

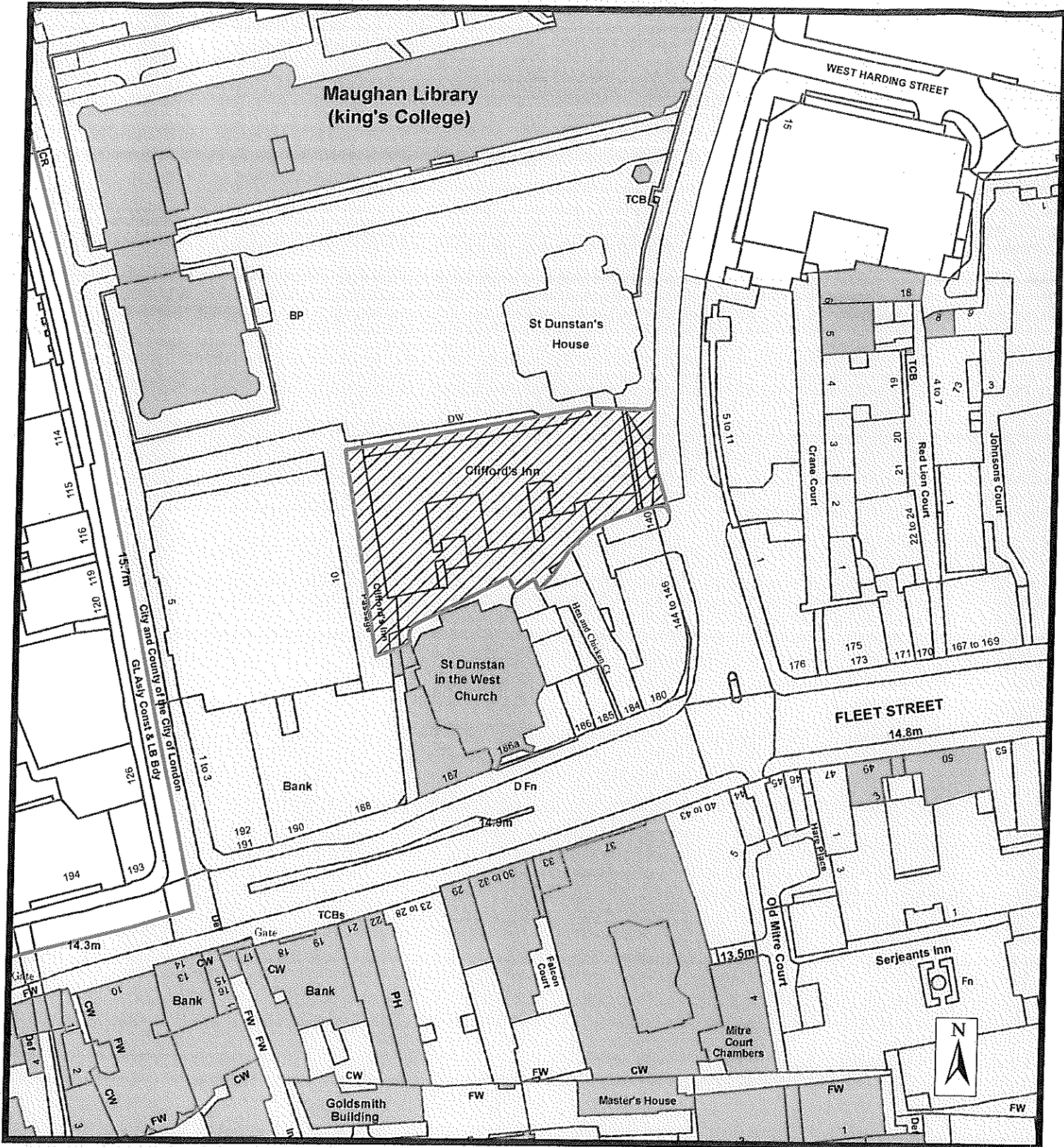
Committee:	Date:	
Planning and Transportation	27 November 2012	
<p>Subject:</p> <p>Cliffords Inn 138 Fetter Lane London EC4A 1BX</p> <p>(i) Demolition and replacement of existing facade to Fetter Lane (ii) Demolition of two external staircase structures, (iii) Infill of existing office space in the rear courtyard in two locations (272sq.m), (iv) Part change of use of lower ground, first and second floors from B1 (offices) to C3 (residential) to provide eight residential units (519sq.m), (v) Replacement windows on lower ground, ground, first and second floor levels, (vi) new spiral staircase and landscaping of southern courtyard.</p>		
Ward: Farringdon Without	Public	For Decision
Registered No: 12/00789/FULL	Registered on: 6 August 2012	
Conservation Area: Chancery Lane	Listed Building: No	
<p><u>Summary</u></p> <p>As part of a comprehensive refurbishment of the building it is proposed to:</p> <p>(i) Demolish and replace the Fetter Lane facade of the building.</p> <p>(ii) Demolish two glazed external staircases to the southern courtyard.</p> <p>(iii) Infill part of the southern courtyard in two locations: (a) from lower ground to second floor level (b) from lower ground floor to third floor level. New green roofs are proposed for each infill. The infills would result in an additional 272sq.m of floorspace.</p> <p>(iv) Install a new staircase on the Courtyard elevation.</p> <p>(v) Replace existing windows on the lower ground, ground and first floor levels</p> <p>(vi) Change the use of the front part of the lower ground, first and second floors from office (Class B1) use to create eight residential units (Class C3). The proposed change of use involves 519sq.m of floorspace. Letters of objection have been received from 16 residents. The objections relate to the removal of the existing front facade, the change of use from offices to residential accommodation, noise caused by demolition and construction and the impact of the proposed infills. The proposed residential use is acceptable and is within and identified residential cluster.</p> <p>The new facade to Fetter Lane would enhance this part of the conservation area</p>		

making a positive contribution to its character and local distinctiveness due to the contextual approach and high design quality of the proposal. The alterations proposed to the southern courtyard of Clifford's Inn and replacement windows are considered to be appropriate interventions that would enhance this locality.

Recommendation

Planning permission be granted for the above proposal in accordance with the details set out in the attached schedule, subject to Planning Obligations being entered into as set out in the body of this report.




Site Location Plan



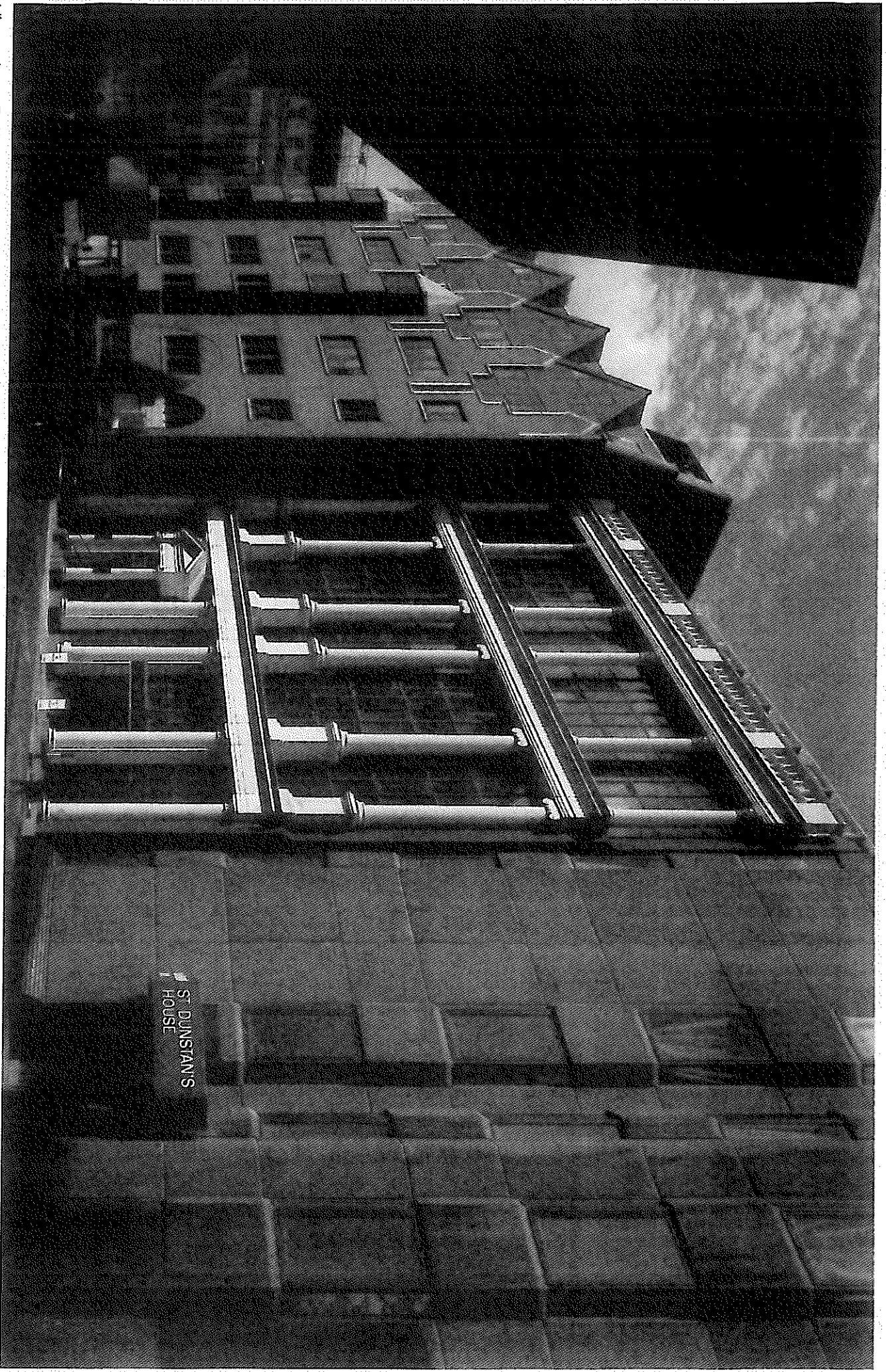
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ADDRESS:
Cliffords Inn, 138 Fetter Lane

CASE No.
12/00789/FULL

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY





View along Fetter Lane looking South - Existing Building

ST DUNSTON'S
HOUSE

Site

1. Clifford's Inn was built in 1937 and significantly altered in 1982 with a replacement facade to Fetter Lane and new external cores on the Courtyard elevation. The building is located on the west side of Fetter Lane at its southern end in close proximity to Fleet Street.
2. The existing building comprises offices at lower ground, ground, first and second floor levels providing (3680sq.m). The remaining seven upper floors are in residential use (101 flats).
3. The main entrance to the building is from Fetter Lane for both residential and office accommodation. There is access from the south along a path and courtyard.
4. The buildings in the surrounding area are mainly in office use, with a number of Law Chambers located in the area.
5. The building is situated within the Chancery Lane Conservation Area. A grade II listed gatehouse and the Grade II* Listed Maughan Library (the former Public Record Office) are located to the north of the site; the Grade I listed Church of St. Dunstan's-in-the West is immediately to the south of the site.

Proposal

6. As part of a comprehensive refurbishment of the building it is proposed to:
 - (i) Demolish and replace of the Fetter Lane facade of the building.
 - (ii) Demolish two glazed external staircases to the southern courtyard.
 - (iii) Infill part of the southern courtyard in two locations: (a) from lower ground to second floor level (b) from lower ground floor to third floor level. New green roofs are proposed for each infill. The infills would result in an additional 272sq.m of floorspace.
 - (iv) Install a new staircase on the Courtyard elevation.
 - (v) Landscaping of the southern Courtyard.
 - (vi) Replace existing windows on the lower ground, ground and first floor levels.
 - (vii) Change the use of the front part of the lower ground, first and second floors from office (Class B1) use to create eight residential units, two one bed units and six two bed units (Class C3). The proposed change of use involves 519sq.m of floorspace.

Consultations

7. The views of other City of London departments have been taken into account in the preparation of this scheme and some detailed matters remain to be dealt with under conditions.
8. English Heritage raises no objection to the proposals and states that "*This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice*"

9. The application has been advertised on site and in the press. Letters of objection have been received from 16 residents. The objections relate to the removal of the existing front facade (addressed in paragraphs 20-23), the change of use from offices to residential accommodation (addressed in paragraph 15), noise caused by demolition and construction (addressed in paragraph 35) and the impact of the proposed infills in terms of loss of light, height of the proposed roof and the appearance of the spiral staircase in the southern Courtyard (addressed in paragraphs 26-29).

Policies

10. The development plan consists of the London Plan adopted in 2011, the saved policies of the Unitary Development Plan and the Core Strategy. The London Plan, UDP and Core Strategy policies that are relevant to the consideration of this case are set out in Appendix A to this report.
11. Government guidance is contained in the National Planning Policy Framework (NPPF).
12. There is relevant City of London and GLA supplementary planning guidance in respect of Sustainable Design and Construction.

Considerations

13. In determining the planning application the Corporation has the following main statutory duties to perform:-
 - To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990).
 - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
 - For development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
 - For development within or adjoining a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area and its setting (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

Proposed Use

14. The proposal would result in the loss of 511sq.m of office (Class B1) floorspace that does not meet modern day office requirements.
15. Objections to the proposed use have been received however; the provision of residential development on the site would accord with policy CS21 of the Core Strategy. This seeks to ensure that additional housing is provided in or near existing residential communities. There is existing residential accommodation within the building at the upper levels.

16. The proposed units, including approaches to the building and common parts, would be designed to meet the lifetime homes standards. All of the dwellings would have access to a dedicated residents passenger lift.

Demolition of the Existing Facade

17. The principal facade, to Fetter Lane, was renewed in 1982. The north, west, and upper sections of the south facades retain their original 1937 utilitarian brick faced appearance.
18. The Chancery Lane Conservation Area is a designated heritage asset. The Fetter Lane frontage of Clifford's Inn makes a neutral contribution to the character and appearance of the conservation area and, in terms of the NPPF, is not of sufficient quality to be considered an undesignated heritage asset.
19. The existing facade is a post-modern composition that comprises superimposed colonnades of glass reinforced concrete (GRC) standing in front of bronze coloured glass curtain walling. A report submitted by the applicant indicates that although the facade is showing signs of deterioration and will require significant expenditure on maintenance in future years it is structurally sound.
20. A number of objections have been made expressing the view that the existing facade should be retained. Most of these objections have been made on the basis that there is no structural need to replace the facade. The lack of need to replace the existing facade does not provide sufficient justification, on planning grounds, to seek its retention.
21. Other objections are that the facade should be retained on the grounds of its architectural merit. The facade is considered to be unusual but not exceptional. It is one example of several post-modern buildings in the City that date from the earlier part of the 1980s to the mid-1990s. Many of these post-modern buildings are superior to Clifford's Inn in terms of quality and appearance. Although the architect, Boyd Auger, may have been an early exponent of the revival of decoration and the embellishment of buildings in response to the functional appearance of modernist buildings up to the 1970's, his composition for the Fetter Lane facade was heavily constrained by the need to retain the existing pattern of fenestration. Clifford's Inn is not listed and is unlikely to be considered a favourable candidate for listing in the future. The retention of the Fetter Lane facade has not been sought because, on balance, it is considered to make at best a neutral contribution to the conservation area.

Construction of replacement Facade

22. The new facade would be given a simple modern appearance, would be of an appropriate design finished in high quality materials and relate positively to the local context in relation to scale, massing and materials. The new Fetter Lane frontage would be divided into seven bays, rising to sixth floor level. The five central bays would project forwards, flanked by a single recessed bay at either end of the facade. All bays would be defined by masonry spandrels and piers with elongated windows between. The office entrance would be relocated to the central bay, set within a surrounding double height recess. White Carrera marble clad piers either side would provide additional focus to the office entrance. The entrance to the existing residential accommodation would be incorporated into the second ground floor bay on the northern side of this facade in a manner that would maintain the symmetry of the overall composition. The

seventh and eighth floors would be contained within the roof structure, set behind a parapet in a similar manner to the existing facade, to reduce their visual presence in views from street level. A metal balustrade would be set back behind the line of the sixth floor parapet.

23. Portland stone is proposed for the masonry elements of the scheme. Roach bed stone would be used for the horizontal spandrels, sills and the ground and first floor base of the central element. External frames, canopies and ironmongery within this central bay would be in stainless steel, to further emphasise the entrance bay. The proposed gate to the courtyard would be fabricated from stainless steel.

Proposed Windows

24. The existing windows to the office accommodation on the lower ground, ground, first and second floors of the north, south and west elevations would be replaced with new metal windows.
25. The existing white metal windows are of a tripartite form with a single transom. The proposed windows are of a similar design, but omit the transom and would retain the same proportions in their vertical divisions and would harmonise with the retained windows on the upper levels of the building.

