5.15 Two studies conducted by Sandy Brown ltd were conducted to create the reports Plant noise assessment and Noise survey and plant noise egress limits that should be read in conjunction with each other.

5.16 The reports utilised guidance from the Amenity SPD by measuring noise egress by BS4142 standards. The BS 4142 suggests that if the noise level is 10 dBA or more higher than the existing background sound level, it is likely to be an indication of a significant adverse impact.

5.17 The investigation saw that the representative noise of the area recorded was 51db and 47db, therefore the Plant noise limits were said to be 41db and 37db respectively.

5.18 The noise survey recorded the existing noise levels at the closest noise sensitive receptors which was deemed to be addresses 13 Great Turnstile and The English Studio and assessed against the predicted noise levels from the plants in the proposal.

5.19 The study concluded that “noise egress from the proposed plant installation is compliant with LBC’s typical planning requirements” as the recordings were provided in the report below in Figure 6.1 show.

Table 4 Calculated noise levels at 1 m from the nearest noise sensitive receptor

Receptor	Predicted noise level	Noise limit	
		Day (07:00-23:00)	Night (23:00-07:00)
13 Great Turnstile (residential)	L_{Aeq} 26 dB	L_{Aeq} 41 dB	L_{Aeq} 37 dB
The English Studio (education)	L_{Aeq} 40 dB	L_{Aeq} 41 dB	N/A[1]

[1] Building not in use during time period

Figure 5.1 – Table extracted from Plant Noise Assessment showing the predicted noise levels against the noise limits resulting from the Noise survey and plant noise egress limits report.

5.20 Therefore, the proposal would be compliant with Policy A4 (Noise and vibration) and Policy A1 (Managing the impact of development).

5.21 The proposal will not cause any further issues in regard to other amenity concerns mentioned in Policy A1 (Managing the impact of development) therefore compliant with the policy as a whole.

Arboriculture, Landscape and Open Space

Impact on Trees

5.22 Tree SPD requires for Tree Surveys to be submitted for trees within certain designations (i.e conservation areas or TPOs). Tree Protection Plans of existing trees should be considered.

5.23 The area has an existing semi-mature fastigiate oak tree that is located against the boundary wall of the area where the plant is suggested to be located is an area of the North-Eastern boundary wall landscaping at the rear of the building. Here, there is existing shrubbery and a young oak tree that is in the place of the proposed site for the rear Air Source Heat Pumps (this can be seen in figure 2.4 in section 2).

5.24 The Arboricultural Statement and Tree Condition Survey by Ruskins Tree Consultancy recommended that the existing oak tree could either be removed or be relocated to make way for the rear ASHPs. Drawings 1409 01 006B and 1409 03 012B show the potential oak tree relocation; 2m to the south, clear of the AC condenser location, as shown in. Figure 6.2.

