

Committee:	Date:
Planning and Transportation	4 July 2017
Subject: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.	Public
Ward: Farringdon Without	For Decision
Registered No: 17/00077/FULMAJ	Registered on: 2 February 2017
Conservation Area: Temples	Listed Building: No

Summary

The proposals relates to the Inner Temple Treasury Building, which comprises the Inner Temple Hall, Library and offices of the Treasury. The Treasury Building was designed by Sir (John) Hubert Worthington in 1947 to replace earlier buildings destroyed in WWII.

The site is within the Temples Conservation Area and in close proximity to listed buildings. The Buttery adjoining to the west is a Scheduled Ancient Monument and Grade II* listed, Temple Church to the north is Grade I listed, The Master's House to the north is Grade II listed, Mitre Court Buildings to the north east are Grade II listed, 1, 2, 3, 4 and 5 Kings Bench Walk are Grade I listed, 3 North Kings Bench Walk is Grade II* listed, 1-5 Paper Buildings are Grade II listed, 6 lamp standards to the east and south of the site are Grade II listed. The Inner Temple Garden is a Grade II registered park or garden.

This application is not an EIA application and no works to The Buttery (which is a Scheduled Ancient Monument) are proposed.

The four storey building plus basement, accommodates a hall, library, dining and ancillary administrative facilities all used by the Inn.

Planning permission is sought for the extension and refurbishment of the Inner Temple Treasury Building to provide a new barristers' Education and Training Centre, primarily at third floor level within adapted library space and a new roof level extension above the Library and the Hall.

The development comprises a new mansard roof extension featuring dormer windows and chimney stacks. Two extensions are proposed on the north elevation to accommodate a new lift shaft and stairs and internal alterations include the insertion of a new ceiling above second floor level within the library.

A total of 77 (plus 8 supplementary) representations have been received across two rounds of consultations. The representations are summarised in a table in the body of the report. The issues raised include the harm to the library space, the impact of the proposed extension on heritage assets and the Temples Conservation Area, the need for education facilities and the impact on the Inner Temple Garden of potential temporary structures during construction.

The proposals would result in less than substantial harm to the significance of the Temples Conservation Area and the setting and significance of Temple Church. The proposals would result in some harm to the Treasury Building as a non designated heritage asset. The harm is outweighed by the public benefits of the proposal which comprise the completion of the original design for the building, and the creation of a barrister's' training centre which would reinforce the legal character of the Inner Temple and sustain the building's long-term use.

It is considered that the development complies with the NPPF and the Development Plan as a whole and is appropriate subject to conditions, and a Section 106/Section 278 Agreement being entered into and complied with.

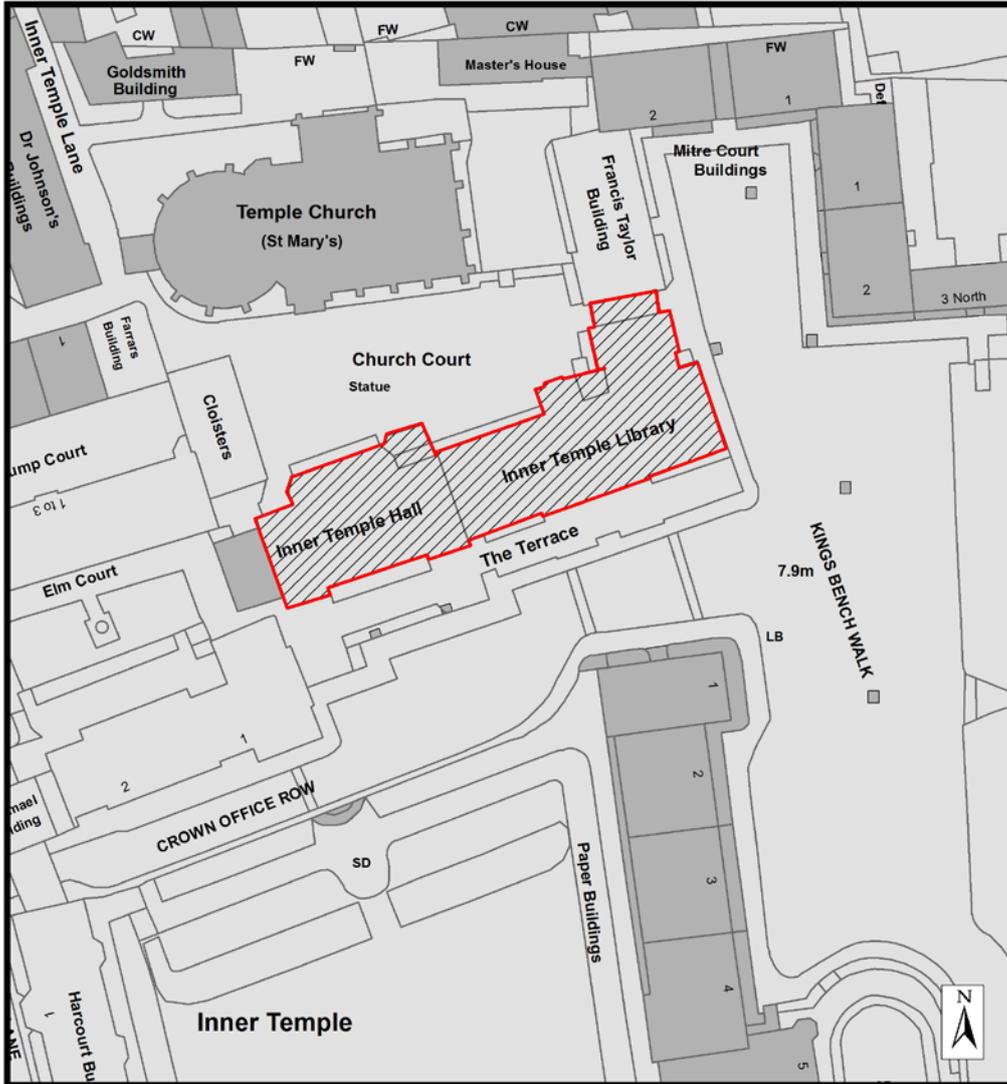
Recommendation

(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;

(b) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

Site Location Plan



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ADDRESS:
Inner Temples Treasury Building

CASE No.
17/00077/FULMAJ

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT



Main Report

Site

1. The site is located within the Inner Temple, between Crown Office Row and Church Court. The proposals relate to the Inner Temple Treasury Building, which comprises the Inner Temple Hall, Library and offices of the Treasury.
2. The Treasury Building was designed by Sir (John) Hubert Worthington in 1947 to replace earlier buildings destroyed in WWII. It was completed to an amended design by T.J. Sutcliffe in 1958. A notable omission from the original design was the library roof.
3. The building is Neo-Classical in style and is built of red brick with stone detailing. The Hall section of the building comprises ground plus one tall storey with stained glass windows and a hipped clay tile roof enclosing plant. The Library and Treasury office section of the building comprises ground plus three storeys with small-paned timber sash windows, a flat roof and brick chimney stacks. A basement extends beneath the full site. The building's interior includes the richly decorated hall, double-height oak panelled library and a series of offices, reception rooms and circulation spaces.
4. There has been a library on the site since at least 1506, while the Hall stands on the site of the ancient halls of the Knights Templar who were associated with the area from the 13th century. The Buttery at the Hall's west end is the remains of a later medieval hall. The buildings and their legal and educational functions continue the site's use established over 500 years ago.
5. The site is in close proximity to a number of designated heritage assets. The Buttery adjoining to the west is a Scheduled Ancient Monument and Grade II* Listed, Temple Church to the north is Grade I Listed, The Master's House to the north is Grade II Listed, Mitre Court Buildings to the north east are Grade II Listed, 1, 2, 3, 4 and 5 Kings Bench Walk are Grade I Listed, 3 North Kings Bench Walk is Grade II* Listed, 1-5 Paper Buildings are Grade II Listed, 6 lamp standards to the east and south of the site are Grade II Listed. The Inner Temple Garden is a Grade II registered park or garden. The site is within the Temples Conservation Area. Fleet Street Conservation Area adjoins to the north.
6. The Treasury Building as a whole has been identified as a non-designated heritage asset for reasons detailed below.

Relevant Planning History

7. In 1991 Planning permission was granted for an additional storey in hipped roofs and infilling of lightwell to provide chambers for barristers and ancillary accommodation (ref: 1977EW). This planning permission was not implemented.

8. In 1994 planning permission was granted for construction of a new wall and associated works to screen a rubbish compactor and bins on Church Court elevation of the building (ref: 1977JL)
9. In 1996 planning permission was granted for the formation of a new doorway to an existing storeroom and the replacement of existing door leaf to the doorway of Pegasus Bar (ref: 5056D).
10. Planning permission was granted in 1998 for the formation of access for people with disabilities involving alterations to the building, landscaping and paving (ref: 5056F)
11. In 1999 planning permission was granted for the installation of railings to lightwells and alterations to north Treasury Entrance (ref: 5056G)
12. In 2003 Planning permission was granted for alterations to terraces to facilitate wheelchair and disabled access (ref: 5057C).
13. The Treasury Building was assessed for listing by Historic England. The quality of the building and in particular its interiors were noted but the assessment concluded that it was not of the exceptional quality required to merit listing. A decision was issued on 21 June 2016. A review was requested and the review decision issued on 14 June 2017 held the earlier decision not to list the Treasury Building.

Proposals

14. The proposed development is for the extension and refurbishment of the Treasury Building in association with its use as an education and training facility and offices (sui generis).
15. The alterations are proposed to the Library and Treasury office sections of the building.
16. The building would provide a new barristers' Education and Training Centre, primarily at third floor level and at roof level. The ground and first floors would be refurbished to provide improved Treasury offices and toilet facilities. At basement level, alterations would create additional book storage for the library, improved catering facilities and ancillary offices for the catering team. The library would remain at second floor level. All the elements of the Treasury Building are considered to be parts of the sui generis use linked to the Inner Temple activities.
17. The scheme includes a fourth floor mansard roof extension above the flat roof and changes to the height and pitch of the Hall roof, incorporating dormer windows into the proposed roof structure and the addition of chimneys.
18. The proposal provides a new auditorium at third floor level which would be located in the space currently occupied by the gallery level of the Library. The auditorium would contain 120 seats arranged in a horse-shoe shape on a sloped floor with access down both sides of the auditorium. The double height gallery space within the library would be removed and a ceiling above the second floor would be installed. The

loss of shelf length within the Library would be offset by the creation of a bookstore at basement level, resulting in a reduction of 13% of shelf space. There would be a reduction of 11 reader positions from 97 existing to 86 proposed.

19. Eight new training rooms and breakout spaces for at least 120 people, with serveries adjacent to the breakout space, would be located on third and fourth floor level.
20. To facilitate improved access and circulation throughout the building, two extensions to accommodate a new lift shaft, fire escape stairs, disabled WC and library infrastructure room are proposed.
21. An extension at the north east corner would house a new lift shaft. A new brick clad extension on the north side between the Treasury Building and the Hall would house escape stairs.
22. 37 new bicycle stands are proposed to be added to the existing cycle parking facilities which would be located behind Crown Office Row

Consultations

23. 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 and the Section 106 agreement.
24. Following receipt of the planning application by the City the application has been advertised in the press, four site notices were put up around the site, and statutory and non-statutory bodies were consulted. The applicants submitted additional information to support their application on 10 May 2017. The contributors from the first round of consultation were reconsulted, making them aware of the additional information submitted and providing them with an opportunity to make further comments. Copies of all letters and email making representations are attached.
25. Conservation Area Advisory Committee raised no objections and the Committee were impressed with the sensitive design of the scheme.
26. Historic England does not wish to comment on the proposal and has deferred to the view of the local planning authority.
27. Twentieth Century Society object to the application expressing concerns that the proposal would greatly undermine the grandeur of the library space through the demolition of original fabric, the reduction of space and loss of light. They consider that the proposals would cause substantial harm to a non-designated heritage asset and therefore object to the application and recommend refusal.
28. Save Britain's Heritage object and express concern that the proposed alterations to the library would have a serious harmful impact on the building, resulting in the loss of a fine interior and one of London's best examples of post war construction.

29. The Director of Open Spaces expressed concern that the Inner Temple Garden may be considered as a location for temporary structures during the refurbishment. The Inner Temple Gardens are listed and a protected open space that is a highly valued public amenity. The Director of Open Spaces wishes to register that the use of the Inner Temple Gardens would be inappropriate and that serious consideration should be given to the use of existing hard surfaced areas in preference to the loss of any green space.
30. A total of 77 (plus 8 supplementary) representations have been received as a result of two rounds of consultation. Of the 77 representations, 45 object (including 8 supplementary representations) to the application, 29 are in support and 3 raise concerns on the impact on Inner Temple Garden. (A representation has been received which appends an online petition which was compiled in October 2015 and attracted 1500 signatories. This petition has been submitted with an objection and is not a petition which was undertaken during the course of this application or formally submitted to the Corporation.
31. The representations are summarised in the tables below. Copies of the representations are appended in date order to this report, and should be referred to in order to appreciate the full extent of the points raised.

Representations

	Name of contributor	Consultation	
		1st	2nd
1	Richard Humphreys QC 17 February 2017	<p>Listing The Treasury Building, Hall or Library have not been listed by the Secretary of State. An application to the Secretary of State to review his decision has not yet been determined. [SoS decision has now been received]</p> <p>Reduction in the height of the Library space The Library (i.e. its rooms and gallery) should be regarded as a non-designated heritage asset.</p> <p>The effect of the proposed scheme on the significance of the Inner Temple Library as a non-designated heritage asset has not been assessed in any of the planning submission</p>	<p>R (Khodari) v. RBKC [2017] EWCA Civ 333 establishes that the loss of, or harm to, the interior of a non-designated heritage asset can be a material consideration even if those features can be removed without the need for planning permission and confirms my original representation.</p> <p>Works to the interior are part of the development that requires planning permission. The interior works are applied for in the description of the application and are shown in the submitted plans. The plans show how the proposed external works would directly affect the interior of the Library.</p>

	Name of contributor	Consultation	
		1st	2nd
		<p>documentation.</p> <p>The removal of the entire gallery of the existing library, with the consequential additional loss in particular of library rooms H and J on the main 2nd floor would be a direct and significant loss of, and harm to, the significance of the heritage asset.</p> <p>The 'reduction in the size of the library' constitutes a major reduction in the significance of the Library as a heritage asset.</p> <p>The proportions of the library are elegant and they depend on the high ceilings, the balustraded galleries, oak panelling and decoration, the sequence of spaces and above all the quality of light admitted by the two tiers of windows.</p> <p>The gallery, which provides well-proportioned height to all the 3 main interlinking rooms, as well as important bookshelves, desk space, daylight, garden views and circulatory space, will be totally lost. The remainder of the main rooms in the library will be a very long (somewhat oppressive) run under a single height ceiling, lacking proportion and the library would be unable to display the whole current collection of books.</p> <p>Library as a non-designated heritage asset and application of para 135 of NPPF Paragraph 135 of the NPPF is</p>	<p>It is not contended by the Inn that the loss/harm to the Library would occur if planning permission for the proposed development were refused so substantial weight can and should therefore be given to the interior.</p> <p>The loss/harm to the interior plainly is a highly material consideration where, but for the grant of permission, the harm would not otherwise arise.</p> <p>The proposed development would result in significant harm to the Library which has the requisite degree of heritage interest to be considered as a heritage asset.</p> <p>The loss of the entire gallery floor, other rooms on the main floor, the reduced ceiling height etc constitutes harm and loss of a significant scale, significantly affecting the special character and architectural quality of the Library.</p> <p>It is premature to give any weight to the benefit. The Inn has not decided whether to seek validation of its proposed BPTC course and has yet to complete a business plan. There is no certainty (or an approval in principle) that the BSB would validate the proposed provision of the BPTC. It is thus premature to place weight on the asserted benefits of the proposal.</p> <p>The use of the space absent BPTC provision, is not explained and no covenant or condition is suggested to ensure the use for</p>

	Name of contributor	Consultation	
		1st	2nd
		<p>not considered or applied to the library in any of the application documents.</p> <p>The Heritage Statement provides no assessment of the Library as a non-designated heritage asset. There is a brief, single reference to the wording of paragraph 135 of the NPPF but no application. The (Heritage) Statement refers only to the effect of the scheme on the Temples Conservation Area and nearby listed buildings.</p> <p>The planning statement makes no express reference to paragraph 135 either.</p> <p>Considerable weight should be given by the City of London to the significance of the heritage asset and to the harm to partial, but significant, loss of the asset.</p> <p>Benefits There is support for improved facilities but the scheme tries to accommodate far too much on the site. A scheme which utilised the roof space without affecting the library could be supported in principle.</p> <p>Business Case/Viability No business case for the proposed scheme has been presented with the application. There is concern the scheme would not be viable. The viability, in terms of long term sustainability, of the scheme is highly relevant to the weight which can be given to the</p>	<p>the provision of legal education and training and it cannot be concluded that the benefits outweigh the significant harm to the interior of the Library.</p> <p>Previously referred to the harm to the character and appearance of the Conservation Area not only by reason of the harm to the interior of the Library but in respect of the dormer windows, the effect on the setting of the Temple Church and the harm to the Garden for the lengthy duration of the proposed construction period.</p> <p>The claim the applicants make that the number of people using the Library is minimal is incorrect. Mr Nicholas Asprey in his representation states an electronic monitor at the library counts people entering and leaving the library and after making allowance for staff footfall and for users entering and leaving more than once – it is likely that over 150 people use the Library every day at present.</p> <p>The locational need asserted is undermined. There are other possibilities which exist and have not been considered/demonstrated not to be realistic: existing buildings in Inner and Middle Temple, Royal Courts of Justice, Scheme 1 (or similar) which could meet locational need.</p> <p>The Inn has existing buildings which it has not considered. Sets of Chambers from time to time decide to relocate outside</p>

	Name of contributor	Consultation	
		1st	2nd
		<p>benefits when balancing them against the substantial harm.</p> <p>It has not been demonstrated there are no alternative locations within the Inn and/or in conjunction with the Middle Temple (or Lincoln's Inn) which could be used/successfully adapted for education and training.</p> <p>The library as part of the character of the Temples Conservation Area.</p> <p>The Temples Conservation Area includes the Library rooms and gallery.</p> <p>The Library rooms, including gallery, make a positive contribution to the significance of the Conservation area.</p> <p>The effect of the proposed development on the character of the Conservation Area, by reason of its significant harm to the Library rooms (including gallery) has not been addressed in the application documents.</p> <p>Paragraph 134 of the NPPF is referred because it is considered that the harm to the significance of the Conservation Area as a whole would constitute "less than substantial harm" rather than substantial harm. Considerable importance and weight should be given to that "less than substantial harm." (reference is made to case law East Northamptonshire District Council V. Secretary of State</p>	<p>the Inn or leases come to an end. The Middle Temple has premises very close to the Inn's Hall (e.g. Cloisters). There is no evidence that Middle Temple has refused to consider land exchange or refused to consider sharing a joint provision of education and training facilities for both.</p> <p>The Royal Courts of Justice is 150 yards from the Inn's Treasury Building and has a vast number of courts (including tiered Courts) not all of which are used, even during the day. It is not suggested that the possibility of hiring these has been explored and rejected by the Ministry of Justice. The proximity to the Inn, its dining hall and library would maintain the collegiality referred to in the Supplementary Statement concerning Bar Education Training and the Role of the Inns of Court.</p> <p>There is no mandated requirement for 120 seats, although Mr Snowdon refers to the figure of 120 having been formulated in 2010, the applicants put forward (to the City of London informally) Scheme 1 in 2014 with 99 seats and shows there is no magic in the figure of 120. The BET refers to the need for 'up to' 120 students.</p> <p>The applicant has failed to consider the alternatives properly, undermines what weight can be given to the benefits which, it is asserted cannot otherwise be delivered.</p> <p>The Bar Educational Training</p>

	Name of contributor	Consultation	
		1st	2nd
		<p>for Communities and Local Government (the Barnwell Manor case)</p> <p>Paragraphs 138 and 134 of the NPPF have not been applied by the applicant's advisers to the Library. It has not been demonstrated that the benefits would outweigh the harms.</p> <p>Design of the proposed dormers The proposed dormers on the north, south and east elevations are inappropriate and harmful. They should have a horizontal, not a strongly vertical, emphasis.</p> <p>On the Northern elevation, the run of 3 contiguous windows within a dormer above the proposed lift shaft would be eye-catching, discordant and inappropriate, especially in the setting of the adjacent Grade I listed Temple Church.</p> <p>The effect of the proposed development on the setting of the Temple Church The effect of the proposed development on the setting of the Temple Church and on the church's significance has not been fully assessed; in particular: The effect from late afternoon/early evening of lighting being visible through the additional fenestration at high level. The potential visibility in views in Church Court of the underside of the suspended floor of the proposed lecture theatre.</p>	<p>Statement confirms what Lincoln's Inn, Gray's Inn and Middle Temple are constructing or have converted parts of their estate to provide an education facility. The BET does not state that for example Scheme 1 would not provide sufficient training facilities or that the conversion of existing buildings within the Inner Temple and/or Middle Temple could not provide sufficient training facilities. The conversion of nearby buildings would also maintain the collegiality referred to in the Supplementary Statement.</p>

	Name of contributor	Consultation	
		1st	2nd
		<p>The run of 3 contiguous windows in the dormer above the proposed lift shaft</p> <p>Conclusion Planning Permission should be refused.</p> <p>The application does not accord with the important policies of the development plan.</p> <p>The loss of the gallery will lead to harm to the Library's significance as a heritage asset.</p> <p>It has not been demonstrated that the setting, and thus the significance of the Grade I listed Temple Church would not be adversely affected by the proposed development.</p> <p>The harm caused to the library and the design of the dormers would not preserve or enhance the character of the Conservation Area.</p> <p>The NPPF is a material consideration. The benefits set out in the documentation are not considered to outweigh the significant harm to the library as a non-designated heritage asset.</p> <p>The lack of a robust and viable business case for the proposed development means that little weight can be given to the benefits of the scheme.</p> <p>Use of Inner Temple Garden for temporary structures It is assumed the Inner Temple</p>	

	Name of contributor	Consultation	
		1st	2nd
	6 March 2017	<p>Garden will be used for temporary structures before and for the duration of the construction period for up to 2 years.</p> <p>[Applicants submitted 3 documents in response to Mr Humphreys 1st consultation response. Mr Humphreys responded back to the applicants and this is summarised below]</p> <p>Mr Humphreys 2nd consultation letter responding to the 3 documents by the applicant.</p> <p>Review of Listing Decision None of the response documents claim that the applicants or its advisors have drawn to the attention of the Secretary of State HBA's acknowledgement that the interior of the library has "special character and architectural quality". This is close to an admission that the statutory test for listing – "special architectural or historic interest" – is met.</p> <p>Despite HBA's acknowledgement, KMH continue to seek to belittle the interior.</p> <p>The evidence relied upon by KMH appears to be the claimed <i>absence</i> of comment by the architectural press. Firstly this is not factually correct, secondly it could not fairly or reasonably be inferred either from the claimed absence of comment that reception to the interior of the library was</p>	

	Name of contributor	Consultation	
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		<p>lukewarm when the contemporaneous Country Life article had already been published and been both comprehensive, and in praise of its interior.</p> <p>KMH were instructed only after the Inn had decided to proceed with the present scheme and after the application to list the buildings had been made. It is unfortunate that the Inn appears content for its heritage to be belittled in this way.</p> <p>The most important and significant point, however, is that KMH do not now contradict HBA's acknowledgement that the interior of the library has "special character and architectural quality."</p> <p>Irrespective of the outcome of the review, that acknowledgement, along with the views of Girouard, Pevsner and Tyack are all highly relevant to the issue as to whether the interior of the library should be regarded as a non-designated heritage asset.</p> <p>The Library's interior as a non-designated heritage asset</p> <p>KMH state that the interior is not of "exceptional quality". Leaving aside the question as to whether or not it is, KMH is, wholly incorrect to imply that the interior has to be of "exceptional quality" to be a non-designated heritage asset. That is <u>not</u> the test. Whether the interior is a "heritage asset" depends on whether the asset has "a degree of significance</p>	

	Name of contributor	Consultation	
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		<p>meriting consideration in planning decisions, because of its heritage interest”.</p> <p>My representation submitted that the interior of the library could in law, and should, be regarded as a non-designated heritage asset. Contrary to KMH’s apparent assumption, this is an entirely <u>separate</u> point from the contribution that the interior of the library makes to the character of the Conservation Area.</p> <p>There is no reason in law, policy, logic or common sense why the interior of the library may not be a heritage asset; heritage assets as defined, are not confined to the exterior of buildings; nor to the whole of a building; nor are heritage assets confined to buildings at all; a heritage asset, as defined could be a site or place or area or a landscape. Here the interior is a part of a building and a place.</p> <p>The interior of the library plainly has heritage interest:</p> <ul style="list-style-type: none"> <input type="checkbox"/> There has been a library on the present site continuously since at least the 15th Century <input type="checkbox"/> The present library came into existence following Second World War bombing and with the considerable assistance of public monies; <input type="checkbox"/> Its design and layout reflect the best qualities of traditional design, layout and execution <input type="checkbox"/> Pevsner notes its “double- 	

	Name of contributor	Consultation	
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		<p>height galleried rooms” Tyack notes that it is “Ingeniously divided into bays by beautifully crafted oak bookcases, with galleries above”</p> <p><input type="checkbox"/> It is associated in many parts of the world with research of the law, as well as the education, work and research of many eminent post-war judges and barristers; and it has central importance to this medieval Inn of Court.</p> <p>It is notable that the responses [from the applicant] do not contradict any of the foregoing.</p> <p>Contrary to KMH’s inaccurate assertion, a designated heritage asset is not equated in my representation with a non-designated heritage asset in terms of significance or weight. NPPF paragraph 135 applies to the latter heritage asset, as already made very clear in my representation.</p> <p>AHL consider it relevant to draw attention to the fact that interior works do not require planning permission. AHL does not, however, draw attention to the statutory wording: it is only works which (i) affect only the interior of the building, or (ii) do not materially affect the external appearance of the building, which do not involve ‘development’ and thus do not require planning permission.</p> <p>In summary, there is no reason</p>	

	Name of contributor	Consultation	
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		<p>in law, policy or logic why the interior of the Library should not be regarded as a non-designated heritage asset. The very significant impact on the interior of the library as a non-designated heritage asset, which HBA acknowledge to have “special character and architectural quality” should have been addressed in the application documentation and assessed against NPPF paragraph 135. This has still not been properly assessed.</p> <p>It is notable that the impacts on the interior of the library described in paragraphs 31-34 and 36-38 of my representation are not in any way contradicted.</p> <p>It is notable too that the points made in paragraphs 46-48 of my representation concerning the claimed benefits, serious concerns as to viability, lack of business plan, existence of alternatives etc are not addressed or rejected by the applicant. The Inn will inevitably seek to let out the new space for commercial use too and clarification in respect of this should in my view be sought by the City of London and provided by the Inn: on this basis the application is inaccurately and (inadvertently) misleadingly limited to “education, training and office use (sui generis).</p> <p>AHL clarifies only a minor point about the present relocation of the education and training</p>	

	Name of contributor	Consultation	
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		<p>department offices to 2 Kings Bench Walk. AHL states simply that the education of barristers is “the Inn’s primary charitable objective, a function that is currently constrained by the limitations of the available accommodation.</p> <p>No reference is made to Scheme 1 which the Inn originally intended to promote (involving use of the extensive existing and proposed roofspace alone) and in respect of which the Inn received favourable pre-application advice in 2014.</p> <p>The interior of the library as part of the character of the Conservation Area</p> <p>KM Heritage inaccurately (again) asserts that my representation “attempts to link the internal quality of unlisted buildings in conservation areas to the overall character and appearance of conservation areas”.</p> <p>My representation could not have been clearer: the late 17th/early 18th design and plan form of the library, including its gallery, and its skilled execution are part of the character.</p> <p>Character (as opposed to appearance) does not require the interior to “be seen” from a public viewpoint or the Conservation Area, contrary to KM Heritage’s response. This is, with respect, a basic and</p>	

	Name of contributor	Consultation	
		1st	2nd
		<p>fundamental error. It is precisely why the words “character or appearance” of a Conservation Area appear in section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended). In any event, the rest of the Conservation Area is “experienced” to use KM Heritage’s words from the interior of the library (through its windows towards the Church to the north and the gardens to the south) which is of course itself part of the Conservation Area.</p> <p>KM Heritage incorrectly states that my representation equates unlisted buildings with listed buildings: it does no such thing; nor does NPPF paragraph 135.</p> <p>NPPF deems Conservation Areas to be designated heritage assets. Harm to the character of a Conservation Area requires the application of paragraph 134 in <i>that</i> context, as explained in NPPF paragraph 138.</p> <p>Design of dormers</p> <p>HBA repeat the point made in the Design and Access Statement that the project “offer[s] the opportunity to complete the roofscape of the building, as originally intended by its architects.” The accompanying drawing showed Sir Hubert Worthington’s original plan with dormer windows with a horizontal emphasis. Self-evidently Sir</p>	

	Name of contributor	Consultation	
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		<p>Hubert's roofscape which included dormers with that emphasis is not proposed by the applicant; as my representation stated, however, "as, if not more, importantly" as built, there are small windows with a horizontal emphasis at Library gallery level which were not in the original plan.</p> <p>HBA recognise that <i>form</i> matched the proposed <i>function</i> in Worthington's design (the dormers were intended for a bookstore in the roof). The dormers were therefore always intended to be subordinate in appearance and function. As built, the gallery windows are subordinate too. The proposed dormers will not be subordinate in appearance or function.</p> <p>The first and principal issue is what is appropriate for this building (rather than other buildings). HBA refer to Harcourt Buildings, but the proposed dormers in the scheme will plainly not be of the same size (or horizontal emphasis) as the gallery windows below.</p> <p>As regards the impact on Church Court and on the setting of the Grade 1 listed Temple Church, I need only refer again to e.g. Drawing 1040-RevP1 and Proposed View from Church Court 1: the view of these large dormer windows will be very noticeable and viewpoint 1 does not support the contention that the</p>	

	Name of contributor	Consultation	
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		<p>run of dormer windows above the lift shaft will be “tucked in”. The fact that it provides natural light into the lift shaft is hardly relevant to the significance of the setting of the Church or to the appearance of the Conservation Area. In my view there will be harm to both. It is difficult to see how a run of 3 windows within a single dormer will “match” other, single windowed dormers, as claimed by KMH. They will be noticeable by virtue of their size. KMH implicitly recognise the potential for harm by stating that they are “furthest away from the Temple Church”; The applicant’s Proposed view from Church Court 1 says it all.</p> <p>Lighting for the first time from these large dormers at this new fourth floor/roof level will, moreover, appear well above the height of the Church opposite.</p> <p>The Church and Building are not shown together in the Proposed views from Church Court 1 or 2. Again, in my view there will be harm.</p> <p>It is noted that KMH accept that the underside of the lecture theatre would be visible, albeit that it would be “very limited”.</p> <p>Finally I await sight of the letter dated 30th November 2016 from Mr Rayment of the City of London to the applicant which has led the applicant not to seek planning permission (as part of this application) for the erection of substantial</p>	

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		<p>temporary structures in the Inner Temple Garden for some 2 years. The applicant's responses provide no clarification at all in respect of the point made at page 23 of my representation that the adverse effects of the scheme as a whole should have been set out for consideration. Although the applicant makes express reference to the letter in its Design and Access Statement, the City believe that the letter is confidential but are giving this further consideration at the time of writing.</p>	
2	Mr Stephen Solley 13 February 2017	<p>Noise from construction Residential amenity Traffic and Highways – heavy truck will come in through Tudor Gate – what effect will this have on foundations? The heavy vehicles may crash into cyclists and are to be discouraged in one of London's oldest quarters. The advantage of adding a modest supplement of space is wholly outweighed by the noise, damage, disruption and the architectural tweaking of the existing building. Post Brexit there will be a surfeit of office space to fulfil the requirements.</p>	
3	Gordon Wignall 24 February 2017	<p>Support the representations made by Mr Richard Humphreys QC that the library is a non-designated heritage asset.</p>	
4	Professor Sir Roy Goode 24 February 2017	<p>Support for the detailed objections made by Mr Humphreys QC. The height of the library would be reduced, which contributes to its elegance reduced and a</p>	<p>The major building works proposed would be an act of destruction and one which is on a scale unnecessary for the purposes it is designed to achieve. Nearly half the members</p>

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		<p>significant amount of shelving space, critical to the adequate functioning of the library would be lost.</p> <p>There is no need for a ramped lecture theatre occupying two floors since there are ample lecturing and courtroom facilities in the nearby vicinity.</p>	<p>of the Inn voting on the proposal objected to it. The proposed development has attracted opposition not only from members of the Inner Temple but also from librarians, academics and users around the world.</p>
5	Mr Justin Gau 25 February 2017	Vandalism of one of the finest law libraries.	
6	Ms Beverly Lang 26 February 2017	<p>Irreplaceable damage will be caused to the Inner Temple Library.</p> <p>Support the representations made by Mr Richard Humphreys QC that the library is a non-designated heritage asset.</p> <p>There are other places in which the Inn could create additional accommodation either within its existing estate or by purchasing or leasing premises outside the Inn.</p> <p>The Royal Courts of Justice allow Inner Temple to use its courtroom for advocacy training offering a more authentic experience</p> <p>There are alternative schemes to the Treasury Building which do not include destruction of the Library.</p> <p>Disruption from works.</p>	
7	Mr Paul Ozin QC 27 February 2017	<p>Add support to the representations made by Mr Richard Humphreys QC</p> <p>The proposal would destroy the unique character of the building, it is architecturally unsympathetic to the existing structure.</p>	

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		It's supposed benefit and need are not convincingly demonstrated Object to the loss of the height of the library.	
8	Mr Robert Woodcock QC 27 February 2017	Absence of evidence that alternative suitable venues do not exist capable of accommodating the functions. Hoped that those responsible for considering this application visit the site.	
9	Mr Simon Levene 27 February 2017	Oppose for the reasons given in the Private Eye article.	
10	Mr David Sanderson 27 February 2017	High ceilings, balustraded galleries, oak panelling, quality of light by two-tier windows of the library contribute to making it and elegant space. The Library plays a central role in the education of students and its destruction would be a tragedy.	
11	Mr Ronald Thwaites QC 28 February 2017	No conceivable justification for destroying a part of the legal heritage of London that is much used and frequently visited.	
12	Sir Richard Buxton 28 February 2017	The proposed development will cause damage to the building which is within the Temples Conservation Area.	
13	David Vaughan CBE QC and Nicholas Asprey Esq Dated March 2017	Fully support the two written submissions by Richard Humphreys QC. History and importance of the Library The Library is one of the finest law libraries in the world. It is an architectural masterpiece and one of the Inn's most	In view of the supplementary papers submitted by the Inn we wish to draw attention to the very strong objections to the Inn's scheme that have been submitted by many eminent judges, practising lawyers and academic lawyers and institutions. We fully support and endorse their objections and wish to draw

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		<p>precious assets.</p> <p>Report of the Inn’s Strategic Review Group It is worth quoting the report produced in October 2015 by the Inn’s own Strategic Review Group (SRG). After carrying out a detailed consultation among the Inn’s members, the report concluded <i>‘considered in isolation, the argument for constructing an auditorium in the Treasury Building is compelling, but we do not believe that it should be done at the cost of reducing the library service, which is rightly valued by members of the Inn.</i></p> <p>The Use of the Library The Library provides comprehensive and up to date research facilities. A copy of the latest Annual Review that shows the extent of the services provided by the Library and its staff and the extent to which they contribute to the education and training of students and pupils has been attached to the representation. The Library’s services and facilities are free of charge except for minor expenses such as photocopying charges.</p> <p>Firstly, the importance of the Library lies in its availability and in the accessibility of its books, the proportion of which will never be published online.</p> <p>Secondly, by arrangement with the other Inns of Court the Library specialises in many</p>	<p>particular attention to the following: The representation of Sir Stephen Sedley The representation of Save Britain’s Heritage in its entirety. This drew attention to the failure of the Inn to describe the significance of the Library as a heritage asset as required by the NPPF. We suggest that the attempt by KM Heritage in their Supplemental Heritage Statement to downgrade the architectural significance of the Library should be construed in the light of that serious error. We note that Save Britain’s Heritage describe the Inn’s plans on their website as “brutal and insensitive”; The representation of Philip Petchey on behalf of the Library Users Group in its entirety. The representation of the Twentieth Century Society in its entirety The representation of Guy Tritton that draws attention to the very high degree of opposition to this proposal among ordinary members of the Inn and other users of the Library who have not been consulted by the Inn and whose interests in the Library and its resources are being ignored or overridden by the Inn. More than 1,500 signatories signed his petition opposing the Inn’s scheme many of whom added trenchant comments of their own.</p> <p>The Legal Issue The Inn contends that the interior works to the building are a consequence of the planning application but not a subject of</p>