South Frontage

26. The south frontage faces onto a private courtyard. The two glazed lift and stair cores at the eastern and west ends of the south facade that were added in 1982 would be demolished. In their place would be; (i) a new core and extension on the eastern side, incorporating the residential entrance lobby, a lift for the new apartments, two office lifts, an escape staircase and bin stores, and (ii) a new fully glazed infill that would extend the office accommodation southwards to the site of the western core. This would provide additional office space on the lower ground, ground and first floor.
27. The appearance of the revised southern elevation of the building would be simplified. The frontage to the extended office accommodation on the western side would be largely faced in clear glass curtain walling also utilised to glaze the office and residential lobbies of the new infill extension on the eastern side. The lower sections of the eastern infill, adjacent to the new fully glazed residential entrance would be clad in a ribbed stainless steel finish around the refuse storage areas. Portland stone would be used to face the new lift shaft. Green roofs would be provided on the flat roofs of both the eastern and western extensions. The proposed extensions would be below the height of the existing residential accommodation within the building therefore there would be no loss of daylight and sunlight to the residential flats.
28. A new steel spiral staircase would provide additional access and egress from the enlarged office accommodation and would stand slightly away from the building. The supporting structure would be formed from black painted sheet steel and being self-supporting without columns, it is intended to have a sculptural appearance. Stainless steel would be utilised for the stair treads and handrails.
29. Objections have been received to (i) the height of the proposed infills in relation to the existing window cills above and (ii) the appearance of spiral

staircase. The submitted drawings show that the height of the roof to the proposed infills would drop to a lower level along the edges of the roof that adjoin the existing building to ensure an acceptable clearance between the top of the roof and the existing eaves. The proposed spiral staircase is an essential element in the scheme and its design would complement the appearance of the southern Courtyard.

Landscaping

30. The proposals include improved landscaping to the in the southern courtyard and improvements to the surfacing of a small area of private land immediately in front of the Fetter Lane facade of the building. The alterations in the southern courtyard would include upgrading the surfaces and the introduction of planters. Full details of the landscaping proposals are to be agreed by condition.

Setting of Listed Buildings and Neighbouring Development

31. The proposals would have a minimal impact on two of the three listed buildings in the immediate vicinity of Clifford's Inn. The overall improvement to the appearance of the building's courtyard elevations would benefit the setting of the rear of the Grade I listed Church of St Dunstan-in-the-West and the setting of the Grade II listed gatehouse that adjoin the site. The changes to the windows on the north and western elevations would not have a detrimental impact on the setting of the Grade II* Listed Maughan Library (the former Public Record Office) where this building is seen in conjunction with Clifford's Inn.

Servicing and Transport

32. The area is well served by public transport and no additional private car parking is proposed. Three existing car parking spaces would be retained in the southern courtyard and available for occupiers of the office accommodation. One of these spaces would remain for the use of disabled persons.
33. A total of 22 spaces would be provided for bicycles in the lower ground floor for both the new office development and the new residential units. The spaces would be accessed from the main stair, which would be fitted with a cycle wheeling channel. Disabled cyclists unable to use the stairs would be able to use the office lifts to reach the lower ground floor.
34. Standard deliveries and servicing for the residential units would be off street via the lift and stair located in the residential entrance off the south facing courtyard. The office accommodation would be serviced off street via the lifts located off the office reception on Fetter Lane.
35. To ensure that the amenity of existing residents is protected during demolition and construction conditions requiring the submission of a detailed demolition and construction statement are proposed.

Archaeology

36. The site is in an area of archaeological potential to the west of the Roman and medieval walled city. There is potential for remains of buildings of the later and post medieval Clifford's Inn as well as Roman and early medieval and prehistoric features. There is some potential for the survival of burials remaining from the 19th century clearance St Dunstan's Church burial ground.

37. An Archaeological Desk Based Assessment, entitled Historic Environment Assessment has been submitted with the planning application.
38. The development would have an impact on archaeological remains where groundworks outside modern intrusions are proposed such as, for new foundations, underpinning, new floor slabs, lift pits and landscaping of a courtyard area in the southern part of the site.
39. The existing building has a lower ground floor, which would be retained and there is potential for cut features such as wells and cess pits to survive below this level.
40. Archaeological evaluation is appropriate to provide additional information on the date, character and nature of archaeological survival and to supplement the findings of the assessment.
41. Conditions are recommended to cover archaeological evaluation, a programme of archaeological work and foundation design.

Planning Obligations and Community Infrastructure Levy

42. On 1st April 2012 the Mayor of London introduced a new statutory charge, the Mayoral Community Infrastructure Levy (CIL), in accordance with London Plan Policy 8.3. The Mayoral CIL is paid by developers to help fund strategically important infrastructure, initially focussing on Crossrail. The Mayor has set a charge of £50 per sq.m and this applies to all development over 100sq.m except social housing, education related development, health related development and development for charities for charitable purposes.
43. In this case the Mayoral CIL would be £13,600. The uplift in floorspace would not trigger the Mayoral planning obligation for Crossrail.
44. These contributions towards the funding of Crossrail would be collected by the City Corporation. Under the CIL regulations the City Corporation is able to retain 4% of the Mayoral CIL income as an administration fee; the remainder would be forwarded to the Mayor of London.

Conclusion

45. The new facade to Fetter Lane would enhance this part of the conservation area making a positive contribution to its character and local distinctiveness due to the contextual approach and high design quality of the proposal. The proposed demolition of the existing Fetter Lane facade is acceptable because the current facade makes a neutral contribution to the Chancery Lane conservation area. The alterations proposed to the southern courtyard of Clifford's Inn and replacement windows are considered to be appropriate interventions that would enhance this locality.

Background Papers

Internal

Memo 31.08.12

Cleansing

Memo 06.09.12

Environmental Health

External

Letter 02.08.12	GL Hearn
Letter 08.08.12	Pauline Lovell
Letter 09.08.12 & 26.09.12	A.P Cracknell
Letter 20.08.12	Jackie Newbury
Letter 20.08.12	Robin Anthony Porter
Email 03.09.12	Environment Agency
Letter 03.09.12	Robert E Langford
Email 04.09.12	Thames Water
Letter 04.09.12	English Heritage
Letter 05.09.12, 25.09.12, Email 02.11.12	N Strauss
Letter 05.09.12	Yvonne and Geoff Bolland
Letter 06.09.12	Peter Simpson
Letter 08.09.12	Nick Banks
Letter 08.09.12	Belinda Bucknall
Letter 08.09.12	Clifford's Inn Management Company
Email rec. 10.09.12	Professor William Ballantyne
Letter rec. 12.09.12	Colin West
Letter 16.09.12	Elisabeth A. Jupp
Email 19.09.12	Iain Hasnip
Letter 19.09.12	Caroline Bennett
Letter 23.09.12	Elisabetta Russo
Letter 02.11.12	GL Hearn
Email 08.11.12	Howard Peace
Environmental Noise Survey	Hoare Lea
Historic Environment Assessment	Museum of London Archaeology
Outline Project Plan	PBC
Final Scoping Flood Risk Assessment	Halcrow
Transport Statement	Halcrow
Design and Access Statement	G L Hearn
Planning Statement	GL Hearn
Energy Statement	Hoare Lea
Facade Condition Report	Sandberg LLP
Proposed Pit Locations	Halcrow Yolles
Proposed Foundation Plan	Halcrow Yolles
Sections and Details	Halcrow Yolles

Site Diary

Reconstruction of Frontage Report

Halcrow Yolles

Kenneth Powell

Appendix A

The London Plan policies which are most relevant to this application are set out below:

Policy 2.10 Enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ) and as a strategically important, globally-oriented financial and business services centre.

Policy 2.11 Ensure that developments proposals to increase office floorspace within CAZ include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the plan.

Policy 4.1 Promote and enable the continued development of a strong, sustainable and increasingly diverse economy;
Support the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity;
Promote London as a suitable location for European and other international agencies and businesses.

Policy 4.2 Support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes.

Policy 4.3 Within the Central Activities Zone increases in office floorspace should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan.

Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should meet the minimum standards outlined in supplementary planning guidance.

Policy 5.13 Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so.

Policy 6.9 Developments should provide secure, integrated and accessible cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Super Highways and facilitate the central London cycle hire scheme.

Policy 7.2 All new development in London to achieve the highest standards of accessible and inclusive design.

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas

of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Policy 7.6 Buildings and structures should:

- a be of the highest architectural quality
- b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c comprise details and materials that complement, not necessarily replicate, the local architectural character
- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g be adaptable to different activities and land uses, particularly at ground level
- h meet the principles of inclusive design
- i optimise the potential of sites.

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

Unitary Development Plan and Core Strategy Policies

CS10 Promote high quality environment

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

CS15 Creation of sustainable development

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

CS2 Facilitate utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS4 Seek planning contributions

To manage the impact of development, seeking appropriate contributions having regard to the impact of the contributions on the viability of development.

ARC2 To preserve archaeological remains

To require development proposals to preserve in situ, protect and safeguard important ancient monuments and important archaeological remains and their settings, and where appropriate, to require the permanent public display and/or interpretation of the monument or remains.

ENV28 Design of building services

To ensure that building services are satisfactorily integrated into the architectural design of the building (with particular reference to its roof profile) and to resist installations which would adversely affect the character, appearance or amenities of the buildings or area concerned.

ENV11 Preserve contribution to CA

To resist the demolition of buildings which make a positive contribution to the character or appearance of a conservation area and to encourage their sympathetic refurbishment.

ENV13 Control demolition in CA

Conservation area consent, if appropriate, will normally be subject to a condition preventing demolition prior to the approval of detailed plans of any replacement building and may be subject to a condition that a contract, or series of contracts, ensuring the construction of such a replacement has been signed.

UTIL6 Provision for waste collection

To require adequate provision within all developments for the storage, presentation for collection, and removal of waste, unless exceptional circumstances make it impractical; to encourage provision to allow for the separate storage of recyclable waste where appropriate.

TRANS15 Seek off-street servicing

To seek, where appropriate, the provision of off-street servicing facilities in such a way as:

- i. to ensure that the location and design of vehicular access and servicing arrangements minimise the adverse effects on the adjoining highway and pay due regard to the environment and the convenience and safety of pedestrians;
- ii. to ensure that vehicular servicing and servicing access is avoided on or onto Tier 1-3 roads, except where a practical alternative cannot be provided; and
- iii. to enable vehicles to enter and leave premises in a forward direction.

TRANS22 Require cycle parking

To provide cycle parking facilities by:

- i. requiring the provision of private parking space for cycles in development schemes;
- ii. maintaining an adequate overall number of spaces for cycles in public off-street car parks; and
- iii. providing an adequate supply of cycle parking facilities on-street.

ARC2 To preserve archaeological remains

To require development proposals to preserve in situ, protect and safeguard important ancient monuments and important archaeological remains and their settings, and where appropriate, to require the permanent public display and/or interpretation of the monument or remains.

ARC3 Recording of archaeological remains

To ensure the proper investigation, recording of sites, and publication of the results, by an approved organisation as an integral part of a development programme where a development incorporates archaeological remains or where it is considered that preservation in situ is not appropriate.

SCHEDULE

APPLICATION: 12/00789/FULL

Cliffords Inn 138 Fetter Lane London

(i) Demolition and replacement of existing facade to Fetter Lane (ii) Demolition of two external staircase structures, (iii) Infill of existing office space in the rear courtyard in two locations (272 sq.m), (iv) Part change of use of lower ground, first and second floors from B1 (offices) to C3 (residential) to provide eight residential units (519sq.m), (v) Replacement windows on lower ground, ground, first and second floor levels, (vi) new spiral staircase and landscaping of southern courtyard.

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects, based on the Department of Markets and Consumer Protection's Code of Deconstruction and Construction Practice, has been submitted to and approved in writing by the Local Planning Authority. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.
REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policy of the Core Strategy: CS15.
- 3 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site identifying efficiency and sustainability measures to be undertaken during site deconstruction of the existing buildings has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The development shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority (in consultation with Transport for London).
REASON: To ensure that deconstruction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14.

- 4 Prior to and during any building, engineering or other operations hereby permitted, archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological work.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Unitary Development Plan: ARC1.
- 5 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policies of the Unitary Development Plan: ARC2, ARC3
- 6 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policies of the Unitary Development Plan: ARC2, ARC3.
- 7 No part of the green roof areas, as shown as on the drawings hereby approved, shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Core Strategy: CS15, CS21.
- 8 Details of the position, size and maintenance strategy of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON:
To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Core Strategy: CS10, CS15, CS18, CS19.

- 9 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) particulars and samples of the materials to be used on all external faces of the building including; external ground and upper level surfaces and boundary treatment.;
(b) details of junctions with adjoining premises to include details of junction between stonework and ground level surfaces.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Unitary Development Plan and Core Strategy: ENV6, CS10.
- 10 All unbuilt surfaces shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any such works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
REASON: In the interests of visual amenity in accordance with the following policies of the Unitary Development Plan and Core Strategy: ENV 8, ENV 9, CS10, CS15, CS19.
- 11 There must be no building, roof structures, plant, pipework or other excrescences on the roofs of the proposed infills.
REASON: To ensure a satisfactory external appearance in accordance with the following policies of the Core Strategy: CS10, CS12.
- 12 Refuse storage and collection facilities shall:(a) be provided within the curtilage of the site to serve each part of the development in accordance with details which must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and(b) thereafter be maintained as approved throughout the life of the building.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policies of the Unitary Development Plan and Core Strategy: UTIL 6, CS10, CS17.
- 13 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Core Strategy: CS15, CS16, CS21.

- 14 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of one pedal cycle per 250 sq.m. of floorspace (minimum 22 spaces). The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking. REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Unitary Development Plan: TRANS22.
- 15 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans. REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Unitary Development Plan: TRANS22.
- 16 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:
1073_DW_01_E0100, 1073_DW_02_E0199, 1073_DW_02_E0200,
1073_DW_02_E0201, 1073_DW_02_E0202, 1073_DW_02_E0203,
1073_DW_02_E0204, 1000_DW_03_E0300, 1000_DW_03_E0301,
1000_DW_03_E0302, 1000_DW_03_E0303, 1000_DW_03_E0304,
1000_DW_03_E0305, 100_DW_04_E0400, 100_DW_04_E0401, 100_
DW_04_E0402, 1073_DW_04_P0410, 1073_DW_04_P0411,
1073_DW_04_P0412, 1073_DW_41_E4100,
1073_DW_01_P0100, 1073_DW_02_P0199, 1073_DW_02_P0200 Rev B,
1073_DW_02_P0201/A, 1073_DW_02_P0202/A, 1073_DW_02_P0203,
1073_DW_02_P0204/A, 1073_DW_02_P0250/A, 1073_DW_03_P0300/A,

1073_DW_03_P0301, 1073_DW_03_P0302/A, 1073_DW_03_P0303,
1073_DW_03_P0304, 1073_DW_03_P0305, 1073_DW_04_P0400/A,
1073_DW_04_P0401, 1073_DW_04_P0402, 1073_DW_04_P4100,
1000_DW_24_P2400, 1000_DW_24_P2401, 1073_DW_41_P4100,
1073_DW_41_P4101/A, 1073_DW_41_P4102/A, 1073_DW_41_P4103,
1073_DW_41_P4104.
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

- 1 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 2 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust

(a) The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b) Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c) Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d) The proposed residential flats are close to busy roads and are in an existing commercial area which operates 24 hours a day. The scheme should include effective sound proofing of the windows and the provision of air conditioning or silent ventilation units to enable the occupants to keep their windows closed to benefit from the sound insulation provided. This may need additional planning permission.

(e) The proposed residential units are located in a busy City area that operates 24 hours a day and there are existing road sweeping, deliveries, ventilation plant and refuse collection activities that go on through the night. The units

need to be designed and constructed to minimize noise disturbance to the residents. This should include acoustic treatment to prevent noise and vibration transmission from all sources. Sound insulation treatment needs to be provided to the windows and either air conditioning provided or silent ventilation provided to enable the windows to be kept closed yet maintain comfortable conditions within the rooms of the flat. This may need additional planning permission.

Ventilation of Sewer Gases

(f) The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

- 3 No on-street residents' parking facilities are available for the occupiers of these premises.
- 4 Reason for Grant of Planning Permission - The decision to grant this planning permission has been taken having regard to the policies in the London Plan, Unitary Development Plan and Core Strategies set out below, relevant government guidance and supplementary planning guidance, representations received and all other relevant material considerations. Objections were made to the application. These were taken into account by the Local Planning Authority but were not considered to outweigh the reasons for granting planning permission.

The new facade to Fetter Lane would enhance this part of the conservation area making a positive contribution to its character and local distinctiveness due to the contextual approach and high design quality of the proposal. The proposed demolition of the existing Fetter Lane facade is acceptable because the current facade makes a neutral contribution to the Chancery Lane conservation area. The alterations proposed to the southern courtyard of Clifford's Inn and replacement windows are considered to be appropriate interventions that would enhance this locality.

Relevant London Plan Policies

The London Plan policies which are most relevant to this application are set out below:

Policy 2.10 Enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ) and as a strategically important, globally-oriented financial and business services centre.

Policy 2.11 Ensure that developments proposals to increase office floorspace within CAZ include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the plan.

Policy 4.1 Promote and enable the continued development of a strong, sustainable and increasingly diverse economy;

Policy 4.2 Support the management and mixed use development and redevelopment of office provision to improve London's competitiveness.

Policy 4.3 Within the Central Activities Zone increases in office floorspace should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan.

Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal.

Policy 5.13 Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so.

Policy 6.9 Developments should provide secure, integrated and accessible cycle parking facilities and provide on-site changing facilities and showers for cyclists.