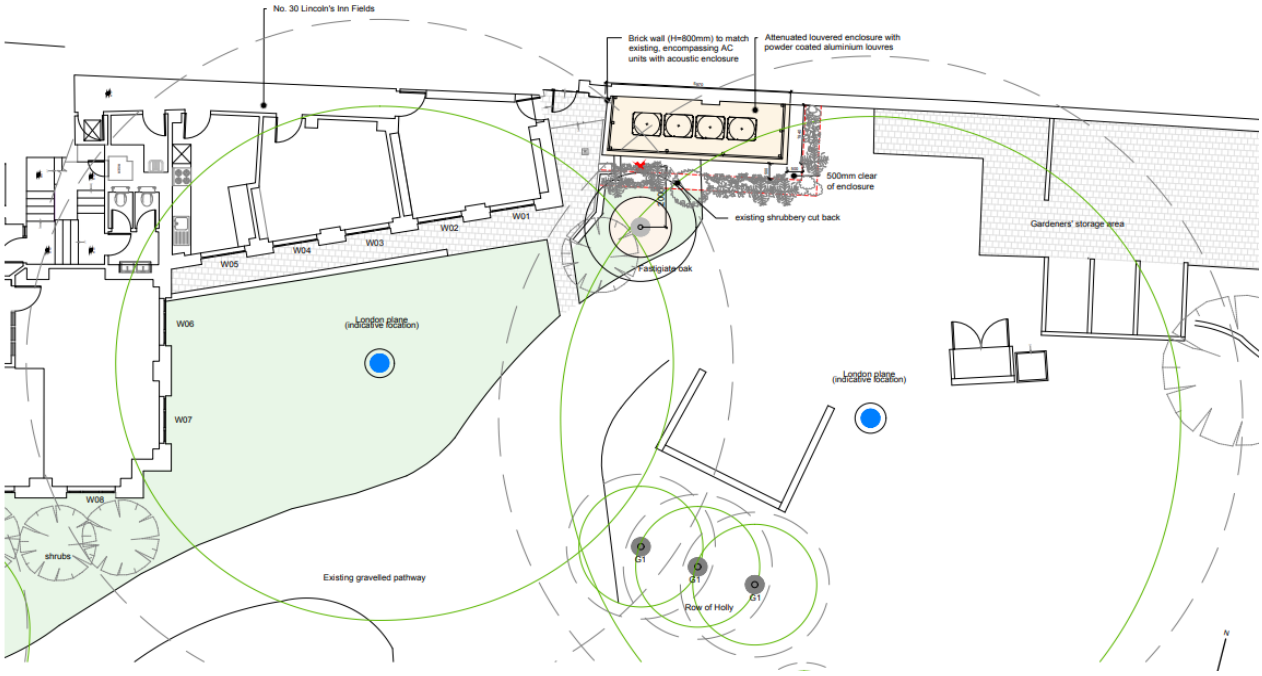

Figure 5.2 – Extract of drawing 1409 01 006C showing the potential placement of the relocation of the tree.

5.25 If the tree is to be relocated, the tree will be removed using a qualified contractor with safety fencing around the space that will prohibit public access to the area of tree works. There will also be Arboricultural Clerk of Works on site to oversee the supervision of tree management and protection making the tree works compliant with London Plan and LBC policy. The method can be controlled by planning condition.

5.26 As mentioned in paragraph 5.22, the proposal seeks to either remove or relocate the existing tree that is placed on the area where the rear AHSPs will be installed. The option was deemed acceptable by the Ruskins Tree Consultancy as they found "the removal of this small tree will not impact on the character and appearance of the area."

5.27 The Arboricultural Statement and Tree Condition Survey by Ruskins Tree Consultancy stated that either be removal or relocation of the existing oak tree can will make little impact to the surrounding existing trees as it mentions:

> *"With regard to the topography of the site, the existing built form, the short distance between the building and proposed condensers, the species, size and location of the trees we are confident that the condensers can be installed without detriment to the health, stability and longevity of the retained trees and without negatively impacting on the rooting environment of the retained tree."*

5.28 Therefore, by removing or relocating the tree, there will be no impact to tree of values in the surrounding area or impact the Conservation Area itself.

5.29 The below render image (Figure 6.3) shows what the immediate area after works have been completed. The arrow points to the existing and the new position of the tree referred to above.

Figure 5.3 – The rendered image shows where the tree will be relocated to in the area.

Impact on Open Space

5.30 A number of design details have been adopted in order to allow for the proposal blend into the surroundings. The design of the enclosure utilises the existing architectural materials that are common in the area; red brick will be used as a plinth that will match the existing boundary wall that the enclosure will be placed against. Additional landscape screening as seen in figure 6.3 below with further conceal the enclosure from public view.

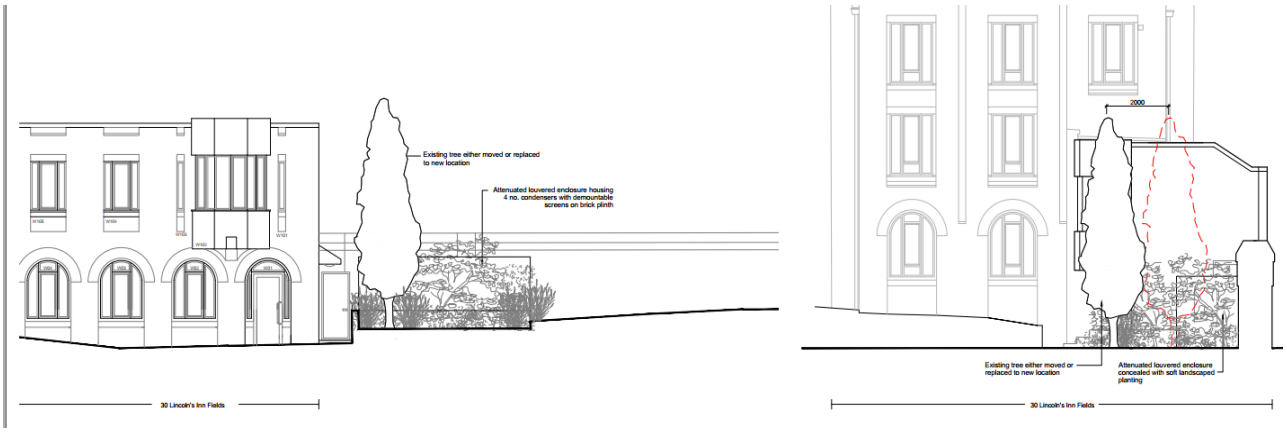

Figure 5.5 – Architectural drawing detailing the landscaping that will be placed around the parameters of the enclosure.