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		<p>areas of the law. Research in specialised areas requires the user to work in the Library and the library websites of the other Inns of Court direct the user to the Library accordingly.</p> <p>Thirdly, people using the Library are counted electronically: see the statistics on page 6 of the Annual Review. After making allowance for staff footfall and for users entering and leaving more than once it is likely that over 150 people use the Library every day at present. The claim by Michael Spencer QC that the use of the Library is 'minimal' is unfounded and wrong. It also fails to take into account the projected future increase in usage of the Library. The figures provided by Mr Spencer and those provided by Susanna Fitzgerald QC are unreliable, as is Sir Stephen Tomlinson's observation that the Library is 'woefully underused space'.</p> <p>Comments made in response to library surveys by both working lawyers and students show that they appreciate being able to work in a quiet, spacious and uncrowded environment which provides an escape from chambers and from the noisy libraries of the BPTC providers.</p> <p>Fourthly, the Library is a crucial resource for barristers who practice outside London and who come to London to appear in the Royal Courts of Justice</p>	<p>that application and that such works are therefore not material to decide whether to grant planning permission. This is said to follow from the judgment of Lewison L.J. in R (Khodari) v RBKC [2017] EWCA Civ 333. It is a startling proposition and in our view misconceived.</p> <p>We consider the legal position to be clear, and as follows: that internal alterations do not by themselves constitute 'development' for planning purposes, but in a case where planning permission is required for any reason such alterations may be a material consideration in deciding whether permission should be granted or refused.</p> <p>In the present case the Inn needs planning permission because the project involves altering the exterior of the building in several respects. The consequential alteration of the interior of the Library – the loss of the galleries, the loss and/or alteration of the bookshelves, the panelling etc. – are relevant to the planning decision because (i) those features have great intrinsic value in themselves and (ii) their loss or alteration will have a severe detrimental impact on what remains of the Library.</p> <p>Since the Inn would not even contemplate harming the Library if planning permission for the present scheme is refused the harm to the interior that would be caused by the Inn's scheme <i>must</i> be material and should be given considerable weight.</p>

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		<p>or the Old Bailey or to use the Library's resources for research.</p> <p>Fifthly, work patterns at the Bar are changing and many barristers no longer practice from a set of chambers but prefer to practice from other locations such as libraries.</p> <p>Sixthly, it is known that some criminal and other publicly funded chambers that depend on legal aid cannot afford their own up to date library of even the most regularly used textbooks. For them too the Library is a vital resource.</p> <p>The Library's resources are and must remain easily accessible for working lawyers and Bar students in the future. The proposals embodied in the planning application will put this resource in jeopardy.</p> <p>Harm to the Library The Design and Access Statement acknowledges the 'special character and architectural quality' of the Library; and yet the Inn's proposal will destroy both its special character and its architectural quality. In particular, the removal of the Galleries and lowering of the ceilings will destroy the proportions of the rooms and the sense of spaciousness and light that is such an important feature of the rooms. We draw attention to two lesser but in our view equally unacceptable features of the Inn's proposals.</p>	<p>The Heritage Statement We suggest that KM Heritage's statement has limited relevance to the planning application. The Library is a heritage asset and entitled to special treatment under planning law and policies. Inn's scheme would destroy many of the features that give it such distinction. One of its exquisite features is the galleries and the feeling of space and extra light that they impart to the interior.</p> <p>As the Library is a heritage asset the Inn must show that its scheme will produce planning gain which outweighs the harm. It has comprehensively failed to do this. We respectfully urge members of the planning committee to visit the Library and view it for themselves to experience the force of what we are saying.</p> <p>Project History and the Consideration of Alternatives First, although the number of people working in the Library at any one time has diminished since the Library was built in the 1950s it remains a vital resource for most working lawyers from time to time. Although many working lawyers have access to their own online resources they still need to use the Library to access its vast resources that are not online.</p> <p>The scheme envisages that a vast number of books would be removed to the basement of the Treasury Building and that many</p>

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		<p>First, the ceilings will be lowered to a level below the fine oak pediments above the doorways linking the main rooms. The pediments will therefore disappear.</p> <p>Secondly, the ceilings will be lowered to a level below the tops of the windows. To avoid obliterating the tops of the windows completely the ceilings will be set back about one metre from the windows. The awkwardness of such a contrivance is wholly out of place here.</p> <p>Harm to the Library's Services</p> <p>The design of the proposed auditorium and ancillary rooms is predicated on the assumption that the Inn will eventually attract 240 students. The students can be expected to make extensive use of the Library and it is desirable that they should do so. However it is not hard to predict that the impact of such an influx on other users will be severe. The Library will lose 8 reader places in the rooms off the Galleries and a further 6 reader places in Room J, leaving a total of 82 places. With 240 students there will be little if any spare room for other users.</p> <p>It makes no sense to promote a scheme that will greatly increase the numbers using the Library and at the same time reduce the number of reader places. The Library is not opposed to an increase in the usage of the Library by both</p>	<p>more books would be moved to other parts of the Inn's estate as yet unspecified. This is totally unacceptable.</p> <p>Educational Training & the Role of the Inns of Courts</p> <p>It seems to us clear that the proposal will lead to harm – substantial harm – to an important heritage asset (albeit not designated). This being the case, the Inn needs to show need that outweighs that harm. The Inn has not demonstrated any need for the scheme. The only reason for destroying the Library is the Inn's desire to construct a <i>tiered</i> auditorium. This is unnecessary and could not compensate for the partial destruction of the Library. A different scheme could achieve an auditorium above the Library without the harm caused by the present scheme.</p> <p>Even now there is no business plan. Each of the Inns has its own space needs and resources but there has until now been a lack of planning between the Inns. It could hardly be sensible for the Inn to go it alone regardless of what the other Inns are proposing. The Inn still does not know if it can deliver the BPTC training at lower cost or to a higher standard than the colleges of law.</p> <p>We are told that Lincoln's Inn are constructing a facility to deliver the training, that Middle Temple have converted part of their library into space from which to deliver the training and that Gray's Inn already have the</p>

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		<p>'first stage' and 'second stage' students of the future, but it is opposed to a simultaneous reduction in the size of the Library and the resultant inevitable over-crowding.</p> <p>There will also be an unacceptable loss of shelf space.</p> <p>Past Intentions Mr Spencer surmises that the Benchers who oversaw the building of the Library "would have been mortified had they realized that the facility they constructed and the money expended would be such as to prevent future development". We disagree. First, the Library does not prevent future development: the roof can be used as the Inn has recognized by proposing its first scheme together with an auditorium and ancillary rooms to support the delivery of education to the increased number of students in the Inn in the future, without the concomitant deleterious effects on the Library. Secondly, in our view they would have been mortified by the proposed harm to the jewel of the rebuilt Inn, namely the Library, which is disrespectful of the time, effort and money spent by them and by the public via the War Damages Commission.</p> <p>Background to the Application The Inn should not be</p>	<p>facility. The Inn, it is implied, is the only Inn without such a facility, although we have been providing the same advocacy training as has been provided by all the Inns for many years.</p> <p>The Inn's scheme will <i>reduce</i> the number of reader places in the Library to 85 and not 91 as stated in KM Heritage's paper.</p> <p>Gray's Inn's facility is currently occupied by City University who use it to run training sessions. We understand that City University have a long lease on that building. It was purpose built originally for the ICSL and has a lecture theatre but if it does not become available Gray's Inn will be in the same position as ourselves.</p> <p>The authors say that many of the specialist bar associations no longer meet or train in the Inns but prefer such venues as the Royal College of Surgeons. This statement is meaningless unless we are told the reasons.</p> <p>We suggest that the Inn has failed to make out its case for causing so much damage to the Library in the manner envisaged in the scheme. The planning application should be refused. We think it important that Committee members come and see for themselves the interior of the Library before making a decision.</p>

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		<p>permitted to cause a partial destruction of the Library unless it can show that it cannot reasonably achieve its education and training objectives in any other way. It has comprehensively failed to do this.</p> <p>We envisage that the planning application is being sought in anticipation that in due course the Inn will be able to provide part or all of the BPTC courses. At the moment this seems to be speculative.</p> <p>Alternative Possibilities</p> <p>The Inn devised an option which involved no intrusion into the Library. The Inn's Estates Department then put forward an even more ambitious scheme that included a tiered auditorium incorporating the whole of the second floor of the Library (known as option 1).</p> <p>The Inn has not explained why it could not reasonably achieve its education and training objectives under the first option and thereby not harm the Library.</p> <p>It has not produced any business plan to support its application possibly because the nature and scope of its requirements are purely speculative at this stage. The Inn has not explained why it cannot make use of other auditoria in the vicinity such as Royal Courts of Justice and the new facility in Lincoln's Inn.</p> <p>Until these alternative</p>	

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		<p>possibilities have been exhausted it cannot be justifiable to grant planning permission for a scheme that will involve a partial destruction of the Library.</p> <p>Lack of Support The Library is not the sole province of the Executive Committee or its Governing Benchers but of the Inn's membership as a whole. The Inn is a charitable institution and there is therefore a public interest in how its assets are used too. This application is being pursued even though it is doubtful whether it has solid support within the Inn.</p> <p>First, the Governing Benchers voted in support of Option 2 by only the slenderest of margins Secondly, the Governing Benchers who opposed the proposal included some of the most eminent and powerful members of the Inn, including four past chairmen of the Library Committee. Thirdly, the ordinary members of the Inn, in whom the future lies, were not consulted on the proposal. Fourthly, the proposal as put to the Governing Benchers was unsupported by any business plan, and indeed we understand it is not proposed to provide such a plan even to the Planning Committee.</p> <p>Conclusion We invite members of the planning committee will visit the</p>	

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		Library before making any decision. We very much hope that the Inn's application for planning permission will be refused.	
14	Mike Fox SAVE Britain's Heritage 1 March 2017	<p>Objects and requests the application is refused</p> <p>The proposed alterations to the Library would have a serious harmful impact on the building, resulting in the loss of a fine interior and one of London's best examples of past war reconstruction.</p> <p>Disappointing no significant description or evaluation of the current library interior is included.</p> <p>Although not listed, SAVE considers the Library's interior to be very significant, worth retaining and preserving.</p> <p>The proposals This application proposes to reduce the Library in size. What is currently a light filled welcoming Library with ample study spaces, would be transformed into a darker, more oppressive single storey room, with reduced shelving and space for study.</p> <p>Policy Context The Library is a significant part of a non-designated heritage asset and the proposals will cause substantial harm.</p> <p>NPPF 128 requires an applicant to describe the significance of any heritage</p>	

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		<p>assets affected, which in this case has not been done. Consideration and assessment has been given to external aspects of the Treasury Building, but not to internal qualities which make a significant contribution to the building's status as a non-designated heritage asset.</p> <p>NPPF requires that the 'effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application'. SAVE consider that the existing library interior makes a significant contribution to the non-designated heritage asset, and its demolition would result in substantial harm, and therefore the application should be refused.</p> <p>An alternative proposal which respected and retained the Library's proportions and features should be encouraged.</p>	
15	Mr Ian Stern 1 March 2017	Supports the application	
16	Mr Alistair McCreath 1 March 2017	The proposal does not destroy the library. It allows the Inn to provide better education and training to its members and students which is one of the Inns most important functions.	
17	Mr Faisal Sadiq 1 March 2017	When attending the library during work hours the library has between 8-24 users and the library often feels deserted. The remit of the Inn is to	

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		provide education and the Inns ability to deliver is hampered by its lack of space. The proposal seeks to address this. The proposed plans retain much of the library's beauty.	
18	Dr Andrew Goodman 1 March 2017	Associate with the representations of Richard Humphreys QC. The scheme is part of a flawed business plan.	
19	Mr Stuart Brown 1 March 2017	The Inn's principle function is fostering the education of aspiring barristers. The project has been carefully considered over a long period and should not detract from the Inn's aesthetic qualities whilst allowing for a 21 st century project.	
20	Mr Anthony Leonard 1 March 2017	The proposal will ensure the Inn has a place in the education of the legal profession achieved with minimal visual impact on the estate overall. The consequences for the Inn's library are proportionate. It is in competition with the other Inns for students and need to follow the lead taken by Lincoln's Inn in the provision for advocacy and other training.	
21	Mr Abbas Lakha 1 March 2017	Supports the application	
22	Guy Tritton 2 March 2017	Strongly objects to this application. The library is considered one of the best law libraries in England. It is one of the finest examples of post-war reconstruction and the whole design of the library including, the double height balustrade, is a treasure valued by everyone.	

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		<p>This option was not a binary one as there were two principal options put forward – what were called option 1 and option 2. Option 1 involved adding a fourth floor to the Inner Temple Building as originally envisaged for the post war reconstruction plans after WW2. This involved the addition of an auditorium and many training rooms on the 4th floor and some on the 3rd floor in a manner that did not involve the destruction of the double height galleried rooms. Option 2, the plan put forward to the City of London which involves the destruction of the double height galleried rooms and several of the rooms on the 2nd floor for relatively little gain.</p> <p>Members of the Inner Temple and the wider public were dismayed that Option 2 (the proposed scheme) was being pursued and an online petition (in October 2015) was set up to register their objections. The online petition attracted 1500 signatories with little publicity. The signatories to that petition and comments have been attached to the representation. The number of signatories and the comments demonstrate antipathy and hostility that this proposal has been put forward without any attempt to seek the views of the members of the Inner Temple or the wider legal community.</p> <p>If application is granted, the result will be a library reduced substantially in size with much</p>	

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		<p>reduced shelving.</p> <p>Would strongly urge you to reject this planning application.</p>	
23	<p>Susan Jacklin QC 2 March 2017</p>	<p>The proposed development would improve the external appearance of the Treasury Building and enhance its standing within the Conservation Area.</p> <p>The Inner Temples needs high quality advocacy training and teaching facility to meet the needs of its students. Pupils and other members.</p> <p>Own facility at the heart of the Inn is required urgently so that the primary purpose of providing education and training for the Bar can be maintained.</p> <p>The quality of training currently delivered is being compromised by inadequate facilities and the Inner Temples faces a shrinking intake of students.</p> <p>The proposed development would enable the Inner Temples to participate in the provision of more cost efficient training and enable students from economically disadvantaged backgrounds to enter the profession.</p> <p>The space in the gallery and room H and J are not needed in terms of accommodating users of the library.</p>	
24	<p>Miss Susanna FitzGerald QC 3 March 2017</p>	<p>The extended roof with the vertical dormers will add to the Treasury Building not detract from it. They are in keeping with the rest of the building.</p> <p>The new lift shaft will not impinge on the surroundings of Temple Church</p>	

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		Rarely found more than 10 people working in the Library during the day. Most of those using the Library were accessing the Inn's computer rather than accessing books.	
25	Miss Rachel Agnello QC 3 March 2017	Education is the core function of the Inn and the Inn is in desperate need of new facilities.	
26	Mr Michael Spencer 3 March 2017	<p>This proposal is the third attempt to provide new facilities within the confines of the Treasury Building.</p> <p>The two sites identified prior to choosing the Treasury Building were not workable in engineering and planning terms.</p> <p>The Inn is governed by its Royal Charter, in which one of the principle objects imposed by the Charter in return for the grant of its lands is the Education of students and barristers in Law.</p> <p>Electronic material has resulted in minimal use of the library.</p> <p>Without the facilities, the Inn would fall well behind the other Inns in the provision of facilities for students.</p> <p>The proposed development would leave a library that will still be the envy of most other institutions.</p> <p>The proposed roof extension is elegant and reflects the original design left unconstructed after the war.</p>	
27	James Richardson QC (Hon) 4 March 2017	<p>Support the detailed objections made by Mr Richard Humphreys QC.</p> <p>In October 2015, a petition in opposition to the proposal attracted approximately 1500</p>	

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		<p>signatories. Only by a narrow majority of the governing benchers of the Inn voted for this proposal.</p> <p>The Library benefits from an abundance of natural light; double height galleried rooms should be preserved.</p>	
28	<p>Sir Stephen Sedley 6 March 2017</p>	<p>Objection.</p> <p>The impact of the proposed development on the Inner Temple's library is unjustified and unacceptable.</p> <p>For the reasons set out in his written submission by Richard Humphreys QC, the library plainly ranks as a non-designated heritage asset. It is accordingly entitled to particular consideration in the planning process to the extent that unjustified or disproportionate harm to it may constitute ground for rejection.</p> <p>The access of light from the windows looking south and north will be impoverished and the uniquely balustrade galleries will be destroyed.</p> <p>No sufficient need to install a lecture theatre has been demonstrated.</p> <p>As to the value of the library as a heritage asset, I fully endorse Mr Humphreys and Save Britain's Heritage comments.</p> <p>The paper submitted to Historic England by four Masters of the Library in support of the listing has been appended to the consultation response.</p>	

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		<p>The truncation of the Library's vault by the insertion of a false ceiling and the destruction of the balustrade galleries would be an irreplaceable loss, aesthetic, cultural and historical, requiring a level of justification which the Inner Temple's application entirely fails to supply.</p> <p>It is unfortunate the Conservation Area Advisory Committee met as early in the process as 23 February and to have expressed a view about the sensitivity of the scheme in the absence, at that date, of public objections to it. I wish to reserve my position on the legal propriety of this procedure.</p> <p>It is hoped that no member of the Planning Committee and no officer advising it, will form a view on the present application without first visiting the Library.</p>	
29	Mr Philip Moser QC 6 March 2017	<p>This is an urgently needed project to enhance a principle use for which the Inn exists. The Library will be largely unaffected.</p> <p>Care has been taken in the design to make the final results closer to the original architectural concept than funds allowed 70 years ago.</p>	
30	Ms Vivian Robinson QC	Supports the application	
31	Mr Guy Fetherstonhaugh QC 6 March 2017	<p>Had the post-war rebuilding plans come to fruition, the roof space of the Treasury and Hall would have been fully mansarded, with chimneys. The current proposals</p>	

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		<p>implement those plans in some respects and go further in others improving upon Worthington's vision by raising the mansard height, inserting handsome dormer windows and adding a sympathetically designed lift and staircase that will enable the use of the new internal facilities.</p> <p>The majority of the Inn's Benchers favoured a use that would offer needed education facilities at the expense of a small part of the library.</p>	
32	John Bate-Williams 7 March 2017	The proposal to remove the double height ceiling would ruin the library.	
33	Sir Stephen Tomlinson 7 March 2017	<p>This development is in keeping with the surroundings and will enable the Inn to perform its historic function ordained by the Royal Charter, of educating students.</p> <p>The Library is an underused space. It will continue to provide its current service but will simply reduce the available reader spaces. The existing reader spaces are underused.</p>	
34	Philip Petchey 8 March 2017	<p>Appended to this submission are comments from library users describing what they value about the Library.</p> <p>Though not technically "listed", the library does have special architectural and historic significance and thus ought to be listed. It nevertheless has a distinct historic and obvious 'heritage characteristic'.</p> <p>NPPF para 135 requires the effect on a heritage asset to be</p>	<p>Consider the Library to be an outstanding undesignated heritage asset. This is not apparent from looking at the building from the outside. Nor can its quality be assessed by looking at pictures. To make a proper assessment it is necessary to see the building. I am confident that the officer who comes to write the report to members will have seen it, however urge that the Report itself recommends that members visit the Library.</p>

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		<p>taken into account. There would be a significant loss and harm to the Library. We invite you to attach very considerable weight to the harm to the Library.</p> <p>The ceilings will be substantially lowered and the remaining reading rooms will be between 2.45m and 2.9m. The modification would create confinement.</p> <p>The present plans must have implications for temperature control and light ingress.</p> <p>The library collections located in the gallery will be relocated. This must severely impact on the present ease of access.</p> <p>It is not for the City to seek to take a view on the absolute importance of library facilities or training facilities. However, it can and should say to the Inn – given the extent of the harm, demonstrate to us that you need to cause it.</p> <p>No business case has been provided and neither has it been demonstrated that there are no alternative locations within the Inn or other Inns or other available buildings (such as the vast Royal Courts of Justice), whether in combination or otherwise.</p> <p>It is not for us to show why planning permission should be granted but for the Inn to show why when there would be harm, it should be granted.</p> <p>There were two options, one of</p>	

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		<p>which preserved the Library and provided a lecture theatre and training rooms but not as much floor space. We suggest that this represents the sort of compromise that the NPPF encourages in order to preserve asserts of value.</p> <p>The Inn's case on need lacks credibility.</p>	
35	Mr Robert McCracken QC 8 March 2017	<p>Integrity of the Library should be respected. This proposal would seriously damage the City's heritage.</p> <p>Endorse what has been said by Richard Humphreys QC, Sir Stephen Sedley and Lord Sumption.</p> <p>The proposed changes to the interior would harm the character and appearance of the Conservation Area.</p> <p>The proposed fenestration of the South elevation is inconsistent with the original designs. The size of the proposed roof windows are awkwardly substantially larger than the windows immediately below.</p> <p>The proposed fenestration of the north elevation is discordant at the east end.</p> <p>Proposed colours of the east and west side of the dormer windows would increase their prominence.</p> <p>The long run of the roof above the Treasury and Library would not reflect the existing projection below the roof and be a further external visual discordance.</p> <p>The view from outside of the library chandeliers at dusk and</p>	<p>Endorse the comments made by Mr Richard Humphreys QC, Philip Petchey, Nicholas Asprey and David Vaughan CBE, QC.</p> <p>Note that a private meeting has taken place between the representatives of the applicants and City officers. Fairness requires that a similar opportunity should be given to objectors before the officers' report is drafted. The applicant can appeal against an adverse decision; objectors cannot. Where heritage is at stake, the opportunity for objectors at this stage to influence officers should be as great as for promoters.</p>

	Name of contributor	Consultation	
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		<p>after dark would be lost.</p> <p>The Inner Temple Library is a heritage asset even though not listed.</p> <p>A key feature of the character of this Conservation Area is that it is collegiate.</p> <p>The Library should be regarded as a place to which a large section of the public has access that the interior of the library cannot lawfully be viewed merely as the concern of the Inn.</p> <p>The alleged 'need' is unconvincing. Other alternatives have not seriously been examined for example:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Retractable tiered seating for the Hall <input type="checkbox"/> Underground lecture theatre and training room <input type="checkbox"/> Chambers of Andrew Tait QC at Francis Taylor Building which has a seminar room <input type="checkbox"/> Conversion of office buildings within the Inn. <p>The margin of benchers in favour of the scheme was very narrow.</p>	
36	Ms Cate Tuitt 8 March 2017	<p>The Secretary of State has still to decide upon the application of the library, hall and treasury building to be listed. (no longer the case)</p> <p>The Conservation Area means that the plans are not in keeping with the planning guidelines and SPDs and the</p>	

	Name of contributor	Consultation	
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		<p>heritage. This would be over development if granted. The amount of traffic that would occur would be significant. Noise and pollution levels would increase. The Library heritage asset has not been adequately assessed by the architects or planners. The loss of heritage is extreme to the area. The loss of the library space is unwarranted. Opposite are the Grade I listed Temple Church and Grade II listed Church Court.</p>	
37	Neil D. Coe 9 March 2017	<p>The validity of the application is questionable due to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Incomplete Planning Application Description to cover the proposed scheme <input type="checkbox"/> Insufficient explanation and justification of proposed Use Class Order <input type="checkbox"/> Incomplete Design and Access Statement, Heritage Study, Heritage Statement and Planning Statement. <p>The design of the proposed scheme is poor and of insufficient quality for such an architecturally and historically significant site.</p> <p>The proposed scheme does not substantially comply with Planning Policy, at National, Regional, and Local level.</p> <p>The proposed scheme would be highly detrimental to Designated and Non-Designated Heritage Assets,</p>	<p>2.0 Supplementary Planning Information: Design Approach by Hugh Broughton Architects. The content of the Design Approach only covers the interior design and fails to address the resultant and significant consequences to the exterior design, as a result of misguided overdevelopment of the interior and associated planned destruction of the Library.</p> <p>It is obvious from the model shown in 3.0 Layouts that the proposed steep mansard roof and tall dormers are disproportionate to the host building and do not complement the overall composition. The requirement of for large vertical dormers is not justified as the 4th floor breakout space is top lit, and the third floor breakout space can suffice with the original smaller windows which are at least third of the size.</p> <p>The generous proportions of the window seats to the Training</p>

	Name of contributor	Consultation	
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		<p>which include the adjacent Listed Buildings, Ancient Monument, Registered Garden, Temple Conservation Area and the Inner Temple Library, Treasury and Hall.</p> <p>The substantial 'harm' to Heritage Assets from the ill-conceived scheme would far outweigh any unsubstantiated 'benefit'.</p> <p>The level of Community Engagement and Involvement has been highly selective and wholly insufficient for the Inn's ordinary members, Library users, Tenants of Chambers, neighbouring institutions, the learning profession, and the general public, for a proposed scheme of this magnitude and sensitivity.</p> <p>The business case for the E&T facilities and associated detrimental impact on the site has not been justified.</p> <p>The destruction of the fine Inner Temple Library to facilitate the proposed luddite scheme is not necessary or warranted.</p> <p>The Inn and their consultants have made no meaningful efforts to explore or articulate numerous alternative options that exist, which would improve the design and authenticity of the proposed scheme, and negate any 'harm'.</p> <p>The Inn can have a world class Education and Training facility</p>	<p>Rooms are not essential.</p> <p>The document acknowledges the warm light levels and talks about the contribution it makes to the Conservation Area. This statement contradicts the statement made by the Inn's Director of Property Surveyor as to the impact of the interior as a material planning consideration.</p> <p>3.0 Supplementary Planning Information: Response to the points raised by Richard Humphreys QC concerning the design of the proposed dormers by Hugh Broughton Architects</p> <p>The additional of a large and dominant roof-scape above an accepted building of specific architectural style and period is no longer appropriate to the host building or adjacent listed Georgian and Victorian buildings, to the Temples Conservation Area.</p> <p>3.0 Supplementary Planning Information: Project History and the Consideration of Alternatives by RJ Snowdon, Director of Properties & Surveyor Inner Temple.</p> <p>The supplementary information on the Project History and Consideration of Alternatives provides a muddled description of the project history and includes limited detail on the Alternatives considered.</p> <p>The discharged alternatives within the Garden are both attractive and feasible schemes and perhaps more challenging</p>

	Name of contributor	Consultation	
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		<p>and retain its world class Library, as the two are not mutually exclusive.</p> <p>The Inn has been timid with its proposed scheme, by restricting the brief to working within the existing building, which would result in overdevelopment, poor design and significant harm to its Heritage Assets.</p> <p>The current scheme (application) lacks vision and a more radical solution is available that would meet all of the Inns requirements in a more economical manner, and satisfy the necessary stringent planning requirements. The application for the proposed scheme Ref: 17/0007/FULMAJ should be refused.</p> <p>(An appendices has been provided with the application which includes photos, drawings, listing, architecture quotes and inspiration)</p>	<p>than adapting the existing Treasury Building and Hall, with its associated structural and decanting implications.</p> <p>The northern boundary of Peony Garden extending under the car park is a logical scheme as this is already an area of built development. The cost of creating an education and training facilities in this location would be favourable when contrasted with the cost of adapting and extending the main buildings to accommodate additional facilities.</p> <p>The High Border is another attractive alternative with direct benefit of access and servicing from the main buildings. There have been other opportunities, within the Inn, since 2010, for rationalisation of Chambers and the creation of additional E&T facilities which have been missed and are not detailed in this submission. The principle omission in this submission is the numerous alternatives to the Treasury Building and Hall, which include development under, adjacent or up and over the buildings.</p> <p>Areas of previous built development, not reinstated after WWII, such as the Lamb Building in Church Court, Library Tower to corner of COR/KBW, King's Bench Office to south of current carpark and amended footprint of Tanfield Chambers could lend weight to any alternatives.</p> <p>The proposed external fire</p>

	Name of contributor	Consultation	
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			<p>escape staircase in Church Court is one of the least successful elements of the scheme covered by the planning application and could be incorporated into the main building.</p> <p>The supplementary submission fails to mention the alternative of extending upwards, which has been acknowledged by the Inn and their architects as beneficial to partially obscure the modern development in Fetter Lane.</p> <p>The objector attached a range of alternative options to the existing buildings, showing plans of the usage proposed in the planning application to compare with the changes to the design and usage of alternative options.</p> <p>4.0 Supplementary Planning Clarification: Email by RJ Snowdon dated 15th May 2017 The Inn is either providing supplementary information that is a material consideration or not. If they are not applying for planning permission [for the interior works], and it is not deemed a material consideration, then all of the Supplementary Planning Information should be formally withdrawn.</p> <p>5.0 Supplementary Planning Information: Heritage Statement by KH Heritage The additional information provided by KH Heritage at last sets out the heritage significance of the current library and its predecessors. It usefully reinforces the case for the preservation of the present</p>

	Name of contributor	Consultation	
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			<p>Library from this proposed scheme which is set to destroy it. The opinions of the author were felt to be inappropriate and should not carry any planning weight.</p> <p>6.0 Supplementary Planning Information: Bar Educational Training & Role of the Inns of Court by James Wakefield, Paul Brown QC and Guy Fetherstonhaugh QC.</p> <p>This paper does not provide a business case to balance the 'benefits' and 'need' against the known 'harm' proposed to the Inn's heritage assets.</p>
38	Rt Hon Lord Lloyd of Berwick (not dated)	<p>Objects</p> <p>Express support for the representations made by Mr Richard Humphreys QC. The principal objection is the effect on the library. It has been custom on Grand occasions to display treasure in the library. With the reduction in the height of the ceiling, would not want to take guests into the library. Refers to a petition signed by 1552 users of the Library and suggests that it deserves weight. In addition to the effect on the Library, there is an effect on the Conservation Area to which Mr Humphreys QC draws attention to in his submission. The proposed vertical dormers look out of place and are obvious from Church Court and would harm the setting of Temple Church. The need for the auditorium is said to justify the harm to the Library and to the character of</p>	<p>Education and Training have at long last been relocated in a set of Chambers at 2 King's Bench Walk as close as could be to the Centre of the Inn. It is said that the move is temporary. But no reason is given. The only objection seems to be that there is no disabled access.</p> <p>As for training rooms, a set of chambers will soon become available at 2 Mitre court, recently let to a firm of solicitors. There are four rooms suitable for training rooms. The entrance is only a few yards from 2 King's Bench Walk. No doubt other similar set will become available long before the completion of the proposed rebuild.</p> <p>As for the loss of rent, it hardly measures against the likely £25 million capital cost.</p> <p>For lectures the Inner Temples currently uses what was the old luncheon room. It holds 65</p>

	Name of contributor	Consultation	
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		<p>the Conservation Area. But with Lincoln's Inn already building an auditorium, it is difficult to believe that more than one tiered auditorium would be required.</p>	<p>students in a horseshoe shape. For larger events the Parliament Chamber can be used which holds 96 students in a horseshoe shape. For still larger events we would be able to use the auditorium currently being built by the Lincoln's Inn. The whole purpose of COIC to which James Wakefield refers on page 2 of his evidence is that the four Inns should cooperate in providing education, and in other matters, rather than compete.</p> <p>I cannot believe James Wakefield is right in suggesting that we will get a black mark from the Regulator unless we build a second auditorium for which a business case has never been made and cannot agree with James Wakefield when he says that it would be "wonderful" to build an auditorium at the expense of causing irreparable damage to the library.</p>
39	Mr Tom Mitcheson 9 March 2017	<p>Modernisation of the Treasury Building is essential to maintain its purpose as an educator of trainee and practicing barristers.</p> <p>The current plans achieve a reasonable and necessary compromise between maintaining the existing structure and building for the future.</p>	
40	Mr Clive Newberry QC 9 March 2017	<p>Support the representations made by Mr Richard Humphreys QC and this application should be refused.</p>	
41	Juliet May The Hon. Mrs Justice May DBE	<p>The application was endorsed by a large majority of the Inn's governing body.</p> <p>Most legal research is done</p>	

	Name of contributor	Consultation	
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	10 March 2017	<p>online. As a result the current Library space is underused. The Inn's Education and Training Department is cramped.</p> <p>One of the Inn's primary Charter purposes is the education and training of new and existing barrister members and the buildings must be adapted to ensure that the primary function continues.</p>	
42	HH Nick Coleman 10 March 2017	<p>The continued raison d'être for the existence of the Inns of Court is that they provide education for the advocates of the future.</p> <p>The proposed development does not materially undermine the overall appearance of the Treasury Building.</p> <p>The changes to the application to minimise the effect on the library are a suitable compromise.</p>	
43	John Ross QC 10 March 2017	<p>Supports the application</p> <p>New facilities for students are desperately needed.</p> <p>Considers the external appearance of the library wing enhances the appearance of this wing and the adjacent hall.</p> <p>The proposed alterations blend the building in its immediate vicinity.</p>	
44	John Whittaker 10 March 2017	<p>The works would destroy one of the gems of interior architecture in the City.</p>	
45	Mr Humphrey Lloyd 10 March 2017	<p>Support the numerous objections made and that of Mr Richard Humphreys QC</p> <p>Wish to emphasise the Library interior is an exceptional example of fine workmanship.</p>	
46	Mr	This is a welcome development	

	Name of contributor	Consultation	
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	Grahame Aldous 10 March 2017	that will enhance the facilities and help preserve the heritage value of the site as well as the future development of the Bar.	
47	Mr Nicholas Green 10 March 2017	The new development will provide essential new training and education facilities and will be consistent in style with the existing building. It will have minimal impact on the amenity of others.	
48	Mr Alastair Hodge 10 March 2017	Supports the application	
49	Mrs Kathryn Arnot Drummond 10 March 2017	The proposal will benefit current and future members of the Inn providing improved teaching areas and facilities.	
50	Mr John Chadwick 12 March 2017	The proposal will provide much needed education facilities.	
51	Lord Jonathan Sumption 12 March 2017	Support the representations made by Mr Richard Humphreys QC. The proposed works will destroy a significant part of the finest modern library interiors in the United Kingdom. This application should be refused.	
52	Ms Alison Levitt QC 13 March 2017	The new facilities will take the education function of the Inner Temple to the next generation. The improved facilities make it possible to extend outreach activities aimed at school children and adults.	
53	Mr Simon Baker 15 March 2017	This project is the only credible way to provide the Inn with modern facilities that are needed to fulfil the core function for student and barrister members.	