Policy 7.2 All new development in London to achieve the highest standards of accessible and inclusive design.

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Policy 7.6 Buildings and structures should:

- a be of the highest architectural quality
- b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c comprise details and materials that complement, not necessarily replicate, the local architectural character
- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy,

overshadowing, wind and microclimate. This is particularly important for tall buildings

e incorporate best practice in resource management and climate change mitigation and adaptation

f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces

g be adaptable to different activities and land uses, particularly at ground level

h meet the principles of inclusive design

i optimise the potential of sites

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

Unitary Development Plan and Core Strategy Policies

CS10 Promote high quality environment

CS12 Conserve or enhance heritage assets

CS15 Creation of sustainable development

CS2 Facilitate utilities infrastructure

CS4 Seek planning contributions

ARC2 To preserve archaeological remains

ENV28 Design of building services

ENV11 Preserve contribution to CA

ENV13 Control demolition in CA

UTIL6 Provision for waste collection

TRANS15 Seek off-street servicing

TRANS22 Require cycle parking

ARC2 To preserve archaeological remains

ARC3 Recording of archaeological remains

2

48 Sheridan Way
Bristol BS30 9UE

8 August 2012

The Planning Officer
Department of Planning and Transportation
City of London
PO Box 270
Guildhall
London EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	09 AUG 2012	LTP
OM		SSE
No	115439	PP
FILE		DD

12/00789/FULL
JCU
13-08-12

ACKNOWLEDGED

Dear Sir

PLANNING APPLICATION FOR CLIFFORDS INN, FETTER LANE, LONDON

I hold a long lease of 158 years for flat 102 Cliffords Inn, Fetter Lane. Flat 102 is at the front of the building and currently enjoys the protection of a glass, steel and concrete structure which is a bolt on façade for the front of the building. This façade was erected in 1982 and is made of very substantial material. The windows are of very tough aluminium and steel and are double glazed to a high standard. The windows are so well made they eliminate around 90% of the traffic noise from the street and certainly have never let in water.

I have been served with a Notice under Article 11 of an Application for Planning permission from the agents of the freeholder, Ingrove Limited, and I was also present when they and their architects gave a presentation for long leaseholders in the reception area of Cliffords Inn on 19 July 2012.

I am most concerned that in their planning permission application, Ingrove merely write of 'façade treatment'. From what they have said, I understand that this 'treatment' involves completely removing the façade, which as far as my flat is concerned is the same as completely removing the front of the building as the windows make up almost all of that wall. This must be the same for other residents living at the front of the building.

The mess, noise and disruption for me would be huge as this is a very solid structure and complete removal of the glass frontage, pillars and balustrades would be a major task during which time a complete wall of my apartment would be exposed to the elements. Ingrove have no plans for rehousing residents and it would be completely impossible for me to use the property or to let it out to tenants during the work which would take many months to complete.

S

What I find most disturbing however is the notion of removing a perfectly good and sound structure just for cosmetic purposes, which Ingrove admit is the case. If the current façade was defective in any way I would be more sympathetic to this proposal, but in my opinion it is in excellent condition and is only 30 years old. I have lived in the apartment for 13 years and I can honestly say there has been no noticeable deterioration of the windows over that period and I am fairly sure there have never been any complaints about the façade. I cannot believe that the new structure would improve on what is already there, apart from looking a little more like the dreadful, boxlike structures which already surround Cliffords Inn.

Yours faithfully

Pauline Lovell (Mrs)

Flat 8,
97 East London Street,
EDINBURGH EH7 4BF.

9th August 2012.

Dept of Planning and Transportation,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 2EJ.

ACKNOWLEDGED

PLANNING & TRANSPORTATION		
PSDD	CPD	PPC
TPD	14 AUG 2012	LTP
OM		SSE
No	115484	PF
FILE		DD

Dear Sirs,

**Re: Notice 1 Application for Planning Permission
Cliffords Inn, Fetter lane, City of London EC4A 1BX**

I have received a Notice 1, dated 2nd August 2012, in relation to the above property describing the proposed development:

“Demolition of external stair core, part refurbishment and infill extension of existing office space, and part change of use from office (B1) to residential (C3) to provide 8 new residential units, façade treatment and landscaping.”

I am one of the 99 leaseholders of residential units in the section of the building that was developed in the late 1970s and which has operated successfully and to everyone’s satisfaction since then as an integral self-contained property, under the management of Cliffords Inn Management Company Ltd (CIMC). My lease was originally granted on 28th August 1984 and since then has been extended until 21st December 2169. The other part of the building has operated completely separately from the residential units until now.

#1. Regarding the first part of the proposed development, I have no objection to the proposed redevelopment of the offices as residential units provided that they are kept completely separate in all aspects from the existing residential development and do not interfere with that in any way.

#2. Regarding the “façade treatment” the planning application is vague about what is intended here. The facade on Fetter Lane consists of super-imposed colonnades of GRC that stand against bronzed glass curtain-walling which was added to the building in about 1982-3. From information provided by the agents of the freeholder and meetings held with those agents it appears that what is intended is “Replacement of the Fetter Lane façade of the building with a new modern façade constructed of high quality Portland Stone” The present façade is a very solid structure that seems to have many years of life left in it yet. The proposals would seem to amount to wanton destruction verging on vandalism.

Cliffords Inn is a historic site dating back to the fourteenth century, although the Inn was dissolved in 1902 and the only surviving building of the Inn is the neo-gothic gatehouse dating from *circa* 1830. It is adjacent to the church of St Dunstan-in-the-West. The Fetter Lane frontage of the present building of residential flats and some office accommodation was re-fronted in 1983 and is of some considerable historical architectural significance. “Renovations in 1983 by *Boyd Auger* included refacing the entrance block to Fetter Lane, E. Here, super-imposed colonnades of GRC stand against bronzed glass curtain-walling, amongst the first such revivals of classical forms for commercial buildings.” (*The Buildings of England London 1: The City of London*, Simon Bradley and Nikolaus Pevsner, Penguin Books 1997, page 294). This frontage sets Cliffords Inn apart from bog



standard blocks of flats and is a tribute to the site's long history as well as being a memorial to its pioneer role in commercial architecture in the City of London and elsewhere. It really should not be swept away and superseded by some characterless modern replacement.

#3. As to the final part of the proposal "... and landscaping" it would seem that the site is largely covered with concrete, slabs, bricks, etc. and offers little scope for landscaping; I have no strong views on this.

You will see from #2 above that I am totally opposed to the proposed "façade treatment" aspect of this proposal and I think that you may find that some other leaseholders are also similarly opposed to this aspect of the proposed redevelopment. In fact there are moves by a group of us to seek to meet with the appropriate Planning Officer to discuss this proposal.

Yours sincerely

(Prof) A.P. Cracknell

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	02 OCT 2012	LTP
OM		SSE
No	115991	PP
FILE		DD

Flat 8,
97 East London Street,
EDINBURGH EH7 4BF.

26th September 2012.

Dept of Planning and Transportation,
Attention Mr R. Chipperfield,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 2EJ.

ACKNOWLEDGED 2/10/12 SB

Dear Mr Chipperfield,

**Re: Notice 1 Application for Planning Permission
Cliffords Inn, Fetter lane, City of London EC4A 1BX**

I am writing with a further submission related to the above Planning Application, since I understand that although the formal deadline for submissions has passed you may nevertheless still be prepared to receive submissions.

I wish to comment on the Facade Report "CLIFFORD'S INN, FETTER LANE, LONDON EC4 PROPOSED RECONSTRUCTION OF FRONTAGE TO FETTER LANE. REPORT BY KENNETH POWELL, M.A., HON. FRIBA" which I have seen on your website, reference number 210489. This report concludes "There can be no case for retaining the weakly imitative Fetter Lane frontage to Clifford's Inn".

#1. This report is by an HON FRIBA and clearly should be respected. However, I wish to make some observations pointing out some errors in that report which the Planning Committee may wish to note.

#2. I trust that the Planning Committee will bear in mind that the report has obviously been selected by the Applicants since it supports their case – and, of course, who can blame them?

#3. The report, penultimate sentence of section 1, speaks of "alterations to the fenestration" when the works of 1983 were carried out. This is not true, there was no alteration to the fenestration. The 1983 article "Screenplay" in the *Architects' Journal*, (Ref. 1) which Kenneth Powell actually cites, makes it very clear that there was no change to the fenestration and that this was a constraint within which Boyd Auger had to work. Paragraph 3 of this article says "The first step has been to hide the 1930s facade behind a curtain wall of dark bronze anodised aluminium and tinted glass which make the existing fenestration pattern invisible – except at night when the interior lights are on. But though hidden, the window openings had, of course, to be left unobstructed. This has meant that the screen, composed of the traditional hierarchy of Doric/Ionic/Corinthian, *has cornices in positions which are determined by the existing fenestration pattern.*" (my italics) (Ref. 1).

#4. The statement in the penultimate sentence of the first paragraph of section 2 of the Report is very misleading. It describes glassfibre reinforced concrete (GRC) as "a



lightweight material". More information about the columns can be found in the December 1983 article in *Concrete Quarterly*, (Ref. 2). This article explains that the GRC columns, in this article denoting glass reinforced cement (not concrete), were hollow with walls only 10mm or 15mm thick so that indeed it is true to say that they are lightweight. However, Kenneth Powell completely omits to say that - when finally erected - the columns are by no means lightweight. The (hollow) columns were mounted in position and acted as moulds; reinforcement cages were lowered into them and the hollow GRC cylinders were filled with concrete. The moulds remained in place after the concrete had set. Thus the columns are extremely heavy, each one weighing several tonnes. Some more details of the filling of the columns with concrete will be found in this 1983 article in *Concrete Quarterly*. What is important about this omission in Kenneth Powell's report is that it gives the impression that the columns are lightweight and therefore easy to remove; this would not be the case. The heaviest of the horizontal members weighed 1.5 tonnes and was lifted into position by crane and the largest of the columns, those in front of floors 2 to 4, are about 6 tonnes each. The removal of all this heavy reinforced concrete is by no means a trivial operation.

#5. The report aims to denigrate generally the work of Boyd Auger. It is therefore relevant to consider a few more details of the work of this architect. Kenneth Powell cites some of Boyd Auger's work on the Gyrotron, on ornamentation and on computers in architectural design, and then continues "These provide a context for the apparently eccentric design of the Clifford's Inn facade" The report ignores one very important factor related to Clifford's Inn. As already mentioned above in section 3 of these comments, Boyd Auger was constrained by the existing positions of the windows (fenestration). Whereas most post-modernistic buildings have been new buildings in which the architect and client chose to build their building in a post modernistic style and therefore had fairly free reign with the proportions etc. of components, this was not the case for Boyd Auger at Cliffords Inn. At Cliffords Inn Boyd Auger was constrained by working with an existing building and his work demonstrates how a dull and boring modern and totally functional building was converted by refurbishing it into a post-modernistic Classical style revealing "how a dull urban facade can be transformed rather than tolerated" (Ref. 1). At the time that the facade was added to the building it was the subject of considerable interest in the architectural press in 1983 (Refs 1 - 4). In 1983 *Country Life* wrote that it "brightens up an area of London not noted for lively architecture (Ref. 3).

Several other examples of Boyd Auger's work not mentioned by Kenneth Powell can be discovered by a perusal of the catalogue of the Library of the RIBA. Finally it is also worth mentioning that in 2008 the RIBA established the annual Boyd Auger Scholarship in his memory, clearly indicating a certain level of respect by the RIBA for Boyd Auger's work. The Scholarship, worth £5,000 annually, supports architecture students and graduates by providing an opportunity to undergo a period of imaginative and original research and travel.

References

#1 Screenplay, A City street has been enlivened by Boyd Auger's unusual facade to a 1930s building which breaks new ground in the campaign for a Classical revival, *Architects Journal*, volume 177, p52-53 (1983).

#2 Classical face-lift in Fetter Lane: refurbishment of Cliffords Inn, Fetter Lane, London EC4; Architects : Boyd Auger, *Concrete Quarterly*, no. 139 December 1983, p.38-39.

#3 Cliffords Inn: classical 1930s building refurbished and new curtain wall added:
Architects Boyd Auger, *Country Life*, volume 174, p. 418 (1983).

#4 Clifford's Inn revamp. Post-modern facade in Fetter Lane; Architects: Boyd Auger,
London architect, August 1983, p.2.

I hope that these comments may be of some interest to the Planning Committee when
considering this application.

Yours sincerely

A.P. Cracknell.

MA, MSc., DPhil., CPhys., FInst.P., FRSA, FRSE, FRSPSoc.
Emeritus Professor, University of Dundee.

306 Cinnamon Wharf
24 Shad Thames
London SE1 2YJ.

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	28 AUG 2012	LTP
OM		SSE
No	115614	PP
FILE		DD

Dept of Planning and Transportation,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 2EJ.

ACKNOWLEDGED

28/08/12 · 20th August 2012.

12100789/FULL
RC.
JCH
28-08-12

Dear Sirs,

**RE: NOTICE 1 APPLICATION FOR PLANNING PERMISSION
CLIFFORDS INN, FETTER LANE, CITY OF LONDON EC4A 1BX**

I have received a Notice 1, dated 2nd August 2012, in relation to the above property describing the proposed development:

“Demolition of external stair core, part refurbishment and infill extension of existing office space, and part change of use from office (B1) to residential (C3) to provide 8 new residential units, façade treatment and landscaping.”

I am a lessee owning the flat 157 Clifford’s Inn. I am also the Chairman of Clifford’s Inn Management Company Limited (CIMC). I have owned a flat in Clifford’s Inn since 1984 and have been Chairman since 2006. In this letter I am writing to you in my personal capacity to lodge objections to the Planning application made by Ingrove for the above application. I will write under separate cover as Chairman of CIMC with other factors relating to this development.

Please note that CLSH is making the application in the middle of the Olympic Games and the summer holidays and this will likely ensure that you do not receive a fair and representative cross section of opinion or objections from the lessees of the building in response to this application. Please also note that the original planning application had been due to be made (according to CLSH) in mid-July.

OBJECTIONS TO THE REDEVELOPMENT OF THE COMMERCIAL PREMISES

1. Regarding the first part of the proposed development, I have little objection to the proposed redevelopment of the offices as residential units. However I would hope that they are kept completely separate in all aspects from the existing residential development and do not interfere with that in any way. I have asked the Freeholder at one of the ‘surgeries’, that the access to the new residential area be kept away from the front entrance of Clifford’s Inn (the original residential area), so that guests and the postal delivery are not confused. I have also asked that the new area be given a separate and easily identifiable name so as not to confuse the two areas.
2. On a more negative note, the value of our flats in the Residential Part of Clifford's Inn will be harmed, with the development of the new Cliffords Inn flats, as well as the development at St. Dunstan's House right next door for residential purposes and the new residential development in Lincoln's Inn and other nearby locations such as the Strand.



3. I fully appreciate that the Landlord represented by CLS Holdings is entitled to redevelop his property when the commercial leases fall due, however as a lessee I would like to point out the following:

-The length and duration of the works, will mean that the Residential Part will be a very uncomfortable building site for all residents, especially if this coincides with demolition and erection of St Dunstan's House. Many of the lessees also rent their properties to local business people and post graduate students, and letting in this sort of atmosphere is going to be nigh impossible. I see no mention is made of any sort of compensation to Lessees. (This will be significantly worse for those lessees who live in the flats fronting onto Fetter Lane if the front façade is indeed removed and replaced. They will have up to 6 months of work at their windows and again no mention has been made of their rehousing or any compensation).

- As a council tax payer I will be seeking permission from the Corporation of London for a reduction of the council tax for the significant dirt, noise, disruption and loss of amenity while these works are on-going.

- The works will also likely significantly overlap with the demolition and rebuilding of St Dunstan's House next door causing us to be surrounded by noise, dirt and I will be sitting on an unmarketable asset causing significant loss of rental income.

4. Regarding the "façade treatment" the planning application is vague about what is intended here. From information provided by the agents of the freeholder and meetings held with those agents it appears that what is intended is

"Replacement of the Fetter Lane façade of the building with a new modern façade constructed of high quality Portland Stone" The present façade is a very solid structure that (we are told by the manufacturers, Kwaneer), has a total of about 60 many years of life left, ie just over another 30 years.

The glass façade was erected in 1982 by the Landlord, Ingrove as part of their redevelopment of the building and conversion from long let to leasehold flats and a full separation between the commercial and residential premises. In the words of the original architect, Boyd Auger who wrote on the Plans submitted to the Corporation in November 1980, to justify his application for the works on the façade: *'The whole object of this exercise is to produce an elegant elevation which will be, hopefully, more pleasing to the eye than either the existing 1936 elevation or the other modern buildings which surround it'*.

The Fetter Lane frontage is of some considerable historical architectural significance. "Renovations in 1983 by Boyd Auger included refacing the entrance block to Fetter Lane, E. Here, super-imposed colonnades of GRC stand against bronzed glass curtain-walling, amongst the first such revivals of classical forms for commercial buildings." (*The Buildings of England London 1: The City of London*, Simon Bradley and Nikolaus Pevsner, Penguin Books 1997, page 294). Indeed one of the front pillars has a plaque to the architect.