5.31 The four ASHPs proposed at the rear are discreetly positioned alongside the existing boundary wall. Figure 2.5 in section 2 and Figure 6.4 below provides a photograph of the application site from the long-distance and mid-distance views across the courtyard space. It is evident that the proposal will be hidden from long view vantage point views as well as from the pathway closer to the property within the North Lawn area.

5.32 This placement and the design will ensure that the openness and the form of the courtyard will not be impacted to any degree therefore, the proposal will cause no impact to the designated open space as designated by Policy A2 of Local Camden Plan (and therefore consistent with Development Plan policy).

Figure 5.6 – Arrow shows where Rear condensers will be placed behind landscape screening.

Design & Heritage Statement

Significance of Bloomsbury Conservation

5.33 The Bloomsbury Conservation Area character is defined by formal planned streets. The streets usually have properties of 3-4 Storeys of accompanying mews, that are arranged in formally planned squares. The streets have a hierarchy of primary and secondary routes throughout the area. The predominant typology across most of the Conservation Area is that of the townhouse, reflecting the area's history of speculative development with the most prominent material in the area being Brick. The characteristic rhythm, pattern and appearance of these buildings (such as the use of the railings) are a major component of the significance of the Bloomsbury Area.

5.34 The Inns make a significant contribution to the significance of the conservation area as a whole. The spatial arrangement is based on interconnected open spaces, larger institutional and ceremonial buildings and formal compositions around squares that are older than the speculatively developed areas of Bloomsbury. This has been referred to in the Council's own Conservation Area Appraisal where it mentions that "the spatial character of Gray's Inn and Lincoln's Inn also differs, being based on a series of interconnected courtyards and open spaces of varying sizes and scales" where the layout of the Inns reflect their medieval origins.

5.35 The application site falls into Sub Area 9 of Bloomsbury Conservation Area. Within this precinct, the main characterises tend to be the car free tranquil collegiate atmosphere of the Inn. Large Victorian Ceremonial buildings are key features of the area in the form of the Great Hall and Library amongst other buildings in the area range in ages such as the 15th Century Old Hall, 17th Century New Square, Stone Buildings from the 18th Century and the main ceremonial buildings from the 19th Century.

5.36 Landscaping is an important detail with courtyards, squares and lawns appearing throughout the area that create an interconnectedness of the courtyards. The Lincoln Inn Fields contributes positively to the sub area by providing a “more enclosed, collegiate character” to the sub area.

5.37 Lincoln’s Inn Fields is formed of a large square containing notable buildings such as Soane Museum and the grand town houses on the Western side. The open area of the square makes a major contribution to the significance of the Conservation Area. The proposal site (30 Lincoln’s Inn Fields) is a recently developed modern building, therefore is not a major component of the significance of the Conservation Area and is not identified as such in the Council’s Conservation Area Statement.