	Name of contributor	Consultation	
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		<p>The Library is a museum not a working facility. Increasing digitisation will affect the way barristers' access legal information.</p> <p>The long term practical benefits of the scheme outweigh any disadvantage to the library.</p>	
54	Mr Kieron Beal QC 15 March 2017	<p>The proposed works will complete the original architect's vision for the building and are in keeping with the overall character and amenity of the area.</p> <p>Many of the comments relate to the re-designed internal space, but the internal use of a non-listed building does not appear to be material consideration for planning purposes.</p> <p>If it is a material consideration for the issue of nature and extent of the amenities, then the works represent an excellent opportunity to provide first class facilities for use in education and training.</p>	
55	Vicky Stewart 16 March 2017	Objects to any plan to change the Inner Temple Library.	
56	Mr Peter Birkett 17 March 2017	<p>There is an overwhelming need for extra space which this proposed development would provide.</p> <p>The Inns function is becoming more and more the promotion and development of Advocacy. The library is an attractive facility but only utilised by a small minority of members.</p>	
57	Tim Walpole-Walsh 18 March	<p>Objects</p> <p>This sort of quality and history should not be destroyed or tampered with.</p>	

	Name of contributor	Consultation	
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	2017		
58	Sir David Keene 19 March 2017	<p>Does not object to the application; however as a resident of the Inn has concerns regarding the use of the Inner Temple Garden.</p> <p>Has the understanding if planning permission is granted, there will be temporary buildings erected on the Inner Temple Garden for a period of 2 years. That may not formally constitute part of the present application but concerned it seems likely to be a consequence.</p> <p>This would impact on residential amenity concerning impact on the views from the windows of the residential property (Harcourt Buildings). which would be highly objectionable.</p> <p>The Garden is an important green space and the use of the Garden would constitute a loss of open space.</p> <p>Were permission to be granted, would not want it to be argued that the loss of public space had to be accepted as an inevitable consequence of such a permission.</p>	
59	Mr Richard Southwell QC 21 March 2017	Objects to the destruction of the Library on the grounds set out in Mr Richard Humphreys QC and Rt Hon Lord Lloyd of Berwick.	
60	Stephen W Williamson QC 21 March	Objects Endorses all the objections of Lord Lloyd of Berwick raises on the Library but also on the	

	Name of contributor	Consultation	
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	2017	<p>architectural ambience. Concerned about the need for such a structure because: A suitable building for the Inn's Education and Training Department has been identified. Questions the amount of use that will be made of lecture facilities, given the availability of other facilities in the City, the lack of residential facilities in the Inn and the restricted access to the Inn. Concerns about the effect of construction works.</p>	
61	Michael Sutcliffe 21 March 2017	<p>Objects to the application on the grounds of design, external appearance and effect on the setting of Listed Buildings in a Conservation Area.</p> <p>Escape Staircase This proposal overrides the visual separation of the Hall from the Treasury/Library and impinges on the windows of both buildings. The rhythm of windows/solid brickwork will be unbalanced. Fussy in appearance with prominent quoins and out of character.</p> <p>The Lift Shaft does not sit comfortably at the internal return. It appears to be pastiche with blind paired dummy sash windows and capped with imitation dormers at variance in size and appearance. The two proposed elements with a strong vertical emphasis will be intrusive in Church Court. The single dormer on the return hip roof over the existing staircase is unnecessary.</p>	<p>The general guidance on the preparation of Heritage Statements requires that they should be balanced evidence based assessment of the potential impacts of a proposed development and should not express personal views of the proposed works. This Supplement contains numerous statements which do not observe this guidance and should be given no weight by the LPA when considering this application. Provides background on T.W Sutcliffe's career and makes corrections on KM Heritage Supplemental Heritage Statement.</p>

	Name of contributor	Consultation	
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		<p>Proposed Roof Alterations The application seeks to justify roof extensions by reference to an earlier and unbuilt design. LPA has to consider effect of proposals on design and appearance of what exists now. The new accommodation within the raised roof will increase the overall volume and bulk in an intrusive way within the Conservation Area.</p> <p>Insertion of additional floor within the Library The Library with its Galleries is an admired space. To truncate the space with the insertion of an additional floor will destroy an important asset. Without the protection that Listing by Historic England would have given to the interior space, the LPA must take all possible steps to protect this non-designated Heritage asset.</p> <p>Declaration of Interest Father was the architect TW Sutcliffe.</p>	
62	Twentieth Century Society 22 March 2017	The proposals would greatly undermine the grandeur of the library space through the demolition of original fabric, the reduction of space and the loss of light. These proposals will cause significant harm to a non-designated heritage asset and recommend refusal.	
63	Rt Hon Professor Sir Bernard Rix 22 March 2017	<p>Objects Writes to express support for the representations made by Mr Richard Humphreys QC, The Lord Lloyd of Berwick, Sir David Keene and others objecting to the application. The application would result in grave damage and prejudice to</p>	

	Name of contributor	Consultation	
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		one of the loveliest libraries created in London in modern times and invite the City to refuse planning permission.	
64	Ms Inner Temple (anonymous) 23 March 2017	Do no object to the building works to the Treasury Building but have concerns regarding the temporary structure which is planned to be housed in the Inner Temple Garden. A temporary structure in the Inner Temple Garden would impact on the amenity of resident, community and members of the public who use this space.	
65	Andrew Tait QC 23 March 2017	The Chambers of Andrew Tait QC (Occupying Francis Taylor Building) will be affected by the potential for severe noise and disturbance over the construction period. In the event planning permission is granted necessary parameters should be secured as to construction management. A planning condition should be attached to preclude the use of the FTB forecourt during construction. Concerned about the proposed loss of a significant part of the library, in terms of limiting the level of access to resources and the apparent consequential loss of the open space of Inner temple Garden to accommodate decanted facilities during the construction period.	
66	The Rt Hon Lord Woolf, CH, FBA (Hon) 23 March 2017	Strongly endorse the representations made by Richard Humphreys QC and Lord Lloyd of Berwick, objecting to the planning application.	

	Name of contributor	Consultation	
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67	Karl Ulas 17 March 2017	<p>Objections to the plans submitted to alter the Inner Temple Library</p> <p>The architectural quality of the existing library is outstanding.</p> <p>The principle that a library should not be lost to short-sighted development plans far outweighs the potential benefit of an extra lecture theatre.</p>	
68	Mr David Streatfeild-James QC 24 March 2017	<p>Wish to be associated with the objections set out by Mr Richard Humphreys QC.</p> <p>Concerned with the irreplaceable damage that will be done to the Library.</p>	
69	Mr Andrew Warnock 24 March 2017	<p>Strong support for the proposed alterations which will enable the Inn to remain a first rate provider of advocacy training for student and barristers.</p> <p>The proposed alterations are aesthetically pleasing and sympathetic to the character of the existing buildings.</p> <p>The addition of a floor will enhance the buildings and accord with the original plans for the Treasury building when it was first constructed.</p>	
70	Sir Konrad Schiemann 24 March 2017	<p>Live in the flat overlooking the Inner Temple Garden. Neither for or against the proposal.</p> <p>Concerned about the consequential physical effect on the Garden during construction if the garden were used to place temporary structures.</p>	
71	Desiree A A Artesi Fabio Artesi Gianfranco Artesi 24 March	<p>Wish to support what is said by Sir David Keene.</p> <p>Concerns raised on the impact on residential amenity due to impact on views from the windows (Harcourt Buildings) and the loss of valuable green</p>	

	Name of contributor	Consultation	
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	2017	space. Supports the submissions of Mr Humphreys QC dated 17 February 2017	
72	Patrick Maddams Hon FRIBA 28 March 2017	Provides a summary of the voting in October 2015 providing an overview of the percentage of votes received for each scheme voted for. Education and Training is a core function of the Inn and there is a recognised need to ensure that the Inn's facilities meet the demands of modern legal education. The Inn fully accepts that it must ensure that the Library is able to continue to deliver all its core services so that the Inn's members continue to have access to its collection. Since the Benchers vote in October 2015, the architect has worked to reduce the intrusiveness and intervention to the Library space which is largely confined to its gallery level.	
73	Mr Thomas Roe QC 29 March 2017	Strongly object to the proposed "vandalism" of the finest library buildings. Agree with the comments of Mr Richard Humphreys QC	
74	Stanley Brodie QC 23 March 2017 4 April 2017	Support the objections made by Mr Richard Humphreys QC, Sir David Keene, Sir Stephen Sedley and Lord Lloyd of Berwick. The Treasury Building and the Library are heritage assets. The supposed explanations in Patrick Maddams representation (regarding the results of the October 2015 vote) are partisan and	

	Name of contributor	Consultation	
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		<p>misleading and should be ignored.</p> <p>Mr Maddams purports to write on behalf of the Temple, but question his authority to do so. I would expect to be told of his intended representation before it was sent. I was not informed. He does not represent me.</p>	
75	Mr Alan Birbeck 8 April 2017	<p>Strongly opposed to the proposals.</p> <p>Losing space in the library would be a considerable detriment for the Inn's main knowledge resource.</p> <p>Endorse the representations made by Richard Humphreys in favour of identifying the Library as a non-designated heritage asset and many of the comments by the eminent contributors opposing the scheme.</p> <p>Quality of physical resources - The library stocks materials which is not available online</p> <p>Quality of Study Space – The libraries provide a quiet place to work. They provide the impoverished pupils and members of the legal aid bar a chance of resources and peace in which to work.</p> <p>Quality of Staff</p> <p>Impact on publicly funded and sole practitioners</p>	<p>Quality of the physical venue</p> <p>Usage – It is estimated around 150 persons use the library daily. This varies depending on the day of the week, time of the day and of the year.</p> <p>Quality of online resources – The online resources provided by the Inner Temples are second to none. However as was emphasised by the Strategic Review of October 2015 there was a strongly expressed preference by users for hardcopy resources.</p> <p>Impact on publically funded and sole practitioners BAME groups - The impact of shrinking the available space will be significant on publically funded and sole practitioners and more considerable on BAME groups.</p> <p>It would be a great shame if this resource were diminished in size. The current space is ideal and is in my view the Inns greatest asset.</p>
76	Tom Devlin 28 April 2017	Objects to the internal alterations to the building.	
77	Simon Jervis 28 April	Objects to the internal alterations to the building.	

	Name of contributor	Consultation	
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	2017		

Policy Context

32. The development plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
33. There is relevant City of London including the Temples Conservation Area Character Summary and GLA supplementary planning guidance in respect of Planning Obligations and Sustainable Design Construction. Government Guidance is contained in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

Considerations

34. The Corporation, in determining the planning application 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, to local finance considerations 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 within 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)
 - In considering whether to grant planning permission 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). In this case the duty is to have special regard to the desirability of preserving the setting of listed buildings;
35. Considerable importance and weight should be given to the desirability of preserving a listed building and/or its setting, and to the desirability of preserving or enhancing the character or appearance of a conservation area, when carrying out any balancing exercise in which harm to the setting of listed buildings or conservation areas is to be weighed against public benefits. A finding that harm would be caused to a listed building

or its setting or to a conservation area gives rise to a strong presumption against planning permission being granted.

36. In considering the planning application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
37. It is necessary to assess all of the policies and proposals in the Development Plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
38. The principal issues in considering this application are:
 - The extent to which the proposals comply with the Development Plan and policy advice (including the NPPF) and the desirability of preserving the setting of listed buildings and preserving or enhancing the character and appearance of the conservation area;
39. In evaluating the principal issues the following key matters are to be considered:
 - Heritage (including the impact of the proposal on the significance of the Treasury Building as a non-designated heritage asset, and the impact of the proposal on the significance of other identified designated and non-designated heritage assets)
 - Design
 - Benefits of the Proposals (and alternatives available to achieve such benefits)
 - Construction Impacts
40. In addition, the following are considered:
 - Access
 - Energy and Sustainability
 - Transport, Servicing and Parking
 - Waste and Refuse
 - Trees
 - Archaeology
 - Air Quality
 - Flooding and Drainage

HERITAGE

Identification of Heritage Assets and their significance

41. Paragraph 129 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including the setting of any asset). The

assessment of significance should be taken into account when considering the impact of a proposal.

42. The designated heritage assets of relevance in the consideration of this case are:
 - Temples Conservation Area
43. As well as the setting of:
 - The Buttery - Scheduled Ancient Monument & Grade II* listed
 - Temple Church (St. Mary's) - Grade I listed
 - The Master's House - Grade II listed
 - Mitre Court Buildings - Grade II listed
 - 1, 2, 3, 4 and 5 Kings Bench Walk - Grade I listed
 - 3 North Kings Bench Walk - Grade II* listed
 - 1, 2, 3, 4, 5 Paper Buildings - Grade II listed
 - 4 lamp standards, Kings Bench Walk – Grade II listed
 - 2 lamp standards outside Inner Temple Hall – Grade II listed
 - Inner Temple Garden - Grade II registered park or garden
44. The non-designated heritage assets of relevance have been identified as:
 - a. The Inner Temple Treasury building (the site)
 - b. The Cloisters
 - c. Francis Taylor Building
45. The Temples Conservation Area, its individual buildings and landscape have a shared historical and communal value for their early association with the Knights Templar and long-established legal use over five centuries. The area and many of its buildings are rare or unique in London and some possess national and international significance.
46. Temple Church has exceptional historical and aesthetic value, being first consecrated in 1185 and extended, altered and reconstructed in subsequent centuries; the Buttery is a surviving fragment of a medieval hall and is a rare survival in London; the buildings in the northern part of Kings Bench Walk identified above are early examples of legal chambers and have high aesthetic, architectural and historic significance; the chambers at the southern section of Kings Bench Walk, Paper Buildings and Mitre Court share these qualities but to a slightly lesser degree due to their later construction.
47. Inner Temple Garden is one of the City's largest and most historic open spaces, with associations ranging from the Knights Templar to the construction of the Victoria Embankment.

48. The significance of the Treasury building as a non-designated heritage asset is summarised below. The Cloisters and Francis Taylor Building are post-war reconstructions of earlier buildings. Each has aesthetic and historical value and makes a positive contribution to the conservation area.

Heritage Policies

49. Policy 7.8 of the London Plan states that “Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.” Paragraph 7.31A of the supporting text states “Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits.”
50. Policy CS12 of the Local Plan seeks to conserve or enhance the significance of the City’s heritage assets and their settings by: safeguarding the City’s listed buildings and their settings, while allowing appropriate adaptation and new uses, and preserving and enhancing the distinctive character and appearance of the City’s conservation areas, while allowing sympathetic development within them.
51. Policy DM12.1 of the Local Plan relates to managing change affecting all heritage assets and ensuring that the proposals sustain and enhance heritage assets, their settings and significance. Policy DM12.2 relates to development within conservation areas. It seeks to ensure that development in consideration areas is only permitted where it preserves and enhances the character or appearance of the conservation area. Policy DM12.3 relates to listed buildings and seeks to ensure that listed building consent is granted for the alteration of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting. Furthermore that “Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings”. (12.1.4)
52. Chapter 12 of the NPPF is relevant in this instance as it sets out key policy considerations for applications relating to designated and non-designated heritage assets. Other relevant guidance is provided by Historic England including the documents Conservation Principles, Good Practice Advice Notes, including Note 1, Conservation Area Designation and Management, Note 3 The Setting of Heritage Assets and Building in Context (HE/CABE)

53. The NPPF defines a heritage asset as “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.”
54. Paragraph 134 of the NPPF states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use”.
55. Paragraph 135 of the NPPF states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”
56. Paragraph 138 of the NPPF states that the “Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage site as a whole.

Extent to which the proposed development complies with the heritage policies of Development Plan

57. The proposal has been assessed in relation to the relevant heritage policies of the London Plan and Local Plan. The proposed extensions and external alterations to the Treasury Building would be high quality and appropriate to the building in terms of form and appearance. The roof extensions would complete the original design concept of the building with appropriate materials and detailing. The proposed roof extensions would conserve the significance, character and appearance of the non-designated heritage asset and the setting of nearby heritage assets.
58. The proposed staircase extension to the north elevation would result in some harm to the setting of Temple Church and this part of the conservation area, but it is considered that in the context of the scheme, and consideration of alternatives as set out below, this harm is less than substantial and is justified and outweighed by the public benefits of development.
59. It is acknowledged that the proposed development would result in some harm to the significance of the Treasury Building as a heritage asset due to the addition of the staircase and the internal alterations to the library. It is considered that the harm is less than substantial and that in the overall context of the scheme, and acceptance of the Applicant’s case that there are no alternative sites which meet the need for educational facilities in a way which maintains collegiality and a community of

practitioners, the detrimental, harmful elements are outweighed by the beneficial aspects of the proposals.

Impact on the setting and significance of listed buildings

60. The roof extensions would alter the appearance of the building on its north, south and east elevations. The new roof and extended chimney stacks above the library, and the new dormer windows to each part of the roof would be prominent new elements in the roofscape of the Inner Temple.
61. To the south and east the roof extensions would be visible in the context of Kings Bench Walk, Mitre Court Buildings, Paper Buildings, and the nearby lamp standards and gate piers. The extensions would form a sympathetic addition to an already substantial building that is the focal point of the Inn. The design approach to the roof extensions and dormers would be in harmony with the listed chambers buildings and prevailing aesthetic of the Temples. The form, scale, design and materials of the new roof would be sympathetic to its context and would not result in any harm to the setting and significance of the listed buildings identified above.
62. To the north side the roof extension, lift core and escape staircase enclosure would alter the appearance of the building, and would project into Church Court over three storeys, resulting in some harm to the setting of Temple Church. In terms of the NPPF this harm would be less than substantial. The harm would be outweighed by the public benefits of the scheme, which include the provision of an educational facility, maintaining the building in the use for which it was designed, and an enhancement of the Inner Temple's legal character.
63. There would be no harm to the setting of the Buttery or Master's House arising from the proposal as they do not address the open space of Church Court in the same manner as the Church or share the same visual relationship with the Treasury Building.

Impact on the significance of the Temples Conservation Area

64. The impact of the works on the significance of the Temples Conservation Area has been assessed with reference to The Temples Conservation Area Character Summary and Historic England Advice Note 1 'Conservation Area Designation, Appraisal and Management' which provides guidance on assessing positive contributors at paragraph 16.
65. The Temples Conservation Area character summary identifies The Temples as a subtle combination of buildings and spaces with a character and environmental quality that is reminiscent of the collegiate atmosphere of Oxford and Cambridge. It emphasises that the area's character is influenced by the use to which the activities of the legal profession has evolved and continues to carry on.

66. The Treasury Building, including the hall and library, make a positive contribution to the character and appearance of the conservation area due to its architectural quality, historical associations and relationship with adjacent buildings in terms of age, materials and style. The interior of the Treasury Building including the library rooms (which include the gallery) are an element which makes a positive contribution to the character or appearance of the conservation area.
67. Due to the elevated and central position of the building the roof extensions would impact on the conservation area when viewed from the north, south and east. From the south and east the new roof and extended chimney stacks above the library would increase the height and visual prominence of the building when viewed from numerous parts of the conservation area. The dormer windows would be a prominent element of the extended roof and have been designed with reference to existing dormers on neighbouring buildings and are appropriate to the traditional character of the Temples. The roof extension would in effect complete the original 1947 design of the building, albeit with adjustments to its scale and detailing to meet the requirements of the training centre.
68. The proposed dormer windows would be larger than those indicated on the original 1947 design for the building, at which time the roof storey was envisaged to serve as book storage. The scale and design of the dormers is commensurate with the Neo-Georgian proportions of the Treasury Building and similar examples on neighbouring buildings of the same period.
69. The roof extension includes plant at the upper level incorporated within the form of the roof and screened from view. The new break-out space in the training centre would be top-lit by a large rooflight extending over the space.
70. The plant and rooflight would not be visible from any ground level views in the conservation area and they would not result in any harm to its significance. The scale, form and materials of the roof extension as a whole would be appropriate to the building and sympathetic to the character of the area.
71. The building would be extended to the north to create a new lift core and escape stair. The extensions would alter the appearance of the building when viewed from Church Court, with the extensions being closer to the church in each location.
72. The lift core would be set back between two existing projections, behind an existing lightwell. It would be faced in matching brick with timber sash windows and topped by a lift overrun designed as a tripartite dormer window.
73. The staircase would be enclosed in brick with stone cornice, copings and quoins to match existing and would include a new stone doorcase and panelled door. At the base it would have stone steps with metal handrails, and at the top would be open to the elements with a metal balustrade. The enclosure would project from the junction of the hall and

library towards Temple Church, but its footprint would not exceed the depth of existing rear extensions.

74. The escape staircase enclosure would obscure an attractive part of the Treasury Building's rear elevation and intrude into Church Court over three storeys, resulting in harm to the significance of the conservation area. This harm would be less than substantial.
75. The NPPF states that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use." In this case the harm would be outweighed by the public benefits of completing the original design for the building and creating a barrister's training centre which would reinforce the legal character of the Inner Temple and sustain the building's long-term use.
76. The current configuration of Church Court is post-war. Prior to 1941 the area, then known as Tanfield Court, was divided into two smaller spaces by the Lamb Building which was aligned north-south between the library and church. A building had been on the site since the 16th century or earlier with the church closely surrounded by buildings from an early date. It was demolished following bomb damage. The church's current open aspect to the south is modern in its form and appearance within the conservation area, not reflective of its earlier built up character.
77. Within Church Court there are three semi-mature trees and a modern statue of the Knights Templar mounted on a stone column. These interrupt views from the church and further mitigate the potential harm to its setting. The visual impact of the stair enclosure would be minimised by the use of sympathetic matching materials and detailing.
78. The interior of the Treasury Building makes a positive contribution to the Temples Conservation Area in terms of its historical associations and legal use. The proposed development would retain the library in its current location, albeit in an amended form, and its significance to the conservation area would be undiminished. The internal appearance of the library does not have a visual presence in the conservation area and its alteration would not cause any harm to its significance. The auditorium enclosure would sit behind the third floor windows which currently light the library gallery. It would be set back from the windows with artificial lighting installed in the void to suggest the appearance of an inhabited space when viewed from ground level, thereby minimising any potential visual impact in the conservation area.

Impact on the setting and significance of the Inner Temple Garden

79. The southern elevation of the Treasury building can be viewed in its entirety from the Inner Temple Garden, which offers a range of viewing points. The building's façade provides a visual termination to the northern edge of the large open space along with 1-2 Crown Office Row. The imposing architectural character and elevated position mean that

the Treasury Building is a prominent element within the setting of the garden.

80. The proposed roof extensions would raise the height of the building and increase its prominence in views from the garden. The overall height of the roof would not exceed the existing Inner Temple Hall roof ridge line. The altered hall roof and new library roof would incorporate new dormer windows and extended chimney stacks which would increase its prominence in the setting of the garden.
81. The extension and alterations to the building would be harmonious with the neighbouring buildings and the Inner Temple and would not cause harm to the significance or setting of the registered park and garden.
82. (Potential construction impacts on Inner Temple Garden are considered below)

Impact on the significance of non-designated heritage assets

83. The Treasury Building is considered a non-designated heritage asset due to the positive contribution it makes to the Temples Conservation Area; for its architectural significance as a high quality post-war building; and for its historical significance in relation to the Inner Temple and the long established use of the site.
84. The interior of the Treasury Building, in particular the library, is considered to contribute to the significance of the non-designated heritage asset due to the historical associations of its use, its accomplished design and high quality materials. The interior was identified as one of the building's more notable features in the assessment carried out by Historic England in the application to list the building
85. The building would be extended at roof level as described above. The proposed roof extension and alterations would be widely visible from Kings Bench Walk, Inner Temple Garden and Church Court, where they would appear as a traditionally-designed clay-tiled roof with copper-clad dormers and brick chimney stacks. The roof extension would complete the original architectural concept for the building which was truncated during its construction and which arguably appears incongruous in relation to neighbouring Georgian and post-war structures. The new roof would not exceed the height of the existing Inner Temple Hall roof and would be appropriately scaled to the building and its context.
86. The extensions to the rear would accommodate a new lift core and escape stair respectively and are an essential component of the scheme. The roof extensions have been sensitively designed in sympathetic materials and would not be harmful to the significance of the non-designated heritage asset.
87. The training centre would include a 120-seat auditorium extending down into the upper level of the two-storey library. The gallery level would be removed and a new ceiling installed above second floor level, with

internal finishes made good to match. The rear ancillary rooms, staircase and external wall would be subsumed into the new lift core and circulation space.

88. The partial loss of the library gallery level and associated spaces would cause a degree of harm to the significance of the non-designated heritage asset by diminishing the scale and quality of a key interior. The reduction of its spatial volume and proportions and the loss of the panelling, shelving and other finishes at gallery level would be detrimental to the library's significance. The existing proportions and internal appearance of the library would be changed, the alterations would be carried out in a sympathetic manner with high quality matching finishes, with new high quality spaces would be created as part of the development. On balance, the benefits of the scheme which include maintaining and optimising the long standing use of the building and providing a significant educational facility for the legal community, are considered to outweigh the harm caused by the internal alterations.
89. The new lift core would result in the loss of a section of the Treasury Building's north elevation which currently lights the library internal staircase, and its replacement with a new section of brickwork. The proposed works would partially infill an existing recess, retaining a setback behind two existing projections. The overrun would be a more visually assertive new element but its design is harmonious with the existing building and proposed roof extension. The lift core extension would not negatively impact on the building's significant features or historic interest and is not considered harmful.
90. The proposed staircase enclosure would alter the appearance of the hall and library by concealing the existing division between the two buildings and by obscuring the end of the hall's elevation including its quoins. It would project from the building between ground and roof level to the line of the existing single storey rear extensions but would be significantly taller. The staircase enclosure would result in a degree of harm to the significance of the non-designated heritage asset by disrupting the architectural composition of its rear elevation and obscuring architectural details.
91. The Cloisters building at the west side of Church Court and the Francis Taylor Building to the north of the site have been identified as non-designated heritage assets in close proximity to the site and the proposed extensions would be viewed within their immediate setting. The alterations to the Treasury Building would be sympathetic in terms of scale, design and materials to each non-designated heritage asset and there would be no harm caused to their setting or significance.

DESIGN

Design policies

92. Policy 7.4 of the London Plan states that “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.”
93. Policy CS12 of the Local Plan sets out the City’s design policies: “To promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City...”
94. And seeks to ensure that “...bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.”
95. Whilst “Encouraging design solutions that make effective use of limited land resources. Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces.”
96. 3.10.8 “In assessing development schemes detailed consideration will be given to the bulk and massing and special characteristics of their locality. All development proposals are expected to have a high standard of design and detailing”.
97. 3.10.13 “The design and execution of extensions and alterations to buildings, such as entrances and windows, are of considerable importance since they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated with the design of the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building”.
98. Chapter 14 of the NPPF sets out the key policy considerations in relation to design. Paragraph 60 states “Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.”
99. NPPF paragraphs 63 and 64 state that “In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.” and “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”

Extent to which the proposed development complies with the design policies of the Development Plan and NPPF Guidance

100. The proposal has been assessed in relation to the relevant design policies of the London Plan and Local Plan and guidance in the NPPF. It is considered that the design of the proposed development would be high quality and appropriate and would make a strong contribution to the local distinctiveness of the Temples area.
101. The proposed extensions at roof level would comprise a clay-tiled hipped roof in different sections relating to each part of the building. The roof over the hall would be reconstructed to match the existing with dormer windows incorporated to light the new internal accommodation. The new hipped roof over the library would complete the original design for the building which was constructed with a flat roof due to budgetary constraints in the late 1950's. The library roof would be in matching clay tiles with copper clad dormer windows, and would incorporate a shallow external terrace to the south and a glazed roof light over the internal break-out space.
102. The bulk and massing of the roof would be broken down into different hipped sections that respond to the varied planes of the building's facades. Each part of the roof would be further articulated by the dormer windows which would align with the windows below, and the chimney stacks which would be extended in their existing locations in matching brick with stone copings. The design and form of the roof is considered to respond well to the building and its setting, and would be a high quality and appropriate addition in terms of its materials and detailing.
103. The dormers have been designed and located with reference to the original 1940s elevation drawings and the appearance of comparable dormers to the roofs of neighbouring, contemporary buildings. They would have patinated copper cheeks to match other 1950s buildings in the area and would incorporate small-paned timber sash windows or French windows in the area of the external terrace. The scale of the dormer windows is larger than those on the original drawings, at which time the roofspace would have largely incorporated book storage. The enlarged scale would result in an inversion of the usual hierarchy of the façade, in that the dormers would be larger than the third floor attic windows immediately below. It is accepted that the new training facility has a requirement for maximum natural daylight that would already be compromised by the traditional form of the roof and dormers. The building is well designed in a late Neo-Georgian style, but is not a pure example of classical architecture and is able to accommodate a variation to a more traditional hierarchical approach.
104. The new lift core would be clad externally with matching brick with sash windows and an overrun disguised as a tripartite dormer window.
105. The escape stair enclosure would project from the building over three storeys. It would bridge over the existing lightwell to the same depth as the building's existing waste enclosure and the hall's single storey

servery extension. The stair would be clad in matching brick with stone quoins and string courses to match existing.

106. Both extensions to the north have been sensitively designed with reference to the existing building in order to ensure their visual impact is minimal. The use of matching materials and the careful detailing of the new elements would further ensure their design quality is equal to the existing building.
107. The proposed extensions have been assessed in a range of local views from the north, south-east and south-west. In views from Kings Bench Walk and the Inner Temple Garden the roof extensions are considered to be high quality and appropriate in scale, form and detailing.

BENEFITS OF THE PROPOSALS

108. The proposal would provide a new barristers' Education and Training Centre within the building, which would primarily be located at third floor level, within adapted library space and in the proposed roof extension.
109. The Inn has an established and historic role in providing education and training for barristers. The Applicants state that in the Charter granting the Inn its accommodation in the Temple, signed by James I in 1608, it preserves the estate and its precincts for accommodation and education of barristers. Over recent years, the Bar Council has criticised providers of Bar Professional Training Courses (BPTC), and called for the education of barristers to be unified and improved so that BPTC would provide a more realistic prospect of pupillage and one which would be recognised by practitioners. Given the presence of advocacy and legal training skills present in the Inns' practitioner members, the Inns' began to actively consider delivery of the BPTCs.
110. In order to put this into practice, in 2013 the Inns created a department (Council of the Inns of Court (COIC)) to support the Inns of Court in advancing and building on their educational activities. The COIC is currently pursuing the delivery of BPTC. This would secure the training of two cohorts per year, each of up to 120 students attending full time courses for 20 weeks. The applicants anticipate that this reformed training model within the Inns will increase access and the diversity of entrants to the profession.
111. The initiative would include all four Inns of Court (Lincoln's Inn, Gray's Inn, Middle and Inner Temples). Lincoln's Inn are currently constructing a facility to deliver this, Middle Temple have converted part of their Library into a space for training and Gray's Inn already have a facility which can provide education and training.
112. The Inns have not finally committed to delivering this training and there would be a need to apply for validation from the regulator. The applicants argue that without the provision for the proposed Inner Temple training facilities (in addition to other facilities being developed by the other Inns), it would be difficult to progress the validation application.

113. The existing education and training department within the Inner Temples comprises three main function rooms, a committee room and an additional meeting room, with basic audio visual facilities which the applicants consider to be inadequate. The applicants argue the overall standard of educational facilities within the Inns' estate is poor and of the four Inns', the Inner Temples current educational estate is the least suitable.
114. The existing building's limitations have been identified by the applicants. There are numerous entrances and exits around the Treasury building and circulation within the building is awkward, with library users having to leave the library via one exit, walk the length of the outside building and enter the Hall at the other end. There is a lack of lecture theatre with adequate audio visual facilities and the existing meeting/training rooms have to be especially re-arranged and set up each time they need to be used for training purposes. The applicants state the majority of training for the Bar is conducted in smaller groups and there is a lack of smaller meeting rooms and breakout spaces to accommodate the number of anticipated student numbers.
115. The applicants have expressed concern that the overall standard of educational facilities within the Inner Temple is the least suitable of all the Inns and this has already had an adverse impact on the Inn's ability to fulfil its role, with many 'Specialist Bar Associations' no longer meeting or training at the Inns, but preferring to use external venues such as the Royal College of Surgeons. The new facilities would enable the Inn to continue to deliver education and training.
116. Your officers accept the case that the applicants have made that there is a need for additional education and training facilities to enable the Inn to continue to play a central role in providing education and training for aspiring barristers consistent with the historic function ordained by the Royal Charter, of educating students. The case is made by the Inn, and as a body with responsibility for provision of education and training and for compliance with the Royal Charter, their views are considered credible and well-informed. There is support for improved facilities amongst many objectors (albeit disagreement regarding scale of provision and as to how it should be achieved)
117. It is considered that the benefits of the proposals to provide improved facilities for legal training, optimising the long standing heritage use and preserving the character of the conservation area can be appropriately secured through a S106 obligation. This will ensure that the principal future use remains related to the legal profession and that those benefits are maintained.

Consideration of Alternative Options/Locations for the provision education and training facilities

118. Many objectors have stated that improved facilities can be achieved on other sites without causing harm to the library interior.
119. The Applicants state that a space planning study was conducted by the Inner Temples Estates department to identify areas within the Inner Temples estate where there might be opportunities to create additional floor space to benefit the Inn's education and training needs. The study identified the requirement for an auditorium to seat 120 people and the need for smaller training rooms and breakout spaces to accommodate up to 120 students.
120. Three areas within the Inner Temple Estate were identified as capable of supporting additional development; the Garden (Peony Garden and the High Border), The Treasury Building Roof and 1 / 2 Crown Office Row.
121. When first assessed as a potential option, the rooftops of both of the Treasury Building and Crown Office Row did not provide sufficient footprint to create the necessary floor space and these options were discounted.

The Garden option (2009-2011)

122. The High Border immediately to the south of the main gate/Crown Office Row was a potential option explored. The High Border proposal would have involved mainly subterranean development and this option was discounted on the grounds of costs and logistics as it would have been a complex civil engineering task.
123. The northern boundary of Peony Garden extending under the car park was an alternative option. This centred on the northern boundary of the Peony Garden, at the southern end of the main car park. The proposal included the creation of an underground facility, topped with a small surface building. This option was discounted due to the challenging construction environment and the removal of significant spoil, the constraints of protected trees and adjacent listed buildings and a high water table in this part of the site.

3 Serjeants Inn (2011-2013)

124. Designs were prepared and pre-application advice was sought from the City of London planning department; this was an option that could not be supported on planning grounds and was discounted.

Treasury Office Roof Revisited (2013-date)

125. Following the setbacks of the 3 original options identified, the Inn revisited the possibility of utilising the Treasury Office roof space to provide the education and training facilities. Previously, the Inn had not

contemplated removing and replacing the Hall roof, but specialist advice indicated the existing plant equipment on the Hall roof was approaching the end of its economic and functional life. Following this, the project appraised the whole roof area, rather than just the existing flat roof area, to provide a bigger footprint.

126. Pre-application discussions were held with City of London between January – April 2014 which included a single storey rooftop scheme utilising a mansard roof to be built over the Hall to contain the necessary plant and equipment. Whilst an auditorium seating 99 people and seven training rooms accommodating 114 people could be provided, the Inn considered the facilities fell short of the numbers required. The auditorium within this scheme would have been on a level floor rather than raked, and the applicants stated this was not considered to be ideal for optimal viewing. The ancillary catering, cloakroom and WC facilities were considered to be inadequate. The scheme included separate access via lifts from Church Court and failed to integrate the scheme into the building beneath.
127. The inadequacies led the Inn to redesign the scheme which incorporated the Gallery level of the Library and one refocused the building around a main entrance from the south terrace, which is the scheme under consideration.
128. The two Treasury Building options were placed before the membership of the Inn in October 2015, in which both the initial scheme and the scheme being considered as part of this application, were voted on by the governing members of the Inn. The design which incorporates the Gallery of the Library was voted as the scheme to proceed.
129. Objectors have pointed to sites outside the Inner Temple, referring to use of the Middle Temple, the Royal Courts of Justice or the Lincoln's Inn auditorium. These would be alternative locations outside the Inner Temples. The Inn believes the education and training centre should be in the main building. The Inn argues that the profession and Inn life relies upon collegiality which would help nurture students and encourage them to mix with and learn from senior members, and that alternative locations which would be in a separate geographical location from the Inn would not be desirable. Representations have been received which refer to other sites available within the Inn for training and education purposes (such as 2 Kings Bench Walk and Mitre Court and the Francis Taylor Building). The Inn states that 2 Kings Bench Walk would not provide the further growth space that the proposed accommodation would provide, and that alternative potential and available sites do not fulfil the requirements based upon the space planning study referred to above.

Impact on the operating of the Library use

130. The partial loss of the library gallery level would result in the loss of shelf length and book storage space. This would be offset by the creation of a bookstore at basement level, resulting in an overall reduction of 13% of

shelf space. Should readers want to access books stored in the basement, they would be able to order the books required. The applicants have stated that a large number legal text/books are available to view online.

131. There would be a reduction of reader positions from 97 existing to 84 proposed. A further 2 reader positions would be provided for occasional research/reading use in the basement. The applicant has advised the number of users currently using the reader positions is relatively low and the reduction of 11 would not create a shortage.