The false front was erected by the then freeholder in at its own expense when about 2/3rd of the individual leases had still to be sold and this suggests strongly that the reason for doing so was to assist the marketing of the outstanding leases and the freeholder's return on his investment by improving the 'curb appeal' of the building. We do not yet know if the façade has to be taken down for structural reasons, or if it can be repaired. The Freeholder has failed to submit any structural survey in his letter to Lessees written by his agent G. L Hearn dated 9th July 2012. Of course any issue of betterment would be a matter for landlord and tenant not the Corporation.

Having reviewed a draft of the freeholder's proposed planning application, it seems that the freeholder is using the improved appearance of the building following the works, by reason of the new façade, merely as a point of persuasion to improve the prospects of success of the application for planning

permission for the proposed development of the commercial part as a whole. (The architect for the work on the commercial part and the design of the front façade is from the same firm as the architect for the removal and replacement of St Dunstan's House. It may be no coincidence that the façade of the proposed building at St Dunstan's House will be remarkably similar to that proposed for Clifford's Inn).

THE NEW LIFTS PROPOSED FOR THE COMMERCIAL SIDE

These are intended to serve the proposed new flats in the commercial side on the first and second floor. In consequence the lifts will stop underneath the flats in the Residential Part on the third floor. Although I am not directly affected, I am concerned about the noise impact on the lessees and residents of the third floor flats from the lift motors, door opening and closing and oral announcements of floors etc. I and my fellow directors have been told that modern lift motors are comparatively quiet but that assertion is not enough. No planning permission for the proposed new flats should be given unless the Planning Authority is provided with detailed proposals for noise inhibition which satisfy it that the lessees and residents of the third floor flats will not be adversely affected by noise.

NOISE/VIBRATION CREATED BY THE WORKS TO RECONFIGURE THE INTERNAL AREAS OF THE COMMERCIAL SIDE

We will all however be affected by on-going noise to reconfigure the internal areas of the Commercial parts of the building. As stated above I will be applying for a reduction in the council tax charge for loss of amenity and loss of a quiet living environment.

CONSULTATION WITH LESSEES

Please be aware that consultation with the Residents and Lessees has been very limited by the Landlord to:

- A letter from G.L. Hearn dated 9th July, 2012 with a general outline of the works to commence
- A display perched on the lobby sofa in the alcove of the lobby of Clifford's Inn, available only to those living in the building, and with no notice that this was available for perusal
- A Notice which went up **in the building alone**, during the week of the 16th July advising of 3 dates to take place that week of surgery hours relating to the proposals. The Notice was unavailable unless Lessees happened to be in Clifford's Inn to receive the dates. Most were not at the start of the summer vacation and taking advantage of the break as the Olympics started. You may appreciate that many of the Lessees only live in the building part time during Term time for barristers and during the week.

CONSULTATION WITH CLIFFORDS INN MANAGEMENT COMPANY

This has been restricted to only 2 meetings, the first dated 22nd May and the second on the 5th July. Before the first meeting the plans had changed from the drafts dated April, to different plans dated May which incorporated a full façade replacement.

THE NEW RESIDENTIAL FLATS

The representatives of CLSH were asked at one of the surgeries (19th July) whether the new flats would be for sale and at what price bracket. The reply was that it was not yet decided whether they would be for sale at all but may just be retained by CLSH for letting. This would hinder the growth of any village and community feel as the new flats would be used for 'hotel' purposes which may maximise profit for the Landlord but will do nothing to enhance the feel of the residential area of the City. This fits in however with the stated objective of the architect at the same Surgery that the reason

for the replacement of the front façade is to enhance the lettability of the building and improve the street view. This of course is the very same reason that it was put up in 1982 to improve the 'curb value'. There are no structural reasons for this that have been provided to lessees.

PARKING PROPOSALS

There are currently 3 parking spaces for the use of the commercial parts of the building on the land adjacent to the Church (St Dunstan in the West). It does not seem to be proposed to change this facility, or the number of spaces, but it should be noted that currently no cars can turn in this space when in the courtyard, let alone when there are other cars or obstructions parked there. Consequently all traffic has to come out very slowly backing onto the busy thoroughfare of Fetter Lane. This always requires two people, one to drive and one to guide, which will be much harder for any users who are disabled (one space is marked in the plans as a special disabled space). Consideration should be given to making the access available only to the disabled or smaller electric vehicles.

'GREEN' ROOFING

If the Landlord wishes to have 'green' (sedum) roof coverings on the top of one of the in-fills, might it be an idea that the roofs of the other protruding parts of the commercial premises should be so covered so that there can be a more pleasant amenity for the residential flat owners overlooking those parts? I would also ask that the Freeholder be asked to provide a schedule of access for care and maintenance of these 'Green' roofs, as they do require proper drainage but also adequate water to survive. My understanding is that they are not maintenance free. If not we will be left to look out over a failed 'brown' experiment.

As mentioned at the start of this letter, Clifford's Inn Management Company, which I Chair will be writing to the Corporation under separate cover with other issues to bring to the attention of the Planning Committee.

I would be grateful to know what the timetable is for the decisions on this development and when the Committee will be sitting?

Many thanks

Yours sincerely,

Jackie Newbury (Miss).

Department of Planning and Transportation
City of London
PO Box 270
Guildhall
London EC2P 2EJ

115574

20th August 2012

Dear Sirs,

**Proposed Development by Ingrove Ltd (represented by GL Hearn) at
Clifford's Inn, Fetter Lane, London, EC4A 1BX.**

We are the owners and occupants of Flat of Flat 117 Clifford's Inn, Fetter Lane, London, EC4A 1BX and we are writing to you pursuant to the above mentioned proposed development and the Notice of an Application for Planning Permission dated 2nd August 2012, a copy of which is enclosed.

As you will appreciate the proposed development is likely to cause considerable disruption, disturbance, inconvenience and monetary loss to all the residents of Clifford's Inn and on 19th July 2012 we attended a "consultation" session with representatives of CLS Holdings, who act on behalf of Ingrove Ltd, the freeholders of the building.

Whilst we have no objection, in principle, to the change of use from offices ((B1) to residential (C3) to enable 8 new residential units to be created, (provided that conditions are imposed to safeguard the amenity of the residents in the building while the works are being carried out), we object strongly to the replacement of the building's façade which fronts Fetter Lane. This façade replacement is, as far as we can ascertain, being proposed solely for cosmetic reasons. Therefore, we wish to highlight that this is environmentally unacceptable and as well as the impact of the works, it would be a waste of natural resources.

We also enclose a copy of a letter dated 24th July 2012 that we sent to Mr Wigzell of CLS Holding plc following the "consultation" session referred to above which sets out the reasons for our objections to the replacement building's façade and the conditions that we consider should be imposed in any Planning Permission for the demolition, refurbishment, extension and re-development of Clifford's Inn, in order to protect the position and amenity of the residents of the building.

In view of the importance of this application for development and the impact that it will have on the residents of Clifford's Inn and the surrounding properties, we ask that a public hearing be convened by you at an appropriate time, so that the views of residents of the building can be aired in public.

Please treat this letter and its enclosures as our representations and objections to the Planning Applications and acknowledge your receipt of this letter in writing.

Yours faithfully,

Robin Anthony Porter LLB &

Shirley Watson BSC CEng CEnv FICE MIHT MCIWEM FRSA

22/8/12
ACKNOWLEDGED



117 Cliffords Inn, Fetter Lane,
London EC4A 1BX

Sent 63
e-mail
24/07/12

CLS Holdings plc
86 Bondway
London
SW8 1SF

Attention of Mr Simon Wigzell

24 July 2012

Dear Sirs

Proposed works to Cliffords Inn

We write as the lessees of Flat 117 Cliffords Inn.

We attended a 'consultation' session with representatives of CLS Holdings plc last Thursday evening, 19 July. Arising from information provided at this session, from the drawings made available in the reception area of Cliffords Inn and correspondence from Cliffords Inn Management Company, we make the following comments which we ask that you take into account in developing and implementing your proposals.

Refurbishment and creation of residential units

The proposed refurbishment of current office space and the change of use to residential units of part of this at Cliffords Inn have the potential to cause significant disruption, disturbance, inconvenience and monetary loss to the Residents. If the project is to proceed, it is essential that the contractor(s) and their sub-contractors, are obliged to work so as to minimise the disturbance to Residents. We ask that as a minimum their contractual working arrangements include the following, which are rigorously enforced by your contract manager:

1. Deliveries and collections :

- To be permitted only between 0800hrs – 1700hrs, Monday – Friday
- To be scheduled in advance with and supervised by designated representatives of the contractor
- Materials and plant to be stored in the area to the south of Cliffords Inn immediately after off-loading or when awaiting collections (not to be temporarily stored in front of the building)

2. Working Arrangements

- All labour, plant and materials to enter/egress Cliffords Inn only by the entrance(s) on the south side of the building
- Work to be restricted to 0800hrs – 1700hrs, Monday – Friday
- Work likely to result in noise and vibration that would disturb residents to be scheduled so as to minimise the periods of disruption
- A detailed programme to be provided to residents on commencement of the works identifying the periods when such disruption is scheduled and revised programmes provided at least 14 days in advance of the revised start date of disruptive works.

We understand that we will be contacted by the Planning Authority in respect of this project and we intend to provide the same views as above and request that the Planning Conditions reflect them.

Façade Replacement Proposal

We note also your proposals to replace the existing east facade of Cliffords Inn. We consider that insufficient justification has been provided for this and indeed the legality of it is being assessed on our behalf. However, we wish to make the following points:

1. The sole reasons given by your representatives at the 'meeting' of 19 July of 'improving the visual appearance' and 'providing us with a guarantee in respect of the façade' are not benefits that we are seeking or value..
2. There is no evidence that these works are required for reasons of structural engineering integrity, weatherproofing or other technical reason(s)
3. All residents will be affected by the external works to the east façade in so far as their physical presence will affect the entrance to and parking for the residential part of Cliffords Inn and also the general appearance and therefore 'status' of living in Cliffords Inn will be affected by scaffolding and other temporary works
4. All residents will be disrupted by the works to install and remove temporary windows as these will entail the movement of labour, plant and materials through the common parts of Cliffords Inn
5. Residents living in flats facing Fetter Lane will be significantly disrupted by the temporary and permanent works to the facade, and the erection of scaffolding in front of their windows
6. The works will impact on the lettable and saleability of flats with a direct monetary loss being incurred by some residents

We consider that the proposed refurbishment and creation of residential units are completely separate issues to the proposal to replace the façade. Therefore, and we made this point to your representatives on 19 July, we suggest that in order the refurbishment and residential flat works are not unnecessarily delayed, two separate Planning Applications should be made, one being solely related to the replacement of the façade.

Yours faithfully

Robin Porter and Shirley Watson

c.c. CIMC

Town and Country Planning (Development Management Procedure) (England) Order 2010 NOTICE UNDER ARTICLE 11 OF APPLICATION FOR PLANNING PERMISSION

(Notice 1: This notice is to be printed and served on individuals if Certificate B or C is completed)

Proposed development at:

Name or flat number _____
Property number or name Clifford's Inn _____
Street Fetter Lane _____
Locality _____
Town London _____
County _____
Postal town London _____
Postcode EC4A 1BX _____

Take notice that application is being made by:

Organisation name Ingrove Ltd _____
Applicant name Title Forename _____
Surname c/o agent _____

For planning permission to:

Description of proposed development

Demolition of external stair core, part refurbishment and infill extension of existing office space, and part change of use from office (B1) to residential (C3) to provide 8 new residential units, façade treatment and landscaping

Local Planning Authority to whom the application is being submitted: City of London

Local Planning Authority address: Department of Planning and Transportation
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Any owner of the land or tenant who wishes to make representations about this application, should write to the council within 21 days of the date of this notice.

Signatory:

Signatory Title Forename _____
Surname GL Hearn (agent) _____

Signature

GL Hearn

Date (dd-mm-yyyy) 02-08-2012

Statement of owners' rights: The grant of planning permission does not affect owners' rights to retain or dispose of their property, unless there is some provision to the contrary in an agreement or lease.

Statement of agricultural tenants' rights: The grant of planning permission for non-agricultural development may affect agricultural tenants' security of tenure.

'Owner' means a person having a freehold interest or a leasehold interest the unexpired term of which is not less than seven years.

'Tenant' means a tenant of an agricultural holding any part of which is comprised in the land.

Once completed this form needs to be served on the owner(s) or tenant(s)

Print Form

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	06 SEP 2012	JTP
OM		SSE
No	115777	PP
FILE		DD

①

167 Cliffords Inn
Fetter Lane
London EC4A 1BY

3 September 2012

Mr R Chipperfield
Planning Officer
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Dear Sir

**Cliffords Inn, Fetter Lane
Ref. 12/0789 Full and 12/07890/CAC**

As a leaseholder in Cliffords Inn, I wish to register my objection to the above planning application, which originally referred to "façade treatment" but has now been changed to "removal of existing front façade". I consider that this significant change is unacceptable.

It appears that the architectural merit of the existing façade has been ignored. Within a conservation area, features such as the Dorian pillars should be preserved and could, in my view, constitute grounds for a listing application. Removal of the existing façade is therefore undesirable.

It has been asserted that replacement of the façade is integral to refurbishment of office accommodation and provision of 8 new residential units. This seems totally unjustifiable, given the possibility that appropriate repairs and maintenance could be undertaken to deal with existing problems with the façade.

I trust that the Planning Committee will therefore reject the expansion of the application as now proposed so as to revert to "treatment" of the façade rather than its "removal".

Yours faithfully

Robert E Langford

ACKNOWLEDGED

tel
06/09

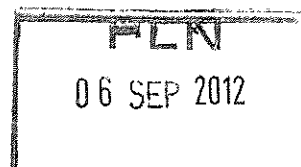
ES

144, Clifford's Inn, Fetter Lane, London EC4A1BX

ACKNOWLEDGED

5th September 2012

Dear Mr. Chipperfield,



Planning applications at Clifford's Inn, Fetter Lane, London EC4

I write to object to these planning applications.

1. Dual nature of the application

1.01 This application seeks permission for two separate things. First, there is the redevelopment, including infill, of the lower three floors and, secondly, there is the tearing down of the existing neo-classical façade and its replacement with a modern façade which will match the new building on the St. Dunstan's House site.

1.02 Several people have suggested to the applicants that it would be preferable to have two applications, since there is little if any objection to the first part of the scheme, but much to the second. The applicants have declined to follow this suggestion.

1.03 This puts objectors, such as myself, who object only to the destruction of the existing façade, in the position of seeming to be trying to block what is otherwise a

reasonable development which offers new office and residential space. It should be appreciated, however, that the applicants could easily have avoided this by behaving sensibly.

- 1.04 The applicants claim that the replacement of the façade is “an integral part of the scheme”. I have asked them (see correspondence attached in copy sent by post) whether this means that if planning is refused because of the façade element, they will not pursue the remainder of the scheme. They have declined to answer this. Obviously, they will - the redevelopment of the lower three floors will proceed anyhow, and with little or no delay, even if this application is refused and a further application is made, without the destruction of the facade but otherwise identical. I and other objectors are not blocking desirable development.

2. Chronological development of the proposals for the façade

- 2.01 I have been told by Clifford’s Inn Management Company (“CIMC”), which is responsible for the maintenance of the building, that the applicants surveyed the façade in February.
- 2.02 I have repeatedly asked the applicants for a copy of this survey, but they have refused to provide it (attached correspondence). I believe that CIMC has a copy, but it has not been prepared to show it to me either.
- 2.03 It is clear from paras. 4.11 and 4.12 of the applicants’ Planning Statement that their intention, up to and including the meeting of 1st May 2012, was only to treat

the lower part of the façade, presumably up to second floor level. There was no suggestion that replacement was necessary.

2.04 This is important because it must mean that, even after surveying the façade, the applicants did not consider that it, or at least the major part of it, required replacement.

2.05 This is to be contrasted with more recent, and wholly unsubstantiated, claims by the applicants that the façade is “at the end of its useful life”; these statements have been made to bolster the claims that the residents of the 3rd to 8th floors, who have long leases, should pay the greater part of the cost of replacing the façade.

3. The main issues

3.01 There are two main issues here.

3.02 The first is whether the new design of the façade is, as the applicants claim, a significant improvement on the existing design or, as I would suggest, an inappropriate design, in the setting of that part of Fetter Lane, which significantly detracts from the surrounding area.

3.03 The second is foreshadowed above. If the façade were indeed at the end of its useful working life, then no doubt it would have to be replaced. But it is not. It has given little or no trouble so far, and whatever defects there may be could easily be repaired. There is, as other objectors have noted, little or no evidence to support

the claim that the facade is at the end of its working life, which should be taken with a pinch of salt.

4. The existing versus the new design

4.01 Fetter Lane is an historic street, dating back, at least, to Tudor times.

4.02 While of course no Tudor buildings survive, the left side of Fetter Lane has retained a number of old buildings of considerable charm and distinction: Clifford's Inn is surrounded by St. Dunstan's in the West, the gatehouse and the old Public Records Office. The only blot is the brutalist St. Dunstan's House, for which any replacement can only be an improvement.