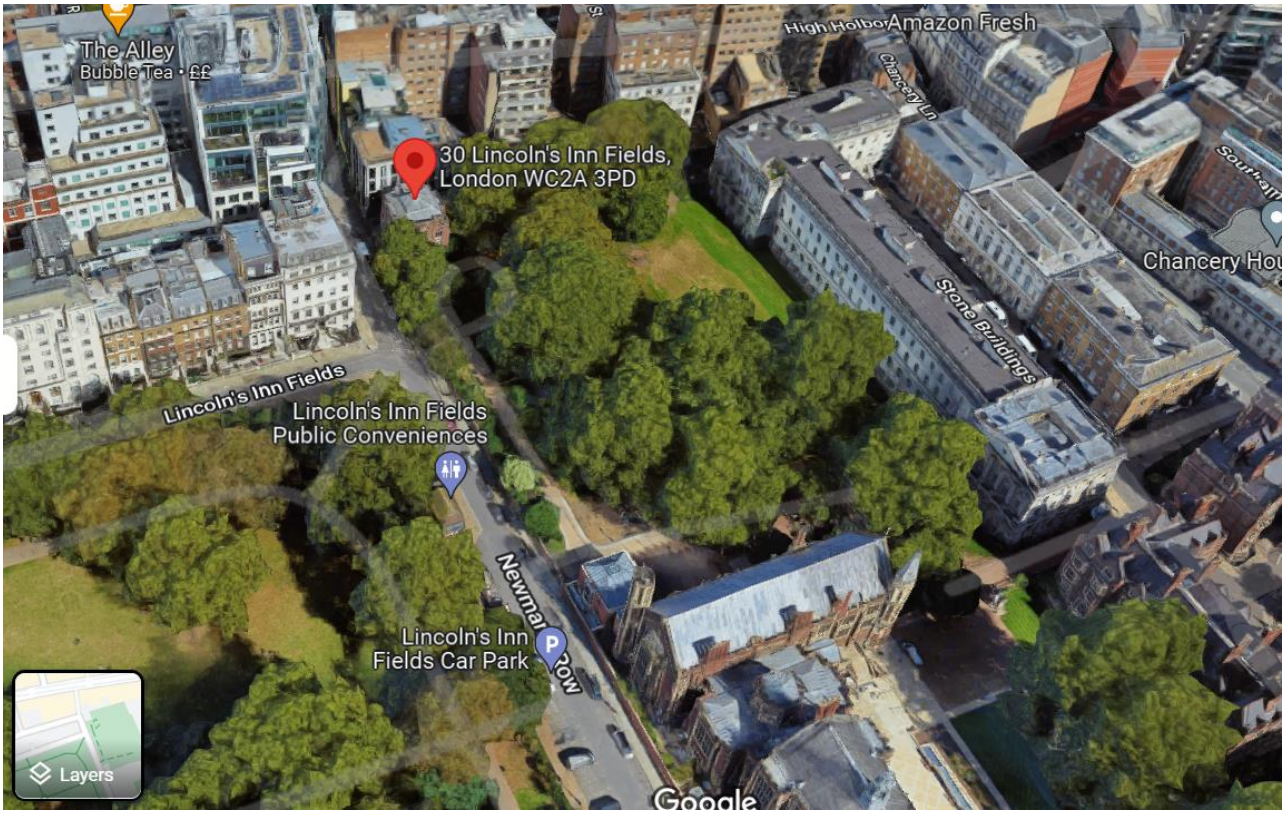

Figure 5.4 – Image marking 30 Lincoln's Inn Field and the surrounding area showing the topology and form of the area.

Effect on Bloomsbury Conservation Area

Impact on Conservation Area

5.38 As set out above, the installation of the roof mounted plant will not materially affect the external appearance of the building. The necessary roof louvres are not visible from the street and notwithstanding whether this constitutes development or not, these also will not materially alter the appearance of the building and therefore have no adverse impact on the character and appearance of the conservation area.

5.39 The rear enclosure will not be visible from the important vantage points and spaces within the Inn due to position and landscaping screening.

5.40 Overall, due the discrete position of the proposals and the choice of materials, the proposal will not cause harm the Bloomsbury Conservation Area or settings of Listed Buildings/charges within the vicinity.

6.0 SUMMARY AND CONCLUSIONS

6.1 The report aims to provide site context of the area and to provide a planning assessment to the details of the proposed development for the property.

6.2 The office was found to be at risk of severe overheating. The Overheating Assessment Report was commissioned by the client to assess the overheating risk in the building. The thermal modelling that was generated for the report shows that the overheating of the building is substantial even in the best-case scenario (where all openable windows are opened at a 90-degree angle). The report recommended that the property be fitted with an energy efficient cooling system.

6.3 Furthermore, the Energy report used the 'Be Lean, Be Clean and Be Green' toolkit to assess the most sustainable cooling measures that can be introduced to the building. The report concluded that the recommendations, including the fitting of AHSPs, can reduce current CO2 emissions of the property by 49.7%.

6.4 This statement is supported by the range technical studies that are carried out to show the proposals adherence to technical standards and guidance.

6.5 Having regard to the assessment undertaken above, we consider the planning benefits arising from this Scheme can be summarised as follows:

- The provision of a refurbished office unit, consistent with development priorities for the area and for the borough and London more broadly;
- Refurbishment of office allows for a more sustainable and environmentally friendly unit in line with London and LBC's climate adaptation goals;
- Discretely designed enclosures that are sympathetic to the local area and heritage assets; and
- Maintaining important tree with safe works.