Assessment of Public benefits

132. Representations regarding the required scale of education provision, the most suitable site for it, and whether the benefits justify the harm to the library interior indicate that there are strongly held divergent views, including amongst senior participants in the life of Inner Temple. Objectors have also expressed concern that the proposals may not be viable and there is no business case. Your officers have concluded that the Applicants have made a credible case regarding the need for facilities that will address likely current and future demand, and the benefits of providing them in a unified Inner Temple Treasury Building where Inn functions can be consolidated. It is noted that the case is made by the Inn, and as a body with responsibility for provision of education and training and for compliance with the Royal Charter, their views are considered particularly well-informed. It is also noted that the case is supported by information from the Director of the Council of the Inns of Court and Dean of the Inns of Court College of Advocacy, who confirms that the proposals forms part of a cross-Bar initiative to improve the teaching estate involving all four Inns. As such, the Applicant's evaluation of the appropriate scale of education and training facilities, of the appropriate location, and of the short comings of alternative locations is considered persuasive and is accepted.
133. Regarding viability concerns, the Treasury Building is owned by the Inn and there is no suggestion that the Inn does not have the resources required to deliver the scheme. It is also noted that were the proposals to be delivered, the lawful "sui generis" use of the Treasury Building would ensure that its primary use remained related to the Bar and Inner Temple.
134. The proposal has been assessed in relation to the relevant heritage and design polices of the London Plan and Local Plan.
135. It is acknowledged that the proposed development would result in some harm to the significance of the Treasury Building as a heritage asset due to the addition of the staircase and the internal alterations to the library. It is considered that in the overall context of the scheme the detrimental, harmful elements are outweighed by the beneficial aspects of the proposals.

136. Policy CS22 of the Local Plan seeks to maximise opportunities for the City's working communities to access suitable educational facilities and opportunities including enhancing existing education facilities and ensuring that facilities are sited in appropriate locations.
137. It is considered that the design of the proposed development would be of a high quality which makes a strong contribution to the local distinctiveness of the Temples area meeting the requirements of Policy 7.8 of the London Plan and policies CS12, DM12.1, DM12.2, DM12.3 and CS22 of the Local Plan.
138. The proposal has been assessed in relation to the relevant heritage and design policies of the NPPF.
139. Paragraph 134 the NPPF states that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use".
140. NPPF paragraphs 63 and 64 state that "In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area." and "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions."
141. Considerable weight and importance has been given to the desirability of preserving the setting of the nearby listed buildings and to the desirability of preserving or enhancing the character and appearance of the Temples Conservation Area in accordance with the relevant policies of the NPPF.
142. There is a presumption against granting planning permission that harms either of those objectives, and that presumption has been applied in evaluating the planning application.
143. In this case the less than substantial harm is outweighed by the public benefits of completing the original design for the building and creating a barristers training centre which would reinforce the legal character of the Inner Temple and sustain the building's long-term use. The consolidation of the Inner Temple activities at the site is considered to preserve the character of the conservation area which partly derives from its historic Inner Temple and Bar functions.
144. In forming a balanced judgement when considering the impact on the non-designated heritage asset, the Treasury Building, as required by paragraph 135 of the NPPF, it is the view of officers that the scale of harm is low, and that the public benefits of the proposal outweigh that harm.

CONSTRUCTION IMPACTS

Environmental Impacts from Construction

145. Representations have been received raising concerns about the effect of the construction works and the use of certain locations within the Inner Temple for construction vehicles and site huts. The amenity of nearby residents and commercial occupiers would be protected by a condition which would require the applicants to submit for approval a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental factors and this would include seeking approval for the locations to be used during construction for construction traffic and vehicles.

The use of the Inner Temple Garden for temporary structures

146. Concerns have been raised that the Inner Temple Gardens will be used for temporary structures to allow the functions of the Treasury Building to continue during the construction phase.

147. The use of the Inner Temple Garden, for temporary structures to enable the ordinary functioning of the Inn during the construction period, is not included in this application.

148. The Inner Temple Gardens is a Grade II registered park or garden under the Historic Buildings and Ancient Monuments Act 1953. Historic England considers registered landscapes should be protected and the impact of any proposed development on the landscape's special character should be considered as a material consideration. It is considered that the use of Inner Temple Garden for temporary structures would cause harm to the special character of the Garden, impact on the amenity of the area by removing part of the garden from use and would impact on the character and appearance of the Temples Conservation Area.

149. Proposed Condition 17 prohibits the use of the Inner Temple Garden as a works compound or for temporary structures during construction.

150. (The London Square Preservation Act 1931 Act also restricts the use of the Inner Temple Garden but as a separate regime and this is not a planning matter. Proposed Condition 17 addresses the potential use of the Inner Temple Garden and brings the matter within planning control).

ACCESS

151. The access to and circulation within the building is poor and the Inn identified a need to create better access and circulation within the Treasury Building and the Hall.

152. There are several access points to the building some of which are not wheelchair accessible. Within the building there are level changes which

do not allow for wheelchair users to access all levels of the building with ease.

153. Access to the main entrance is improved by replacing the current lower section of the South terrace (currently only accessible via steps) so that wheelchair users can access via the existing ramps on the west side, without having to navigate past the external Pegasus Bar seating.
154. All students and visitors to the Treasury Building would access the building via the main entrance on the south terrace. The current Treasury Office entrance would become a fire escape only.
155. The new lift shaft would house two 10-person lifts and would serve basement to fourth floor level. A new fire escape stair within a brick enclosure would be constructed in Church Court.
156. The existing library lift and stair would be extended to the new fourth floor level. The main staircase would be extended to the third floor allowing visitors to either take the lift or use the staircase to access the proposed training centre.
157. The Access Officer welcomes the improvement of inclusive access to and within the building which would meet the requirements of Local Plan policy DM10.8 and part A of London Plan policy 7.2.

ENERGY AND SUSTAINABILITY

158. The NPPF, London Plan and Local Plan seek to ensure that sustainability is integrated into designs for all developments.
159. The London Plan requires an assessment of the energy demand that demonstrates the steps taken to apply the Mayor's energy hierarchy to achieve carbon reductions and to use renewable energy sources.
London
160. Plan policy requires non domestic buildings to achieve a 35% carbon emissions reduction over Part L (2013) of the Building Regulations. Policy CS15 of the Local Plan supports this approach.
161. An energy statement has been submitted in relation to the new build element of the proposed development which consists of the construction of a new roof extension at 4th floor. Energy consumption reduction would be achieved by design features and the use of energy efficient building measures. The proposed development would include Air Source Heat Recovery, ErP compliant air handling equipment incorporating heat recovery and Solar Photovoltaics.
162. The reduction in carbon emissions with the proposed energy efficient measures in place would result in a 41% carbon saving which exceeds the target set by the Mayor.
163. A BREEAM pre-assessment has been submitted which demonstrates the refurbishment and extension of the existing building would achieve a 'very good' rating. Policy CS15 has not been complied with and a condition is recommended for further details of a BREEAM assessment

to be submitted prior to demolition to demonstrate how an 'Excellent' rating could be achieved.

TRANSPORT, SERVICING AND PARKING

164. Vehicular access to the site would be through a narrow archway from Tudor Street on the east side of Inner Temple, which would remain the only point of vehicle access to the site. Access to the Inner Temple is controlled by a security booth and the vehicle size for access is limited.
165. Currently the deliveries comprise daily deliveries of fresh produce and dry goods for the catering department. The catering department currently receives 6-7 daily deliveries of fresh produce and dry goods and 2-3 deliveries of drinks per week. Delivery drivers drive to the existing designated service zone located adjacent to the catering entrance to the south of the Hall. Other deliveries to the building include stationery and personal deliveries. For these type of deliveries, delivery vehicles park in the designated service zone to the south of the building or in adjacent car parking spaces and supplies and parcels are delivered to the main reception of the Treasury Building. The training and education department currently receive on average 21 deliveries per week. A total of 75 deliveries arrive on average per week to service the Treasury Building.
166. It is proposed that the extension would increase the catering department's requirements for food and drinks supplies by one third. It is not anticipated this would increase the number of deliveries, only the quantities delivered, and this would be able to be accommodated using the existing sizes of delivery vehicles. A delivery and servicing management plan would be secured in the S106 agreement.
167. All deliveries would continue to arrive via Tudor Street and the main delivery entrance for the building would be the catering delivery entrance located to the south of the Hall.
168. A condition has been recommended to manage vehicle movements during the construction period.

Car Parking

169. The Inner Temple car park has a total of 220 car parking spaces with three designated disabled spaces. No car parking spaces is proposed and no increase in disabled parking spaces is proposed.

Cycle Parking Facilities

170. The existing cycle parking in the Inner Temple is dispersed around the perimeter off the Inner Temple car park in banks of 4 or 5 serving the adjacent buildings (Paper Buildings, Kings Bench Walk and Mitre Court

Buildings). A larger bicycle storage area is located to the rear of Crown Office Row with 26 Sheffield bike stands.

171. A total of 37 new Sheffield bike stands would be provided, which would be located behind Crown Office Row. This would be in line with the London Plan Cycle Parking standards for the uplift in student numbers and is therefore acceptable.

WASTE AND REFUSE

172. An existing bin store is located on the north side of the building in Church Court. The bin store is a brick enclosure containing a compactor and two 1100L waste bins. Waste from the existing bin store is moved by hand daily to the Inner Temple car park for collection by a refuse lorry once a day.
173. The existing bin store would be modified to accommodate the addition of the new fire escape stair, and this would involve the relocation of the door. The Waste and Amenity Planning Manager is satisfied with the proposals would comply with policy CS17 of the Local Plan.

TREES

174. An Arboricultural Impact Assessment has been submitted as part of the application. The report identifies a group of four London Plane trees (T1-T4) located at the southern edge of Church Court which could potentially be impacted by the proposed development. The trees are not the subject of a Tree Preservation Order but are protected by virtue of their location within the Temples Conservation Area.
175. The Arboricultural report states that the London Plane Tree (T2) would 'require minor tree pruning works' to facilitate the construction of the new stair core on the northern side of the building. The works include tipping-back the southern low-upper crown overhang of the tree by a max of 2.5m.
176. In addition, assuming that the tree roots of T2 extend under the existing bin store, there would be a root protection area edge incursion of 2.5%. The works would only affect the southern section of the canopy of T2 which is partly hidden from view. It is considered these works would not affect the overall appearance of tree T2 or the character or appearance of the conservation area. Conditions have been added to control the extent and quality of works.
177. During construction it is proposed that temporary tree protection boxes be provided around each of the four London plane trees (T1-T4) to prevent direct damage to the trunks and roots. A condition has been added to deal with the protection of the trees during building works. Informatives have been added to deal with wildlife protection, faculty provision, ownership and archaeology.
178. The report makes reference to the southern crowns of the four trees T1-T4 being in close proximity to the adjacent building. It states that in the

short term their crown size will likely increase by up to 30% which will require crown tipping-back to clear the adjacent building. Therefore it is likely that in future T1-T4 will require building clearance pruning works that will be over and above the proposed tipping-back for the emergency staircase. This will have to be the subject of a separate section 211 Notice and an informative has been added to deal with this.

ARCHAEOLOGY

179. The site is an area of archaeological potential, lying to the east of the Saxon settlement of Lundenwic where there is evidence of a Saxon cemetery. Occupation during the Saxon, Medieval and Post-Medieval periods has been recorded in the vicinity.
180. The potential for archaeological remains on the site is high, however, the existing building has a basement across the entire site. There is potential for deep cut features of the Saxon, medieval and post-medieval periods to survive.
181. A new lift shaft would be constructed, and a set of stairs in the basement would be rebuilt. Both are likely to affect archaeological remains.
182. An Archaeological Impact Assessment and a Method Statement for an Archaeological Watching Brief during geotechnical investigations have been submitted as part of the application.
183. Conditions are recommended to cover a programme of archaeological work.

AIR QUALITY

184. The applicant submitted an assessment of the likely changes in air quality as a result of the construction and operational phases of the development and has been considered having regard to Policy 7.14 of the London Plan and CS15 of the Local Plan.
185. The development is within a sensitive land use area due to nearby residential areas. An Air Quality Neutral Assessment and an Air Quality Impact Assessment have been undertaken with regard to the GLA's Sustainable Design and Construction SPG and relevant guidance.
186. During construction, emissions to air would require control through the implementation of good practice mitigation measures detailed in the Scheme of Protective Works to be approved under conditions attached to the planning permission. During the operational phase, relevant combustion plant will meet the emission limits specified in the GLA's Sustainable Design and Construction SPG and compliance with these emission limits will be ensured via conditions attached to the planning permission.
187. It is expected that any extra traffic movements from the proposed development would be negligible and the overall air quality impact at

relevant locations is considered to be negligible. The development is Air Quality Neutral and is expected to have an insignificant impact on local air quality.

FLOODING AND DRAINAGE

188. A flood risk assessment has been submitted as part of the application. The site is within Flood Zone 1 and has low risk of flooding from ground water or the sewers and has a very low to negligible risk of flooding from all other sources. The low risk from sewer flooding would be mitigated by installing an anti-backflow valve to prevent sewer flows entering the basement. The residual low risk of flooding from groundwater sources would not warrant specific mitigation measures.
189. The Flood Risk Assessment includes a Sustainable Urban Drainage (SuDs) Assessment, which sets out the appropriate measures for the site. As the site is underlain by clay soils and has a basement it is not possible to infiltrate on site. The development is an extension to an existing building, all of the site area is impervious and there are no areas that can be made pervious.
190. The most appropriate SuDs techniques for the site are rainwater harvesting. Water butts are proposed to harvest rainwater which would reduce the total volume of runoff from the site and peak run off during extreme rainfall. A condition would be added to provide further details of the water butts to ensure they are suitably located and enclosed to safeguard the appearance of the conservation area. The report concludes that the proposed development should not increase flood risk on or offsite.

PUBLIC SECTOR EQUALITY DUTY (section 149 of the Equality Act 2010)

191. The City, as a public authority, must, when deciding whether to grant planning permission have due regard to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it
192. Access to the library and its facilities will be maintained, including for those with protected characteristics. There is no reason to conclude that the proposals will have any different effect on those who share a relevant protected characteristic and those who do not share it.

PLANNING OBLIGATIONS AND COMMUNITY INFRASTRUCTURE LEVY

193. The development would require planning obligations in a Section 106 agreement to mitigate the impact of the proposal and make it acceptable in planning terms and to contribute to the improvement of the City's environment and facilities.
194. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
195. CIL is not payable as the proposed development would provide education and facilities for the Inner Temple and development which is used wholly or mainly for the provision of education is not chargeable.

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£0	£0	£0.00
City Planning Obligation Affordable Housing	£22,730	£22,503	£227.30
City Planning Obligation Local, Training, Skills and Job Brokerage	£3,410	£3,375	£34.10
City Planning Obligation Monitoring Charge	£1,250	-	-
Total liability in accordance with the City of London's policies	£27,390	£25,878	£261

City's Planning Obligations

196. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.
- affordable housing contributions
 - local procurement
 - local training skills and job brokerage
 - delivery servicing plan
 - travel plan
197. The benefits of the proposals to provide improved facilities for legal training, optimising the long standing heritage use and preserving the

character of the conservation area would be secured through a S106 obligation. This will ensure that the principal future use remains related to the legal profession and that those benefits are maintained.

198. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

Monitoring and Administrative Costs

199. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
200. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

CONCLUSIONS

201. The proposal has been assessed in accordance with the relevant statutory duties, and having regard to the development plan and other relevant policies, and relevant advice including the NPPF. The proposals would result in some less than substantial harm to the significance of the Temples Conservation Area and the Temple Church. The proposals would result in some less than substantial harm to the Treasury Building as a non-designated heritage asset. The harm is outweighed by the public benefits of the proposal which comprise the completion of the original design for the building, and the creation of a barrister's training centre which would reinforce the legal character of the Inner Temple and sustain the building's long-term use.
202. The proposal accords with the development plan when considered as a whole. It is considered that the design of the proposed development would be high quality and make a strong contribution to the local distinctiveness of the Temples area meeting the requirements, in particular, of Policy 7.8 of the London Plan, policies CS12, DM12.1, DM12.2, DM12.3 and CS22 of the Local Plan.

Background Papers

INTERNAL

Memo Department of Markets and Consumer Protection, Garry Seal - 15/02/2017

Email Department of Markets and Consumer Protection, Kelly Wilson - 16/05/2017

Email Department of Built Environment, Bradley Viljoen 15/02/2015

Letter Director of Open Spaces, Colin Buttery – 22/03/2017

EXTERNAL

Letter Historic England – 02/03/2017

Letter Conservation Area Advisory Committee 25/02/2017

Planning Application Proposed Images dated January 2017 (including 231-P1100-RevP1, 231-P1101-RevP1, 231-P1102-RevP1, 231-P1103-RevP1, 231-P1104-RevP1, 231-P1105-RevP1, 231-P1106-RevP1, 231-P1107-RevP1)

Arboricultural Impact Assessment – January 2017

Planning Statement Adrienne Hill Limited – January 2017

Flood Risk Assessment & Drainage Impact Assessment, Walsh – January 2017

Design and Access Statement, Hugh Broughton Architects – January 2017

Heritage Study. Hugh Broughton Architects – January 2017

Ventilation Statement, The Engineering Practice – January 2017

Noise Survey, Ramboll – January 2017

BREEAM Pre Assessment, The Engineering Practice – January 2017

Energy Statement – January 2017

Archaeological Impact Assessment, Pre-Construct Archaeology Limited – January 2017

Heritage Statement, KM Heritage – January 2017

Flood Risk Assessment & Drainage Impact Report January 2017

Air Quality Assessment Hugh Broughton Architects – 17 May 2017

Supplementary Planning Information: Design Approach, Hugh Broughton Architects – May 2017

Supplementary Information supporting application 17/00077/FULMAJ – Bar Educational Training & the Role of the Inns of Court, May 2017

Supplementary Information supporting application 17/00077/FULMAJ – Project History and the Consideration of Alternatives, May 2017

Supplemental Heritage Statement, KM Heritage - May 2017

Email Richard Snowdon 15/05/2017

Email Richard Snowdon 15/05/2017

Email Richard Snowdon – Inner Temple – 17/00077/FULMAJ – Library reader spaces 06/06/2017

Hugh Broughton Architects – email, 17th May 2017

Adrienne Hill Limited, Inner Temple, Supplementary comments - 28/02/2017

KM Heritage – heritage response to points raised by Richard Humphreys QC concerning planning application 17/00077/FULMAJ (not dated)

Project Pegasus – Application 17/00077/FULMAJ – Response to Points raised by Richard Humphreys QC concerning the design of the proposed dormers – Hugh Broughton Architects - February 2017

REPRESENTATIONS

Letter – Richard Humphreys QC (1st Consultation Response – 17/02/2017)
Letter – Richard Humphreys QC (2nd Consultation Response – 6/03/2017)
Online – Mr Stephen Solley – 13/02/2017
Email – Gordon Wignall – 24/02/2017
Letter – Professor Sir Roy Goode – 24/02/2017
Online – Mr Justin Gau – 25/02/2017
Online – Ms Beverley Lang – 26/02/2017
Letter – Mr Paul Ozin QC – 27/02/2017
Email – Mr Robert Woodcock QC – 27/02/2017
Online – Mr Simon Levene – 27/02/2017
Online – Mr David Sanderson – 27/02/2017
Email – Mr Ronald Thwaites QC – 28/02/2017
Email – Sir Richard Buxton – 28/02/2017
Letter - David Vaughan CBE QC and Nicholas Asprey Esq - March 2017
Letter – Save Britain’s Heritage – 01/03/2017
Online – Mr Ian Stern – 01/03/2017
Online – Mr Alistair McCreath – 01/03/2017
Online – Mr Faisal Sadiq – 01/03/2017
Online – Mr Andrew Goodman – 01/03/2017
Online – Mr Stuart Brown – 01/03/2017
Online – Dr Anthony Leonard – 01/03/2017
Online – Mr Abbas Lakha – 01/03/2017
Letter – Guy Tritton – 02/03/2017
Letter – Ms Susan Jacklin QC – 02/03/2017
Online – Miss Susanna FitzGerald QC – 03/05/2017
Online – Miss Raquel Agnello QC – 03/03/2017
Online – Mr Michael Spencer QC – 03/03/2017
Letter – Mr James Richardson QC (Hon) – 04/03/2017
Letter – Sir Stephen Sedley – 6 March 2017
Online – Mr Philip Moser QC – 06/03/2017
Email – Ms Vivian Robinson QC – 06/03/2017
Online – Mr Guy Fetherstonhaugh – 06/03/2017
Email – John Bate-Williams – 07/03/2017
Email – Sir Stephen Tomlinson – 07/03/2017
Letter – Philip Petchey – 08/03/2017
Letter – Mr Robert McCracken QC – 08/03/2017
Letter – Ms Cate Tuit – 08/03/2017
Letter - Neil D. Coe – 09/03/2017
Letter – Rt Hon Lord Lloyd of Berwick – not dated (Stamped date by CoL 09/03/2017)
Online – Mr Tom Mitcheson – 09/03/2017
Online – Mr Clive Newberry QC – 09/03/2017
Email – The Hon. Mrs Justice May DBE – 10/03/2017
Email – HH Nick Coleman – 10/03/2017

Email – John Ross QC – 10/03/2017
Email – John Whittaker – 10/03/2017
Online – Mr Humphrey Lloyd – 10/03/2017
Online – Mr Grahame Aldous – 10/03/2017
Online – Mr Nicholas Green – 10/03/2017
Online – Mr Alastair Hodge – 10/03/2017
Online – Mrs Kathryn Arnot Drummond – 10/03/2017
Online – Mr John Chadwick – 10/03/2017
Online – Lord Jonathan Sumption – 12/03/2017
Online – Ms Alison Levitt QC – 13/03/2017
Online – Mr Simon Baker – 15/03/2017
Online – Mr Kieron Beal QC – 15/03/2017
Email – Vicky Stewart – 16/03/2017
Online – Mr Peter Birkett – 17/03/2017
Email – Tim Walpole-Walsh – 18/03/2017
Letter – Sir David Keene – 19/03/2017
Online – Mr Richard Southwell QC – 21/03/2017
Letter – Stephen W Williamson QC – 21/03/2017
Email – Michael Sutcliffe – 21/03/2017
Letter – Twentieth Century Society – 22/03/2017
Letter – Rt Hon Professor Sir Bernard Rix – 22/03/2017
Online – Ms Inner Temple – 23/03/2017
Email – Andrew Tait QC – 23/03/2017
Letter – The Rt Hon Lord Woolf CH, FBA (Hon). – 23/03/2017
Email – Karl Ulas-Ono – 23/03/2017
Online – Mr David Streatfeild-James QC – 24/03/2014
Online – Mr Andrew Warnock – 24/03/2017
Letter – Sir Konrad Schiemann – 24/03/2017
Email – Desiree A A Artesi, Fabio D Artesi, Gianfranco R R Artesi – 24/03/2017
Letter – Patrick Maddams Hon FRIBA – 28/03/2017
Online – Mr Thomas Roe QC – 29/03/2017
Email – Stanley Brodie QC – 27/03/2017 and 04/04/2017
Online – Mr Alan Birbeck – 08/04/2017
Email – Tom Devlin – 28/04/2017
Email – Simon Swynfen Jervis – 02/05/2017

Letter – Professor Sir Roy Goode – 12/05/2017
Letter - Rt Hon Lord Lloyd of Berwick dated 19/05/2017
Letter – Neil D. Coe dated 24/05/2017
Letter – Michael Sutcliffe dated May 2017
Online – Mr Alan Birbeck dated 22/05/2017
Letter – Philip Petchey dated 24/05/2017
Letter – Mr Richard Humphreys QC dated 25/05/2017
Email – Mr Robert McCracken QC dated 25/05/2017
Letter – David Vaughan CBE QC and Nicholas Asprey Esq dated 25/05/2017

Appendix A

London Plan Policies

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

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 5.7 Major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

Policy 5.12 Development proposals must comply with the flood risk assessment and management requirements set out in PPS25 and address flood resilient design and emergency planning; development adjacent to flood defences will be required to protect the integrity of existing flood defences and wherever possible be set back from those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

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 6.13 The maximum standards set out in Table 6.2 should be applied to planning applications. Developments must:

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

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

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.

Policy 7.14 Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

Policy 7.21 Trees should be protected, maintained, and enhanced. Existing trees of value should be retained and any loss as the result of development should be replaced.

Relevant Local Plan Policies

CS4 Seek planning contributions

To manage the impact of development, seeking appropriate developer contributions.

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.

CS16 Improving transport and travel

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

CS17 Minimising and managing waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

CS22 Maximise community facilities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes

for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM12.5 Historic parks and gardens

1. To resist development which would adversely affect gardens of special historic interest included on the English Heritage register.
2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:

- a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
- b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
- c) where on-site carbon emission reduction is unviable, offsetting of residual CO₂ emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
- d) anticipated residual power loads and routes for supply.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM₁₀ pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NO_x).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

- a) road dangers;
- b) pedestrian environment and movement;
- c) cycling infrastructure provision;
- d) public transport;
- e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
 - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
 - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be

required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;

- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
 - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

SCHEDULE

APPLICATION: 17/00077/FULMAJ

Inner Temple Treasury Building The Terrace Crown Office Row

Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

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 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;
 - (b) details of dormer windows;
 - (c) details of soffits, hand rails and balustrades;
 - (d) details of windows and doors;
 - (e) details of stonework to fire escape surround, chimney stacks and new elevations;
 - (f) details of rooflight;
 - (g) details of plant screening;
 - (h) details of junctions with adjoining premises;
 - (i) details of all alterations to the existing facade;
 - (j) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;
 - (k) details of the integration of cleaning equipment, cradles and the garaging thereof;
 - (l) details of all ground level surfaces including materials to be used;
 - (m) details of walkway surfaces including materials to be used;

- (n) details of external surfaces within the site boundary including hard and soft landscaping;
- (o) measures to be taken during the period of demolition and construction for the protection of the trees to be retained and details of any pruning of the trees.
- (p) details of all water butts (and enclosures)

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 Local Plan: DM10.1, DM10.5, DM12.2.

- 3 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects including the proposed locations of the work compounds to be used during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. 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 policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

- 4 Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall include relevant measures from Section 4 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. No demolition or construction shall be carried out other than in accordance with the approved details and methods.

REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.

- 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 policy of the Local Plan: DM12.4.
- 6 Prior to the commencement of any works on site, details shall be submitted to and approved in writing by the Local Planning Authority showing the means of protection of trees T1, T2, T3 and T4 including their root system and the approved details shall be implemented prior to and during the course of the building works as appropriate.
REASON: To ensure the protection of the adjacent trees in accordance with the following policies of the Local Plan: DM10.4, DM19.2. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated before the design is too advanced to make changes.
- 7 A pre-construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted to and approved in writing by the Local Planning Authority prior to demolition.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 8 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: water butts, flow control devices, design for system exceedance. Three water butts should be provided in the locations shown on Drawing 231-SK20170314-1, at least two of these should have a restricted discharge so as to only hold water temporarily - each water butt should be sized to attenuate at least 5mm of rainfall falling on its relevant catchment area; unless otherwise agreed with the Lead Local Flood Authority;
(b) Evidence that Thames Water have been consulted and consider the proposed discharged rate to be satisfactory.

(c) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, its aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

- 9 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 10 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 11 Any generator on the site shall be used solely on intermittent and exceptional occasions when required in response to a life threatening emergency or an exceptional event requiring business continuity and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise noise impacts and emissions of air pollutants and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.
REASON: To minimise adverse air quality in accordance with policies DM15.6 and DM 21.3 of the Local Plan and policies 7.14 B a and c of the London Plan.
- 12 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least in accordance with the height

detailed in the air quality assessment submitted in order to ensure maximum dispersion of pollutants.

REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2015 and the Local Plan DM15.6.

- 13 No boilers that have a dry NOx emission level exceeding 40 mg/kWh (measured at 0% excess O2) shall at any time be installed in the building. Unless otherwise agreed in writing by the local planning authority the stack discharge velocity shall be in accordance with the air quality impact assessment submitted.
REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.
- 14 A. No CHP plant in the thermal input range 50kWth to 20MWth with NOx emissions exceeding that specified in Band B of Appendix 7 to the GLA Sustainable Design and Construction Supplementary Planning Guidance published April 2014 (or any updates thereof applicable at time of installation) shall at any time be installed in the building.
B. Prior to any CHP plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority:
1. The results of an emissions test demonstrating compliance with Part A of this condition and stack discharge velocity carried out by an accredited laboratory/competent person; and
2. An equipment maintenance schedule demonstrating that the emission standard would always be met.
C. The CHP plant shall at all times be maintained in accordance with the approved schedule.
REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan
- 15 This permission only permits the carrying out of works to tree T2 as detailed in the Arboricultural Impact Statement dated January 2017 which are necessary to implement the full planning permission under Part III of the Town and Country Planning Act 1990 (Reg 14(a)(vii)). This permission does not authorise any other works to the 4 plane trees, (T1-T4), as set out in the arboricultural report.
REASON: To ensure the protection of the adjacent trees in accordance with the following polices of the Local Plan CS19
- 16 All works to the tree(s) shall be carried out in accordance with BS 3998: 2010, Tree work - Recommendations.

REASON: In order to ensure the continued protection of the tree(s) in accordance with the following policies of the Local Plan: DM10.4, DM19.2.

- 17 Notwithstanding the provisions of Part 4 of Schedule 2 Town and Country Planning (General Permitted Development) Order 2015 - Part A The Inner Temple Garden shall not be used for temporary structures including the use for of the Garden as a works compound.
REASON: To preserve the character and appearance of the conservation area and to safeguard historic open space in accordance with the following policies of the Local Plan: DM12.2 and CS19.
- 18 No amplified or other music shall be played on the roof terrace.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 19 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 37 pedal cycles. 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 Local Plan: DM16.3.
- 20 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: 231-P1001-Rev P1, 231-P1002-Rev P1, 231-P1009-Rev P1, 231-P1010-RevP1, 231-P1011-RevP1, 231-P1012-Rev P1, 231-P1013-Rev P1, 231-P1014-RevP1, 231-P1015-RevP1, 231-P1019-RevP1, 231-P1020-RevP1, 231-P1022-RevP1, 231-P1024-RevP1, 231-P1027-RevP1, 231-P1040-RevP1, 231-P1041-RevP1, 231-P1042-RevP1, 231-P1043-RevP1
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 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

- 2 Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.
- 3 The location of outside space is an important consideration with regard to the exposure of air pollutants. The applicant is therefore minded to consider the location of existing and planned combustion plant termination points relative to any terrace, general access areas or openable windows etc. In addition to any building control or planning requirements, the third edition of the Chimney Height Memorandum (1981) requires that that certain types of combustion plant terminate at least 3m above any area to which there is general access.
- 4 Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the

Department of Markets and Consumer Protection on measures to avoid this

- 5 You are advised that a section 211 Notice does not need to be given to the local planning authority where consent would not be required if the tree was protected by a TPO (Reg 15(1)(a)(i) of the Tree Protection Regulations 2012.) One of these exemptions from the need to obtain consent (and in this case from the need to give a s.211 Notice) is the cutting down, topping, lopping or uprooting of a tree so far as the work is necessary to implement a full planning permission under Part III of the TCPA 1990 (Reg 14(a)(vii)). However any other works including, in the long term, general trimming back of the 4 plane trees will require a section 211 Notice.
- 6 You are advised to discuss the impact of the proposed works on the existing trees with the Chief Planning Officer who will advise in respect to any potential archaeological remains.
- 7 If at any time ground works or excavations are to take place below existing ground levels for works related to the existing tree(s) or any new tree(s), you are requested to contact the Chief Planning Officer to establish whether the site has archaeological potential.
- 8 You are advised to contact the Church Authorities before any works commence in order that they can advise as to whether a Faculty is required for those works.
- 9 You are advised to notify and if necessary obtain the permission of the owner before carrying out any work for which approval has been granted.
- 10 Many species are protected under legislation such as the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010. A contravention of those statutory provisions may constitute a criminal offence. The grant of this consent/planning permission does not override any statutory requirement to notify Natural England and/or obtain a licence prior to carrying out activities which may harm or disturb protected species such as bats.

Planning Application 17/00077/FULMAJ

Representation by Richard Humphreys QC

Introduction

1. I am a member, Bencher and resident of the Inner Temple. I specialise in town and country planning and local government law. Of those Governing Benchers of the Inn who voted¹, I was one of the 46%² who did not support the proposed scheme.³
2. The views I express below are my personal views.
3. I respectfully request that the proposed application be refused planning permission.
4. Members of the Planning Committee are requested, if possible, to visit the Inner Temple Library before reaching a decision on the application.

The harm to, and partial loss of, the Library

5. Firstly, I should mention that, whilst neither the Treasury Building, Hall or Library have been listed by the Secretary of State, it is understood that an application to the Secretary of State to review his decision has not yet been determined.
6. *Irrespective* of the outcome of that review, it is respectfully submitted that the Library itself (i.e. its rooms and gallery) should be regarded by the City of London

¹ 219 (including 10 abstentions).

² Excluding the 10 abstentions.

³ Design and Access Statement page 29. There are 319 Governing Benchers. Non-Governing Bencher members of the Inn (it is believed that there are some 8,000 qualified barrister members in total) were not entitled to vote; nor were sets of Chambers (professional tenants many of whom are not members of the Inn).



Corporation ("City of London") as a "non-designated heritage asset".⁴ The Library is a place (and part of a building) which has a degree of significance meriting consideration in the planning decision because of its heritage interest.⁵

7. The effect of the proposed scheme on the significance of the Inner Temple library (its rooms and gallery) as a heritage asset (non-designated) has not, however, been assessed in any of the planning application documentation.

8. The NPPF advises that:

"135. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

9. The Design and Access Statement acknowledges that:

"one of the inevitable consequences of the scheme however is the reduction in size of the library to make way for some of the facilities of the education and training centre."

10. The principal reduction in size of the Library would be caused by the inclusion of a ramped lecture room (spanning 2 floors) which would involve the removal of the entire gallery of the existing library; with the consequential additional loss in particular of library rooms H and J on the main (2nd) floor.

⁴ "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)": the NPPF Glossary.

⁵It is noted that the Library building is identified by the City of London in the Conservation Area Character Summary for the Temples (2000). The planning applicant's Planning Statement also acknowledges (page 10, paragraph 7.4) that the Treasury Building, Hall and Library is "a non-designated heritage asset in a Conservation Area".

11. There will thus be direct and significant loss of, and harm to, the significance of the heritage asset. No assessment of this in the context of paragraph 135 has been undertaken in any of the application documents.

**why the Library should be regarded as a non-designated heritage asset
(assuming that it is not listed following review)**

12. The Inner Temple library is considered to be one of the most handsome law libraries in the English-speaking world. The Library is free to use by all members of the Inn and members of the 3 other Inns (more than 15,000 practising and student barristers). Academics from all over the world visit and work in the Library too. Library tours for school and university students and other prospective members, as well as librarians, academics and lawyers are also freely provided on request.

13. The library houses, presently in an easily accessible manner, one of the most important law libraries in the world.

14. A reading room, and subsequently a library, are known to have existed in the Inner Temple since about 1506. Professor Sir John Baker Q.C., LL.D., F.B.A. in *The Inner Temple: a brief historical description* (1991) says that:

"The Inn had a library by the time of Henry VII, and the original building (in existence by 1506) joined the east end of the old hall, close to where it still is."

15. Great care and attention was given to the design and execution of the Library after the Second World War. The Library is panelled throughout; the woodwork of the tables, book-cases, doors and balustrades are of natural English oak and the floors of sapele mahogany. Much of the wood for the panelling (in very short supply after

the War) is understood to have been acquired from the Bank of England. The best skilled craftsmen were employed. The Library work was overseen by Treasurers of the Inn (the highest office in the Inn), including Lord Goddard (Lord Chief Justice 1946 – 1958) and Lord Somervell of Harrow (a Lord of Appeal in Ordinary 1954-1960).