4.03 Against that background, while the existing Clifford's Inn building, in its original form, while unobjectionable, was of no great architectural interest, the façade considerably improved it. I do not have access to the 1981 or 1982 planning application relating to it, but I would be very surprised if this did not dwell on the architectural distinction of what was proposed.

4.04 Other objectors have already gone into some detail about the above, and have referred to Pevsner. Put shortly, the proposal to remove the façade, which supports the architectural distinction of this part of Fetter Lane, is sheer vandalism, unless (which is not the case) it is at the end of its life and irreparable.

5. Comments on the Planning Statement

5.01 Para. 3.5 on page 6 clearly reveals the applicants' purpose:

“A complimentary (sic) **new high quality modern façade** fronting Fetter Lane.”

5.02 Similarly, para. 6.11:

“The proposed replacement of the whole façade with **the new high quality modern façade** will not only improve the building's appearance but also provides a significant positive contribution to the Chancery Lane Conservation Area and the quality of Fetter Lane's street scene.”

5.03 These two quotations show that the applicants wish to present their development as up to date and modern, and are prey to the fallacy that modern = good. Doubtless some modern design does enhance its neighbourhood, but what is shown in the plans is quite banal.

5.04 Making all due allowance for different tastes, the suggestion that replacing an innovative neo-classical façade with these standard, boring, modern rectangles represents “a significant positive contribution to the Chancery Lane Conservation Area is beyond reasonable understanding.

5.04 This is an important point because, as para. 6.10 recognises, “design, and in particular the impact on the ... Conservation Area” is a key consideration. It is one which points firmly against the approval of this application, while it includes the replacement of the façade.

5.05 The applicants also correctly refer at para. 5.24 to the Policy which seeks to ensure that alterations to an existing building “take account of its ... architectural

character, materials and setting”. However, what is proposed spectacularly disregards this consideration too.

5.06 The same can be said of para. 5.25, referring to the policy which:

“... resists the demolition of buildings which make a positive contribution to the character or appearance of the conservation area and to encourage their sympathetic refurbishment.”

This must, I suggest, apply equally to the demolition of a part of a building, and it could not be more relevant: the façade does contribute to the character and appearance of this part of Fetter Lane, and it could easily be refurbished.

5.07 Finally, as regards para. 6.16, the statement that the development seeks to conserve and enhance the significant of the City’s historic assets and their settings, in accordance with Policy CS12, this may be true for archaeological matters, but it is certainly not true from an architectural/design point of view.

5.07 In short, the application in its present form disregards several important Policies. It pays lip service to them, but makes no attempt to show how they are complied with.

5.08 It may be said that the proposed new facade is similar to the one proposed for the St. Dunstan’s House site, which is I believe similar to a design commonly used in Berlin. This is certainly better than St. Dunstan’s House, but that does not make it a desirable replacement for the facade at Clifford’s Inn.

6. The condition of the façade

6.01 The starting point here is that, far from being at the end of its useful life, as claimed by the applicants, the façade has so far given rise to very few problems - as I understand it a few seals, which have been replaced.

6.02 As I have said above, the fact that, after surveying the façade in February, the applicants had no intention of replacing it strongly suggests that, contrary to the applicant's current assertions, the façade is not at the end of its useful life.

6.03 I have not seen CIMC's surveyor's report, but I understand that it does not support the view that the façade needs to be replaced: I would like an opportunity to comment further, when it becomes available.

6.04 I attended one of the meetings in July held by the applicants referred to in the Planning Statement and pressed for details of the alleged poor condition of the façade, of which I had previously heard nothing, although I have been in the building for nearly 20 years. The applicants' representatives were unable to provide a single detail.

6.05 In their response to the residents' questions (Planning Statement appendix 5, page 4, Qu.3), in answer to the question, please provide a schedule of maintenance undertaken and complaints received in the past ten years, the applicants answered " we understand CIMC have carried out some maintenance and repairs to the

residential part of the front facade such as recent repairs to the residential canopy, however we do not have details...” .

6.06 I asked CIMC, but they were able to provide nothing further, except that they washed the facade while roof repairs were going on, with scaffolding, last year.

6.07 In other words, nobody knows of any significant past or present complaints, or of any significant work.

6.08 I therefore believe that there is no substance in the applicants’ assertion (e.g. Planning Statement para.6.10) that the façade is seriously defective, and that they have considerably overstated any defects which may have developed, in support of their attempt to achieve the, to them, desirable “modern façade”, and to achieve it largely at the expense of the residents of other parts of the building.

6.09 I would respectfully suggest that this part of the applicants’ application should be viewed with great scepticism.

7. Other matters

7.01 Consultation. There has been consultation, but - as shown by the attached correspondence - the applicants are unwilling to answer a number of pertinent questions, in particular as regards the extent of disruption to other residents especially those with flats facing Fetter Lane, the specific steps if any to be taken to reduce this and the production of the survey. They have been vague, even, as to the extent of any physical intrusion and damage to the inside of flats.

7.02 It is obvious that the tearing down and replacement of the façade of the building will cause enormous and increased disruption and distress to other residents on the 3rd floor and above, again particularly those with flats fronting on Fetter Lane. The Planning Statement contains a pious statement of all the standard, boilerplate, generalised measures which may be taken - but nothing specific which is likely to make any difference.

7.03 It is obvious that there will also be considerable, and unnecessary, disruption to users of Fetter Lane.

8. The office space redevelopment

8.01 As already stated, there is no justification for objecting to this, but I would ask that the specific measures proposed by Mr. Porter and Mrs. Watson be made conditions of any permission.

8.02 I would also ask, especially as regards the infill part of the plan, that any additional fans or other noisy machines be excluded, as the noise and smell will rise and disturb the higher floors.

Yours sincerely,

N. Strauss

Stothard, Gideon

From: Chipperfield, Rob
 Sent: 25 September 2012 12:01
 To: Stothard, Gideon
 Subject: Clifford's Inn

ACKNOWLEDGED

-----Original Message-----

From: Nicholas Strauss
 Sent: 24 September 2012 10:03
 To: Chipperfield, Rob
 Subject: FW:



Dear Mr. Chipperfield,

Clifford's Inn

I would like to supplement my objections with 3 further points in response to the applicants' arguments.

This is in substitution for the email sent at 1.23 am on 21st September, which please disregard.

(1) In answer to the applicants' architect's report (a) it is patronising and ungenerous in tone as regards Boyd Auger's work, (b) while it describes the Clifford's Inn facade as a weak example of its genre, it does not actually say what he considers the weaknesses are, (c) the fact that there is in his opinion a better example a mile away in Poultry is hardly relevant: the City can accommodate more than one interesting building - the more the better to counteract the bland and the ugly which predominate. He appears to rely on the enigmatic last few words in Pevsner, but surely the important point in Pevsner is that Boyd Auger was among the first of the new movement: other architects must have found it to be worth following in its footsteps.

(2). In seeking to meet the conservation policy point by referring to the similarity of the proposed new facade to the new building on the St. Dunstan site, the applicants are making a false point.

St. Dunstan's House must rank as one of the ugliest buildings put up in the City since the war, and the new building certainly improves the site - almost anything would.

It does not follow however that its facade is contributing to the conservation of the character and historical ambience of the area - it is simply neutral on that score, but its developers cannot be expected to contribute where there was nothing before.

These developers are in a different position. They have a building the facade of which, on any view, has architectural merit, even if there are different opinions as to its stature. It is beyond argument that, in removing it, they would detract from the quality of the area, and of the City.

The suggestion that by giving the area another boring facade, and returning Clifford's Inn to the undistinguished state it was in until 1982, the area is being enhanced, just because it matches next door, is lacking in logic.

(3) Another illogical argument put forward by the applicants is the their reliance on the supposed superior materials to be used in the new facade and its possibly longer life to meet the breach of the policy relating to conservation of materials and against waste of resources.

If such an argument were right, the policy could always be defeated by the use of more modern materials.

The whole point of the policy is that you do not waste perfectly good buildings. You wait until they need replacement and only then replace them with something better.

In this case, the application flagrantly disregards the policy - discarding a perfectly good and distinguished addition to a previously undistinguished building, which is just half way through its 60 year life.

Yours sincerely,

Nicholas Strauss

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Chipperfield, Rob

From: Nicholas Strauss
Sent: 02 November 2012 14:34
To: Chipperfield, Rob
Subject: Cliffords Inn 2012/0789

Dear Mr. Chipperfield,

I would like to add the following to my objections, arising from the minutes of a recent meeting held by the developers.

In the minutes they state –

“Q. What is the life cycle of the new facade.

A. There is a 25 year warranty from the facade contractors however the design life ...(if maintained correctly) is likely to be longer than this.

...

Q. What is the main driver behind a full facade replacement?

A. The lower four floors of office space need to be refurbished as they will be vacant in early 2013. In order to bring these into line with market levels, the windows (among other things) need to be replaced with thermal efficient, waterproof, acoustic retard glass. Given the cost of replacing the windows and repairing the current facade, it was decided that a full replacement would be researched. Additionally, the Town Planners advised that they would not support a facade replacement on the lower levels that would leave an older less efficient facade on the upper levels”

As to the last sentence, obviously the facade cannot be partially replaced, cutting off the lower part of the columns!

What the above shows however is the following –

- (1) The reason for replacing the distinguished present facade with the banal new one is just the developers' perception that their premises will more marketable with better windows – but these could be installed without replacing the facade at all.
- (2) With particular reference to the efficient use of existing buildings, and the avoidance of waste, the new facade proposed would only be warranted for 25 years – whereas the present one should last at least another 30 years.

Yours sincerely,

Nicholas Strauss

Nicholas Strauss QC

1 Essex Court
Temple
London EC4Y 9AR



ONE ESSEX COURT

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90 Cliffords Inn
Fetter Lane
LONDON
EC4A 1BX

Mr Rob Chipperfield
Department of Planning & Transportation
City of London
PO Box 270
Guildhall
LONDON
EC2P 2EJ

PLANNING & TRANSPC		
PSDD	CPO	PPD
TPD	07 SEP 2012	LTP
OM		SSE
No		PP
FILE	115745	DD

September 5, 2012

ACKNOWLEDGED

10/9/12
RMC

Re: Notice 1 Application for Planning Permission: Cliffords Inn, Fetter Lane, LONDON, EC4A 1BX

Dear Mr Chipperfield,

We have received your advice, dated August 21, 2012, of a planning application by the freeholder for various works proposed by the freeholder at Cliffords Inn.

We are lessees at Cliffords Inn and have owned flat 90 since early 2005.

We wish to object to the proposals and make the following points:

1. We see no reason to modify the Fetter Lane façade. Indeed, we like the current Fetter Lane elevation. We wish to retain it. The façade is distinctive and distinguished. It sets the building apart from other large, nondescript blocks in London. The façade is described positively on page 294 of Pevsner's authoritative survey in *The Buildings of England, London 1: The City of London*, published in 1997.
2. The freeholder justifies the need for a new façade by claiming that the current facade has deteriorated to the extent that significant refurbishment work is required. However, the freeholder has offered no independent survey or documentary evidence to support this claim that it is failing.

The freeholder has mentioned some recent window leaks. We understand these leaks may have been the result of blocked gutters. I am told that these gutters have now been cleared and no further leaks are being reported.

3. Creation of a new façade (and removal of the current façade) and the consequences will be costly. No budget has been presented by the freeholder to the leaseholders. Moreover, there is no agreement between those assumed to be funding the work i.e. between the freeholder and the leaseholders, individually or through our representative Cliffords Inn Management Company (CIMC),

on the assumptions for allocation between the parties, the financial consequences and the cost to individual leaseholders.

It seems extraordinary that planning proposals have been submitted to Council with no regard to their overall cost or before the allocations of the overall cost have been agreed with those affected by the proposals but not responsible for the proposals i.e. we the leaseholders.

As a leaseholder we do not wish to be forced to contribute to the costs of what the leaseholders claim is an improved façade. Through CIMC, we are happy to contribute to the reasonable cost of repairs to the current façade, subject to the assessment of an independent surveyor.

4. We have no objection to the creation of new residential flats (provided these are completely separate in all respects from the existing residential development) and to landscaping (since the site is already covered by a combination of concrete, slabs, brick and the like and these areas do not offer any leisure amenity and are anyway not available for use outside office hours).
5. In this case, we believe it would be beneficial to split the overall planning proposal into 2, one for the façade and another for the residential and landscaping work. The dynamics of the 2 proposals and concerns of those affected in each case are completely separate.
6. However, we do object to having to suffer the noise, vibration, pollution and general disruption we will have to suffer during the life of the project work (to the façade, the creation of residential flats and for landscaping) which is of no interest or benefit to us. We ask that any eventual permit contains strict limits on the disturbance to current leaseholders not affected by the proposed works.

We note that one other objector intends to apply for a reduction in Council Tax for loss of amenity and loss of a quiet living environment during the works. This seems like a great idea and we propose to do the same.

7. Finally, we object to the way the freeholder has communicated to date with leaseholders. There have been very limited opportunities to meet with the freeholder and its representatives. Any and all meetings have been held during the Summer vacation and Olympic Games period. We have been unable to attend any of these and feel severely disadvantaged as a result. I know that others feel the same way.

We will be happy to discuss our objections further with you and your colleagues.

Yours sincerely,

Yvonne and Geoff Bolland

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PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	10 SEP 2012	LTP
OM		SSE
N6		FP
FILE	115 760	DD

66 Clifford's Inn
Fetter Lane
London EC4A 1BX

6 September 2012

Mr R Chipperfield
City Of London
Planning Dept
PO Box 270
Guildhall
London EC2P 2EJ

ACKNOWLEDGED

10/9/12
NMC

Dear Mr Chipperfield

Planning application 12/00789/Full - Proposed works at Clifford's Inn

I write concerning the above application to which I have a number of objections,

Clifford's Inn is a building in the shape of the letter 'E' with the top of the 'E' facing eastwards onto Fetter lane and the three arms facing south. The floors up to the 2nd are currently offices while those from the 3rd upwards are residential and contain in total about 100 leasehold flats. I live with my wife on the 3rd floor in a south facing flat which overlooks the bay formed by the central and eastern arms of the 'E'.

The plan comprises three basic elements, namely:

- (i) the replacement of the eastern facade facing Fetter Lane
- (ii) the refurbishment of the offices and their re-configuration to include 8 residential flats on the 1st and 2nd floors at the eastern end of the building.
- (iii) the demolition of two extensions in the eastern and western bays which extend to the 2nd floor and currently contain lifts and staircases and their replacement with larger extensions, again extending to the 2nd floor.

My comments on these three aspects are as follows.

(i) Replacement of facade. This is described (para. 3.5)¹ as "A complimentary new high quality modern facade fronting Fetter Lane". It goes on to say (para 4.14) that at a meeting with the corporation planning officers "The main design change discussed at [this] meeting related to the proposal to replace the whole of the front facade along Fetter Lane. This would be a significant improvement on the existing design of the building, which is currently considered to be of poor quality, and detracts from the wider environment of the conservation area".

¹ Unless otherwise stated, all references are to the document entitled "Planning statement"

Paras 6.10 states "A key consideration in relation to the acceptance of the proposals will be design, and in particular the impact on the Chancery Lane Conservation Area and the Grade I Listed Building, St Dunstan in-the-West Church, to the south. The current facade condition is now some thirty years old and would appear to not have been subjected to regular maintenance, and is now considered to be generally in poor condition. In addition, the existing alley way and rear of Clifford's Inn is of poor quality. Para. 6.11 continues "The proposed replacement of the whole facade with a new high quality modern facade will not only improve the building's appearance but also provide a significant positive contribution to the Chancery Lane Conservation Area, and the quality of Fetter Lane's street scene".

This is complete nonsense and is merely an opinion. There is no doubt that the existing facade has little to recommend it but it is at least distinctive. As far as I am aware it there are no problems with its quality. We formerly lived in a flat on the Fetter Lane frontage for 5 years and certainly never noticed any such problems.

To suggest that the changes will "provide a significant positive contribution to the Chancery Lane Conservation Area, and the quality of Fetter Lane's street scene" is laughable. Fetter Lane has only one building of any architectural and historical merit (the old Public Record Office): otherwise it is a desert of concrete and glass boxes. This proposed development will involve exposing the flats on the Fetter Lane frontage to the elements and will be highly disruptive to the residents of those flats.

(ii) Conversion of offices to provide 8 residential flats.

Para 5.8 states "Policy 3.3 (Increasing Housing Supply) recognises the pressing need for more homes in London, which is targeted at least an annual average of 32,210 net additional homes across London. The City of London has a target of 110 homes (annual monitoring target) and a minimum ten year target of 1,100 new homes".

It may be true that there is a "pressing need for more homes in London", although this is debateable and is not a view I hold. Presumably the reason for quoting this is to imply that there are hordes of homeless urchins at the City's gates. However, this proposal is obviously not designed for these mythical hordes, as para. 6.9 demonstrates "Policy CS21 states that residential developments with the potential to provide 10 or more units should provide 30% affordable housing on-site or 60% equivalent affordable housing units off-site. The development proposes an increase of eight units and is therefore below the threshold to provide affordable housing provision. As a result, the proposal does not include any affordable housing".

It is worth noting that the corporation has recently approved the demolition of St Dunstan's House which is next door to Clifford's Inn and the construction of 76 new dwellings, thus meeting 69% of its target.