6.6 The assessments showed that there will be no impact on trees of value in the area.

6.7 The assessment shows that there will be no impact on designated area of open space.

6.8 Overall, the proposed development was assessed against the existing LBC Development plan including the Local Plan and the relevant SPDs that will be used by the council to assess the application under Section 38(6) of the Planning and Compulsory Purchase Act 2004.

6.9 In conclusion, the proposed development in sympathetic to the local area, as well as to the existing design and integrity to the existing building and looks to improve the use and aesthetic of the building. The plans show the design, regarding external alterations and layouts as well as sections, are as suggested in the policy guidance. The development would enhance the contribution which the property makes to the Bloomsbury Conservation Area.

6.10 We consider that the development complies with Policy E1 by improving office facilities for the city.

6.11 In our view, the development meets the strict design and heritage objectives of the Development Plan and the Framework, which, with reference to statute, gives these benefits considerable importance and weight in the planning process.

APPENDIX 1.0

CORRESPONDENCE FROM SAVILLS TO CLIENT – CONFIRMING NEED FOR AIR CONDITIONING IN PROPERTY

Coco Pemberton

From:	**Philip Ardley <Philip.Ardley@lincolnsinn.org.uk>**
Sent:	**Friday, July 1, 2022 8:04 AM**
To:	**Coco Pemberton**
Subject:	**FW: 30 Lincoln's Inn Fields**
Follow Up Flag:	**Follow up**
Flag Status:	**Flagged**

From: James Gillett <JGillett@savills.com>
Sent: 30 June 2022 17:24
To: Philip Ardley <Philip.Ardley@lincolnsinn.org.uk>
Cc: 'Tim Miles' <tim.miles@montagu-evans.co.uk>; Sarah Lee <Sarah.Lee@lincolnsinn.org.uk>
Subject: [EXTERNAL] 30 Lincoln's Inn Fields

Sent: 30 June 2022 17:24
To: Philip Ardley <Philip.Ardley@lincolnsinn.org.uk>
Cc: 'Tim Miles' <tim.miles@montagu-evans.co.uk>; Sarah Lee <Sarah.Lee@lincolnsinn.org.uk>
Subject: [EXTERNAL] 30 Lincoln's Inn Fields

Dear Phil

I refer to our recent conversation regarding 30 Lincoln's Inn Fields.

You have asked for our views on the letting prospects for the building and whether the chances of securing a tenant without improvements are reasonable, or if not whether the chances are reasonable after upgrading the services and providing an improved standard of accommodation. The building at present is only centrally heated and does not benefit from any air conditioning services.

Demand for offices at present is almost exclusively focussed on best quality accommodation where tenants can provide a satisfactory environment to their existing employees and provide the opportunity to recruit new staff. With a plentiful supply of good quality conventional and serviced offices available to those tenants prepared to relocate it is clear that those that cannot meet tenants needs will be left vacant. This is especially the case where buildings are centrally heated rather than air conditioned and from our research database we have not found a single letting of a centrally heated building over the past 12 months. This is most likely because landlords are aware of the non existent demand for such accommodation and have specified their buildings accordingly.

Savills have been marketing 30 Lincoln's Inn Fields for a number of months now and although there have been a few tenant viewings, principally from the legal sector, the building has been turned down on all occasions because of the lack of air conditioning. Whilst the building could be upgraded to include modern finishes and styling to improve the letting prospects if it remains as a centrally heated building then I do not envisage the tenant perception of the building to change.

I am firmly of the view therefore that if the building is to achieve it's full letting potential and does not remain vacant for a considerable period then it is essential that an air conditioning system is installed.

I hope that this information is helpful but please call if anything requires clarification.

Kind regards

James

James Gillett

Director

Central London and International

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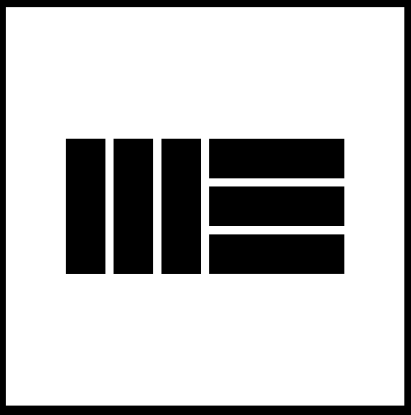

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