16. The design and layout of the Library was influenced by late 17th and early 18th century libraries, reflecting the insistence of the Inn on “recreating the qualities which made the place special”⁶; a then (in the 1950s) unfashionable approach, but now properly recognised and appreciated.⁷
17. Public monies were given to the Inn for rebuilding by the War Damage Commission.
18. The Library was considered sufficiently important to warrant the inclusion of a photograph of the main room as a feature in The Times on 16th April 1958 under the heading: “The Inner Temple Library finished”.

⁶ Conservation Bulletin (2007) written by Philip Davies, Planning and Development Director (South), English Heritage: “Political Landscapes – Governing and Defending the Land - The post-war decades saw unprecedented investment in public building. But how much of that legacy will survive into the 22nd century? – Post-war place making”:

“Today it is possible to walk from the Embankment through the Inner and Middle Temple, past Street’s magnificent Law Courts, through Lincoln’s Inn, across High Holborn to Gray’s Inn and beyond into Bloomsbury and still appreciate the qualities which so captivated George Edinger and his pre-war contemporaries. The primary reason for this is the unfashionable approach adopted by the Inns of Court in insisting upon recreating the qualities which made the place special, based on a deep understanding that the importance of the place transcended the sum of its component parts. While the intrinsic architectural quality of the post-war ranges may vary, the overall unity derived from a common classical vocabulary deploying traditional materials and details confers a very distinct and serene sense of place.”

⁷ The Temples Conservation Area was designated in 1991. The Conservation Area Appraisal also notes the existence of the Library.

19. The Library was opened on 21st April 1958 in the presence of the then Lord Chancellor, Lord Kilmuir.

20. The *Law Times* of 2nd May 1958 noted that

“those who were present on the occasion cannot fail to be impressed both with its general design and with the workmanship which has been bestowed on its furnishings and equipment”.

21. On 24th April 1958 *Country Life* included an article⁸: “The Inner Temple Library Re-housed” with photographs of the “Great Central Room” and the “gallery floor”:

“The Plan of the library is approximately L shaped ...the main rooms are in the long branch of the L, which runs west from King’s Bench Walk. On its south side is a splendid run of three great rooms, of which the central and biggest measures approximately 53 ft. by 27 ft. These rooms go up through two storeys, with galleries running around them at the intermediate floor level

....

These rooms ... are unashamedly modelled on late-17th – and 18th-century prototypes ...the heart of every book-lover must immediately be warmed on coming into them; for they are supremely workable-in rooms and give him exactly what he wants, the possibility of reading in comfort, and in spacious and yet intimate surroundings. The smaller rooms are friendly and unassuming; the big rooms extremely dignified, but never pretentious or pompous. The whole library is carefully planned on a principle that was first worked out in the pre-war library, that of giving the maximum variety of choice

⁸ Referred to in the Inn’s own “History of the Library”.

to the reader, who can sit at tables of every kind and size, and in rooms that range from the grand to the small and informal. The material and workmanship of the fittings are of high quality. The woodwork, including the tables, is of very attractive colouring, with bookcases, doors and balustrades of grey-brown English oak, and floors of polished sapele mahogany. The big pedimented doorways leading into the central room are fine examples of traditional design. The long line of brass candelabra that hang at regular intervals along the centre of the ceiling is one of the pleasantest features of the main rooms."

22. Pevsner's "Buildings of England: The City of London" (1997) expressly notes the Library's

"double-height galleried rooms".

23. In 2007 Dr Geoffrey Tyack F.S.A.⁹ described the library as:

"Ingeniously divided into bays by beautifully crafted oak bookcases, with galleries above".

24. Vistas of the 3 acre Inner Temple Gardens (the Inner Temple Garden is included in the English Heritage Register of Parks and Gardens of Special Historic Interest in England (Grade II)) are afforded from all south-facing windows, including the Gallery windows. On the northern elevation the Library looks over Church Court, with clear views, and as part of the setting, of the Grade 1 listed ancient Temple Church opposite.

⁹ "The Inner Temple – A Community of Communities" (Third Millennium, London) a book published to mark the 400th anniversary of the Letters patent granted to the Honourable Societies of the Inner and Middle Temple by King James I. Chapter entitled "The Buildings of the Inner Temple".

25. The Design and Access Statement (Hugh Broughton architects) acknowledges the proposed reduction from “double height to single height space”¹⁰ and recognises that

“the Inn’s archives express Members’ particular pride in the quality of interior spaces, especially ... the Library ...”¹¹

26. The Design and Access statement itself now acknowledges¹² the Library’s

“special character and architectural quality.”

27. It is assumed that this more recent acknowledgment of the Library’s special character and architectural quality has not yet been drawn by the Inn to the attention of Historic England or the Secretary of State for Culture, Media and Sport in connection with the listing review.

28. As is well known, our common law legal system is based on precedent. It has been adopted by about one third of the countries around the globe and in particular the countries of the Commonwealth and the United States. Because of this the libraries of the four Inns of Court including the Inner Temple have a special place in the culture and learning of a great many lawyers from many different jurisdictions. This is because of their association in the minds of lawyers with the development and evolution of the common law.

¹⁰ Page 3.

¹¹ Page 6.

¹² Page 11.

29. As acknowledged by the Heritage Statement¹³, the Inner Temple library is a function of “great historical relevance within the evolution of the Inner Temple”.

30. In summary, the heritage interest¹⁴ is considered to be that:

- there has been a library on the present site continuously since at least the 15th Century; the library is of great historical relevance within the evolution of the Inner Temple;
- the present library came into existence following Second World War bombing and with the considerable assistance of public monies;
- its design and layout reflect the best qualities of traditional design, layout and execution; Hugh Broughton Associates now recognise its “special character and architectural quality”;
- Pevsner notes its “double-height galleried rooms”; Tyack noted that it is “Ingeniously divided into bays by beautifully crafted oak bookcases, with galleries above”;
- it is now regarded as one of the handsomest law libraries in the English-speaking world;
- it is associated in many parts of the world with research of the law, as well as the education, work and research of many eminent post-war judges and barristers; and it has a central importance in this mediaeval Inn of Court.

¹³ Page 9, paragraph 2.26.

¹⁴ See the NPPF Glossary definition of “heritage asset”.

Impact

31. As noted above, the Design and Access Statement acknowledges that:

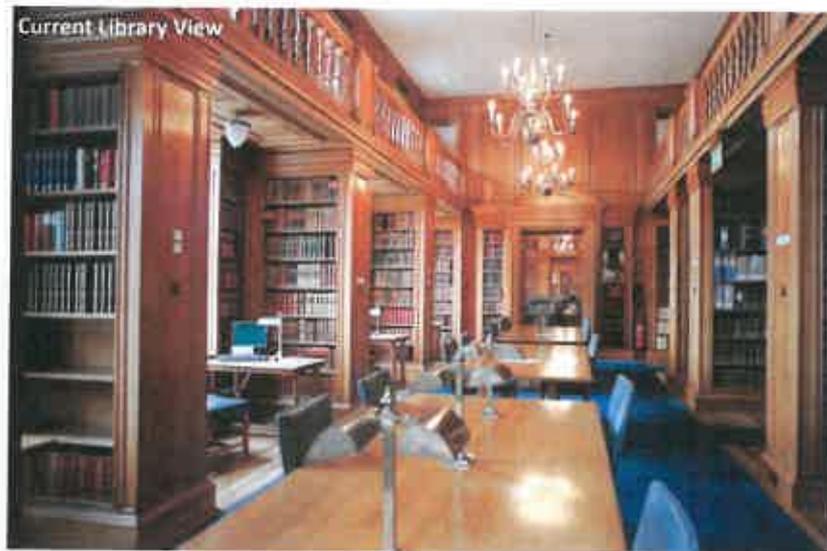
“one of the inevitable consequences of the scheme however is the reduction in size of the library to make way for some of the facilities of the education and training centre.”

32. The principal reduction in size would be caused by the inclusion of a ramped lecture room spanning two floors which will involve the removal of the entire gallery of the library; with the consequential additional loss in particular of library rooms H and J on the main floor. The Design and Access Statement describes¹⁵ the layout as being

“significantly adapted by the infilling of the third floor above.”

33. What the application fails to spell out is that the ‘reduction in the size of the library’ is therefore to be achieved by severing the entire balustraded gallery of the existing library, reducing it from its present spacious and elegant proportions to the low-ceilinged structure, as shown in the two images which follow on the next page.

¹⁵ Page 14.



34. Whilst, as noted above, the Design and Access Statement acknowledges¹⁶ the need to ensure that the Library's "special character and architectural quality can be maintained as far as possible", it is self-evident that "the double-height galleried rooms"¹⁷ will be completely lost.

¹⁶ Page 11.

¹⁷ Pevsner.

35. As confirmed by Pevsner's and Tyack's independent views, this constitutes a major reduction in the significance of the Library as a heritage asset.
36. The proportions of the Library are particularly elegant. They depend in particular upon the high ceiling, the balustraded galleries, the oak panelling and decoration, the sequence of spaces and above all the quality of light admitted by the two tiers of windows.
37. The gallery, which provides this well proportioned height to all 3 main interlinking rooms¹⁸, as well as important bookshelves, desk space, daylight, garden views and circulatory space, will be totally lost. The remainder of the main rooms in the library will be a continuous, very long (somewhat oppressive) run under a single height ceiling¹⁹, lacking proportion; and the library will be unable to display the whole current collection of books.
38. The applicant seeks to attract up to 240 students at any one time to the lecture and training rooms as well as to the reduced-in-size library. Irrespective of laptop use by students, it is clear from the experience of other institutions currently providing education courses for barristers that shelf provision for substantial numbers of additional books for students may well also need to be made.
39. As already noted, the National Planning Policy Framework ("NPPF") paragraph 135 provides that:

¹⁸ Rooms C, D and E.

¹⁹ Rooms C and D would be 2.8 metres high (as in proposed illustration) and 2.5 metres in Room E and in side Rooms F and G.

"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

40. This paragraph is not considered or applied to the Library in any of the application documents.

41. The Heritage Statement provides no assessment of the Library as a non-designated heritage asset. There is a brief, single reference to the wording of paragraph 135²⁰ in the "policy context" section of the Statement but no application thereafter of the paragraph. The Statement refers only to the effect of the scheme on the Temples Conservation Area and nearby statutory listed buildings.

42. The Heritage Study (Hugh Broughton Architects) devotes paragraphs 2.23-2.29 to the history of the *previous* libraries since the 15th Century but makes no comment on the present library which was constructed almost 60 years ago.

43. The only reference to non designated heritage assets is a brief reference²¹ to buildings adjacent to the Treasury Building, Library and Hall.

²⁰ Page 16, paragraph 3.13.

²¹ Page 18 paragraph 3.8.

44. The Planning Statement (Adrienne Hill Limited) makes no express reference to paragraph 135 either. However at paragraph 7.4 it is acknowledged that the Treasury Building, Hall and Library building is a non-designated heritage asset.

45. It is submitted that considerable weight should be given by the City of London to the significance of the heritage asset and to the harm to and partial, but significant, loss of the asset.

- **Benefits**

46. Whilst there is no objection, indeed there is of course support for improved facilities in principle, it is considered that the proposed development is a classic example of a "quart into a pint pot": it tries to accommodate far too much on the site. A scheme²² which utilised the roof space without affecting the library could be supported in principle.

47. No business case for the proposed scheme has been presented with the application. There is very considerable concern as to whether the scheme (which would inevitably cost 10s of millions of pounds) would be viable. The viability, in terms of the long-term sustainability, of the scheme is of course highly relevant to the weight which can be given to the benefits when balancing them against the substantial harms.

²² As was originally envisaged and, it is believed, informally discussed with planning officers in 2014.

48. Moreover, it has not been demonstrated that there are no alternative locations (existing buildings) within the Inn and/or in conjunction with the Middle Temple (or Lincoln's Inn) which could be used/successfully adapted for education and training.

49. It is also now understood that the Inn's education and training department offices are moving soon to 2 King's Bench Walk.²³

50. In conclusion, in my view the benefits do not outweigh the harms.

The library as part of the character of the Temples Conservation Area

51. The Temples Conservation Area is a designated heritage asset.²⁴

52. It is submitted that the character of the Temples Conservation Area includes the library rooms and gallery.

53. As the Temples Conservation Area Character Summary notes:

"Of all of the City's conservation areas the Temples is perhaps the most distinctive and has a character that is not only unique to the City, but rarely found elsewhere. It has a private quality that is emphasised by its gated entrances and most buildings are designed to face the interior of the Temple, it appears to turn its back on the noise and bustle of the City. The area is

²³ This is not mentioned in the Planning Statement. The existing basement level plan – Draw No. 231-E1009-RevP1 – will need to be amended accordingly.

The existing third floor plan – E1013-RevP1 - is also inaccurate: there is an area marked "Book Store" which implies that this is the only area in the Gallery which houses books, which is not, of course, the case. Further, the plan does not show any of the existing seating (8 tables with computer terminals and 13 reading stools in the windows.

²⁴ NPPF Glossary: "A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation."

more than an outstanding collection of buildings of historic importance. It is a subtle combination of buildings and spaces with a character and environmental quality that is reminiscent of the collegiate atmosphere of Oxford and Cambridge.

The area's character is influenced, in no small measure, by the use to which the activities of the legal profession has evolved and continues to carry on here. There is a sense that change over time has been carefully considered ..."

54. Again, the effect of the proposed development on the character of the Conservation Area, by reason of its significant harm to the library rooms (including gallery) has not been addressed at all in the application documentation.

55. The NPPF advises that:

"138. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area ... should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area ...as a whole."

The library rooms including gallery make a positive contribution to the significance of the Conservation Area. As already noted, the applicant's architects now recognise the "special character and architectural quality" of the library.

56. Paragraph 134 states:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”

57. Paragraph 134 is referred to above because it is considered that the harm to significance of the Conservation Area as a whole would constitute “less than substantial harm” rather than substantial harm. Considerable importance and weight should, however, be given to that ‘less than substantial harm’²⁵ as confirmed by the Court of Appeal in East Northamptonshire District Council v. Secretary of State for Communities and Local Government (the Barnwell Manor case)

“a finding of harm to the setting of a listed building is a consideration to which the decision-maker must give “considerable importance and weight”.

58. As Lindblom J. (as he then was) subsequently observed in R (Forge Field Society) v Sevenoaks DC²⁶ :

“As the Court of Appeal has made absolutely clear in its recent decision in Barnwell, the duties in sections 66 and 72 of the Listed Buildings Act do not allow a local planning authority to treat the desirability of preserving the

²⁵ See East Northamptonshire District Council v. Secretary of State for Communities and Local Government (2015) 1 WLR 45, at page 54 letter F (paragraph 22) (the Barnwell Manor case) “a finding of harm to the setting of a listed building is a consideration to which the decision-maker must give “considerable importance and weight”.

²⁶ [2014] EWHC 1895 (Admin), paragraphs 48-51, in particular paragraph 48.

settings of listed buildings *and the character and appearance of conservation areas* as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building *or the character or appearance of a conservation area*, it must give that harm considerable importance and weight." (italicised text added)

59. Paragraphs 138 and 134 have not been applied by the applicant's advisers to the library. It has not been demonstrated that the benefits would outweigh the harms.

The design of the proposed dormers

- Southern elevation

60. The design of the proposed dormer windows is in my view inappropriate and harmful.

I have raised this issue since 2014. In my view they should have a horizontal, not a strongly vertical, emphasis. They should be subordinate, as the gallery windows of the library below are.

61. Reference is made by the applicant to Worthington's original scheme. It is clear, however, from the Design and Access Statement²⁷, that the dormer windows intended for the roof in Worthington's scheme were not vertical in emphasis, but had a horizontal emphasis completely missing from the proposed dormers. Thus the proposed dormers (as designed) are not a fulfilment of the original objective.

62. Secondly, and as, if not more, importantly, as built the building includes smaller windows (with a horizontal emphasis) at the gallery level of the Library (which are

²⁷ Page 9.

immediately below the proposed dormers). The strongly vertical emphasis of the proposed dormers will in my view be eye-catching rather than subordinate.

63. Hugh Broughton Associates shows other examples²⁸ of roof dormer windows in the Inn. Many including, for example, 1-3 Kings Bench Walk – Grade 1 listed buildings – have a horizontal emphasis.²⁹ Key, however, is the appropriateness of the proposed dormers in this building and in views of this building from the south and the garden in particular.

64. In my view, the eye-catching nature of the proposed dormers would not be consistent with the “quiet demeanour” which the Design and Access Statement recognises the character of the Temples Conservation Area to have.³⁰

65. As the Design and Access Statement further acknowledges³¹ “the premise of the design should be ... so that the new parts compliment (sic) the old without drawing attention to themselves.”

- **Northern elevation**

66. On the northern elevation the run of 3 contiguous windows within a dormer above the proposed lift shaft³² would, in addition, be particularly eye-catching, discordant and inappropriate, especially in the setting of the adjacent ancient Grade I listed Temple Church.³³

²⁸ Page 19.

²⁹ Those above Carpmael Building are (i) above a road archway and may thus justify a different treatment there; (ii) they would not be read with the proposed dormers from the south, north and west.

³⁰ Page 6 paragraph 2.5.

³¹ Page 12 paragraph 3.4.

³² P1040-RevP1 – item 12 – lift overrun.

³³ E.g. Drawing 1040-RevP1 and Proposed View from Church Court 1.

Eastern elevation³⁴

67. Similar points to those made in respect of the southern and northern elevations are made in respect of all four proposed dormers.

68. In conclusion the design of the proposed dormers would harm the character and appearance of the Temples Conservation Area (a designated heritage asset).

The effect of the proposed development on the setting of the Temple Church and thus on the church's significance.

69. I am also concerned that the effect of the proposed development on the setting of the Temple Church and thus on the church's significance has not been fully assessed; in particular:

- (i) the effect from late afternoon/early evening onwards of lighting being visible through the additional fenestration particularly (but not only) at high (new 4th floor) level. Comparing Drawing No 231 – E1040-RevP1 with Drawing No 231 – P1040-RevP1 at 4th floor there will be the following new windows: 12 dormer windows, 6 generally larger windows than the 4 existing (immediately below the 3 contiguous windows referred to above); and an additional window above the proposed new entrance in Church Court;
- (ii) the potential visibility in views in Church Court of the underside of the suspended floor of the proposed lecture theatre. See, for example, proposed section drawing E-E.
- (iii) the run of 3 contiguous windows in the dormer above the proposed lift shaft.

³⁴ Drawing No. 231-P1042 – RevP1.

70. In my view there would be harm to the setting, and therefore significance of, the Grade 1 listed building. This would be “less than substantial” within the meaning of NPPF paragraph 134, but it is harm to which “considerable importance and weight” should be attached.³⁵

Conclusion

71. The application should be determined in accordance with the development plan unless material considerations indicate otherwise.

72. The application does not accord with important policies of the development plan and does not therefore accord with the development plan as a whole. Material considerations (in particular the NPPF) do not indicate otherwise.

(1) The London Plan notes that “London’s diverse range of designated and non-designated heritage assets contribute to its status as a World Class City”.³⁶

(2) Policy 7.8 Heritage Assets and Archaeology requires that:

“C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

³⁵ See paragraphs 56-57 above.

³⁶ Paragraph 7.30.

D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.”

Here the applicant should have identified the Library as a heritage asset particularly given that the applicant’s advisers recognise the special character and architectural quality of it and that the Library will be “significantly adapted by the infilling of the third floor above.” The heritage interest has been set out above. The proposed development cannot be said to accord with either C or D above. The loss of the gallery, a feature specifically recognised by Pevsner and Tyack, in particular will lead to harm to the Library’s significance as a heritage asset.

(3) Similarly, contrary to D above, it has not been demonstrated that the setting, and thus the significance, of the Grade 1 listed Temple Church would not be adversely affected by the proposed development whether in terms of the effect of lighting from all of the additional windows, particularly but not only at high level, and/or the strong vertical emphasis of the proposed dormers as well as the run of 3 contiguous windows in the dormer on the northern elevation.

(4) Policies CS10/DM10 of the City of London Local Plan promote/require:

“a high standard of design ..., having regard to their surroundings and the historic and local character of the City ..., by:

1. Ensuring that ... detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

The design of the proposed dormers would not in my view be appropriate to the character of the Temples Conservation Area and the setting of surrounding buildings and spaces.

2. Encouraging design solutions that make effective use of limited land resources.

Effective use of limited land resources should and could be made, however, without causing the harm which would result from the proposed development.

(5) CS12/DM12.1

"To sustain and enhance heritage assets, their settings and significance."

This applies to the Library and the setting and significance of the Grade I listed Temple Church. The proposed development would not sustain them.

(6) DM12.2

"Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area."

The legal requirement³⁷ is that "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

It is submitted that the character of the Conservation Area includes the library.

³⁷ Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The harm caused to the library would not preserve or enhance the character of the Conservation Area.

The design of the dormers would not preserve the character or appearance of the Temples Conservation area either.

(7) DM12.5 To resist development which would adversely affect gardens of special historic interest included on the Historic England register.

It is assumed that there would be no permanent adverse affect on the Inner Temple Garden, by reason of the need for substantial temporary structures to be placed in the Garden before and for the duration of the construction period. The likely length of the construction period is not stated in the application documentation. It is assumed that use of the Garden will be required for up to 2 years.

Reference is made in the Design and Access Statement³⁸ to a letter dated 30th November 2016 from Mr Rayment of the City of London. This letter has not been appended to the application documentation. The adverse effects of the scheme as a whole should have been set out for consideration.

(8) The NPPF is of course a material consideration. This suggests again that planning permission should be refused. Whilst development will bring (for example) construction jobs and some other benefits set out in the documentation, (i) these are not considered to outweigh the significant harm to the library as a non-designated heritage asset; (ii) the lack of the demonstration of a robust and viable business case for the proposed development means that little weight can

³⁸ Page 12.

properly be given to the benefits of the scheme. As NPPF paragraph 173 advises: "Pursuing sustainable development requires careful attention to viability and costs in ... decision-taking." This principle logically applies also when considering what weight should be given to claimed benefits.

(9) Attention is also drawn to the following paragraphs with which the development conflicts:

Paragraph 17 – core planning principles:

- "always seek to secure high quality design"

- "conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations"

Paragraph 56 – good design

- "The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."

Paragraph 134 – less than significant harm to designated heritage assets

- "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be

weighed against the public benefits of the proposal, including securing its optimum viable use.”

This applies to the setting of the Grade I listed Temple Church. As confirmed by the Court of Appeal in East Northamptonshire District Council v. Secretary of State for Communities and Local Government (the Barnwell Manor case) “a finding of harm to the setting of a listed building is a consideration to which the decision-maker must give “considerable importance and weight”³⁹

Paragraph 134 also applies to the harm to the Conservation Area (a designated heritage asset). Considerable importance and weight should also be given to that harm.

Paragraph 135 – non-designated heritage assets

This has already been referred to above.

Paragraph 138 – Conservation Area

This has already been referred to above.

73. It is therefore respectfully submitted that the application should be refused.

17th February 2017

Richard Humphreys QC

³⁹(2015) 1 WLR 45, at page 54 letter F (paragraph 22).

Planning Application 17/00077/FULMAJ**Further Representation by Richard Humphreys QC in response to 3 documents submitted on behalf of the Inner Temple¹****Introduction**

1. This Note responds to the various points made in 3 documents submitted by the applicant in response to my original representation. For convenience only, Hugh Broughton Associates are referred to below as HBA, KM Heritage as KMH and Adrienne Hill Limited as AHL.
2. None of the points made in them materially alters the views I have expressed.

Review of listing decision

3. The outcome of the Secretary of State's review of the decision not to list the Treasury Building, Hall and Library, or any part thereof, is still awaited.
4. It is notable that none of the response documents claim that the applicant or its advisers have drawn to the attention of the Secretary of State HBA's acknowledgment that the interior of the library has "**special character and architectural quality**". This is very close to an admission that the statutory test for listing - "**special architectural or historic interest**" - is met.
5. Despite HBA's acknowledgment, KMH continue to seek to belittle the interior. KMH suggest that the reception of the contemporaneous architectural press to the "construction of the building" was "lukewarm". There are a number of points in response to this.
6. The "evidence" relied upon by KM Heritage appears to be merely the claimed *absence* of comment by the architectural press. Firstly, this is not factually correct: for example the architectural correspondent of the Times wrote an article dated 8th April 1948 about Sir Hubert Worthington's plans for the rebuilding of the Hall, Treasury Building and Library, entitled "Tradition Maintained in Scale and Character"; and the Times' architectural correspondent wrote a further article on 5th October 1955 entitled "New Inner Temple Hall Opened".²

¹ It is believed that the documents were submitted to the City of London on 28th February. Only AHL's response is dated. They were received from the City of London on 2nd March.

² attached.

7. Secondly, it could not fairly or reasonably be inferred either from the claimed absence of comment that the reception to the interior of the library was lukewarm when the contemporaneous Country Life article had already been published and been both comprehensive, and in praise, of its interior.
8. Moreover that article was written by Mr Mark Girouard³, then an architectural writer for Country Life before he became its architectural editor. Subsequently he was appointed Slade Professor of Fine Art; and made a Fellow of the Society of Antiquaries of London. KMH, astonishingly, make no acknowledgment of the foregoing.
9. Presumably KMH also seek to belittle Pevsner's observations about the library's double-height galleried rooms and Dr Tyack's views. The latter's views were published in a book commissioned by the Inn.⁴
10. KMH were instructed only after the Inn had decided to proceed with the present scheme and after the application to list the buildings had been made. It is unfortunate that the Inn appears content for its heritage to be belittled in this way.
11. The most important and significant point, however, is that KMH do not now contradict HBA's acknowledgment that the interior of the library has "special character and architectural quality."
12. Irrespective of the outcome of the review, that acknowledgment, along with the views of Girouard, Pevsner and Tyack are all highly relevant to the issue as to whether the interior of the library should be regarded as a non-designated heritage asset.

The Library's Interior as a non-designated heritage asset

13. KMH state that the interior is not of "exceptional quality". Leaving aside the question as to whether or not it is, KMH is, again, wholly incorrect to imply⁵ that the interior has to be of "exceptional quality" to be a non-designated heritage asset.
14. That is not the test. Whether the interior is a "heritage asset" depends on whether the asset has "a degree of significance meriting consideration in planning decisions, because of its heritage interest."⁶

³ His initials appear at the end of the article.

⁴ See footnote 9 of my original representation.

⁵ Paragraph 8.

15. My representation submitted that the interior of the library could in law, and should, be regarded as a non-designated heritage asset. Contrary to KMH's apparent assumption, this is an entirely separate point from the contribution that the interior of the library makes to the character of the Conservation Area. (I refer to this later.)
16. There is no reason in law, policy, logic or (if different) common sense why the interior of the library may not be a heritage asset: heritage assets, as defined, are not confined to the exterior of buildings; nor to the whole of a building - there is no reason why the expression may not apply to a part of a building; nor are heritage assets confined to buildings at all: a heritage asset, as defined, could be a site or place or area or indeed a landscape. Here, as previously stated, the interior is a part of a building and a place.
17. The interior of the library plainly has heritage interest. As summarised at paragraph 30 of my representation:
- there has been a library on the present site continuously since at least the 15th Century; the library is of great historical relevance within the evolution of the Inner Temple;
 - the present library came into existence following Second World War bombing and with the considerable assistance of public monies;
 - its design and layout reflect the best qualities of traditional design, layout and execution; Hugh Broughton Associates now recognise its "special character and architectural quality";
 - Pevsner notes its "double-height galleried rooms"; Tyack noted that it is "Ingeniously divided into bays by beautifully crafted oak bookcases, with galleries above"; ...
 - it is associated in many parts of the world with research of the law, as well as the education, work and research of many eminent post-war judges and barristers; and it has a central importance in this mediaeval Inn of Court.
18. It is notable that the responses do not contradict any of the foregoing.

⁶ The statutory test for listing depends upon whether a building or a feature of the building have "special architectural or historic interest". The precise statutory wording is "any feature of the building consisting of a manmade object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building" (see section 1(3)(b) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended). The fact that the interior is not listed does not in any way – law, policy or logic - prevent the interior from being a heritage asset.

19. The very narrow focus of criticism by KMH is simply on whether the additional claim that the library is now regarded as one of the handsomest law libraries (and one of the most important) in the English-speaking world is of heritage interest. Whilst obviously not of itself of heritage interest, these claims are nevertheless entirely consistent with its heritage interest. KMH question do not provide a single contrary example of their own, let alone of the applicant.
20. It should suffice to rely on the collective view of four past, highly distinguished Benchers and Masters of the Library (covering the period 1989 – 2013); and to the view of the British and Irish Association of Law Librarians, as set out in a letter dated 4th December 2015 written by its President, to Historic England: “The Inner Temple Library is one of the finest law libraries in the world.”⁷ A recent past Treasurer (His Honour Judge Cryan) himself, in a newsletter preceding an Open Weekend in 2015, described the Inner Temple and Middle Temple libraries as “great legal libraries”.
21. Again, it is unfortunate, indeed seemingly self-serving, that the Inn appears content now to question the status of its library. The important point, however, is that the points made in paragraph 17 above as to the heritage interest of the interior of the library are not contradicted by the Inn.
22. Contrary to KMH's inaccurate assertion⁸, a designated heritage asset is not equated in my representation with a non-designated heritage asset in terms of significance or weight. NPPF paragraph 135 applies to the latter heritage asset, as already made very clear in my representation.
23. AHL consider it relevant to draw attention to the fact that interior works do not require planning permission. AHL does not, however, draw attention to the statutory wording⁹: it is only works which (i) affect only the interior of the building, or (ii) do not materially affect the external appearance of the building, which do not involve ‘development’ and thus do not require planning permission.
24. Here, neither (i) nor (ii) apply: the scheme of works affect more than the interior; and, separately, materially affect the external appearance of the building.
25. Moreover, in respect of (i), it would be fanciful to suggest (and it is not of course suggested by the applicant) that the Inn would ever seek to carry out the proposed

⁷ Reference can in addition be made to the petition submitted to the City by Guy Tritton (uploaded onto the City's website on 2nd March 2017).

⁸ Paragraph 9.

⁹ Section 55 (2) of the Town and Country Planning Act 1990 (as amended).

interior works to the Library alone: such a scenario is not therefore a 'fallback' position to which, as a matter of law, the decision-maker may have any regard.¹⁰

26. In summary, there is therefore no reason in law, policy or logic why the interior of the Library should not be regarded as a non-designated heritage asset. The very significant impact on the interior of the library as a non-designated heritage asset, which HBA acknowledge to have "special character and architectural quality" should have been addressed in the application documentation and assessed against NPPF paragraph 135. This has still not been properly assessed.
27. It is notable that the impacts on the interior of the library described in paragraphs 31-34 and 36-38 of my representation are not in any way contradicted.
28. It is notable too that the points made in paragraphs 46-48 of my representation concerning the claimed benefits, serious concerns as to viability, lack of business plan, existence of alternatives etc are not addressed or rejected by the applicant. The Inn will inevitably seek to let out the new space for commercial use too and clarification in respect of this should in my view be sought by the City of London and provided by the Inn: on this basis the application is inaccurately and (inadvertently) misleadingly limited to "education, training and office use (sui generis)."
29. AHL clarifies¹¹ only a minor point about the present relocation of the education and training department offices to 2 Kings Bench Walk¹². AHL also states¹³ simply that the education of barristers is "the Inn's primary charitable objective, a function that is currently constrained by the limitations of the available accommodation."
30. No reference is made to Scheme 1 which the Inn originally intended to promote (involving use of the extensive existing and proposed roofspace alone) and in respect of which the Inn received favourable pre-application advice in 2014.

¹⁰ See, for example, New Forest District Council v Secretary of State for the Environment (1996) 71 P. & C.R. 189 and Brentwood Borough Council v Secretary of State [1996] 72 P. & C.R. 61, cited in R. v Secretary of State for the Environment Ex p. Ahern [1998] Env. L.R. 189; [1998] J.P.L. 351 (Christopher Lockhart-Mummery Q.C. sitting as a Deputy High Court Judge, p.9); South Buckinghamshire DC v. Secretary of State for the Environment, Transport and the Regions (1999) PLCR 72.

¹¹ Paragraph 17.

¹² my paragraph 49.

¹³ Paragraph 10.

The interior of the library as part of the character of the Conservation Area

31. KM Heritage¹⁴ inaccurately (again) asserts that my representation “attempts to link the internal quality of unlisted buildings in conservation areas to the overall character and appearance of conservation areas”.
32. My representation could not have been clearer: the late 17th/early 18th design and plan form of the library, including its gallery, and their skilled execution are part of the character (again I underline that word as I did in my representation – see paragraph 52 and the heading preceding paragraph 51). Character (as opposed to appearance) does not require the interior to “be seen” from a public viewpoint or the Conservation Area, contrary to KM Heritage’s response. This is, with respect, a basic and fundamental error. It is precisely why the words “character or appearance” of a Conservation Area appear in section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended). In any event, the rest of the Conservation Area is “experienced” to use KM Heritage’s words from the interior of the library (through its windows towards the Church to the north and the gardens to the south) which is of course itself part of the Conservation Area.
33. KM Heritage again¹⁵ incorrectly states that my representation equates unlisted buildings with listed buildings: it does no such thing; nor does NPPF paragraph 135.
34. NPPF deems Conservation Areas to be designated heritage assets. Harm to the character of a Conservation Area requires the application of paragraph 134 in *that* context, as explained in NPPF paragraph 138. Paragraphs 51-59 of my representation could not have been clearer.

Design of dormers

35. HBA repeat the point made in the Design and Access Statement that the project “offer[s] the opportunity to complete the roofscape of the building, as originally intended by its architects.” The accompanying drawing showed Sir Hubert Worthington’s original plan with dormer windows with a horizontal emphasis. Self-evidently Sir Hubert’s roofscape which included dormers with that emphasis is not proposed by the applicant; as my representation stated, however, “as, if not more,

¹⁴ Paragraph 11.

¹⁵ *ibid.*

importantly”¹⁶ as built, there are small windows with a horizontal emphasis at Library gallery level which were not in the original plan.

36. HBA recognise that *form* matched the proposed *function* in Worthington’s design (the dormers were intended for a bookstore in the roof). The dormers were therefore always intended to be subordinate in appearance and function. As built, the gallery windows are subordinate too. The proposed dormers will not be subordinate in appearance or function. That is why they will be eye-catching, in my view. The first and principal issue is what is appropriate for this building (rather than other buildings). HBA refer¹⁷ to Harcourt Buildings, but the proposed dormers in the scheme will plainly not be of the same size (or horizontal emphasis) as the gallery windows below.
37. As regards the impact on Church Court and on the setting of the Grade 1 listed Temple Church, I need only refer again to e.g. Drawing 1040-RevP1 and Proposed View from Church Court 1: the view of these large dormer windows will be very noticeable in Proposed View from Church Court 1; and this viewpoint does not support the contention that the run of dormer windows above the lift shaft will be “tucked in”. The fact that it provides natural light into the lift shaft is hardly relevant to the significance of the setting of the Church or to the appearance of the Conservation Area. In my view there will be harm to both. It is difficult to see how a run of 3 windows within a single dormer will “match” other, single windowed, dormers, as claimed by KMH.¹⁸ they will be noticeable by virtue of their size. KMH implicitly recognise the potential for harm by stating that they are “furthest away from the Temple Church”; the applicant’s Proposed view from Church Court 1 says it all.
38. Lighting for the first time from these large dormers at this new fourth floor/roof level will, moreover, appear well above the height of the Church opposite. Church Court and the space around the Church is especially sensitive. The Church and Building are not shown together in the Proposed views from Church Court 1 or 2. Again, in my view there will be harm.

¹⁶ Paragraph 62.

¹⁷ Paragraph 6.

¹⁸ Paragraph 12.

39. It is noted that KMH¹⁹ accept for the first time that the underside of the lecture theatre would be visible, albeit that it would be "very limited". I leave this and all other judgments of course to the City.
40. Finally I await sight of the letter dated 30th November 2016 from Mr Rayment of the City of London to the applicant which has led the applicant not to seek planning permission (as part of this application) for the erection of substantial temporary structures in the Inner Temple Garden for some 2 years. The applicant's responses provide no clarification at all in respect of the point made at page 23 of my representation that the adverse effects of the scheme as a whole should have been set out for consideration. Although the applicant makes express reference to the letter in its Design and Access Statement, the City believe that the letter is confidential but are giving this further consideration at the time of writing.