Para 6.5 states "Housing sites within the City of London are generally windfall sites and as a result can be vulnerable to the economics of development". It would seem that the only reason for

the proposed creation of 8 flats is economic. Recent reports from the Bank of England and property consultants Cluttons make the point that overseas finance is attracted to the UK market, and in particular, London. It appears to be very much the current fashion for office blocks to be converted to residential accommodation². This is fair enough, provided there is no disruption to existing residents which is far from the case with this proposal.

We, and as far as I know other leaseholders, have received an unsolicited offer from the freeholder of Clifford's Inn to purchase our flat. The proposal to build more therefore seems totally unjustifiable.

(iii) Demolition and replacement of extensions in the eastern and western bays. This aspect of the proposal is the one which will affect us most severely. The effect of this proposal in the eastern bay would be to roughly double the size of the existing extension. The roof of this new infill extension will be just under the sills of all the windows in our flat. Two lifts are proposed which will be beneath the windows of our flat. The lower part of the waste pipes from our flat and all those above will be covered by the lifts and will therefore become inaccessible, as will our overflow pipes. It will result in a loss of light into our flat. I attach some photographs which I hope will demonstrate the effect of this new extension.

The final six pages of the planning statement purport to give answers to queries raised by the leaseholders but they are far from convincing. For example it states that "*For flats affronting the side passage, the disturbance will be slightly higher than further into the building due to the demolition of the existing staircases and creation of the new extensions*". I am perplexed as to how the works proposed can give rise to only a "slightly higher" disturbance!

In the western extension, a hideous staircase resembling a giant corkscrew is proposed. Furthermore, the proposed infill extension will remove the sole piece of greenery in the courtyard. Just how this proposed development will "*improve and enhance the public realm to the rear of the building resulting in a significant enhancement to the setting of the listed building [i.e. St Dunstan in-the-west church], meeting the objectives of Policy CS12*" (para 6.11) is a mystery to me.

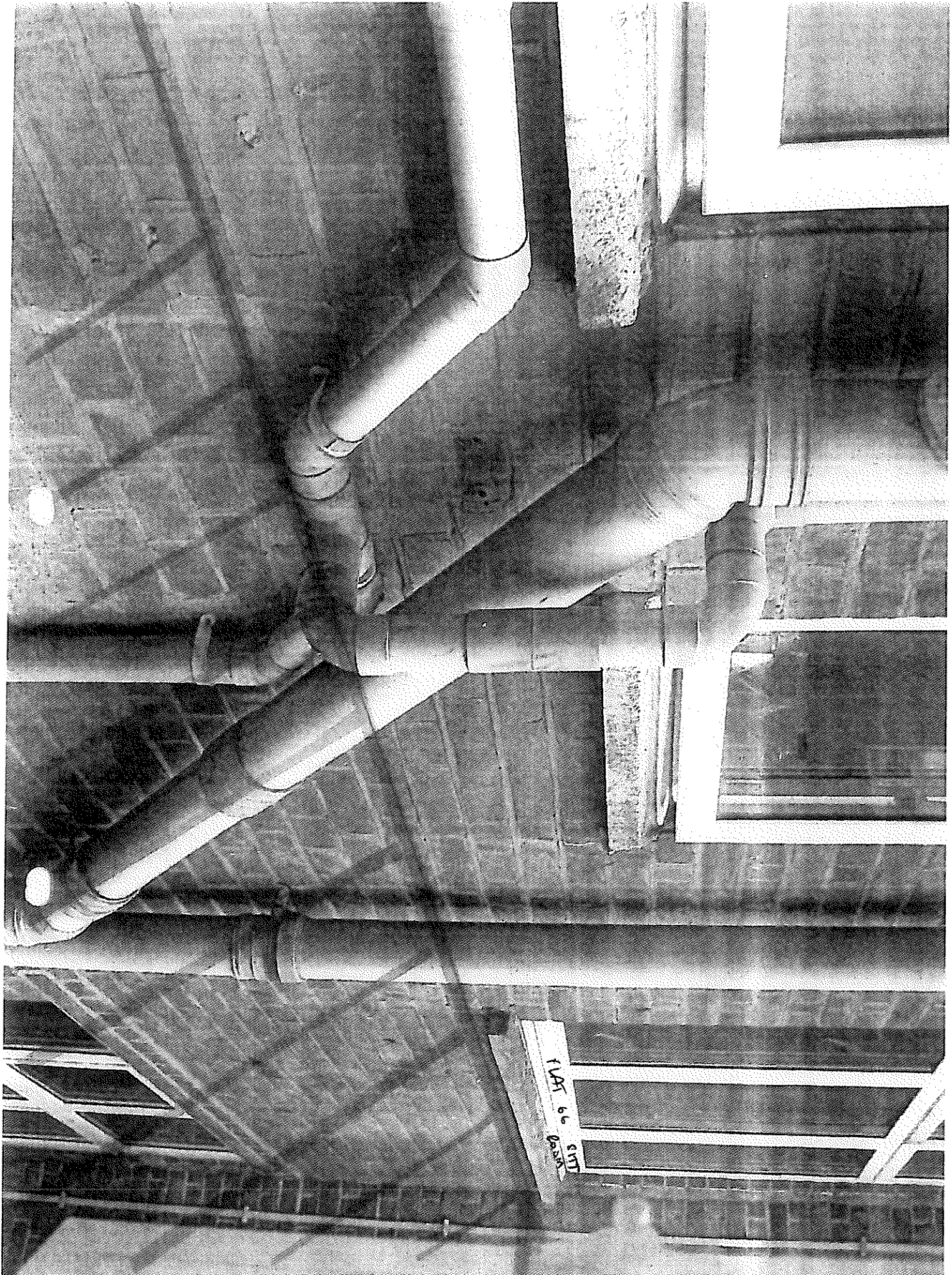
In summary, I urge you to reject this ill-thought and half baked application completely. I should be grateful if you could let me know the date of the meeting at which it will be heard as I wish to attend.

Yours faithfully,

Peter Simpson

(14 Encl.)

² See, for example, Spittles, David. "Conversion boom brings communities back into the city". *Evening Standard*, 5 September 2012.



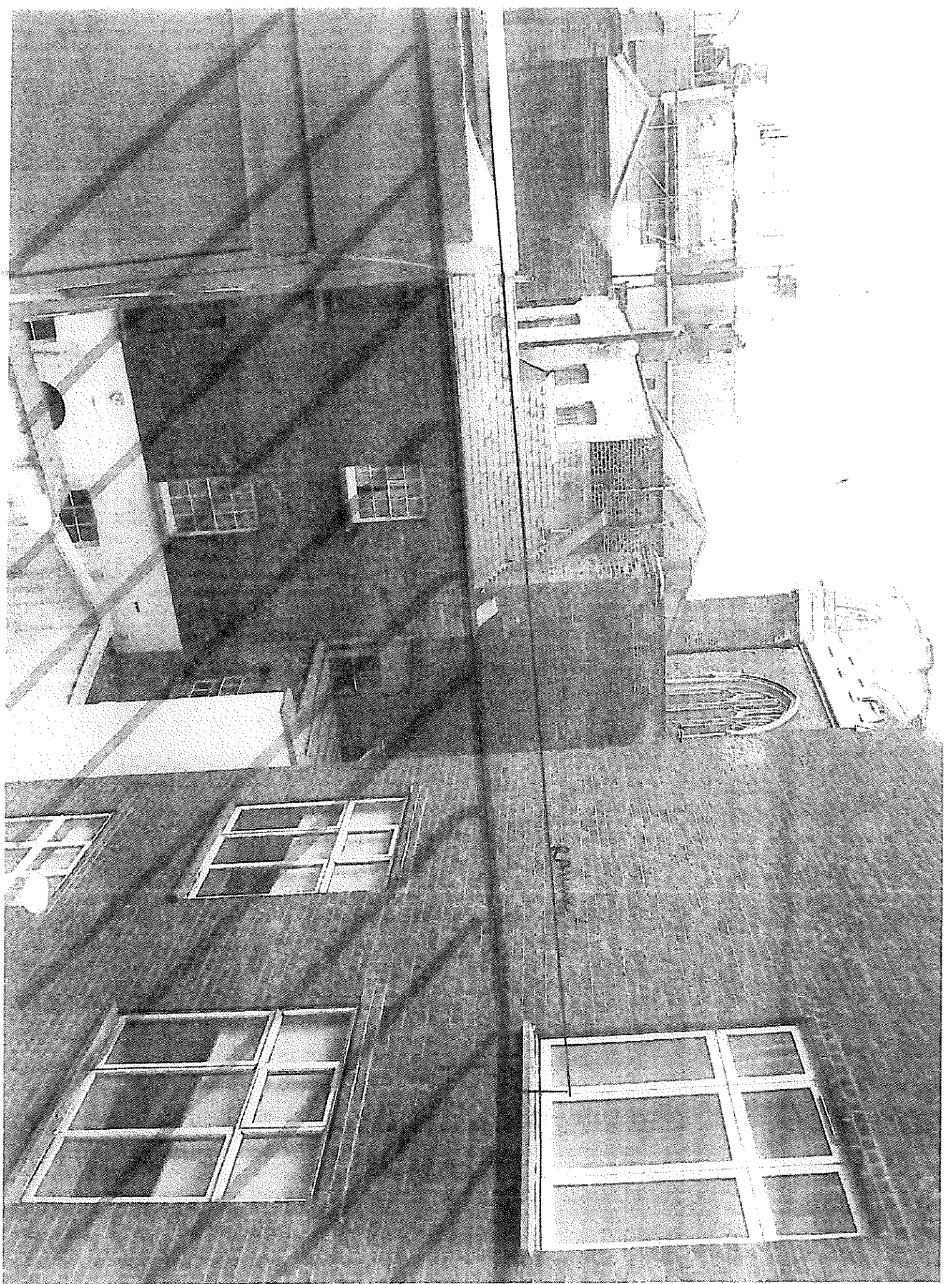
① VIEW EASTWARDS FROM FLAT 66 BEDROOM,
SHOWING CURVED ROOF LINE



VIEW WESTWARDS FROM FLAT 66 SITTING ROOM

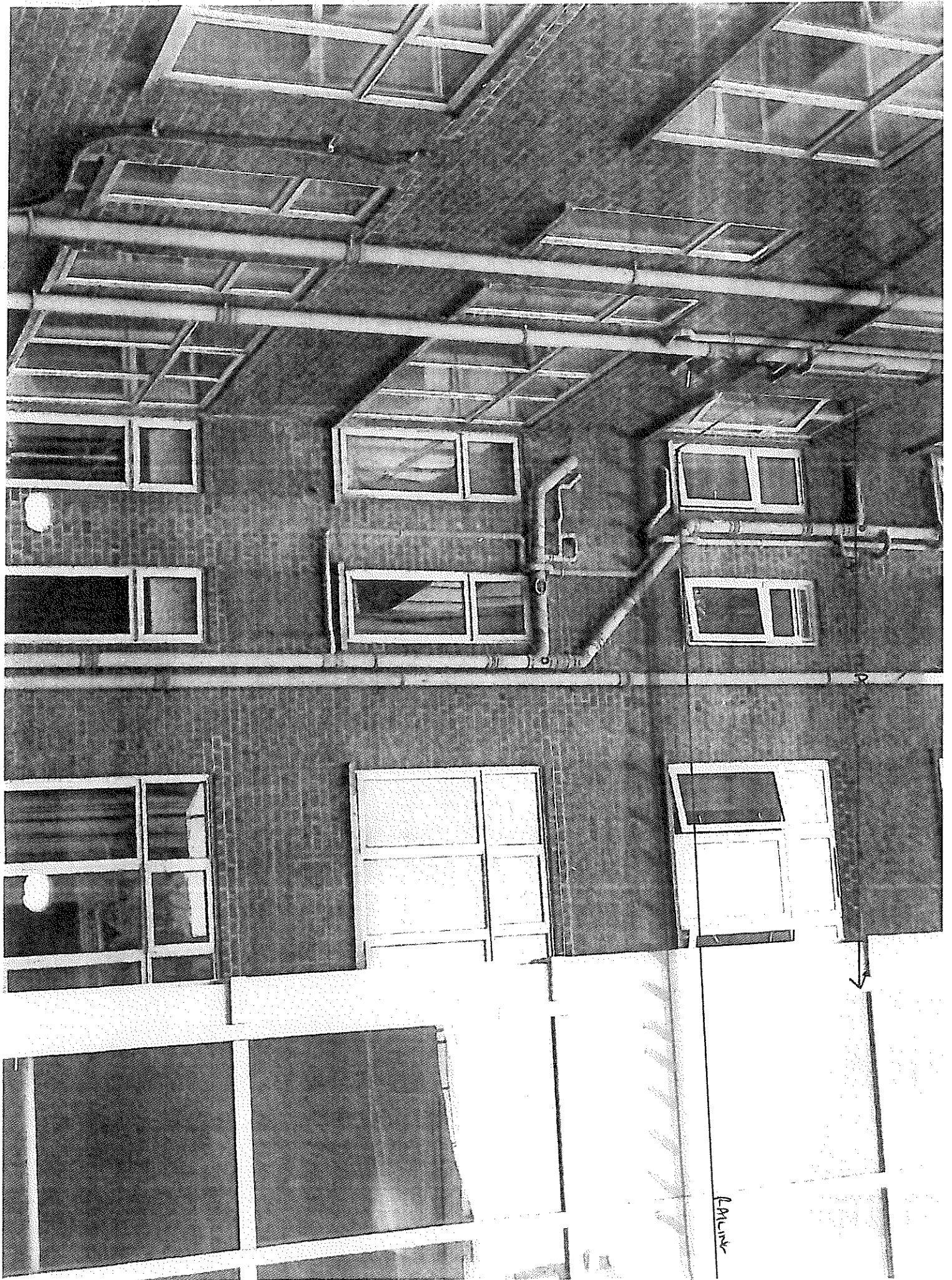
(2)

1/11/1988



VIEW COURTYARDS FROM FLAT 66 SITTING ROOM
SHOWING ORIGIN ROOF LINE

(2)



VIEW FROM COURTYARD ~~IS~~ SHOWING LINE OF GREEN ROOF

(4)

65 Cliffords Inn
Fetter Lane
LONDON EC4A 1BX

ACKNOWLEDGED

Attn. Rob Chipperfield
Department of Built Environment
City of London
PO Box 270
Guildhall
LONDON EC2P 2EJ

Your Ref. 12/00789/FULL

8 September 2012



**Cliffords Inn Fetter Lane
Application for demolition, refurbishment and extension**

Thank you for the opportunity to comment on this application.

Our flat is on the third floor and looks south over the easternmost staircase to be demolished. If this application is approved we would look out over the green roof.

We do not wish to object to the proposed extension, but if you do decide to approve it we would ask you to apply two planning conditions.

First, the exact height of the proposed extension is not clear from the drawings and we were told by the agent that they had not yet gone into that level of detail. It will nevertheless be crucial to our outlook. Secondly, the drawings state that access to the green roof will be for maintenance only, but this needs to be conditioned to protect existing residents' privacy.

The two conditions I am seeking are:

- a. *No part of the eastern infill extension, including the vegetation on the green roof, shall be higher than the underside of the external sills on the third floor windows.*
- b. *Access to the green roof shall be for maintenance only and for no other purpose.*

Lastly, as you know, the applicants are implausibly claiming that the proposal to replace the front elevation is greatly to the benefit of the existing residents and that we should contribute substantially to its cost. Whatever the legal and financial merits of this debate, the proposed elevation is dismal. Whilst the existing elevation is not to everybody's taste and has not always been kept very clean, it does at least have

some character. The proposal on the other hand is so featureless and lacking in imagination that one wonders whether the architect was inspired, if that is the right word, by anything other than a piece of graph paper. In deciding whether it deserves a bare pass, can I ask you at least to consider what it will look like when it gets dirty?

Yours sincerely

Nick Banks

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ACKNOWLEDGED

12/9/12

FLAT 100 CLIFFORD'S INN, FETTER LANE,
LONDON EC4A 1BX

8th September 2012

Department of the Built Environment,
City of London, PO Box 270,
Guildhall,
London,
EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	12 SEP 2012	LTP
OM		SSE
No	115783	PP
FILE		DD

For the attention of Mr. R Chipperfield,
Ref 12/00789/FULL

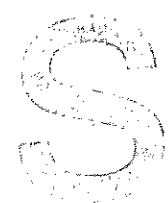
Dear Mr. Chipperfield (if I may be permitted so to address you since we have corresponded amicably in the past about St. Dunstan's House),

Planning application by CLS Holdings Ltd. on behalf of Ingrove Ltd. relating to Clifford's Inn, 138 Fetter Lane, London EC4A 1BX

I own two flats in the Residential Part of Clifford's Inn; my partner owns a further two, all of them on long leasehold terms. I have the following comments on the above applications, which I would be grateful if the Planning Authority would take into account in its deliberations.

The application to replace the existing facade

- (1) The existing facade was designed by Boyd Auger and was clearly thought to be of merit in 1982 because the Planning Authority gave planning consent for it.
- (2) The facade has considerable historical value because the re-fronting of a building for the sole purpose of improving its appearance was at that time a very unusual, possibly even unique, approach. This is a point made in Pevesner's Guide, underlining the historical importance



of the façade.