6th March 2017

Richard Humphreys QC

¹⁹ Paragraph 12.

FILE

Hassall, Pam

From: PLN - Comments
To: Hassall, Pam
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 13 February 2017 16:43
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 4:43 PM on 13 Feb 2017 from Mr Stephen Solley.

Application Summary

Address: Inner Temple Treasury Building The
Terrace Crown Office Row London EC4Y
7HL London EC4Y 7HL

Proposal: Extension and refurbishment in association
with an education and training facility and
office use (sui generis) of the Treasury
Building, works comprising; i) Mansard
roof extension at fourth floor, with new
dormer windows on front, rear, west and
east elevation and a glazed rooflight; ii)
Installation of a rooftop plant area; iii)
Amendments to the existing hall roof
resulting in an increased ridge height; iv)
Insertion of dormer windows in the hall
roof; v) Extension at the north east corner
to create a new lift shaft; vi) A new brick
clad escape stair on the north side
between the Treasury Building and the Hall
; vii) Insertion of dormer windows in the
hall roof viii) Creation of new chimney
stacks and associated internal and external
alterations and cycle parking

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Stephen Solley

Email:

Address: 67a Endell St London

Comments Details

**Commenter
Type:** Member of the Public

Stance: Customer objects to the Planning
Application



- Reasons for comment:**
- Noise
 - Residential Amenity
 - Traffic or Highways

Comments: Years ago I worked nearby at Cloisters, 1 Pump Court, built post-war at the same time and materials as Inner Temple Hall. If you banged a nail in the wall to hang a picture, the noise resounded many tens of metres across courtyards. Multiplied by thousands, the noise impact will be intolerable both for the Inner Temple and the Middle Temple. Over many, many months, realistically over a year. Hundreds of trucks will have to come through the Tudor St gate, laden with detritus or goods; what effect on ancient foundations? These heavy wagons, of the type that seem to crash mercilessly into cyclists, will cause great damage inside and outside the Inn. They are to be discouraged in one of London's oldest quarters.

The advantage to the Inner Temple of adding a modest supplement of space is wholly outweighed by the noise, damage, disruption, and the architectural tweaking of the existing building. Post Brexit there will be a surfeit of office space available nearby to fulfill the requirements of the Inn.

Adjei, William

From: Depala, Bhakti
Sent: 02 March 2017 14:31
To: Devlia, Neel; Adjei, William
Subject: RE: 17/00077/FULMAJ

From: Gordon Wignall
Sent: 24 February 2017 16:19
To: PLNComments@cityoflondon.gov.uk
Subject: 17/00077/FULMAJ

Dear Planning Officer,

I write in connection with the application which involves destruction of part of the Inner Temple's historic and beautiful library (which houses amongst other things a detailed and comprehensive library of Commonwealth law books and reports which can be accessed freely by visitors from the Commonwealth). The library I believe was part of the post-war reconstruction of this part of the Temple after WWII.

I was not aware of the personal representations made by Richard Humphreys QC dated 17 February 2017 until they were very recently brought to my attention, but I both object to the planning application and support his representation that the library constitutes a non-designated heritage asset.

Yours sincerely,

Gordon Wignall

Gordon Wignall

6 Pump Court

London EC4Y 7AR

<http://www.6pumpcourt.co.uk/>

██████████
██████████
██████████

ACKNOWLEDGED

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The information in this email and in any attachments is confidential and intended solely for the attention and use of the named addressee(s). If you are not the intended recipient, please contact me or in my absence contact my clerks at the following address - clerks@6pumpcourt.co.uk



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Professor Sir Roy Goode CBE QC FBA

42 St John Street
Oxford
OX1 2LH


Chairman
Planning Committee
City of London
Guildhall
PO Box 270
London EC2P 2 EJ

24 February 2017

Dear Chairman

Planning application 17/00077/FULLMAJ by Inner Temple

I am writing to lend my strong support for the detailed objections made by Mr Richard Humphreys QC, a Master of the Bench of the Inner Temple, to the application by the Inn for planning permission to carry out extensive building works to the Inner Temple law library. I am myself an honorary bencher of the Inn and take great pride in its buildings and activities.

The building as a whole is a fine building which blends well with the surrounding Inner Temple buildings and garden, while the Library, which is used by students, practising lawyers, judges and academics from around the world, is one of the finest and most elegant in England reconstructed to the highest quality after the destruction of the former library during the war.

The major building works proposed by a small majority of the Inn's governing benchers, against strong opposition, would entail substantial expenditure and would in my view be an act of wanton destruction on a scale quite unnecessary for the purposes it is designed to achieve. The height of the library, which greatly contributes to its elegance, would be substantially reduced and a significant amount of shelving space, critical to the adequate functioning of the library, would be lost. Moreover there is no need for a ramped lecture theatre occupying two floors since there are ample lecturing and courtroom facilities in the nearby vicinity, including the Royal Courts of Justice.

I therefore very much hope that your committee will reject this planning application.

Yours sincerely



Newman, Conor

From: PLN - Comments
Sent: 25 February 2017 18:59
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 6:59 PM on 25 Feb 2017 from Mr Justin Gau.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Justin Gau

Email:

Address: Pump Court Chambers 3, Pump Court, Temple London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: This is a terrible plan to vandalise one of the finest law libraries in the world that arose from the catastrophic bombing in the Second World War. This is completely unnecessary. Please do not finish the work of the Luftwaffe.

Newman, Conor

From: PLN - Comments
Sent: 26 February 2017 10:04
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 10:03 AM on 26 Feb 2017 from Ms Beverley Lang.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Ms Beverley Lang

Email:

Address: Royal Courts of Justice Strand London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I am strongly opposed to these proposals, because of the irreparable damage which will be caused to the magnificent Inner Temple Library. I support the representations made by Richard Humphries QC in favour of identifying the Library as a non-designated heritage asset.

There are many other places in which the Inn, with its significant wealth, could create additional accommodation for its education and training facilities,

either within its existing estate or by purchasing or leasing premises just outside the Inn. Nearby University premises (LSE, Kings College) are keen to rent out their lecture theatres and adjoining seminar rooms. The Royal Courts of Justice allow Inner Temple to use its courtrooms for advocacy practice, offering a much more authentic experience than the proposed new lecture theatre.

There are also alternative schemes to add a floor to the Treasury building which do not include destruction of the Library's gallery on the floor below.

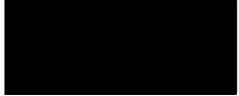
I am a longstanding member of Inner Temple and a Bencher. I work nearby as a Judge in the Royal Courts of Justice, and so I make use of the Inn's facilities. My ability to do so will be adversely affected by the proposed scheme, during the lengthy and disruptive works, and as a result of the permanent reduction in the Library's facilities.

Dame Beverley Lang

17/00077

23 ESSEX STREET
LONDON WC2R 3AS

Chairman
Planning Committee
City of London
Guildhall
PO Box 270
London EC2P 2 EJ


London DX 148

27 February 2017

Dear Chairman

Planning application 17/00077/FULLMAJ by Inner Temple

I am writing to add my support to the detailed objections made by Mr Richard Humphreys QC to the application by the Inn for planning permission to carry out extensive building works to the Inner Temple law library.

The main thrust of those objections, as I understand them, is that the proposal would destroy the unique character of this fine building; that, in its detail, it is architecturally unsympathetic to the existing structure; that its supposed benefit and need are not convincingly demonstrated; and that such supposed benefit is, in any event, not proportionate to the irreparable damage that would undoubtedly be caused.

I agree. In particular, the objections raised to the loss of the height of the library are very compelling. It is no exaggeration to describe the proposal to sever the entire balustraded gallery of the existing library as an act of vandalism.

I am a member of chambers situated adjacent to the Middle Temple and a member of Middle Temple. As such, I have had the great privilege of using the Inner Temple library when the occasion demanded throughout the years of my practice. It would be a great sadness to me if future generations had to suffer an impoverished experience in using the library.

I therefore would urge your committee to reject this planning application.

Yours sincerely

Paul Ozin QC

17/00077

Newman, Conor

From: PLN - Comments
Subject: FW: Inner Temple Library

From: Robert Woodcock QC []
Sent: 27 February 2017 14:07
To: PLN - Comments
Subject: Inner Temple Library

Planning application 17/00077/FULLMAJ by Inner Temple

Dear Sir/Madam,

I write as a member of the Inner Temple in opposition to the plans to which the above reference refer. In short, in the absence of evidence that alternative suitable venues do not exist capable of accommodating the functions anticipated in the newly configured building the plans represent vandalism at an historic, much loved and much used library.

It is to be hoped that those responsible for considering this application not only visit the site of this proposed desecration but spend long enough there to sense the history, comfort and utility threatened by the plans.

**Yours sincerely
Robert Woodcock QC
Red Lion Chambers
London**

Newman, Conor

From: PLN - Comments
Sent: 27 February 2017 16:45
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 4:44 PM on 27 Feb 2017 from Mr Simon Levene.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Simon Levene

Email:

Address: 12 King's Bench Walk Temple London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: I oppose it for the reasons given by Piloti in Private Eye this week. A short extract: "As the melancholy Lost Treasures of Europe, published in 1946, noted: 'The four great Inns of Court, which include Lincoln's Inn, Inner Temple, Middle Temple and Gray's Inn, are among the most remarkable survivals of the medieval organisation of civic life in a great modern metropolis.' They still are... [but] now the modernists are having their revenge - or is it just greed? The Honourable Society of the Inner Temple has devised an astonishingly philistine

redemption scheme for the Hall and Library... Both are now to be enlarged and mutilated... to make an education and training facility, no doubt to cash in on the lucrative conference trade..."

From: PLN - Comments
Sent: 27 February 2017 15:44
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 3:43 PM on 27 Feb 2017 from Mr David Sanderson.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr David Sanderson

Email:

Address: 12 King's Bench Walk Temple London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I have been sent a copy of the submission to Historic England drafted by the four most recent past Masters of the Inner Temple Library and wish to add my vigorous support.

The following passage from that submission encapsulates the aspect that causes me most distress for the future:

"(v) The proportions of the Library are unusually elegant.

They depend in particular upon the high ceiling, the balustraded galleries, the oak panelling and decoration, the sequence of spaces and above all the quality of light admitted by the two tiers of windows. The high windows give a generous access of light with a perspective to the south over the Temple gardens to the river and, to the north, the Temple Church.

(vi) None of the undersigned knows of a handsomer or more attractively situated law library anywhere in the world.

(vii) The Inner Temple's Library, like those of the other Inns of Court, plays a central role both in the higher education of Bar students and in the daily work of practising and academic barristers. Its spaciousness, quietness and light all contribute to making it an unparalleled working environment."

Inner Temple Library is truly exceptional and it would be a tragedy for future generations for it to suffer the destruction that is proposed.

17/00077

Newman, Conor

From: PLN - Comments
Subject: FW: Planning Application 17/00077/FULMAJ

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

From: Ronald Thwaites []
Sent: 28 February 2017 10:40
To: PLN - Comments
Subject: Planning Application 17/00077/FULMAJ

Little Court
2 Blackhills
Esher
Surrey
KT10 9JW

28th February 2017

Dear Sir

I am barrister and have been a member of Grays' Inn since 1967 and Inner Temple since 1981.

I am writing to object to the proposed act of vandalism that the above-mentioned planning application represents.

In my view there is no conceivable justification for destroying a part of the legal heritage of London that is much-used, frequently visited and universally admired.

I hope that you will find it possible to reject the application.

Yours faithfully

Ronald Thwaites QC

17/00077

From: Richard Buxton
To: PLN - Comments
Subject: Planning Application 17/00077/FULMAJ Inner Temple Library
Date: 28 February 2017 15:23:55

I am a bencher of the Inner Temple and as such, although not resident in the Inn, a very regular user of the Inn and its Library. I strongly support the objections to this planning application that have been put forward by Mr Richard Humphreys QC.

The principal damage that will be caused by this proposal is the disruption of a building of high, to some extent unique, quality that was specifically designed in its present form to be an integral part of the particular environmental experience presented by the Temple, which has since then been recognised by the Temple's designation as a Conservation Area. This is not just a matter of private property, but an extremely important public asset. While I appreciate the organisational aims that have led the Inn to seek to develop its property, those aims cannot justify the damage to architectural heritage that is proposed.

Sir Richard Buxton

40 Arlington Avenue London N1 7AY.

David Vaughan CBE QC
50 Oxford Gardens
London W10 5UN

Nicholas Asprey Esq
14 Queen Anne's Gardens
London W4 1TU

Ms Bhakti Depala
Case Officer
Department of the Built Environment
City of London
Guildhall
PO Box 270
London EC2P 2EJ

March 2017

Dear Chairman,

Planning Application 17/00077/FULLMAJ by Inner Temple

We are members of the Inner Temple ('the Inn'), Governing Benchers of the Inn and members of the Library Committee. We are writing to express our strong opposition to the Inn's application for planning permission to carry out extensive building works to the Inn's law library ('the Library').

Until we retired recently we were practicing members of the Bar in prominent sets of chambers for 50 years and 45 years respectively. We made extensive use of the Library, first as students and then as practicing barristers. We continue to use the Library occasionally in retirement for research and related purposes.

We fully support the two written submissions by Richard Humphreys QC from which it is clear that the Library is a non-designated heritage asset and therefore entitled to special treatment under planning law and policies.

History and Importance of the Library

It is an almost universally held view that the Library is one of the finest law libraries in the world. It is also one of the oldest, dating back to 1506 or earlier. It houses a unique collection of ancient books and manuscripts that are among the Inn's finest treasures. A copy of *A History of the Library* written by a former Librarian and published by the Library accompanies this letter.

The Inn's pride in the Library is demonstrated in many ways. Visiting dignitaries and lawyers from all over the world are taken to see the Library. Members of the Inn bring their guests into the Library. The Inn's treasures are put on display there. When the Inn participates in Open House Weekend the Library is open to the public. On the last occasion, in 2015, it was one of the Inn's most popular venues, attracting over 2,300 visitors.

The Library provides legal services to practicing barristers, members of the judiciary and academic lawyers from around the world. We personally know of one senior Australian judge, who is the editor of legal textbooks used in all common law jurisdictions, who comes to London to carry out research in the Library. Its attraction lies in its quality as a place to work and in its vast collection of easily accessible law reports, textbooks and research facilities.

We agree with the article in the April 1958 issue of *Country Life* that says the rooms are '*supremely workable-in rooms*' that provide '*the possibility of reading in comfort, and in spacious and yet intimate surroundings*'.¹ This unsurpassable ambience is a consequence of the design and workmanship that have been the pride of generations of barristers since the Library was built.

It is self-evident that these qualities depend on the proportions of the rooms, in particular the height of the rooms, and on the Galleries and the sense of spaciousness and light that they impart to the rooms. The Library is indisputably an architectural masterpiece and one of the Inn's most precious assets.

¹ Cited by Richard Humphreys QC on page 5. See also *A History of the Library* on pages 8 & 9.

Report of the Inn's Strategic Review Group

We think it worth quoting from the Report produced in October 2015 by the Inn's own Strategic Review Group ('SRG'). After carrying out a detailed consultation among the Inn's members, the Report concluded, amongst other things, that

'considered in isolation, the argument for constructing an auditorium in the Treasury Building is compelling, but we do not believe that it should be done at the cost of reducing the library service, which is rightly valued by members of the Inn.'

It went on to say:

'We were struck by the strongly-expressed preference of many colleagues for the traditional printed form, especially when "speed reading" has to be undertaken. The printed page is not dead yet, nor will it ever be in our lifetimes, to judge by the responses to our consultation. So there is a powerful case for preserving the remarkable physical collections of the Inn's Library'.

In his evidence to the SRG the Squire Law Librarian at the University of Cambridge, described the Inn's collection as "one of the treasures of the Inn" citing the finding in the Clinch Report to the following effect:

'Well over a third of the collection at Inner and Middle Temple libraries are of national significance either because the materials are not held elsewhere, or in very few other locations, or because the collection is the most complete in the UK'.

The Use of the Library

The Library provides comprehensive and up to date research facilities. We enclose a copy of the latest Annual Review that shows the extent of the services provided by the Library and its staff and the extent to which they contribute to the education and training of students and pupils.

The Library's services and facilities are available to practicing barristers, members of the judiciary and academic lawyers ('working lawyers') and to students free of charge except for minor expenses such as photocopying charges. Such services and facilities are available at all reasonable hours and the books are easily accessible.

It is sometimes argued that the availability of law reports and textbooks online has diminished the importance of the Library and that the numbers using the Library reflect this². This is a fundamental misconception and we propose to deal with it.

First, the importance of the Library lies in its availability and in the accessibility of its books, the overwhelming proportion of which will never be published online. They include a vast array of old editions that are often needed for research or reference in court and which are unlikely to be found elsewhere. Just one example is the law applicable to historical sexual offences, where the law pertaining to a time when the offence was committed needs to be researched, which is simply not available online.

Secondly, by arrangement with the other Inns of Court the Library specialises in the laws of Scotland and several Commonwealth jurisdictions and in twenty-one discrete areas of the law such as the armed forces, coroners, criminal law and family law. Research in such areas requires the user to work in the Library and the library websites of the other Inns of Court direct the user to the Library accordingly.

Thirdly, people using the Library are counted electronically: see the statistics on page 6 of the Annual Review. After making allowance for staff footfall and for users entering and leaving more than once it is likely that over 150 people use the Library every day at present. The claim by Michael Spencer QC that the use of the Library is 'minimal' is unfounded and wrong. It also fails to take into account the projected future increase in usage of the Library as outlined in detail below.

We believe that the 'survey of library usage' referred to by Mr Spencer was a survey of headcounts but such surveys only provide a snapshot at the time when the heads are counted. The figures provided by

² See, for example, Mr Spencer's statement.

Mr Spencer and those provided by Susanna Fitzgerald QC are therefore unreliable, as is Sir Stephen Tomlinson's observation that the Library is 'woefully underused space'. In any case the headcount figures taken at 3.00pm since 2014 show there are *often* more than 20 people using the Library at any one time.

Comments made in response to library surveys by both working lawyers and students show that they appreciate being able to work in a quiet, spacious and uncrowded environment which provides an escape from chambers and from the noisy libraries of the BPTC providers. We also know from our own experience that lawyers often need to spread out their papers and occupy more than one reader place. In addition, survey evidence shows that use of the Library's print collections is not reducing even though the use of online resources is increasing.

In-house and online user surveys carried out as part of the Library Committee's strategic review in 2013 showed that one of the main reasons for visiting the Library was to use the hard copy resources and to copy specific materials. Comparison data from an earlier survey showed that the Library's print collections were as well used in 2013 as in 2011. There was an increase in the use of some categories of material, such as textbooks (current and non-current), journals, loose-leaf volumes, statutes and parliamentary debates.

Survey responses also showed that chambers, especially those doing publicly funded work, had cut back on buying hard copy materials and on some online subscriptions and that users expected to find all they needed in the Library. In 2013 the percentage of survey respondents who valued the Library as 'a quiet or convenient place to work or study' was 51.9% (online survey) and 55.3% (in-house survey). This was one of the most important factors for BPTC students who answered this question.

Finally and in any event, over-reliance on current figures fails to appreciate the manner in which the Library will be used in future for educational activities for the Bar Practitioners Training Course ('BPTC') if the regulations change to enable this to happen. We discuss this further below.

Fourthly, the Library is a crucial resource for barristers who practice outside London and who come to London to appear in the Royal Courts of Justice or the Old Bailey or to use the Library's resources for research.

Fifthly, work patterns at the Bar are changing and many barristers no longer practice from a set of chambers but prefer to practice from other locations such as libraries. The scale and rapidity of this change have not been assessed but the Library is a vital resource for these practitioners too.

Sixthly, it is known that some criminal and other publicly funded chambers that depend on legal aid cannot afford their own up to date library of even the most regularly used textbooks. For them too the Library is a vital resource.

The Library's resources are and must remain easily accessible for working lawyers and Bar students in the future. In this way the Library makes a necessary contribution to the administration of justice and development of the law. The proposals embodied in the planning application will put this resource in jeopardy.

Harm to the Library

The Design and Access Statement acknowledges the 'special character and architectural quality' of the Library; and yet the Inn's proposal will destroy both its special character and its architectural quality.

In particular, the removal of the Galleries and lowering of the ceilings will destroy the proportions of the rooms and the sense of spaciousness and light that is such an important feature of the rooms. What will remain of the Library will be, as Mr Humphreys says, 'somewhat oppressive'³. We are astonished that the Inn should even contemplate such a change.

³ See his letter of objection at paragraph 37.

We draw attention to two lesser but in our view equally unacceptable features of the Inn's proposals. First, the ceilings will be lowered to a level below the fine oak pediments above the doorways linking the main rooms. The pediments will therefore disappear.

Secondly, the ceilings will be lowered to a level below the tops of the windows. To avoid obliterating the tops of the windows completely the ceilings will be set back about one metre from the windows. The awkwardness – indeed the ugliness – of such a contrivance is wholly out of place here.

Harm to the Library's Services

The design of the proposed auditorium and ancillary rooms is predicated on the assumption that the Inn will eventually attract 240 students. The students can be expected to make extensive use of the Library and it is desirable that they should do so. However it is not hard to predict that the impact of such an influx on other users will be severe.

The Library will lose 8 reader places in the rooms off the Galleries and a further 6 reader places in Room J, leaving a total of 82 places⁴. With 240 students there will be little if any spare room for other users. The students will obviously not use the Library all at once but at certain times their numbers are very likely to be overwhelming. Some segregation of students from working lawyers might help to ameliorate the problem but the loss of the rooms off the Galleries and of Room J will reduce the scope for such segregation.

It makes no sense to promote a scheme that will greatly increase the numbers using the Library and at the same time reduce the number of reader places in the midst of educational proposals from the Bar Standards Board ('BSB') supported by the Inn and the Council of the Inns of Court ('COIC') to increase significantly the number of students in the Inn in general and the Library specifically. Lincoln's Inn has recognized this problem and has planned for the increase on the number of students on their premises. It is building an auditorium for its students and *extending* its library at the same time.

The Library is not opposed to an increase in the usage of the Library by both 'first stage' and 'second stage' students of the future, but it is opposed to a simultaneous reduction in the size of the Library and the resultant inevitable over-crowding. That, as the SRG concluded on page 11 of its Report, would destroy the quality of the working space as '*a quiet place, where people can work, think and prepare, in a calm atmosphere, fully conducive to concentration and reflection*'.

There will also be an unacceptable loss of shelf space. The Library at present has a total of 2,297.95 linear metres of shelving. If the proposal goes ahead the total shelving will be reduced to 1,410.10 linear metres. To make up for this loss it is proposed that the Library should be given a room in the basement that will house an additional 572 linear metres. The paper containing these figures prepared by the Inn's architects accompanies this letter.

In the result, there will be a net deficit of 16.7% on the present shelving for which room will have to be found elsewhere; but the overall effect, irrespective of this deficit, is that books that have always been easy to access for legal research on two adjoining floors – i.e. the main rooms and the Galleries – will be separated out and kept in the basement or elsewhere making legal research more difficult and time consuming at the same time that the pressure on the Library will be increased through the increased number of students.

Past Intentions

Mr Spencer refers in his statement to the building of the Library. The Library was always intended to be able to house the size of collection that it houses today. By agreement with the other Inns of Court, and as mentioned already, the Library houses the important and extensive Commonwealth collection and many other specialist subjects.

Mr Spencer surmises that the Benchers who oversaw the building of the Library "would have been mortified had they realized that the facility they constructed and the money expended would be such as to prevent future development". We disagree.

⁴The number of reader places in the other Inn libraries is: Middle Temple 152; Lincoln's Inn 95 (at present); Gray's Inn 89.

First, the Library does not prevent future development: the roof can be used as the Inn has recognized by proposing its first scheme together with an auditorium and ancillary rooms to support the delivery of education to the increased number of students in the Inn in the future, without the concomitant deleterious effects on the Library.

Secondly, in our view they would have been mortified by the proposed harm to the jewel of the rebuilt Inn, namely the Library, which is disrespectful of the time, effort and money spent by them and by the public via the War Damages Commission.

Background to the Application

The Inn should not be permitted to cause a partial destruction of the Library unless it can show that it cannot reasonably achieve its education and training objectives in any other way. It has comprehensively failed to do this. We need to explain the background to the proposal so far as we know it.

At present the Inns of Court do not provide teaching for students studying for the Bar exams: that is, Parts 1 and 2 of the BPTC. However the Inn, like the other Inns of Court, runs what are called 'qualifying sessions' for student members of the Inn and it also provides advocacy training for those who have been called to the Bar and awarded pupillage in chambers.

These training sessions are small in scale and do not involve lengthy study for exams. They take place in the Benchers rooms on the first floor of the Treasury Building. This is far from ideal but so far as we know no one suggests that a new facility should be located on the roof of the building for the sole purpose of accommodating them.

The universities and the law colleges conduct the teaching courses for the BPTC exams. The fees payable for these courses impose a heavy burden on the students. This concerns the Bar because a large number of students incur the cost but only a small proportion of them succeed in getting a place in chambers to practice at the Bar.

Some time ago COIC proposed that a change should be made in the regulations and that the BPTC course should be divided between the universities and law colleges on the one hand and the Inns of Court on the other. The COIC proposal is that the future BPTC course would comprise two stages, known as the 'knowledge subjects' and the 'vocational subjects' respectively, and the proposal was that the Inns of Court under the umbrella of COIC would offer at least one of these stages and in the medium to long term both stages.

Whether this should happen does not depend on COIC but on the BSB. We believe that discussions between these two bodies have been ongoing for a long time and that issues as to whether, when or how the courses should be divided up are still unresolved.

We envisage that the planning application is being sought in anticipation that in due course the Inn will be able to provide part or all of the BPTC courses. At the moment this seems to be speculative. Indeed we understand that the Inn has not yet considered whether it might be able to provide the courses at lower cost than the present providers. It is not clear as to why it should be able to do so.

One of the proposals from the current BSB consultation on Future Bar Training does incorporate the COIC two-stage BPTC proposal, a proposal supported by the Inn as part of its membership of COIC. The first stage would involve the studying of 'knowledge' subjects at the students' own pace. It is anticipated that many more students would study this first stage before a smaller number would move on in tranches to the second 'vocational training' stage.

The students at this second stage are the anticipated 240 students who would use the proposed auditorium and ancillary rooms. However, the significance is that many more than the anticipated 240 students would study the first stage of the BPTC.

Although these 'first stage' students can study online, it can readily be envisaged that many would wish to use the Library and its resources to facilitate their studies in the 'knowledge' subjects. Accordingly, a significant number of students would use the Library with 'first stage' students overlapping with 'second stage' students and other working lawyers.

Against this backdrop, very little reliance can be placed on current usage figures, given the very substantial increase in student numbers if the COIC proposal to offer part or all of the future BPTC course should be approved by the BSB.

Alternative Possibilities

When the Inn began to consider how to build an education and training facility on the roof of the Treasury Building it devised a scheme that involved putting the facility, including an auditorium, on the roof of the building. This scheme became known as 'Option 1'.

That first option involved no intrusion into the Library and it was even suggested that some of the rooms could be leased out for commercial use as arbitration rooms and/or conference rooms. In informal pre-application discussions the City's planning officers viewed this option favourably.

The Inn's Estates Department then put forward an even more ambitious scheme that included a tiered auditorium incorporating the whole of the second floor of the Library: i.e. the Galleries and the rooms off the Galleries. This became known as 'Option 2'. The present proposal is a modified version of that second option.

The Inn has not explained why it could not reasonably achieve its education and training objectives under the first option and thereby not harm the Library. In particular, it has not explained why it needs a *tiered* auditorium or how or why the advantages of a tiered auditorium over a level auditorium can possibly justify the partial destruction of its world class Library.

It has not produced any business plan to support its application possibly because the nature and scope of its requirements are purely speculative at this stage. The bland assertion that it needs an education and training centre⁵ explains little and justifies nothing let alone the partial destruction of the Library.

Nor has the Inn explained why it cannot make use of other auditoria in the vicinity. There are several in the area including the courtrooms in the Royal Courts of Justice about 100 metres away and the new facility being built by Lincoln's Inn.

Indeed the possibility that a change might be made in the regulations *calls out* for cooperation between the Inns of Court under the auspices of COIC. Such cooperation existed in the past when they ran the Inns of Court School of Law together in Gray's Inn. There is no reason why such cooperation could not be revived and we think it is surprising that such discussions have not (as we understand it) taken place already.

Such cooperation would include the provision of an auditorium in a location to be agreed and sharing the costs of providing the teaching and related facilities. The idea that both the Inn and Lincoln's Inn should incur the vast cost of constructing its own auditorium - which would only be used for part of the day - and of providing its own teaching facilities is irresponsible and inexcusable, the more so because the Inns' funds are charitable. Even if this is wrong and the Inn does require its own auditorium, this can be achieved within the ambit of the Inn's first option, rather than the current (modified) second option.

Until these alternative possibilities have been exhausted it cannot be justifiable to grant planning permission for a scheme that will involve a partial destruction of the Library.

Lack of Support

As mentioned, the Library is not the sole province of the Executive Committee or its Governing Benchers but of the Inn's membership as a whole. The Inn is a charitable institution and there is therefore a public interest in how its assets are used too. This application is being pursued even though it is doubtful whether it has solid support within the Inn.

First, the Governing Benchers voted in support of Option 2 by only the slenderest of margins and after a short discussion attended by only a small number and during which attendees were only allowed a few minutes to speak. Having regard to the way in which the material was presented before and at the

⁵ See, for example, Mr Spencer's statement.

meeting it is inconceivable that more than a handful of Governing Benchers would have had a detailed grasp of the issues and of the harm to the Library and its resources.

Secondly, the Governing Benchers who opposed the proposal included some of the most eminent and powerful members of the Inn, including four past chairmen of the Library Committee who are now or have been senior members of the judiciary.

Thirdly, the ordinary members of the Inn, in whom the future lies, were not consulted on the proposal. However the evidence gathered by Mr Guy Tritton from such members suggests that there is strong opposition to the proposal: see his letter of objections.

Fourthly, the proposal as put to the Governing Benchers was unsupported by any business plan, and indeed we understand it is not proposed to provide such a plan even to the Planning Committee. In the present state of affairs it is hard to see how a meaningful business plan could even be devised.

Conclusion

We invite members of the planning committee to visit the Library before making any decision. We very much hope that the Inn's application for planning permission will be refused.

Mr David Vaughan CBE QC

Mr Nicholas Asprey



INNER TEMPLE
LIBRARY

A History of the Library



16th & 17th Centuries



*Sir Edward Coke, 1552-1634. Attributed to Paul Van Somer.
Image copyright © The Inner Temple*

Of the Inner Temple before 1500 little is known, though much has been conjectured, for the records of the Inn prior to 1505 have been either lost or destroyed, whilst the earliest recorded mention of the Society itself occurs in a Paston letter of 1440. The date of its foundation therefore must remain a subject for speculation alone. But whilst it is tempting to believe that the Inn must have possessed a Library in the Middle Ages, surviving evidence suggests strongly that if nothing is known of the Library before 1506 it is because there is indeed nothing to know. One thing is certain: if the Library existed before the time of Caxton it would have held legal manuscripts. Yet none are recorded in the earliest surviving catalogue dating from the early eighteenth century. The manuscripts there recorded were all gifts, presented in the age of printing. It is unlikely that the former would have been sold if they existed, nor is there any hint that they were destroyed.

The Library in 1506 consisted of a single room (on the east side of the Hall, probably where the Bench Luncheon Room is at present) set aside for the reading of books and used at a later date as an annexe for dining in when the Hall became overcrowded; and though this practice was stopped in 1606 it was still to be used for moots, for the reception of distinguished visitors at the

feasts, and for meetings of the Benchers (senior members of the Inn). A legal collection at that time could have been contained in a handful of close presses, so that its use for social and other functions was not so unreasonable as it might seem to the modern librarian.

The sixteenth century records are meagre: they contain no direct reference to any books being bought or presented, and there is no mention of any library custodian or cleaner. By 1607 however, a second room had been added, there are records of library books being repaired (the repair of two of them cost 3s. 4d.) and a first reference to a gift when Sir Edward Coke presented his Reports in 1608. The rooms had rushes on the floors, shelves for the books which, by 1609, were padlocked upon iron rods, tin candlesticks upon the tables (though these would only have been lit when the upper Library, which had a special leather chair for the Treasurer, was used for the meetings of parliament) plaster walls and windows frugally fitted with old glass taken from the Temple Church. During the first half of the seventeenth century steady improvements were made to these rooms. The flooring, probably, was tiled, the plaster work renewed, and the leaded windows of the upper Library ornamented by two large curtains.

The physical arrangement of the books is hard to determine. It is unlikely, on the known evidence relating to other libraries, that all the books were chained; probably only a minority and the most valuable at that. The less valuable titles were probably shelved in close presses, the doors being locked and with labels fixed to them describing the contents. As the books increased new shelves were erected upwards, either on the lectern or in the press, to accommodate them; and thus arose the (apparently) curious habit still followed at a number of university libraries (and in use at the Inner Temple until 1950) of numbering or lettering the shelves from the bottom shelf upwards, for the books were shelved at first in accession order.

On Sunday 2nd September 1666 the Great Fire broke out; the wind blew from the east and the City was engulfed. On Tuesday the 4th it reached Whitefriars on the eastern boundary of the Inner Temple. The damage was considerable and the Library wholly destroyed. It is not clear, however, whether the books it housed were saved or not. Rebuilding followed swiftly and by 1668 the Library was in use again. It was wainscotted now and another room added. It would seem from this that the intake of books was now on the increase and this may be supported by the known expansion of law publishing during this half century. Improvements continued. By 1670 the Library was graced by the additional decoration of the Readers' coats of arms while in 1677 a handsome Spanish table was added to the furniture. The Library, however, still served other purposes, and the upper room was used on occasion for recreation, one table alone being reserved for hazard, a popular game of chance at that period. But a greater hazard lay outside, for in 1679 a disastrous fire broke out in the Middle Temple and destroyed a number of residences. This was in winter, the Thames was frozen and water hard to obtain. It is said that the beer from the Temple cellars was used by the fire engines available but this soon ran out and, in what proved an unnecessary effort to prevent it spreading, the small Library of one storey was blown up by gunpowder after its contents had been removed.



Plan of The Temple, 1671. Image copyright © The Inner Temple

18th Century



William Petyt, 1636-1707. English School, late 17th/early 18th c. Image copyright © The Inner Temple

Once more the Library was rebuilt and was in use again by 1680, the upper room still being used for social functions, the drinking of wine by members after dinner and the serving of suppers to the invited guests of the Masters of the Bench. Of its administration during the 17th century little is known. There was, apparently, no catalogue, certainly no official library keeper, and no rules existed to govern the use of the material and the conduct of readers.

Then in 1707 the Inn was offered what has since become known as the Petyt MSS. William Petyt, Treasurer of the Inn in 1701-2, was for many years Keeper of the Records in the Tower of London. He had antiquarian interests, was a scholar of some distinction and, despite later tales to the contrary, was a scrupulously honest collector of ancient documents. At his death he left to the Inn a great mass of manuscripts together with a sum of money to construct a building to house them. By his bequest, which was accepted, he performed a double service, that was to be of lasting benefit.

He provided the Inn with a manuscript collection of a richness which few private societies could otherwise have hoped to obtain; and this in turn provided the spur for the reorganisation of the Library upon a sound administrative basis. His collection, still intact after more than three hundred years, contains 386 volumes and covers a diversity of subjects.

These include Year Books, Registers of Writs, Statutes, Legal Treatises, Precedent Books and Commonplace Books. Among chronicles there is an uncollated early 13th century manuscript of Roger de Hoveden's *Historia Anglorum*, which once belonged to the Abbey of Rievaulx. There is also a long range of Journals of the House of Commons, some of which contain entries which were no longer decipherable when the printed version of the Journals was made. Among noteworthy manuscripts there is an early 12th century Macrobius, and the earliest known Books of Forms in Ecclesiastical Causes, from the end of the 13th century. There are works by Sir Francis Bacon, Sir Robert Cotton and Sir Thomas Bodley, and important original letters from such personages as Lord Burghley, Sir Edward Coke and Sir Christopher Wren.