- (3) Clifford's Inn on the west side of Fetter Lane is located in the Chancery Lane/Fetter Lane conservation area and if conservation means anything it means conserving what is already there, unless there are very sound reasons not to do so. There are no sound reasons for replacing the existing façade with a new façade of different design. CLS Holdings Ltd. has confirmed via its representatives that the reason why it wants to replace the façade is because it thinks it will improve the appearance of the building, four floors of which it will have to market in due course as high class residential flats (if it is granted planning permission for that development) and modernized commercial premises. The façade does not need to be replaced on the grounds that it is in poor condition. Kawneer, who are the manufacturers of the extruded aluminium and glass system which forms the basis of the façade, have advised that the system has a life expectancy of about 60 years. It was erected in 1982/83 and is thus only half way through that expected life. Kawneer expects double glazed window units, etc. to be replaced from time to time during that life and the frame is designed so that that can be done as and when necessary at minimal disturbance to the occupants of the flats facing Fetter Lane and those using the front entrance.
- (4) The unnecessary removal and destruction of the existing façade and the erection of a replacement of different design is environmentally extremely unfriendly in terms of wasted materials, creation of dust, noise, additional traffic for scaffolders, and contractors, cartage, etc.
- (5) The proposed works will impact extremely seriously upon the residents of the Residential Part of Clifford's Inn in general and the residents of the flats fronting Fetter Lane in particular and will interfere with the exercise of our right to family life and the quiet enjoyment of our homes. That consideration is of particular importance in light of the fact that the Planning Authority has already given permission for St. Dunstan's House to be knocked down and rebuilt to house 76 new flats. As you know, St. Dunstan's House is right next door to, and only a matter of feet away from, the residential side of Clifford's Inn and the development is likely to overlap with the proposed works to the façade. The residents will, therefore, have to suffer all the disturbance and misery of living in the middle of a

building site for an extended period of time.

- (6) If, contrary to the foregoing, the Planning Authority is minded to grant planning permission for the existing façade to be removed and the proposed replacement installed in its stead, a Planning Condition should be imposed that working hours in general and noisy working hours in particular are limited to a shorter period than the current standard hours for such work.

- (7) The proposed design for the replacement façade does not include a replacement of the existing canopy over the Residential Part front entrance. If, contrary to the foregoing objection, the Planning Authority is minded to grant planning consent, a Planning Condition should be imposed requiring the design of the proposed replacement to be modified to include a replacement canopy for the Residential Part. The residents MUST have a canopy outside their front entrance. The desire of successive freeholders to give predominance to their commercial premises via a grandiose portico and to minimize the entrance to the Residential Part without regard to the convenience and well being of the residents of the Residential Part is unmeritorious. The Planning Authority accepted that objection in 1982 and it is respectfully suggested that it should do so again.

The planning application for 8 new flats

- (1) I object to this application on the ground that it is unnecessary to provide additional residential accommodation within the Planning Authority's area to meet its target objectives. There has already been a considerable amount of recent development for residential accommodation within the immediate area, for instance Bream's Building and Lincoln's Inn, with St. Dunstan's House poised to provide a further 76 flats in the very near future.

- (2) Furthermore, to develop a substantial part of the side of the building which is currently designated as commercial property will significantly alter the mix of commercial and residential use which the Planning Authority is publicly dedicated to maintaining.

- (3) In addition, the works to refit the commercial side to provide the services required by the proposed 8 new flats will add to the

disturbance of the residents of the Residential Part, in particular, the residents of the third floor who live immediately above the proposed new lifts.

The application to remove the present service blocks and to build infills with green roofs to third floor level on the south side of Clifford's Inn, plus an external staircase

I have no objection to this application in principle, subject to the following points.

- a. As the Planning Authority's representatives will appreciate as and when they inspect the site, the bays within which the proposed infills are to be constructed act as funnels to carry all noise at lower levels upwards to the considerable disturbance of the residents above, some of whom are very elderly. If planning permission is to be granted for these structures, very strict limits should be placed on working hours in general and noisy works hours in particular (see above) as a Planning Condition, in order to reduce as much as possible the impact on the residents of the south facing flats on floors 4-9.
- b. I welcome the proposal for green roofs on the infills. A Planning Condition should, however, be imposed in relation to the maintenance intervals of the green roofs to ensure that they are properly tended so that they remain green and do not become instead an unsightly view from above, and in particular from the third floor windows of the south facing flats which will be immediately above the green roofs, of brown and rotting vegetation, bare earth, trapped waste paper and dead pigeons, etc.
- c. A Planning Condition should also be imposed requiring Ingrove Ltd. to replace the existing, defective, flat roof of the three-storey section of the Chancery Lane arm of the building with a green roof, in order to provide an homogenous appearance to the south side of the building and to achieve the pleasing outlook which is CLS Holding Ltd.'s stated reason for designing green roofs for the infills.

Bicycle storage

The proposed development includes very generous basement storage for the bicycles of the residents of the proposed new flats. I have been told by CLS Holdings Ltd.'s project managers that these will only be accessible by those residents and the present plans seem to bear that out. There are, however, a hundred flats in the Residential Part of Clifford's Inn, some of the residents use bicycles and many others (myself among them) would, but do not, because we have no safe place to store our bicycles. Since the reported investment which CLS Holdings Ltd. is making in developing the commercial side of Clifford's Inn is £9.1 million, I respectfully suggest that no hardship would be suffered by CLS Holdings Ltd. if any planning consent is subject to a Planning Condition that secure, covered bicycle accommodation be provided for the exclusive use of the residents of the Residential Part of a size at least equivalent to the storage for the proposed new flats. The basement of one of the infills might be an appropriate location.

Inquiry

CLS Holdings Ltd. chose to make its planning application in August when, inevitably, a large number of the residents of the Residential Part were away for annual holidays and/or to avoid the anticipated congestion resulting from the Olympics. In consequence the usual period of time for consultation has been totally inadequate. In addition, a number of the flats are owned on long leasehold terms by people living abroad, many of whom let their flats to earn an income which is likely to be severely impacted by the proposed works, and I am aware that more than one lessee as well as some residents, have not received notice of the planning application. Bearing in mind these factors, I respectfully suggest that the Planning Authority should appoint an inspector to hold an inquiry into this planning application to investigate whether, inter alia, the statutory notice provisions have been given and to ensure that residents and lessees have a proper opportunity to make their views known.

Yours sincerely,

Belinda Bucknall Q.C.

ACKNOWLEDGED

11

nmc
12/9/12

Clifford's Inn Management Company Limited
As from 306 Cinnamon Wharf
24 Shad Thames
London SE1 2YJ.

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	12 SEP 2012	LTP
OM		SSE
No	115794	PP
FILE		DD

Department of the Built Environment,
City of London, PO Box 270,
Guildhall,
London,
EC2P 2EJ

8th September 2012

Your ref 12/00789/FULL and 12/0790/CAC

Dear Sir,

Planning application dated 2nd August 2012 by CLS Holdings Ltd. on behalf of
Ingrove Ltd. relating to Clifford's Inn, 138 Fetter Lane, London EC4A 1BX

Introduction

I am the Chairman of the Board of Directors of Clifford's Inn Management Company Ltd. ("CIMC") the company incorporated in 1979 for the express purpose of managing the Residential Part of Clifford's Inn. The Residential Part is defined in the common form lease attached in draft to the company's Article of Association on incorporation and thereafter issued to each long leaseholder, as floors 4-8 plus the roof and its structures on the 9th floor. There are 100 flats in the Residential Part of which all but one is owned on long leasehold terms. All lessees are members of CIMC.

I am able to say from my own knowledge that for many of the lessees their flat is their home, either full time or for very substantial parts of the year. Many others let their flats to earn an income. The residents are a cross section of the city in terms of age, ranging from newborn babies to those who are elderly and in some cases infirm.

CIMC has the role, inter alia, of repairing and maintaining the structure of the building from floor 4—9 (it accepts no liability for the façade, either on its own behalf or on behalf of the lessees who, via the service charge, fund any repairs carried out by CIMC) and the common parts within the Residential Part. I am the



extending into the tank room and roof space on the 9th floor.

I have already written a letter in my personal capacity to the Planning Authority. I now write this letter in my capacity as Chairman of CIMC's Board of Directors on behalf of CIMC and its members.

The façade attached to the wall on the Fetter Lane side of the building

Although the original Article 11 Notice for Planning Permission refers to façade "treatment", CLS Holdings Ltd. in fact now intends to remove the existing façade entirely and replace it with a new façade of different design. I am aware that a number of the lessees approve strongly of the design of the existing façade but that there are others who equally do not like it. That being so, CIMC takes a neutral stance to the debate on aesthetic grounds to the proposal to remove and replace it.

CIMC does, however, have very deep concerns about the proposal on other grounds.

The most important consideration is that removal and replacement of the façade will cause a huge disturbance for the lessees and residents in general and the lessees and residents whose flats are on the Fetter Lane side of the building in particular.

As to the façade flats, of which there are 13, the double glazed windows are an integral part of the façade. If repairs to seals or replacement of double glazed window units are required, it is a comparatively simple matter to deal with them on a piecemeal basis, which should in the case of the windows be capable of being effected within a day with minimal disturbance to the occupier of the relevant flat. Removal of the entire façade will leave those flats without permanent windows for up to six months or longer, depending on how long the entirety of the proposed works to the façade take. In addition the flats are small and the dimension from the outer wall (to which the façade is attached) and the parallel inner boundary wall of the flat is no more than a few metres. All work to the façade, therefore, will take place very close to anyone who is at home during the hours when of the day when construction work is being carried out; it will be absolutely impossible for them to escape from the noise, dirt and intrusion.

As soon as I learned in July that CLS Holdings Ltd. intended to remove the entire façade and replace it, instead of proceeding with its original plan to replace only the lower section covering the commercial floors, I asked whether it intended to rehouse the residents of the façade flats and offer compensation from the lost letting income that will assuredly be suffered by those who let. The same question was put by lessees who attended the presentations by CLS Holdings Ltd.'s representatives in July in the Residential Part front lobby. The response has been slow in coming and is not satisfactory. In brief CLS Holdings has

stated it has no intention of rehousing or of offering any form of compensation. More than one flat owner who had intended to sell has now advised that he/she feels that it will be impossible to market his/her flat while this matter is on-going. All CLS Holdings proposes to do is to replace the permanent windows with some form of temporary window (whether double glazed or not has not been made clear) for the duration of the works until the new façade is in place and replacement windows can be fitted.

In relation to my point about the noise which those lessees and residents will have to endure, I was told by CLS Holdings Ltd.'s representatives that the work of cutting the façade into sections and removing it would not be a very noisy job (an assertion I find unworthy of belief). However, I was also told by other representatives of CLS Holdings Ltd. when I inquired how the anchor bolts were to be dealt with (in the context of my concern that the Fetter Lane wall of the building, to which the façade is attached, and for part of which CIMC/the lessees have a repairing responsibility, would be damaged), that they were to be cut off, not extracted. Cutting off large steel anchor bolts cannot be anything other than a very noisy job, producing air borne steel particles and brick dust. The drilling of holes into the Fetter Lane wall for the anchor bolts to secure the replacement façade will also be very noisy and productive of brick dust.

In sum, the lessees and residents of the façade flats are, if planning consent for the removal and replacement of the façade is granted, expected by CLS Holdings Ltd. to endure a period of six months or more, with the noise, disturbance and lack of privacy of having workmen right outside their windows, cutting the aluminium frame and GRC classical features of the façade into sections for lowering, cutting off the steel anchor bolts and drilling new holes for new anchor bolts for the replacement facade. If, as CLS Holdings Ltd. plans, the work takes place during the spring and summer months, the residents will be left with the choice of keeping their flats sealed or being choked with dust. This is an imposition which goes far beyond the usual disturbance which may be experienced by residents living in the vicinity of building works.

I respectfully suggest that if the Planning Authority is minded to grant planning permission for these works, it should only do so if CLS Holdings proposes as a Planning Condition, that it will re-house at its own expense in suitable nearby accommodation, all the residents in the façade flats who will accept that solution and also proposes a compensation scheme for the lessees of those flats.

The proposed works will also affect the other lessees and residents, and CIMC's staff whose work place is the front lobby, since the front entrance is via the façade and the noise will inevitably be transmitted into the front lobby and into the flats that are close to but not immediately against the façade.

I therefore also suggest that the Planning Authority should limit noisy work to shorter periods each day than would normally be allowed.

I am also very concerned about the safety of the residents, our visitors, private contractors and staff and CIMC's staff, who will on a daily basis be required to walk through a façade in the course of deconstruction/reconstruction. I respectfully suggest that the Planning Authority should, if minded to grant planning permission, impose the most stringent terms to ensure that we can all use our front door in total safety and have clean access. The latter is a point of considerable importance because the Residential Part of Clifford's Inn has recently undergone extensive capital works for interior refurbishment, including new carpets throughout, for which the lessees have paid via the service charge.

The Planning Authority will also have in mind when considering whether it is necessary at all to permit the disturbance of the façade removal and replacement to be inflicted on the lessees and residents, that CLS Holdings' representatives have admitted openly that its reason for wanting to replace the façade is to improve the appearance of the building from the street. I query whether a desire for embellishment (which in any event is a question of taste) is a sufficient reason for inflicting that misery on us.

The Planning Authority will also have in mind that it has already granted planning permission for St. Dunstan's house, which is right next door, and very close to, the Residential Part of Clifford's Inn, to be demolished and rebuilt and that those works are likely to overlap with the proposed works to the façade.

The canopy over the Residential Part front door

The proposed design for the replacement façade does not include a canopy over the Residential Part front entrance. Even before the façade was erected in 1982 the entrance had a canopy and the efforts of the then freeholder to dispense with it met with such vigorous opposition from the residents that it had to redesign the façade to incorporate a canopy. If the Planning Authority decides to grant planning consent for the removal and replacement of the existing façade I ask that it only be granted on terms that an appropriately sized and designed canopy is incorporated into the replacement façade.

The planning application for 8 new flats

Since CIMC's role is to manage the Residential Part (floors 3-9 - see my first paragraph above) and the proposed new flats are to be constructed on floors 1 and 2, CIMC will have no role to play in that development if allowed. It therefore does not object in principle to this application.

It does however have considerable concern about the impact on the lessees and residents of flats on the third floor, some of which are also façade flats, of the proposed development works immediately below them and of the noise from the new lifts beneath.

It is also anxious to ensure that whatever name and address is given to this new residential development it is quite distinct from the name and address of the Residential Part and that its separate entrance on the south side of the building is clearly signposted on the Fetter Lane side of the building. Unless these steps are taken, the Residential Part is likely to be the first port of call for deliveries, visitors, etc. to the new flats and we do not see why CIMC's staff, whose salaries are paid by the lessees via the service charge should be expected to deal with this.

The application to remove the present commercial side service blocks and to build infills with green roofs to third floor level on the south side of Clifford's Inn, plus an external staircase

CIMC has no objection to this application, in principle.

It does, however, have concern about the noise that will be created by this development in an area where the bays between the three arms of the building act as funnels to carry noise up, to the disturbance of everyone in the south facing flats on floors 3-9. I would respectfully suggest that in relation to this part of the proposed works the hours for noisy works should be more strictly limited than might normally be the case.

The external staircase carries with it the additional risk, which will extend beyond the construction period, of unacceptable noise caused by those using it, to the disturbance of the lessees of the flats on the south side of the building. Is this structure really necessary?

As for the green roofs, CIMC welcomes them as an improvement subject to the following points.

(1) CIMC feels very strongly that if the south side of the building is to have any respectability as a coherent structure, the existing third floor-level flat roof of the western arm should also be re-made as a green roof. At the moment it is covered with an ugly tar-paper-and-red-grit-type cladding which is out of repair and has caused damage to the third floor flats which abut it, in the recent past. CLS Holdings Ltd.'s project managers have advised that there is "money in the budget" for this to be done and CIMC considers that it would be money well spent. It asks the Planning Authority to back CIMC's proposal.

(2) The green roofs will need regular maintenance to ensure that they remain an enhancing feature and do not become a desert of dead sedums and trapped rubbish. Although I have asked CLS Holdings specifically for details of the proposed maintenance schedule so far nothing has been forthcoming. I would respectfully suggest that CLS Holdings Ltd. should be required to propose as a Planning Condition a suitable maintenance and access schedule. If it is

suggested that such a condition could not be enforced, the Planning Authority should bear in mind that CIMC will, on behalf of its lessee members, and pursuant to its duty to maintain the Residential Part as a high class residential building, be prompt to require the schedule to be adhered to by CLS Holdings Ltd.

(3) The directors of CIMC have asked CLS Holdings Ltd.'s representatives exactly how it intends to access the green roofs for maintenance. So far the answer has been that it will do so via the windows and "if necessary" a cherry picker. Access via the windows is not acceptable to CIMC because the windows in question are the windows of the third floor flats. CIMC does not consider that its members who are the lessees of those flats should be expected to put up with the burden of having maintenance men requiring access at what are likely to be relatively frequent intervals. Planning permission for the green roofs should, therefore, only be granted on terms that CL Holdings provides proper plans for access which do not involve the third floor windows.

Bicycle storage

CIMC has noted that the proposed development includes storage for bicycles. It is apparent from the plans, and CLS Holdings Ltd.'s representatives have confirmed, that only the residents of the proposed new flats will be able to use that storage. The Residential Part of Clifford's Inn has 100 households. Many of the residents use bicycles and I am aware that others would do so if they had a safe place to store what are usually expensive items of equipment and are very vulnerable to theft or damage if left on the street. As proof of this point at the time when I joined the Board of CIMC in 2006, there were over 30 bicycles kept in the back lobby in breach of the terms of the lease and a serious hazard in the event of an emergency evacuation. They had to be removed but ever since individual lessees have made the point that they would like safe bicycle storage. I have asked CLS Holdings Ltd. to consider including some bicycle storage for the residents of the Residential Part in the development and my understanding is that it is agreeable in principle to the proposal but does not want to do so as part of the proposed development/planning application. In my view however this would be an ideal opportunity to ensure the provision of such an environmentally friendly and useful facility to meet a known need. I therefore ask the Planning Authority to consider making this a requirement.

Inquiry

CLS Holdings Ltd.'s senior management has so far had no consultation with the lessees and residents of the Residential Part of Clifford's Inn. I and my co-directors have been urging them to hold a "Town Hall" meeting attended by senior management since I was first advised of the development plans in May of this year. All the information given to the lessees and residents to date has been three short presentations of the outline plans in the front lobby of the Residential Part over a period of about a week in July attended by

representatives of the project managers and architects (but not the senior management of CLS Holdings), who were unable to answer a number of the questions put to them, and a letter answering some (but not all) of the queries raised at those meetings. I am aware that many people did not know that the presentations were to be made, as the dates were only circulated in the building and not posted to lessees. Many were therefore unaware of the meetings or were away or unable to attend for other reasons. CLS Holdings Ltd. has finally now given notice that it intends to hold the "Town Hall" meeting. The date initially set without consultation with CIMC was 25th September. CIMC has just been given notice, again without consultation, that the date is to be changed to 24th September. That, however, is long after the period for a response to the planning application has passed. In addition, the planning application was made in August at a time when even more people than usual were away in order to avoid the Olympics. I am also aware that the correspondence from CLS Holdings Ltd. has not reached some of the lessees/the residents. This calls into question whether proper notice of the planning application has been made to those interested.

Bearing in mind these various factors, together with the seriously adverse impact that the proposed development will have on the lessees and residents while the work is in progress, I suggest that this is a proper case for an inquiry to be held so that everyone is given a proper opportunity to make their views known to the Planning Authority.

Yours faithfully,

Jackie Newbury
(Chairman of Clifford's Inn Management Company Ltd.)

10

Email: Rob.Chipperfield@cityofLondon.gov.uk

Reference 12/0789 FULL and 12/07890/CAC

Dear Bob Chipperfield

I am the leaseholder at Flat 168 Cliffords Inn.

During the war, my father held two flats at the Inn. In 1940 I "firewatched" on the roof during the Blitz, with a bucket of sand and a bucket of water.

I then served as a pilot in the RAF until 1945.

Thus, I have a long connection with the Inn.

The façade of the building, with its pillars, has for many years been an essential feature of the Inn. The present proposal to demolish it, shows no reason why that should be necessary on grounds of repair or unsuitability. Apart from that and the aesthetic consideration to carry it out would create enormous disruption to existing leaseholders, as well as to Fetter Lane. It will also cause damage to flats facing Fetter Lane.

As I understand it, present surveys reveal no reason why repair and maintenance cannot meet the case. The alternative may well result in actions for nuisance by leaseholders.

I oppose the application.

Yours sincerely

ACKNOWLEDGED

Professor William Ballantyne

PLN
10 SEP 2012

S

ACKNOWLEDGED

12/9/12

37 Wapping Wall, London E1W 3SG

Department of the Built Environment,
City of London, PO Box 270,
Guildhall,
London,
EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPO	SPD
TPD	12 SEP 2012	LTP
OM		RSE
No	115791	PP
FILE		DD

Your ref 12/00789/FULL and 12/0790/CAC

Dear Sir,

Planning application dated 2nd August 2012 by CLS Holdings Ltd. on behalf of Ingrove Ltd. relating to Clifford's Inn, 138 Fetter Lane, London EC4A 1BX

I refer to the above planning application, on which owners/tenants have been invited to comment.

I have had sight of a draft letter from Clifford's Inn Management Company to you in relation to this application. In addition to owning a flat in Clifford's Inn (number 166) I am also a director of CIMC. I do not currently live in flat 166, but let it out.

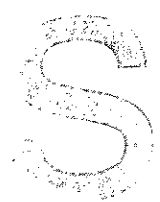
I wish to say in my personal capacity as the owner of flat 166 that I agree with the contents of the letter from CIMC.

I wish only to add that, although my flat is not at the front of the building, and will thus not be directly affected by the façade removal, there remains a potential for the letting value of my flat to be affected for perhaps up to a year or more by these works. Any grant of planning permission should therefore depend upon the freeholder providing proper proposals for compensating flat owners who lose out financially by reason of the significant and disruptive works proposed. The purpose of those works is ultimately to increase the income the freeholder can earn from its ownership of the property. It would be unfair if the financial burden (in terms of reduced rental values) of works intended to benefit the freeholder financially, could be passed to the existing lessees. Such costs should be compensated by the freeholder and should be costed into the budget for the project.

I do not as yet know whether my rental values will be affected as the lease has not yet been renewed, but I anticipate that there will be such an effect.

Yours sincerely,

Colin West



From: Elisabeth Jupp
Sent: 16 September 2012 18:31
To: Chipperfield, Rob
Subject: your ref 12/00789/FULL

127, Cliffords Inn, Fetter Lane, London EC4A 1BY

16 September 2012

R. Chipperfield, Esq.,
 City of London Planning Department

ACKNOWLEDGED



Dear Mr Chipperfield,

12/00789/FULL Cliffords Inn 138 Fetter Lane London EC4A 1BX

Further to your letter of 21 August, and our subsequent telephone conversation, I am grateful to you for allowing me to make late observations on the planning application in respect of the above. As other residents have already made clear and detailed objections, with which in general my husband and I are in agreement, I shall try to keep this letter brief.

1. We have held a long (under)lease of a 6th floor studio which faces the rear of those flats which look onto Fetter lane (i.e. we face east, but do not abut Fetter Lane) since 1996. Our major concern with the first part of the planning application does not therefore relate to the impact of these proposed works as they would actually affect the flats immediately adjoining them, both during and after construction. Those who would be affected will have already made their points. However, the design of the building as a whole is such that noise from works affecting the rear of the building is emphasised by the rear area being, effectively, an echo chamber. Although works would no doubt be carried out in accordance within the usual timing and other restrictions which the City of London rightly places on developments to minimise the impact on surrounding workers and residents, the very design of the building would inevitably add to the noise and pollution problems during works.
2. While the problem during the carrying out of works would be temporary, it would still be likely to cause inconvenience over an extended period. Of more serious concern would be the effect of noise and/or pollution such as smells from any machinery permanently installed at the rear of the building or from other operations carried out there. The noise would very probably be magnified to an intrusive level for residents, including those who work there during the day. Residents already experience this when, e.g., cleaning works are carried out to the yard at the rear at anti-social hours by parties who are, or say they are, unaware that Cliffords Inn is a residential building. Even a noise which might be at a lower level, such as a hum from extractors, would need careful assessment as to the likely impact if it would possibly be continuous or persistent.
3. The proposed removal of the existing front façade does cause us, as others, considerable concern. As indicated by others, until very recently this year there has been no suggestion that the façade is reaching the end of its useful life. The suggestions now made to that effect have not been backed up by any evidence so far as we are aware. Others have also made observations on the architectural value and provenance of the façade, which we ask you to take into account, without its being necessary to repeat them fully here. Observations have also been made on the likely cost to the individual lessees under the service charge.

Whilst perhaps not strictly a planning issue, this is obviously of great concern, when no adequate reason for such expenditure has been forthcoming.

4. I have worked in the area for over 45 years; I remember the façade being constructed and the effect it has had in introducing and maintaining some variety of good standard among the otherwise bland, or worse, styles at the southern end of historic Fetter Lane. On the eastern side, buildings have been fairly regularly replaced by others, none considered to be of particular merit so far as I am aware, but which are apparently considered virtually as disposable items. At one stage a cherry tree, just coming to some maturity, and able to break the monotony of the frontages, was abruptly removed as part of a redevelopment there. The façade of Cliffords Inn gives some much needed depth and character to this end of the street. Why, just as it also appears to be reaching some maturity, is it considered necessary wantonly to change the character of the site itself and its immediate area? Whilst appreciating that ultimately any choice of design is subjective, there is no indication that the present proposal would represent an improvement; it is more likely to represent a deterioration in standard. In the present overall circumstances no good reason has been submitted for the works which are proposed.

5. Although Cliffords Inn stands back slightly from the road, there would also be considerable inconvenience to all in the area who are not residents. The road crossing between Fleet Street and Fetter Lane is already busy and hazardous for both vehicles and pedestrians and consideration would need to be given to the impact on both foot and motor traffic while the works were carried out. It would be necessary to put into place appropriate protection.

We should be grateful if you would take these concerns into consideration.

Yours sincerely

Elisabeth A. Jupp and on behalf of Peter C. Jupp

Stothard, Gideon

From: Chipperfield, Rob
Sent: 19 September 2012 09:44
To: Stothard, Gideon
Subject: FW: Planning application for Clifford's Inn Ref 12/0789 FULL and 12/0789/CAC: OBJECTION

From: Iain J Hasnip
Sent: 18 September 2012 21:47
To: Chipperfield, Rob
Cc: iainhasnip@tiscali.co.uk
Subject: Planning application for Clifford's Inn Ref 12/0789 FULL and 12/0789/CAC: OBJECTION

ACKNOWLEDGED

PLN
18 SEP 2012

Dear Mr Chipperfield,

My wife and I own and live in Flat 64 Clifford's Inn which is on the third floor, at the rear of the Fetter Lane wing of the building.

In respect of the proposed replacement of the facade of the building, other more informed correspondents have made the case more eloquently than we could regarding the architectural merit or lack thereof of the proposed design. Suffice it to say that the present facade is somewhat unique in this area of the city and it would be a travesty to tear it down in favour of a modern nondescript design before the end of its useful life simply for the financial gain of the corporation that owns the freehold, notwithstanding the enormous disruption that this would impose on owners of the Fetter Lane facing flats.

As a third floor residents what concerns us most is the proposed redevelopment of the first and second floors at the front of the building into residential accommodation. We are strongly opposed to this part of the proposal as we bought our apartment on the understanding that the floors below were office space and therefore empty and consequently quiet on evenings, weekends and public holidays. We are particularly dismayed to see from the plans that a kitchen / living area is to be situated directly below our bedroom. We believe that this proposed redevelopment in its current form represents a serious threat to the relative peace and quiet that we currently enjoy and therefore to the continuing enjoyment of our property.

Throughout the rest of the building, the design of the apartments is consistent between the different floors, i.e. bedrooms are above bedrooms and living rooms above living rooms. If this proposal is to go ahead against our wishes, we would like it to be on the condition that the designs are modified to preserve this consistency throughout the first and second floors. We do not want a living room below our bedroom.

Furthermore we would like state of the art sound proofing to be put in place between the floors. We raised this point to the freeholder and they responded by saying "the flats will be constructed to comply with current acoustic regulations." We do not believe that this goes far enough.

On the subject of the green roofs we believe this would generally represent an improvement, however our living room window would directly overlook the green roof and we would ask that access to the green roof is strictly limited to maintenance only otherwise this would give rise to unacceptable privacy and security issues for us and for residents of the other apartments overlooking the green roof.

Obviously works on this scale and the associated noise and vibrations would cause no small measure of disruption to residents of the whole block, and particularly to those on the third floor of the Fetter Lane wing of the building such as ourselves. As such we would like to request that limitations are put in place such that any building work will be carried out strictly between the hours of 9am and 5pm Monday to Friday and that no work will be carried out during evenings, early mornings, weekends or public holidays.

Finally we would like to draw attention to the fact that the air conditioning unit in the Clifford's Inn yard has been a persistent source of unwelcome and intrusive noise in our apartment, and I would request that the unit be

decommissioned as part of the redevelopment, and that a more suitable and less intrusive solution be found for the air conditioning needs of the proposed new commercial part of the building.

Yours sincerely,

Mr Iain J and Mrs Alicia S Hasnip

18

PLANNING & TRANSPORTATION		
PSDD	OPD	REP
TPD	25 SEP 2012	
OM		USE
No		DP
FILE	115907	DD

527 Willoughby House
 Barbican
 London EC2Y 8BN

Department of Planning and Transportation
 City of London
 PO Box 270
 Guildhall
 London EC2P 2EJ
 19th September 2012

Planning Application, Cliffords Inn, Fetter Lane, 2nd August 2012

Dear Sirs,

I am a leaseholder of flat number 149 in Cliffords Inn and am writing to object to the part of the above planning application that relates to the proposed removal of the existing façade on Fetter Lane and replacement by a new façade. My objection is based on the existing façade being perfectly functional and with more character than the proposed bland modern façade, but more importantly, it is simply a sheer waste of resources. The proposed façade will mean the disposal, no doubt into landfill, of the existing façade, it will mean the mining of minerals etc. for the material to build the new façade, it will use energy for a totally unnecessary purpose, and of course, in addition to trashing our environment, it will also cost the leaseholders dearly.

I've read in the newspapers only this week that Saudi Arabia will run out of oil by 2030, and that there will be no ice in the Arctic during the summer months by the same year. When will the City of London's planning department start linking all the pieces of the puzzle together?

Yours faithfully,



Caroline Bennett

ACKNOWLEDGED

25/9/12

23rd September 2012

FOR THE ATTENTION OF:

Mr Peter Wynne Rees

The City Planner Officer

Department of the Built Environment

City of London

PO BOX 270

Guildhall

London, EC2P EJ

PLANNING & TRANSPORTATION		
PSDD	CPD	PPD
TPD	27 SEP 2012	LTP
OM		SSE
No	115938	PP
FILE		DD

Ref: PT_RC/12/00789/FULL (Clifford's Inn)

Dear Mr Peter Wynne Rees,

I am the owner of flat 126, located in the building known as Clifford's Inn in the City of London borough in Fetter Lane (zip code: EC4A 1BY).

I am writing to you to express my concerns and disagreement with the freeholder's plans to carry out significant modifications to the Clifford's Inn building, in particular, to the external façade on Fetter Lane. Over the last three years, onerous maintenance works have been carried out, both in terms of financial costs and of inconvenience caused to the residents. The new modifications to the façade and to other parts of the building will result in additional costs and further inconvenience. Whilst the maintenance works were required for the safe operation of the building and its up keeping, the new works lack ground for necessity and pose a threat to the décor of the reception area on the ground floor that was recently refurbished. The freeholder has not confirmed, to my knowledge, that he intends to fully fund the financial costs associated with the new works and I strongly opposed to these costs being passed onto the leaseholders, like myself. The freeholder cannot in my view demand further financial sacrifices from the leaseholders and further patience and understanding from the residents.

I therefore ask you to take notice of my concerns and opposition to new works.

Kind regards,

Elisabetta Russo

ACKNOWLEDGED

Chipperfield, Rob

From: Richard.Steele@cityoflondon.gov.uk
Sent: 08 November 2012 00:12
To: Chipperfield, Rob
Subject: Application Comments for 12/00789/FULL

Planning Application comments has been made. A summary of the comments is provided below.

Comments were submitted at 12:11 AM on 08 Nov 2012 from Mr Howard Peace.

Application Summary

Address: Cliffords Inn 138 Fetter Lane London EC4A 1BX

Proposal: Demolition of external staircase, refurbishment and infill extension of existing office space, and part change of use of lower ground, first and second floors from B1 (offices) to C3 (residential) to provide 8(no.) residential units, removal of existing front facade to Fetter Lane, works and landscaping.

Case Officer: Rob Chipperfield

[Click for further information](#)

Customer Details

Name: Mr Howard Peace

Email:

Address: Cefn Coch Isaf Cwmystradllyn Gwynedd

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: Cefn Coch Isaf, Cwmystradllyn, Gwynedd. LL51 9AZ Dear Sir, The façade of Clifford's Inn is unique in the city conservation area. It may not be particularly old but its character and design stands out in comparison with the surrounding buildings. Fetter Lane has been modernised with large glass fronted buildings which are out of keeping with the old Rolls building. Clifford's Inn with its columns helps keep that balance of the old with the new and the area would be devalued by the replacement of this façade (NPPF 9.2 para 127). Without being disrespectful to the architect the new facade would not be making a positive contribution to local character and distinctiveness (NPPF 9.2

para 131). It would be similar to the buildings on either side which have no distinguishing merit. Clifford's Inn may not be a building of significant interest however it does have a façade in keeping with the more classical buildings in the vicinity. The replacement façade is in keeping with the commercially acceptable frontage of the surrounding modern mediocrity. Conservation means protecting against undesirable changes. Yours Sincerely, Howard and Susan Peace, Leaseholders of 107 Clifford's Inn.