Macrobius Commentary on Somnium Scipionis. Mid 12th Century. Image copyright © Ian Jones



Original letter of Lady Jane Grey, signed by her as 'Quene'. July 1553. Image copyright © The Inner Temple Library

One of the most notable manuscripts in the collection is "Edward VI's Devise for the Succession". In his own handwriting, it sets out the plan by which the dying king, aged 16, sought to exclude his half-sisters Mary and Elizabeth from the succession in favour of his cousin, Lady Jane Grey. The collection also includes an original letter of Lady Jane Grey, signed by her as 'Quene', the original draft of Sir Edward Coke's 12th and 13th Reports, and a Year Book for a term of Edward I, which seems to be contemporary and which is, besides, unique. There are also autograph letters by Mary and Elizabeth I.

By 1709 the new Library had been built. It included the two former rooms (one of which was to be known as 'the back library') as well as a new room spacious and handsome. Samuel Carter, an "aged and impecunious barrister" was appointed as Library Keeper to attend in the Library as follows: Lady Day to Michaelmas, 9 a.m. - 12, and 3 p.m. to 6 p.m.; Michaelmas to Lady Day, 10 a.m. to 12, and 3 p.m. to 5 p.m. His salary was £20 a year. He it was who did the first work on Petyt's books and manuscripts. He produced, besides, a draft catalogue of the books

in the Library, dated 1713, which is still extant, but he died the same year leaving it unfinished. He was succeeded by Joshua Blew, a butler in the Inn, who served for fifty years as Librarian.

On 18th May 1716-17 a Bench Table Order was issued: "No copy or transcript is to be taken by any person of any manuscript books in the Library, and no books to be delivered or taken out of the Library without leave of the Table. This order to be hung up in the Library". Thus was formally established the principle that the Library was essentially for reference and not for borrowing. But though the books were now housed either in close presses or frames with wire guards the manuscripts seem to have been easily available (at least to Masters of the Bench) and were as often consulted out of curiosity as out of need; their availability not being restricted in the modern sense until late in the nineteenth century. If in the early days the Library's acquisition of books had been haphazard it was regulated by a Bench Order of 1713 directing the Treasurer to expend £20 a year on books, but it was the Librarian, Joshua Blew, who was responsible for the actual purchase of books, often their selection too, their binding, and on occasion, the publication of the manuscripts. During his years in office he produced four catalogues. These are notable for the careful and accurate annotations to entries, for Blew had all the instincts of a good bibliographer.

In the eighteenth century the great majority of books purchased were law books; of the books presented the majority were also law books. But antiquarian, historical and literary interests were also held by the members of the Society, and the purchase or presentation of books reflected these interests as is duly recorded in the catalogues subsequently to be issued.

This diversity of interests, continued to the present though in modified form, explains the presence today of many valuable works, all either original or second editions: Higden's *Polychronicon*, Strutt's *Sports and Pastimes* (1810), Hakluyt's *Voyages* (1598-1600), Clarendon's *History* (1702-4), Saxton's *Atlas of England and Wales* (1579) and, Seller's *Atlas Maritimus* 1678. The list of incunabula acquired is shorter but includes *The Nuremberg Chronicle* (1493), volumes of statutes printed by Caxton in 1490, as well as two out of the three volumes of statutes issued by Machlinia, the first of the English law printers. On the whole however the purchase policy towards legal and allied materials was highly selective, and books had to prove themselves before they were bought. The forty eight titles purchased in 1723 range in publication date from 1651 onwards but only four of these were current publications.



King's Bench Walk in the 1720s. Image copyright © The Inner Temple

Many problems familiar to modern librarians were already being encountered. By 1729 as a result of gifts the problem of duplication existed and the Librarian drew up a list of seventy nine titles for disposal by sale. Books were being supplied by mistake and having to be returned, whilst overcharging of booksellers' accounts was not uncommon.

The catalogue of 1773, the work of another Librarian, the Rev. William Jeffs, was the last to be in manuscript and was the most scientifically planned to date. It was ordered that "The Librarian ... to make a

complete Catalogue of all the books in the Library and to range the books relating to the several subjects they treat upon in distinct presses so as to compose a separate Library of Law and Equity, Civil Law and Parliamentary proceedings, Classics, General and Biographical History, Theology, Heraldry, Physic, Miscellaneous Books or others relating to any particular science or subject and manuscripts; that in the Catalogue to be made there shall be one column to signify the number of the press, another the shelves, another the name of the book, another the name of the printer and another the date of the year, and that the books may follow in an alphabetical manner, as much as may be, and that all duplicates may be placed together in two or three presses, and that the same may be completed by the first full week in Michaelmas term, and for which this Society do desire his acceptance of ten guineas."

In 1784 Randall Norris, a clerk in the Treasurer's department (he subsequently became Sub Treasurer) was appointed Librarian, and it was during his tenure of office that the earliest printed catalogue, dated 1806, was issued. The surviving evidence suggests that the appointment of Norris was not a happy one. His intellect was not powerful and he possessed none of the qualities that make a true librarian. When he died in 1827 Charles Lamb wrote a famous letter about him to Crabbe Robinson: "In him I have a loss the world cannot make up. He was my friend, and my father's friend, all the life I can remember. I seem to have made foolish friendships ever since ... To the last he called me Charley. I have none to call me Charley now. Letters he knew nothing of, nor did his reading extend beyond the Gentleman's Magazine. Yet there was a pride of Literature about him from being among books (he was Librarian) and from scraps of doubtful Latin which he had picked up in his office of entering new students, that gave him very diverting airs of pedantry. Can I forget the erudite look with which, when he had been in vain trying to make out a black letter text of Chaucer in the Temple Library, he laid it down and told me that "in these old books, Charley, there is sometimes a deal of indifferent spelling", and seemed to console himself in the reflection".



Seller's Sea Atlas, 1678. Image copyright © Ian Jones

19th Century

Randall Norris was succeeded in 1818 by the Reverend William Henry Rowlatt, MA, a member of the Inn (called to the bar in 1804) who had subsequently taken holy orders and was at that time Reader of the Temple Church. Rowlatt is credited with initiating many overdue improvements during his tenure of office.

In 1818 the need for new measures was raised at Bench level. Scots Law, for example, was inadequately represented and it was ordered that books on this subject should be bought at a cost of £200. In 1825 attention was drawn to the fact that the Library was poorly heated. The walls contained apertures which admitted the cold air in winter, and it was suggested that these should be closed by sliding panels, which action would then allow the temperature to rise in the room. It was further suggested that the room to the north of the Library should be fitted with a stove and with shelves for books (by now the great majority of books were kept in open presses); it could then be partitioned so that the Librarian might use it to superintend the room to more advantage "than he could when in the winter season the severity of the cold weather renders it almost impossible for him to be constantly in the Library".

In addition a committee that year issued a new and detailed statement on the duties of the Librarian and directed him to make an "accurate catalogue of the books and manuscripts arranged alphabetically, according to their respective subjects and continue the same as additional books or manuscripts are received into the Library and should also make a shelf catalogue of every book in each shelf. These should be printed copies of such catalogues, two of which should be interleaved ... and there should be six copies kept on the table in the Library, for the use of those frequenting it". Five hundred copies were to be printed and it was issued in 1833, a classified catalogue like its predecessor. A new alphabetical catalogue was ordered in 1842 and published in 1843. It shows the Library's holdings as being approximately 5,500 titles representing over 12,000 volumes. There were, in addition, 492 volumes of manuscripts.

In 1851 the rebinding of the Petyt MSS was initiated, a task that was to extend over twenty years, while in 1856 J E Martin, Librarian to the Duke of Northumberland and already Sub Librarian to the Inn, was appointed to succeed Rowlatt. In 1860 he wrote to the Bench on the need for expanding the Library and this resulted in the accommodation being extended in 1867, 1872 and 1882, by which time it consisted of eight large rooms with a gallery all round. This was sufficient to hold 85% of the entire stock on open access. Heating in winter was by coal fires in large fireplaces and the reading desks had, subsequently, table lights. Admission was strictly confined to members of the Society. Others, including barristers of the remaining Inns, could be admitted only upon special application. The main entrance was via a staircase in the clock tower on the south east corner of the building and the Librarian sat in the open at a desk in the first room.

Martin was succeeded in 1883 by J E L Pickering who had been Sub Librarian since 1869 and it was under his direction that in 1892 a new catalogue was prepared "written by type-writer". This was fourteen years after the first shift-key typewriter was commercially marketed. It was to extend to twenty one volumes, kept up-to-date by revision and retyping, and it was in use for fifty years. It is a tribute to the skill of both Martin and Pickering as library organisers that the printed library plan for the guidance of readers and showing the location of the collection was still effective without alteration in 1939, forty seven years later.

20th & 21st Centuries



*The Library tower before the air raid, 1940.
Image copyright © The Inner Temple*



*The Library tower after the air raid, 10th September
1940. Image copyright © The Inner Temple*

In the early years of the 20th century the Library acquired by gift one of its most valuable and historically important manuscripts. This was a set of four fifteenth century illuminations on vellum which provide the earliest known depictions of the English courts and court dress. They date from about 1460 and show the four courts at Westminster Hall - the courts of Chancery, Common Pleas, Exchequer and King's Bench. The illuminations were presented to the Inn by Lord Darling (Treasurer 1914-1915), who had purchased them at Christie's in 1894.

Between 1941 and 1942 the Library was destroyed by a succession of enemy air raids. The Benchers of the day in 1939 had declined to agree to the removal of any printed books though the manuscripts were taken out of London to safety. It was not until after severe damage was done to the building and several thousand volumes destroyed that the order was given to evacuate the Library, leaving sufficient "day to day" books to carry on with. From September 1941 until the final destruction in 1942 books were blown off the shelves while windows, originally of glass, now of linoleum substitute, were blown in daily. The roof was burnt off, rain and snow had to be contended with, while books that were frozen hard to the shelves had to be levered off with iron bars.

By May 1941 approximately half the book stock had been moved to a dozen country houses. The remainder of the stock was to be destroyed by fire on 10th May, 1941. Among material lost was the John Austin collection of Jurisprudence, presented by his wife after his death. It consisted of one hundred and thirty three volumes of which thirty volumes had MS notes in his hand. All vanished. The catalogue and shelf lists were saved but the subject index was not. All the records of the Library up to 1940: correspondence, memoranda and reports together with the Librarian's files were burnt. The loss of buildings and facilities was costly but these could in time be replaced. The loss in books was tragic, for much that was destroyed was irreplaceable and the task of restoration was not to be accomplished within thirty years.

In 1942 the Library commenced operating again in four rooms in No. 2 King's Bench Walk with a stock consisting of borrowed and hastily purchased books. This accommodation was extended in 1949 and meanwhile a new Library was being planned for construction on the site of the pre-war building. *The Times* architectural correspondent, stressing the integrity of the design of the whole complex, observed that "the juxtaposition of the Inner Temple Hall, Library, and Parliament Chamber, and the thorough destruction of all three, have presented [the architect] with the one opportunity of large-scale replanning the Temple offers." The new Library was opened by The Treasurer, Sir Patrick Spens QC MP in April 1958, in the presence of a distinguished legal gathering which included Lord Kilmuir, the Lord Chancellor. By this time much of the lost essential legal material had been replaced through the generosity of members and friends.

The present Library, designed by T W Sutcliffe, occupies two top floors above the Benchers' private rooms and is built in the shape of an L, thus conforming roughly to the plan of the pre-war Library which it replaced. The main rooms housing the legal collections are in the long arm of the L, looking south over the garden to the river beyond, while galleries run round them at intermediate floor level. There are, in addition, a number of smaller rooms of different shapes and sizes.



The new Library, 1958. Image copyright © The Inner Temple

Built in a style stemming directly from the traditions of the late 17th - early 18th century, the Library is panelled throughout; the woodwork of the tables, book-cases, doors and balustrades being of natural, unstained English oak and the floors of sapele mahogany. A contrast in colour is provided by the chairs which are covered in blue leather.

An April 1958 *Country Life* feature commented on the rooms of the Library that "the heart of every book-lover must immediately be warmed on coming into them; for they are supremely workable-in rooms and give him exactly what he wants, the possibility of reading in comfort, and in spacious and yet intimate surroundings. The smaller rooms are friendly and unassuming; the big rooms extremely dignified, but never pretentious or pompous. The whole library is carefully planned on a principle that was first worked out in the pre-war library, that of giving the maximum variety of choice to the reader, who can sit at tables of every kind and size, and in rooms that range from the grand to the small and informal. The material and workmanship of the fittings are of high quality. The woodwork, including the tables, is of very attractive colouring, with bookcases, doors and balustrades of grey-brown English oak, and floors of polished sapele mahogany. The big pedimented doorways leading into the central room are fine examples of traditional design. The long line of brass candelabra that hang at regular intervals along the centre of the ceiling is one of the pleasantest features of the main rooms."

The books are shelved in cases that run, bay-fashion, around the walls, leaving the centre of each reading room clear for the siting of the readers' desks. The bay windows on the south side contain single desks so that a reader may sit in solitude or in company as the preference takes him. Heating was supplied by oil-fired boilers throughout a succession of pipes concealed in the ceilings, while additional warmth was provided by radiators set in the recesses beneath the windows. Comfort-cooling was installed in the Library in 2001. Brass candelabra in the main rooms provide a general light, the bookcase bays have pendant globes to illuminate the various shelves and, in addition, each reading space is provided with its own table lamp. Other features are the pull-out flaps on the tables for the stacking of used books, and the very fine craftsmanship and design of the moulding on the pedimented doorways leading into the central room. The various MSS collections and the more valuable of the printed books are housed in a fire-proof strong room, leading off the Librarian's office which commands the staircase approach to the Library:

The recataloguing of the Library which was necessary as a result of the war-time losses was a major undertaking and was not completed until 1960. It took the form of a sheaf catalogue, with a supplement on cards which was maintained until the introduction of online cataloguing in 1991. With the initial recataloguing of the bookstock completed, attention was turned in 1960 to the cataloguing of the manuscript collection.

Dr James Conway Davies was invited by the Masters of the Bench in 1960 to compile for publication a detailed catalogue of all five of the manuscript collections - the Petyt Manuscripts, the Barrington Manuscripts, the Records of the Inner Temple, the Mitford Legal Manuscripts, and the Miscellaneous Manuscripts. Conway Davies was a retired academic, some time Reader and Head of the Department of Palaeography and Diplomatic in the University of Durham. The resulting work, entitled *Catalogue of Manuscripts in the Library of the Honourable Society of the Inner Temple*, was published by Oxford University Press in three volumes in 1972, though Dr Davies had died in the previous year, while in the final stages of its preparation. In December 1976 agreement was reached between the Inn and World Microfilms Publications Ltd for the publication of the whole manuscript collection in a microfilm edition. The results were published on 256 reels of microfilm in 1978.

In the new post-war building the Library occupied not only the two upper floors but also the basement, in which older and less frequently used material was stored, at first in fixed metal shelving, replaced in the 1960s by compact mobile shelving units. In 1991 it was decided by the Inn that the basement should be converted for use as a student common room and bar. The Library would in due course have additional space in the basement of a new building but in the meantime the older legal material, together with the non-law collections then housed in the gallery (the history, biography, heraldry, genealogy, topography and literature collections), was sent into storage. The return of the stored books, to their new home in what had by now been officially named the Littleton Building, was completed in 1997.

Perhaps the most important development of recent years has been automation. Since its introduction in 1991, information technology has taken on an ever more important role in the Library. Users can now access the online catalogues of all four Inns of Court as well as a variety of legal databases via the Internet.

The Library has had its own website since 1997 and Library staff also maintain a gateway site, AccessToLaw, which provides annotated links to over 1, 300 free legal and parliamentary websites.

In 2007 the Library launched a selective Current Awareness blog, which provides up-to-date information on new case law, changes in legislation and legal news. Users can subscribe to the blog via RSS feed or email or follow the blog on Twitter. Other developments include an electronic newsletter, legal research FAQs online and a virtual tour. The Library has also created a Facebook page to promote its services and as an additional way of communicating more directly with users. Some of these initiatives led to the Library team winning a Halsbury Award for Best Legal Information Service (Non Commercial Sector) in October 2007. The team also won the BIALL Wallace Breem Award 2012 for its "considerable contribution to the legal information profession".

More than 500 years since its inception, the Library (with a staff of nine) still provides and develops services to meet the needs of its two main categories of user: members of the Bar and the judiciary, and student members studying for the Bar examinations. It offers users access to a wide range of print and electronic resources in a comfortable and quiet working environment, with over 90 reader places. This includes a reference library of 70,000 volumes, the most up-to-date editions of major practitioner texts; a comprehensive archive of old editions of practitioners' works; specialist Commonwealth and Scottish collections; as well as 22 PCs with access to free and subscription-based legal web services and Wi-Fi access for use with readers' own devices.

Within this deceptively tranquil setting of book-lined shelves and oak panelled walls it aims to offer a service for the 21st Century which combines traditional sources with new technology for the benefit of its readers.



Internet access in the Library. Image copyright © Yael Schmidt

This lea. et is an edited, updated and illustrated version of A Sketch of the Inner Temple Library by Wallace Breem, Librarian and Keeper of Manuscripts 1965-1990.

The Library Today

The Library offers the following facilities and services:

- a quiet environment for study, with over 90 reader places
- a comprehensive collection of English legal materials, including the most up-to-date editions of major practitioner texts
- an extensive archive of old editions of practitioners' works
- specialist Commonwealth & Scottish collections
- collections which are all on-site and easily accessible
- a range of commercial legal research databases
- PCs for online research, access to email and word processing
- free Wi-Fi
- photocopying and printing facilities
- a document supply service for barristers in chambers
- an enquiry service (in person, by telephone and by email)
- assistance with online searching and legal research
- an overnight loans scheme for barristers
- legal research training for pupils
- legal research FAQs on our website
- tours for students and pupils, plus a virtual tour on our website
- web access to the library catalogues of the four Inns
- AccessToLaw, a gateway site providing annotated links to selected UK, Commonwealth and worldwide legal websites (www.accesstolaw.com)
- Current Awareness blog for legal news, changes in legislation and new case law (www.innertemplelibrary.com)
- quarterly electronic newsletter
- a Facebook page with information on Library services, news and events (www.facebook.com/innertemplelibrary)
- range of guides available in the Library or for downloading from our website
- equipment and software for users with hearing or visual impairment

Front cover copyright images: © Adrian Blunt (top) © Inner Temple Library (centre) © Yael Schmidt (bottom)

Contacts

The Honourable Society of the Inner Temple
The Library
Inner Temple
London
EC4Y 7DA

Tel: 020 7797 8217/8218/8219
Fax: 020 7583 6030/020 7583 1055
Email: library@innertemple.org.uk
Website: www.innertemplelibrary.org.uk



INNER TEMPLE
LIBRARY

Annual Review 2016



Image © Abhimanyu Bose

AccessToLaw - the content of our gateway site, which provides annotated links to over 1300 free legal websites, was checked and updated on a quarterly basis. There were 148,324 individual visitors to the site from 197 countries, the majority coming from the UK, USA, Malaysia, India, Canada, Australia and Singapore. The sections of the site accessed most frequently were Case Law, Court Information, Legal Journals, Northern Ireland, Caribbean, Courts and Tribunals, Republic of Ireland and Regulatory Law.

Binding - a total of 538 volumes of UK law and 131 volumes of Commonwealth law were bound or rebound during the year. Bookends Bindery, which specialises in dealing with manuscripts and early printed books, carried out conservation and repair work on a number of items including two manuscript works by Francis Maseres and a volume of the Marshall Hall press cuttings.

Branding - a new library branded mug was given to students at the fresher events we attended at the London Bar schools and to participants in our open afternoon for students and induction sessions for pupils. The Library tote bag was also given away at a number of events.

Cataloguing - around 170 new law titles and editions were added to the catalogue during the year. This total includes only practitioners' texts, and excludes continuation volumes of periodicals (which are of course heavily represented in a library such as ours), reissue volumes of encyclopaedic works, non-law books, or general reference books or other non-law titles, so the actual number of volumes acquired (and in most cases, individually catalogued) would be many times that total.

Circuits - in February the Librarian and Deputy Librarian took part in a Circuits Conference convened by the Treasurer. For the Library this was an opportunity to explain about the services available to members who are not based in London. Our presentation to representatives from the Circuits covered areas such as the document supply service, enquiry service, the Current Awareness blog and the Library's gateway site, AccessToLaw. An information sheet *Ten Reasons to use the Inner Temple Library* was circulated to participants.

Committees - the Librarian acted as secretary to the Library Committee and as coordinator of the Bar Librarians Group, and attended meetings of the Institute of Advanced Legal Studies Library Committee. The Deputy Librarian continued as a member of the British and Irish Association of Law Librarians Conference Committee and helped to organise a very successful conference in Dublin.

Current Awareness Blog - the coverage of the blog includes the latest legal news, new case law and changes in legislation, commentary from chambers' blogs, announcements of forthcoming lectures and seminars, and advertisements for chambers vacancies. A total of 4,250 posts were added in 2016. The blog now has 46,581 posts, 1,108 subject categories, 2,562 subscribers via email or RSS feed and 8,200 Twitter followers. The number of individual visitors to the site was 200,087.

The top ten most frequently accessed subject categories were sentencing, appeals, police, human rights, murder, internet, children, media, local government and sexual offences. Apart from the UK, visitors to the site came from a wide range of countries including the USA, Russia, Malaysia, Hong Kong, Australia, India, Canada and the Republic of Ireland.

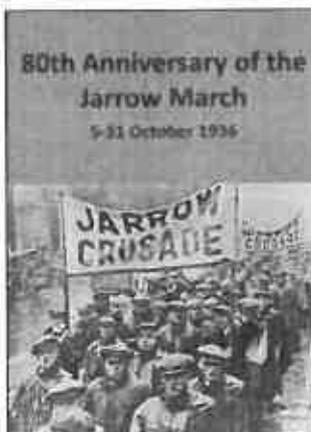
We will be celebrating the 10th anniversary of the blog in April 2017.



Displays and Publications - during the year we mounted a number of displays to commemorate anniversaries and events and to highlight particular parts of our collection. They included LGBT History Month, International Women's Day (Women at the Inns of Court), the Easter Rising in Dublin, the Great Fire of London, Canada Day, and the World Cup 1966. To accompany the displays we produced information sheets and leaflets all of which can be found online via our Publications webpage.



Women at the Inns of Court



Document Supply Service - this service is available to barrister and judicial members of all four Inns wherever they are based, and to student members of the Inner Temple. Over the year 206 items have been scanned and emailed to barristers located in the UK, the Bahamas, Bermuda, Gibraltar, Guernsey, Jersey, the Republic of Ireland and the Turks & Caicos Islands.

Donations - members of the Inn continue to present copies of their newly published works. Donations resulted in a saving of over £3000 on monographs and over £8,000 on loose-leaf releases and journals. We continue to receive Wildy, Simmonds and Hill publications free of charge.

In August, thanks to the generosity of Lady Le Quesne, the Library received some 40 volumes from the library of the late Master Le Quesne who was Treasurer of the Inn in 1989.



Master Le Quesne

Enquiries - staff at the Enquiry Point dealt with 3,654 personal and telephone enquiries from barristers, judges, pupils, students, and clerks. Enquiries were, as always, very varied and included establishing what discretion to admit fresh evidence was exercisable by judges under the R.S.C. as in operation in 1954; assembling legislation and case law concerning criminal appeals in various Caribbean jurisdictions; and finding historic statutory guidance relating to child protection.

Particularly intriguing was a request for an early 18th-century Act concerning insolvent debtors, to which an incorrect title (and date) had been applied by a later commentator; the matter was only resolved by reference to the Acts of the period as originally printed.

We have increased the range of stationery items available for purchase at the Enquiry Point in response to users' requests.

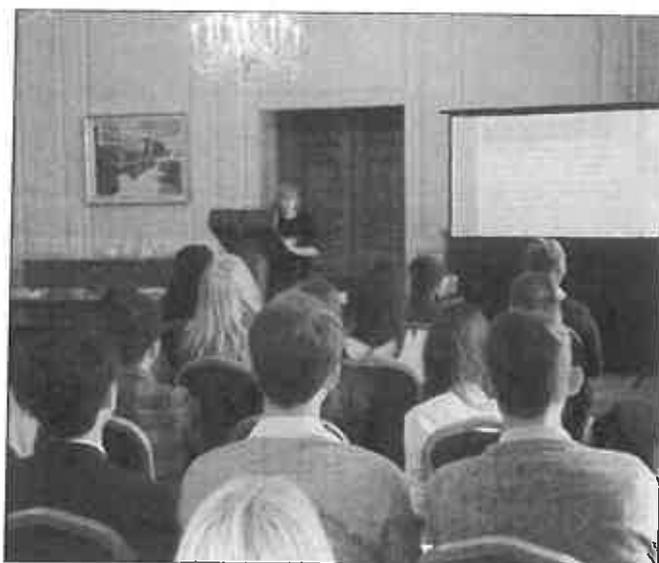
Historical Enquiries - enquiries dealt with during 2016 related to a wide range of topics, including: the law examinations taken by Gandhi; evidence of commercial production of legal material in the 17th century, especially Hobart's Reports; and the life of E.W. Barker, law minister in the government of the newly independent Singapore. As ever we received a great many enquiries concerning persons supposed to have been members of the Inn and these were dealt with in collaboration with the Archivist.

IT - public access PCs are in the process of being replaced with new models to improve the IT experience for all library users.

Legal Research Training - the Library ran its legal research training course for new pupils in the spring and autumn of 2016. The course covers UK case law and legislation.

A new initiative in 2016 was the introduction of legal research training in the context of the Inn's qualifying sessions. Over 110 students attended the sessions which were run twice on a Saturday and once on a weekday evening in the autumn. Feedback on the content and on the trainers was very positive. Dates have now been set for 2017.

In November two members of the library team, Tracey Dennis and Simon Hindley, travelled to Gibraltar to run a training session for members of the local Bar, which gave an overview of the key points to consider when carrying out legal research.



The Deputy Librarian talking at one of the qualifying sessions

We continue to provide one-to-one training on databases and printed material as required for students, pupils and barrister members of the Inn.

Littleton Basement - 250 items were requested from the Library's basement store in the Littleton Building. In the main material housed there is not available online. The most frequently requested works are old editions of textbooks, law reports and journals. More parliamentary material was requested in 2016 than in any previous year.

Staff Changes - one of the Library Assistants, Mark Leonard, left the Inn to take up the post of Assistant Librarian at Lincoln's Inn. He was replaced by Lucia Asnaghi who had been working in the Library as an Evening Assistant for several years and who is a qualified librarian.

Staff Training - courses attended by Library staff included the following topics: copyright; knowledge management; use of social media; Pepper v Hart research; and advanced Photoshop as well as legal research sessions run by the Institute of Advanced Legal Studies Library.

Student Events - the Library participated in the Inn's introductory evenings for London and out of London students and for the first time the Deputy Librarian joined the panel of speakers to explain to new students the benefits of using the Library and library services.

The Deputy Librarian and colleagues from the other Inns gave presentations at the City Law School, the University of Law and BPP Law School on the services that the Inn Libraries offer to Bar students. The presentation is also available as a slideshow on the Library website.

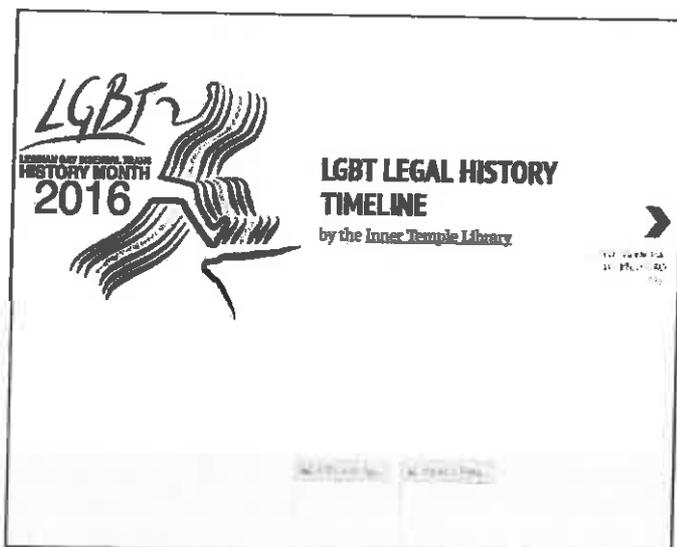
In addition, library staff from the Inner Temple, the Middle Temple and Lincoln's Inn represented their three Inns at fresher events at the London Bar schools. This was a new initiative and proved an excellent way to connect with new BPTC students.

In September the Library held an open afternoon for students which was well attended. A number of attendees took part in an orientation quiz with one lucky student winning lunch for two in Hall.

Timelines - a member of the library team, Sally McLaren, created a number of interactive legal history timelines featuring landmark moments in legislative and judicial history, which received very positive feedback on social media. These included LGBT Legal History, Women's Legal History and Black British History and the Law. All the timelines can be viewed on the Library website.



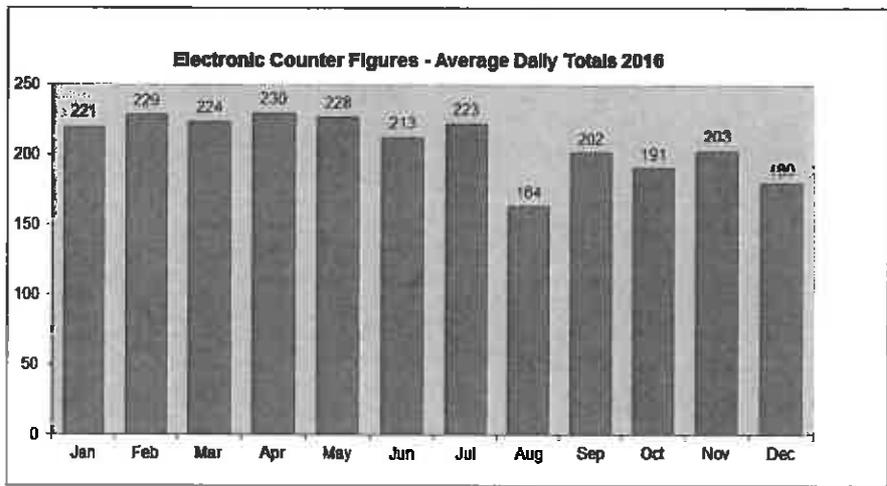
The Deputy Librarian awaiting students at the University of Law Freshers' Fair



Black British History and the Law

Tours - over 90 tours of the Library were given to individuals and groups of prospective new members during the year. The virtual tour on our website was viewed 1,390 times.

Usage Statistics - an electronic monitor at the library entrance counts people entering and leaving the Library, including staff: totals for each day are halved to compensate (as far as possible) for the fact that most people would be counted twice. The average daily total in 2016, after this adjustment, was 209.



User Group - the Library Users' Group, which consists of students, pupils and barristers, held a number of meetings during the year. The main topic for discussion was how the implementation of Project Pegasus would affect the Library space, collections, services and staff.

Visits - we received visits from new library staff at the other Inns, Lorena Dinca, the Magna Carta scholar from Romania, Claudia Cristina Saltao, Head Librarian of the Faculty of Law at the New University of Lisbon, Sean Barr, law librarian at Swansea University, members of the Chester Bedell American Inn of Court in Texas, Australian lawyers on a tour accompanied by Peter Butt (Emeritus Professor at Sydney University), the Indian High Commissioner and Deputy High Commissioner, and a group of law librarians attending the International Association of Law Libraries conference.

Library staff visited the House of Commons Library, the City Business Library and the National Archives at Kew.



Group of American lawyers from the Chester Bedell American Inn of Court, with the Deputy Librarian on the left

Website - the Library's website, which has been completely redesigned, went live at the end of the year. The new site showcases library services and facilities more effectively while the menu structure makes it easier to navigate and more user friendly. The Library Catalogue can now be searched from any part of the site. Wordpress technology has been used on the site to ensure it will work on any device from PC to tablet to smartphone.



Wellbeing - one of the library team, Sally McLaren, has been a member of the Inn's Wellbeing Group since its inception. Amongst the events she is planning will be lunchtime talks with guest speakers. The Wellbeing Group has been set up to promote staff wellbeing and the creation of an open and supportive culture in the workplace.

The Honourable Society of the Inner Temple
 The Library, Inner Temple, London EC4Y 7DA
 Tel: 020 7797 8217/8, Fax: 020 7583 6030/020 7797 8224
 Email: library@innertemple.org.uk
 Website: www.innertemplelibrary.org.uk

Existing & Proposed Shelving Capacity Analysis
 Hugh Broughton Architects
 10.03.16

* Capacity measured in linear meters (lm)

	Area	Existing shelving	Retained shelving	New shelving	
Second floor	Lobby	3.93			
	Enquiry Point	67.18	67.18		
	Library room A	87.36	87.36		
	Library room B	55.37	47.72	8.4	
	Library room C	230.59	230.59		
	Library room D	259.61	259.61	21.44	
	Library room E	224.52		224.62	
	E&F Cupboard	22.16			
	Library room F	203.73		160.15	
	Library room G	114.13		97.58	
	Library room H	126.02			
	Library room J	141.93			
	Acquisitions office	100.44	100.44		Assume relocated
	T&M office	23.21	23.21		Assume relocated
	Third floor	Library Gallery	283.13		
Gallery Tunnel		158.1			
Gallery room A		64.6			
Gallery room B		47.95			
Gallery room SL		45.1			
Times room, Corridor & Privy Council		38.89			
New Areas	Basement storage room			510	
	Lift Lobby			82.74	
Total		2297.95	816.11	1104.93	

Total existing capacity
 Total proposed capacity

2297.95
1921.04

16.4% loss

17 / 00077

Bhakti Depala
Case Officer
Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ



plans@cityoflondon.gov.uk
By email

1 March 2017

Dear Ms Depala,

Planning application: 17/00077/FULMAJ | Inner Temple Treasury Building, the Terrace, Crown Office Row, London, EC4Y 7HL

SAVE Britain's Heritage writes to **object** to this application that proposes external and internal changes to the Inner Temple Treasury Building.

SAVE is particularly concerned that the proposed alterations to the Library would have a serious harmful impact on the building, resulting in the loss of a fine interior and one of London's best examples of post-war reconstruction.

We therefore request that the application be **refused** planning permission.

We note that there is significant interest in this application, not least amongst the Benchers of the Inn, several of whom have contacted SAVE with their concerns. We therefore also request that the application be taken to full planning committee, and not decided at officer level.

The Library

A library has been present on the site since c.1506, and the applicant's heritage study and statement describe in some detail the evolution and design of the previous buildings on the site, specifically the second, third and fourth incarnations of the Library. It is disappointing therefore that no significant description or evaluation of the current Library interior is included with the application.

70 Cowcross Street London EC1M 6EJ
T: [REDACTED] F: [REDACTED] E: [REDACTED]
www.savebritainsheritage.org
Registered Charity 269129

Following bomb damage between 1940 and 1942, the Library was rebuilt to the designs of Sir Hubert Worthington and T W Sutcliffe, overseen by Sir Edward Maufe; however due to delays and disagreements over the design the Library can be best attributed to Sutcliffe, who became the lead and sole architect following Worthington's removal from the project in 1953. It was opened in 1958.

The principal Library is a sequence of three rooms, the largest at the centre, with matching extensions at either end. There are additional smaller Library rooms on the north side of the building. All the rooms survive in blemishless condition and are of a piece, beautifully executed in oak with floors of polished mahogany, with pedimented doorways, brass candelabra, and an interconnected series of galleries above.

The design throughout is elegant yet robust, without the watered down feel of some post war reconstructions; upon its opening in 1958, *Country Life* described the Library as being, 'carefully planned,' and, 'extremely dignified, but never pretentious or pompous'. Similar sentiments were expressed by other articles at the time.

Writing in 1966 the architectural critic Ian Nairn described the buildings of the Temple as being, 'as memorable as anything in Oxford or Cambridge', specifically noting that, 'more than half of it is post war reinstatement'.

Although not listed by Historic England, we consider the Library's interior to be very significant, worth retaining and preserving.

The proposals

This application proposes to reduce the Library in size so as to accommodate a lecture theatre, breakout space, and office accommodation. Such a proposal requires the removal of the entire upper gallery and all its woodwork, candelabras and architraves, and the insertion of a new low ceiling, something that would entirely disrupt the elegant proportions of the existing Library.

What is currently a light filled welcoming library with ample study spaces, would be transformed into a darker, more oppressive single storey room, with reduced shelving and space for study.

Policy context

The Library is a significant part of a non-designated heritage asset (the Treasury Building), and SAVE considers that the proposals as submitted will cause substantial harm.

The National Planning Policy Framework (NPPF) requires local authorities to, 'recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance'. (NPPF 126)

70 Cowcross Street London EC1M 6EJ

T: [REDACTED] F: [REDACTED] E: [REDACTED]

www.savebritainsheritage.org

Registered Charity 269129

NPPF 128 states that, 'local planning authorities should require an applicant to describe the significance of any heritage assets affected', something which in this case we contend has not been done. Consideration and assessment has been given to external aspects of the Treasury Building, but not to internal qualities which make a significant contribution to the building's status as a non-designated heritage asset.

The NPPF also requires that, 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighting applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significant of the heritage asset.' (NPPF 135)

We consider that the existing library interior makes a significant contribution to the non-designated heritage asset, and that its demolition would result in substantial harm, and therefore the application should be refused.

Conclusion

The Inner Temple Library is a distinguished room and one of the finest pieces of post war reconstruction in London, carried out with the highest quality, care and attention to detail. It is much valued by members of the Inner Temple, and an asset to the legal profession and London as a whole.

These proposals are entirely unsuitable and would amount to substantial harm to an undesignated heritage asset, something which must be taken into consideration and given due weight in the planning process.

For these reasons we request this application be **refused** planning permission. An alternative proposal which respected and retained the Library's proportions and features should be encouraged, and would be more likely to meet with success and support.

Yours sincerely,


Mike Fox
Deputy Director

70 Cowcross Street London EC1M 6EJ

T:  F:  E: 
www.savebritainsheritage.org
Registered Charity 269129

Sehmi, Amrith

From: PLN - Comments
Sent: 01 March 2017 12:08
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 12:07 PM on 01 Mar 2017 from Mr Ian Stern.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Ian Stern
Email:
Address: 2 Bedford Row London

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments:

Sehmi, Amrith

From: PLN - Comments
Sent: 01 March 2017 11:28
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 11:28 AM on 01 Mar 2017 from Mr Alistair McCreath.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Alistair McCreath
Email:
Address: 57 Spetchley Road Worcester

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: I write as a Bencher of Inner Temple. I have an interest in advocacy training and have delivered other legal training over many years.
 This proposal does not mean the wholesale destruction of the library, a resource which is acknowledged by all to be valuable. It does, however, mean that the Inn will be better able in modern conditions to provide education and training to its members and students and thus discharge one of its most important functions. At a time

when lawyers are more and more accessing digital rather than hard copy sources for legal information and when the need to deliver legal education, to students at the beginning of their careers and to practitioners on a continuing professional development basis, is increasing it is surely appropriate for the Inn to undertake some rebalancing in favour of the provision of better educational facilities. I strongly support this application.

Sehmi, Amrith

From: PLN - Comments
Sent: 01 March 2017 10:59
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 10:58 AM on 01 Mar 2017 from Mr Faisal Sadiq.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Faisal Sadiq
Email:
Address: 11 Oak Close Sutton

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Reasons for comment: - Residential Amenity
Comments: I am a barrister member of the Inner Temple. My Chambers are a short walk away on Ely Place. I am also active in the Inn's education and outreach programmes.

I frequently use the Inn's law library. It is a phenomenally valuable resource but in an age when many legal texts are available online (Westlaw, Lexis, etc), in my experience, the library is seldom used to capacity. Usually, when I have attended during working

hours the library has between 8 and 24 users. It is a quite place to work but often feels deserted. I make no criticism of Inner Temple's library, the same can be said of the libraries of all of the Inns.

The Inn is a living institution. Its ancient remit is to provide education to the next generation of barristers. Before the civil war the Inns collectively were viewed as England's third university. The Inner Temple has a vibrant education programme and it aspires to continue to deliver on its ancient remit - to continue to provide valuable training to the next generation of barristers. All too often I have found that the Inn's ability to deliver on this is hampered by its lack of space. Project Pegasus seeks to address this.

The library is indeed beautiful but it is not some sterile temple glorifying the law. Rather, it is an integral part of a living institution that has at its heart a remit to provide legal education.

In my view the plans advanced as part of this planning application retain much of the library's beauty whilst at the same time recognising the reduced usage the library gets in the 21st century and allowing the Inn to meet its educational remit more effectively.

Sehmi, Amrith

From: PLN - Comments
Sent: 01 March 2017 09:55
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 9:54 AM on 01 Mar 2017 from Dr Andrew Goodman.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Dr Andrew Goodman
Email:
Address: 1 Chancery Lane London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I am a barrister and governing Master of the Bench of Inner Temple. I have actively and frequently used the Inner Temple library since 1977. I wish to associate myself with the representations of Richard Humphreys QC and object to the grant of planning permission on the grounds he sets out in detail. This scheme is part of a flawed business plan which, in my considered opinion, is ill-conceived and should not proceed. Circumstances have materially altered since it

was last debated by the Bench.

Sehmi, Amrith

From: PLN - Comments
Sent: 01 March 2017 09:40
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 9:39 AM on 01 Mar 2017 from Mr Stuart Brown.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Stuart Brown

Email:

Address: The Gatehouse, Copgrove Harrogate

Comments Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Reasons for comment: - Residential Amenity

Comments: The Inn's principal function is fostering the education of aspiring and established barristers. This project provides an opportunity to do such on site in high quality specially designed accommodation. It has been carefully considered over a long period and should in no way detract from the Inn's aesthetic qualities whilst allowing for a 21st century facility

Sehmi, Amrith

From: PLN - Comments
Sent: 01 March 2017 08:30
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 8:30 AM on 01 Mar 2017 from Mr Anthony Leonard.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Anthony Leonard

Email:

Address: Southwark Crown Court 1 English Grounds London

Comments Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: This is a bold Initiative which will ensure that the Inn has a place in the education of the legal profession for the foreseeable future. It can be achieved under these plans with the minimum visual impact to the estate overall. The consequences for the Inn's library are proportionate to the overall aim and, in terms of educational use, will greatly increase the facilities available. We are in competition with the other Inns for students, and we need to follow the lead taken by Lincoln's Inn in the

provision for advocacy and other training.

Sehmi, Amrith

From: PLN - Comments
Sent: 01 March 2017 22:37
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 10:37 PM on 01 Mar 2017 from Mr Abbas Lakha.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Abbas Lakha
Email:
Address: 35 Compayne Gardens LONDON

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Reasons for comment:
Comments: This is an excellent project and will provide much needed dedicated space for the Inns Education and Training needs.

17/00077

From: Depala, Bhakti
To: PLN - Comments
Subject: FW: Inner Temple Library Planning Application
Date: 02 March 2017 14:18:41
Attachments: [save-the-inner-temple-library-from-the-devastating-effects-of-option-2_022817.pdf](#)

From: Guy Tritton [REDACTED]
Sent: 02 March 2017 13:03
To: Depala, Bhakti
Subject: Inner Temple Library Planning Application

Guy Tritton
Barrister

Hogarth Chambers

Recommended Chambers & Partners 2016 and Legal 500 for IP and Media Law

5 New Square | Lincoln's Inn | London | WC2A 3RJ

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REF 17/00077/fulmaj

Dear Ms Depala

I write in connection with the application for planning permission for the changes to the Inner Temple Library. I strongly object to this. Much has been said by others about the Inner Temple Library, its design and how it is considered one of the best law libraries in England. It is one of the finest examples of post-war reconstruction and the whole design of the library including, most importantly, the double height balustrade, is a treasure much valued by everyone as conducive to work, research and reflection.

The main reason for writing is that when the proposals were first put forward, I was conscious that barristers and others strongly objected to what they saw as desecration of a beautiful restored library (recognised by Niklaus Pevsner) simply to add more training rooms. The option was not a binary one as there were two principal options put forward – what were called Option 1 and Option 2. Option 1 involved adding a fourth floor to the Inner Temple Building as originally

envisaged for the post war reconstruction plans after WW2. This involved the addition of an auditorium and many training rooms on the 4th floor and some to the 3rd floor in a manner that did not involve the destruction of the gallery's double height galleried rooms. It was a good balanced plan. Option 2 is, in essence, the plan put forward to the City of London which involves the destruction of the double height galleried rooms and of several rooms on the 2nd floor for relatively little gain.

Members of Inner Temple and the wider public were very dismayed by this and wanted to register their objection to this. To this end, I set up an online petition and this attracted over 1500 signatories with relative little publicity (please ignore the last long rambling entry which can be considered as "spam"). The number of signatories and their trenchant comments demonstrate the "grassroots" antipathy and hostility to this proposal who feel that this proposal has been put forward without any attempt to seek the views of the members of the Inner Temple or indeed the wider legal community.

I attach as a PDF the signatories to that petition (which can be found at <http://www.thepetitionsite.com/en-gb/526/526/022/save-the-inner-temple-library-from-the-devastating-effects-of-option-2/>) and their comments (where such have been provided). I would invite you to read the comments from the objectors which represent the heartfelt views of many members of the Bar, librarians, students and the wider public.

I believe that the Option 1 plans will be sent to you so that you realise that what is being proposed is wholly unnecessary.

I would strongly urge you to reject this planning application. Refusing this application does not thwart the goals of Inner Temple to provide education and training as there is a perfectly viable Option 1 which preserves the library. Furthermore, a fundamental cornerstone of Inner Temple (as with all other Inns of Court) is to provide a library that is accessible to all thereby allowing it to fulfil the need to provide legal education. Currently, this is done by providing a beautiful setting conducive to learning and work and provides a welcome "refuge" from the hurly burly of modern life (so self-evident when one goes there).

Furthermore, if the application is granted, the result will be a library reduced substantially in size with much reduced shelving (thereby impeding the ability of the Library to provide to law practitioners and students a first class and compendious law library).

To allow this application would be an irreversible loss of one of the finest postwar interiors in London and indeed in the United Kingdom.

I would invite the committee to reject this proposal.

Yours sincerely

Guy Tritton

Guy Tritton
Barrister

Hogarth Chambers

Recommended Chambers & Partners 2016 and Legal 500 for IP and Media Law

5 New Square | Lincoln's Inn | London | WC2A 3RJ

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The Inner Temple

	Name	From	Comments
1.	Guy Tritton	London, United Kingdom	Guy Tritton
2.	Kathryn Irby	GULFPORT, MS	
3.	Génesis Arce	San José, Costa Rica	
4.	pedro simoes	Soure, Portugal	
5.	Rajeeva Ranjan	New Delhi, India	
6.	Dina Smith	NEWINGTON, NH	
7.	Adam Wagner	London, United Kingdom	The Inner Temple Library is a treasure of the Temple and should be protected in its current form.
8.	Carl Gardner	London, United Kingdom	What a bloody awful idea this is.
9.	Lucy Bailey	London, United Kingdom	
10.	Sajid Suleman	London, United Kingdom	
11.	Neil Jeffares	London, United Kingdom	
12.	Amy Lush	Winchester, United Kingdom	
13.	Kelly Charnock	Norton, United Kingdom	
14.	James Sheedy	St Helier, United Kingdom	
15.	Jason Braier	edgware, United Kingdom	
16.	John McLaren	London, United Kingdom	
17.	Ben Ray	London, United Kingdom	
18.	John Goss	London, United Kingdom	
20.	Tim Parker	London, United Kingdom	
21.	Shannon Ware	JACKSONVILLE, FL	
22.	Ben Smith	Birmingham, United Kingdom	

	Name	From	Comments
23.	Anne Toovey	London, United Kingdom	
24.	Craig Lowe	Leeds, United Kingdom	
25.	Caitlin Moore	London, United Kingdom	
26.	Sarah Rudd	Sutton, United Kingdom	
27.	Chelsea Alexander	Cheltenham, United Kingdom	
28.	Leigh Hudson	London, United Kingdom	
29.	Tom Challinor	Stafford, United Kingdom	
30.	Sue Christensen	Sale, United Kingdom	Please don't destroy this haven of peace and learning and beauty.
31.	Barbara Hewson	London, United Kingdom	
32.	Robert Ramsay	Reading, United Kingdom	
33.	Hayley Miller	London, United Kingdom	
34.	Robert Steele	Battersea, United Kingdom	
35.	Louise Glencross	Aldershot, United Kingdom	
36.	Karin Tampion	London, United Kingdom	
37.	Turlough Stone	Shepreth, United Kingdom	
38.	Adam Kingaby	York, United Kingdom	
39.	Catriona Stirling	London, United Kingdom	
40.	Dr Mary Malecka	London, United Kingdom	Even Option 1 is not necessary. The additional upper floor project should not go ahead at all.
41.	William Latimer-Sayer	London, United Kingdom	
42.	Sally Robertson	London, United Kingdom	
43.	DAPHNE ROMNEY QC	London, United Kingdom	
44.	Katherine Illsley	London, United Kingdom	

	Name	From	Comments
45.	Robert Salis	London, United Kingdom	
46.	Michaela Jacobs	London, United Kingdom	
47.	Agata Patyna	London, United Kingdom	
48.	Claire Buonaquisti	Rugeley, United Kingdom	
49.	James Atkinson	London, United Kingdom	
50.	Rehana VN	Selcourt, South Africa	
51.	Alan Birbeck	London, United Kingdom	<p>The impact of losing space in the library would be a considerable shame for the Inns main knowledge resource. The Inner Temple library provides superb legal knowledge resources which are invaluable to barristers and benchers. I have tried to summarise five key themes. I have personally used the library for over 13 years both as a student, a pupil and as a practising barrister.</p> <p>1. Quality of physical resources The library stocks a unique unrivalled collection often of material which is not and will never be available online such including historic and current versions a diverse range of law texts, case reports, command papers and overseas collections etc.</p> <p>2 Quality of online resources The online resources provided by the Inner Temple are second to none. They are well structured and helpfully signposted for those new to the resources. The current awareness section is excellent.</p> <p>3. Quality of the study space The libraries also provide an excellent quiet place to work. They also provide the impoverished pupils and members of the legal aid bar a chance of resources and peace in which to work. I have used all four of the Inns libraries and by far Inner is the most accessible and high quality space.</p> <p>4. Quality of the staff The staff at all the Inns libraries are helpful and knowledgeable but Inners staff are outstanding. The diverse range of resources required by any legal practitioner requires access to knowledgeable information specialists. The staff can handle queries from the vagaries of Hansard and Royal Commissions to using the online databases.</p> <p>5. Impact on publicly funded and sole practitioners and BAME groups The impact of shrinking the available space will be significant on publicly funded and sole practitioners. The impact will also be considerable on BAME groups. <i>(continues on next page)</i></p>

	Name	From	Comments
51.	Alan Birbeck	London, United Kingdom	<i>(continued from previous page)</i> In times of austerity all chambers are cutting their physical and online resources this is particularly so for small chambers and publicly funded chambers. The statistics are clear that BAME groups are more likely to operate from smaller chambers and thus more likely to suffer the impact. Further to all the above the 2013 Library User group survey pointed to all of the above qualities and more from large numbers of Inner Temple library users. It would be a great shame if this resource were diminished in size. The current space is ideal and is in my view the Inns greatest asset.
52.	Dimitris Dallis	Thessaloniki, Greece	
53.	Chris Bryden	London, United Kingdom	
54.	John Brown	London, United Kingdom	
55.	Jeffrey DeCristofaro	ASHEVILLE, NC	
56.	Andres Caballero	Camarillo, AK	
57.	Muriel Servaege	Arlon, Belgium	
58.	Chris Aikman	Hornby Island, Canada	
59.	Alison Million	London, United Kingdom	
60.	Charles Morgan	London, United Kingdom	I am a user of the Inner Temple Library
61.	Guy Tritton	London, United Kingdom	Please help with this petition.
62.	Damian Brown	Lonodn, United Kingdom	
63.	Richard Perkoff	London, United Kingdom	The Library is an invaluable resource and these proposals compromise its institutional integrity and value to researchers, students and, above all, practitioners.
64.	Brendan Mullee	Hove, United Kingdom	
65.	Ed Kemp	London, United Kingdom	This outrageous proposal, apparently prioritising the Inn's commercial interests over the needs of the community of barristers and students which it serves, will cause irreparable damage to this unique legal district. A great shame that such a valuable resource and a legal institution is under threat.
66.	Carol Davis	London, United Kingdom	

	Name	From	Comments
67.	Charles Samek QC	London, United Kingdom	
68.	Catherine Piskolti	London, United Kingdom	
69.	simon birks	London, United Kingdom	
70.	Ruzin Dagli	London, United Kingdom	
71.	Will Dobson	London, United Kingdom	
72.	Ben Birtchnell	Temple, United Kingdom	A philistine proposal that would destroy one of the world's most beautiful learning environments.
73.	Katherine Apps	London, United Kingdom	
74.	Judith Mayhew	London, United Kingdom	
75.	Kellie Lashbrook	Temple, United Kingdom	
76.	Barbara Zeitler	London, United Kingdom	This is a short-sighted proposal. Please do not destroy this invaluable resource and one of the most beautiful environments for research and learning in London.
77.	John Macpherson	Inverness, United Kingdom	
78.	MARTIN Fodder	Temple, United Kingdom	
79.	Emily Beer	London, United Kingdom	
80.	Gizem Algan	New York, NY	
81.	Naomi Dreyer	San Salvador, El Salvador	
82.	Eloise Turnnidge	Orsett, Essex, United Kingdom	
83.	Katherine Lane	Ross-on-Wye, United Kingdom	
84.	Alexander Sehmer	London, United Kingdom	It will be a great shame if Option 2 is adopted and I urge the Bench Table to dismiss the Committee's recommendation.
85.	George Molyneaux	London, United Kingdom	
86.	witold pawlak	London, United Kingdom	
87.	Barry AWAY Thiessen	Delta, Canada	

	Name	From	Comments
88.	Ling Yah wong	Kuala Lumpur, Malaysia	
89.	robert mc cracken qc	london, United Kingdom	
90.	Marc Delehanty	London, United Kingdom	Inner Temple library is a great resource for pupils and junior barristers in particular and it provides a splendid space in which to work. The proposal is radical and, as the petition states, would have devastating effects on the library.
91.	Zeynep Ozturk	Istanbul, Turkey	
92.	Durin Dagli	New York, NY	
93.	Lale Dagli	Istanbul, Turkey	
94.	memet dagli	istanbul, Turkey	
95.	Peter FitzGerald	London, United Kingdom	
96.	Terence Merck	London, United Kingdom	
97.	Robert Blake	SHOREHAM-BY-SEA, United Kingdom	
98.	Angela Narey	Newcastle, United Kingdom	
99.	Jack Hickling	Birmingham, United Kingdom	
100.	John Matthews	Orpington, United Kingdom	One of the reasons I joined the Inn.
101.	Rhys Rosser	Camberwell, United Kingdom	
102.	James Beeton	Winchester, United Kingdom	
103.	Owen Smith	London, United Kingdom	
104.	Cameron Giles	Redcar, United Kingdom	
105.	Terry McGuinness	London, United Kingdom	
106.	Gita Patel	Salford, Manchester, United Kingdom	
107.	Catherine Baksi	London, United Kingdom	
108.	Thomas Jones	London, United Kingdom	
109.	Charlotte Mitchell-Dunn	Twickenham, United Kingdom	

	Name	From	Comments
110.	Adam Porte	London, United Kingdom	
111.	Jasmine Chan	Stalybridge, United Kingdom	
112.	Tracey Archer	West Bridgford, United Kingdom	
113.	Anthony Searle	London, United Kingdom	
114.	Tanja Deane	London, United Kingdom	
115.	Mavis Amonoo-Acquah	London, United Kingdom	
116.	K Bhalla	London, United Kingdom	One of the most impressive libraries in London will be ruined
118.	Maya Chopra	Trusham, United Kingdom	
119.	luke whittaker	malvern, United Kingdom	
120.	Dee Evans	Leybourne, United Kingdom	It's a tragedy that they are even considering destroying this wonderful space. And all to make a money. They're philistines.
121.	Charlotte Scott	London, United Kingdom	Inner Temple library is a fantastic resource and a lovely place to work.
122.	Rosalind Nicholson	London, United Kingdom	
123.	Max Turnell	Henley, United Kingdom	
124.	Beatrice M. PetitBon	LONDON, United Kingdom	
125.	Gwawr Thomas	London, United Kingdom	
126.	Daniel Searle	Cardiff, United Kingdom	
127.	Charles Jamieson	Sutton, United Kingdom	
128.	Ksenia Bakina	London, United Kingdom	
129.	Stefan Bisson	London, United Kingdom	
130.	Michael Cogan	London, United Kingdom	
131.	Russell Sandberg	Cardiff, United Kingdom	

	Name	From	Comments
132.	Otto Vervaart	Utrecht, Netherlands	This library is not just a number of rooms with information carriers, but a key element in and an invaluable witness to the history and functioning of the Inner Temple
133.	patrick scott	bury, United Kingdom	
134.	James Culverwell	London, United Kingdom	
135.	Chelsey Bartup	Hockley, United Kingdom	
136.	Gunnar Schulte	London, United Kingdom	
137.	Christopher Blackett	Shildon, United Kingdom	
138.	ERIKA SOMLAI	BUDAPEST, Hungary	
139.	Alice Carse	London, United Kingdom	
140.	Sarah Black	London, United Kingdom	
141.	Edward Smith	London, United Kingdom	
142.	Lucas Fear-Segal	London, United Kingdom	
143.	Jonathon Lodwick	London, United Kingdom	
144.	Georgina Bryan	London, United Kingdom	
145.	Nicholas Khan	Brussels, Belgium	As an Inner Temple member, I found the library invaluable, especially when I was a Bar student.
146.	Katherine Barnes	London, United Kingdom	
147.	Christina Paine	Chelmsford, United Kingdom	
148.	Julian Wilson	London, United Kingdom	
149.	Chloe Shuffrey	Somerset, United Kingdom	
150.	Pawda Tjoa	London, United Kingdom	
151.	Charles Streeten	London, United Kingdom	
152.	Robyn Cunningham	London, United Kingdom	
153.	Emily Garside	London, United Kingdom	

	Name	From	Comments
154.	Vincent Scully	London, United Kingdom	This is terrible news! It's by far my favourite place to work in the Inns.
155.	Alex Watters	London, United Kingdom	
156.	Morrow Golden	London, United Kingdom	
157.	Michael Coley	London, United Kingdom	
158.	Francesca O'Neill	London, United Kingdom	
159.	Peter Hook	London, United Kingdom	
160.	Alex Milner	BARNET, United Kingdom	
161.	Scarlett Milligan	London, United Kingdom	
162.	Peter Sanderson	Hamilton, Bermuda	
163.	Haitham Jamal	London, United Kingdom	
164.	Madhu Khanna-Davies	Cardiff, United Kingdom	
165.	Clementine Coram James	London, United Kingdom	
166.	Benedict Jeffries	Oxford, United Kingdom	
167.	Duncan McCombe	London, United Kingdom	
168.	Hannah Fountain	Leicester, United Kingdom	
169.	Ryan Hocking	London, United Kingdom	
170.	Jamie Holmes	London, United Kingdom	
171.	Patience Quartey	Mitcham, United Kingdom	As a new member, one of the factors that attracted me to the Middle Temple was the library. I thought it'd give me the opportunity to read through various areas of the law and act as a guide to my BPTC training so I was quite disappointed when I came across this story. I hope the petition does get the 1,000 signatures so we can keep the library which, I am sure for may students starting the BPTC, can be very beneficial
172.	Zander Goss	London, United Kingdom	

	Name	From	Comments
173.	Rosalee Dorfman	Cardiff, United Kingdom	
174.	William Rees	Newport, United Kingdom	
175.	Charlotte Bellamy	London, United Kingdom	
176.	Daniel Hoadley	Cobham, United Kingdom	
177.	Sharmaine Nethercott	Chippenham, United Kingdom	
178.	Jessica Elliott	London, United Kingdom	
179.	Mark Clifford	Cupar, United Kingdom	
180.	Oliver Harris	Cardiff, United Kingdom	
181.	Matthew Stubbins	Kettering, United Kingdom	
182.	doug pyper	hants, United Kingdom	
183.	Brian Ho	Ifford, United Kingdom	
185.	William Shaw	London, United Kingdom	The library provides an invaluable service and the extremely high cost of refurbishment is far beyond what will be recuperated on the investment in coming decades.
186.	Rebecca Morgan	Windsor, United Kingdom	
187.	Atli Stannard	London, United Kingdom	
188.	Daniel Chicot	Todmorden, United Kingdom	
189.	Lucinda Hecquer	London, United Kingdom	
190.	Gareth Raisbeck	Banbury, United Kingdom	
191.	Brendan O'Reilly	Pontyclun, United Kingdom	
192.	Yusuf solley	London, United Kingdom	
193.	Michael Rawlinson QC	Temple, United Kingdom	

	Name	From	Comments
194.	Ian West	Darlington, United Kingdom	I am a member of the Inner Temple, and I regard the library as both an essential research tool, and a haven of peace in which to work when I come to London. I would be very disappointed to see it shrunk in size, or in any way diminished.
195.	Matthew Scott	Temple, United Kingdom	I am a member of Inner Temple.
196.	Geoff Payne	LONDON, United Kingdom	
197.	Deborah Colbran Espada	Croydon, United Kingdom	I am a user of Inner Temple library. I consider that any option which leaves the Inner Temple without a library for a year and a half is irredeemably unworkable.
198.	Chloe Barton	Bromley, United Kingdom	
199.	Alice Ward	London, United Kingdom	
200.	Diane Broughton	London, United Kingdom	
201.	Stephen Shay	London, United Kingdom	
202.	Tim Concannon	Portsmouth, United Kingdom	You can't sacrifice the old and valuable for the new and untried. We are training too many young barristers and giving them unrealistic hopes of a place in Chambers. Do not sacrifice the Library to that cause!
203.	Tony Shaw QC	London, United Kingdom	Inner Temple Library is integral and irreplaceable part of the extensive research facilities of the Inns of Court. Why decimate those facilities to house activities which could readily be located elsewhere?
204.	Raphael Gray	Radlett, United Kingdom	
205.	Tomas Quinn	London, United Kingdom	
206.	Donald MacFaul	Newcastle upon Tyne, United Kingdom	member of Inner Temple
207.	William Skjøtt	Henley on Thames, United Kingdom	
208.	Anthony Reddiford	Bristol, United Kingdom	I am a member of Inner Temple and a user of the library. I oppose the proposed option 2.
209.	William Carter	London, United Kingdom	
210.	Stephen Donnelly	London, United Kingdom	

	Name	From	Comments
211.	James aUSTIN-sMITH	George Town, Cayman Islands	
212.	Mek Mesfin	London, United Kingdom	
213.	Ivan Indilo	London, United Kingdom	
214.	Robin Howat	Birmingham, United Kingdom	Member of Inner Temple Practising Lawyer and Library user
215.	Elizabeth Stevens	London, United Kingdom	
216.	lucy angier	london, United Kingdom	
217.	Françoise Tillard	Paris, France	
218.	Charles Kellett	East Dereham, Norfolk, United Kingdom	
219.	Amarjit Seehra	Temple, United Kingdom	Member of Middle Temple, but regular user of Inner Temple Library
220.	Nicholas O'Brien	Temple, London, United Kingdom	
221.	Ruth Bird	Oxford, United Kingdom	(Though I'm an Hon Bencher at Middle), I believe Inner's repute is in no small part due to the superb library collection and service it provides. It concerns me greatly that the vandals (ie bean counters - see http://www.slaw.ca/2015/07/29/libraries-the-value-of-just-in-case-nr appear to be at the gate....
222.	Olivia Potts	London, United Kingdom	
223.	Tim Forte	London, United Kingdom	This would be a travesty. The Inns should remember they are meant to be there for their Barrister members and the Students. The Library is a gem.
224.	Janet Maxted	LONDON, United Kingdom	
225.	CINDY COLLIER	NORMANTON, United Kingdom	
226.	Rob Thomson	Windang, Australia	Maintain the rage and don't allow this travesty to occur!
227.	Sharron Wilson	Edinburgh, United Kingdom	
228.	Aliyah Akram	London, United Kingdom	
229.	Peter Grievess-Smith	Rugby, United Kingdom	Option 2 represents nothing more than vandalism of a beautiful library for no good reason at all

	Name	From	Comments
230.	David Clark	Yarm, United Kingdom	Iconic locations and history such as the Inns should never be changed for commercial benefit. Another solution must be found please
231.	Mark O'Neill	London, United Kingdom	This is a vital resource for all who work in and study law. It would be barbaric to reduce such a key asset.
232.	Peter Caldwell	London, United Kingdom	
233.	Marianne Barber	Chester, United Kingdom	Once dismantled, this library will be gone forever - a loss to future generations and a lessening of the rich heritage of the Inns.
234.	Diane Kostka	Sheffield, United Kingdom	Such a beautiful, essential resource. Would be a tragedy.
235.	Tim Calland	London, United Kingdom	
236.	Karen Palmer	London, United Kingdom	I am deeply concerned that Option 2 is being considered as this would destroy the library and services available to Inner, and greatly reduce the overall research facilities of the Inns of Court. How does Inner expect its members to cope without a library for 18 months?
237.	Lillian Stevenson	Ceredigion, United Kingdom	This unique library needs to be protected for the future. Inclusion in this year's Open House Weekend pays testament to its importance to all.
238.	Julie Ferris	London, United Kingdom	
239.	Meghan Jones	Brighton, United Kingdom	
240.	John Sinkins	London, United Kingdom	With the greatest respect, I believe this proposed project is sheer madness and hugely damaging for current and future generations!
241.	MARIA DEL MAR CARRASCO	ALCORCON, Spain	
242.	Roia McHugh	Southport, United Kingdom	
243.	Sarah Maule	London, United Kingdom	
244.	David Simpson	London, United Kingdom	Is this absurdity ego driven?
245.	Tim Barlow	Hastings, United Kingdom	Such a rare and fine library should be treasured.
246.	Carly Douglas	London, United Kingdom	
247.	Jessica Leedham	Brookmans Park, United Kingdom	

	Name	From	Comments
248.	Ann James	Henrico, VA	It is truly sad that this is Option 2 is even being considered. Why would we homogenize such a wonderful library?
249.	Dean Mason	London, United Kingdom	
250.	Chris Sherlock	Bromley, United Kingdom	
251.	Jean Sinclair	Portsmouth, United Kingdom	
252.	Nicola Devas	London, United Kingdom	
253.	Jade Playle	Portsmouth, United Kingdom	I find it disgusting that these works are even being considered to go ahead!
254.	Marc Playle	portsmouth, United Kingdom	leave the library alone. its been around longer than you have!
255.	Paul Magrath	London, United Kingdom	I cannot believe a less destructive alternative is not available.
256.	Jennifer Findlay	Edinburgh, United Kingdom	As a law librarian, Inner Temple is well known among the profession as being one of the most important and comprehensive legal collections available in the UK. To reduce and irreparably damage this resource merely to provide generic meeting space is an unbelievable foolishness.
257.	Billie Coxhead	LONDON, United Kingdom	
258.	Linda Jones	Portsmouth, United Kingdom	This library is a national treasure and a great resource for the profession it would be devastating to marginalise it in this way.
259.	Daniella King	London, United Kingdom	The Inner Temple is a fantastic place - the library should be protected and not destroyed - these proposals are devastating and need to be stopped!
260.	Gary Morgan	LONDON, United Kingdom	
261.	John Halton	Orpington, United Kingdom	
262.	Miriam Smith	London, United Kingdom	
263.	Nina Singh	Windsor, United Kingdom	
264.	David Busfield-Birch	London, United Kingdom	I am a user of the library; as a member of Gray's Inn the library is an invaluable resource when I am in Temple.
265.	hjk hjk	Wuerzburg, Germany	
266.	V walker	London, United Kingdom	

	Name	From	Comments
267.	Chris Emmerson	Portsmouth, United Kingdom	Whats next on the agenda? Buckingham Palace as an office block?
268.	Janet Scoones	London, United Kingdom	This is part of our heritage and there is a responsibility to maintain it. Moreover, it is a fantastic legal informaton resource of value far beyond the inn itself.
269.	Ian Sainsbury	Reading, United Kingdom	Would destroy the library as a welcoming space for readers and its integral design
270.	Leanne Targett-Parker	London, United Kingdom	
271.	Katie Kinnear	London, United Kingdom	I agree with Jennifer Findlay's point, in that as a law librarian, I know that Inner Temple is well known among the profession as being one of the most important and comprehensive legal collections available in the UK. To reduce and irreparably damage this resource merely to provide generic meeting space is an unbelievable foolishness.
272.	Leanne Common	South Croydon, United Kingdom	Another law librarian voting for a library as a library and not a meeting hall. This is a world class institution and should be valued as such.
273.	Philip Cable	St Albans, United Kingdom	The Bench Table must see sense and save a vital part of the fabric of Inner Temple.
274.	Diane Stitt	Watford, United Kingdom	
275.	Penny Bailey	Hove, United Kingdom	I wonder what English Heritage would say about this?
276.	Sandra Lewis	Maesteg Bridgend, United Kingdom	
277.	Loyita Worley	London, United Kingdom	There are few legal libraries in the United Kingdom with collections as good as this. Once dispersed the collection will be gone fofr ever and future generations of lawyers will be the poorer for it.
278.	Clare Brown	London, United Kingdom	Our legal library collections are hugely important for research and study, whereas meeting rooms can be found anywhere. Seriously Inner Temple, really?
279.	Nicholas Isaac	Birmingham, United Kingdom	The library is and remains a vital resource for the Bar regardless of increasing use of online resources
280.	Fiona Fogden	Orpington, United Kingdom	The Inner Temple Library is a pre-eminent collection, renowned around the world deserves better treatment than what is proposed. Once this crack-pot plan is implemented the damage cannot be undone and the impact on effective legal justice at a time of budget cuts elsewhere on the system cannot be underestimated.
281.	Kieron McCormack	London, United Kingdom	

	Name	From	Comments
282.	Jason Crimp	London, United Kingdom	This would be an utterly bizzare decision, and a short sighted one, In my view.
283.	Amy Pankiewicz	Colchester, United Kingdom	
284.	Leah Tea	Newtownabbey, United Kingdom	
285.	Olivia Murphy	London, United Kingdom	sacrilege
286.	Michelle Marnham	London, United Kingdom	
288.	Chris Maynard	London, United Kingdom	Sure, we all use online resources nowadays. But the great value of this library lies precisely in making accessible arcane and otherwise inaccessible books which are kept in the very rooms which the proposal seems designed to remove from library use. Surely there is a better way for IT to generate money than by chopping the library.
289.	Steve Shaw	London, United Kingdom	
290.	Gillian Davies	London, United Kingdom	It would be a disaster to reduce by half one of the historic collections of law books in the UK. I am a member of Lincolns Inn and know from colleagues at the Inner Temple what an amazing facility is the library.
291.	Ann Hodge	London, United Kingdom	
292.	Brenda Scoble	Long Buckby, United Kingdom	
293.	Paul Staddon	London, United Kingdom	As a member of the Inn, I would be very sad to see the diminution of a facility that I have used as a student and a practitioner for over 40 years.
294.	Rosemary Shakespeare	Bristol, United Kingdom	
295.	Annushka Donin	Gosport, United Kingdom	
296.	Norman Cooley	Wandsworth, London, United Kingdom	
297.	John Rees	Chiddingfold, United Kingdom	Is this the death knell of yet another priceless library resource that well served me at the Royal Courts of Justice?
298.	Corryn Walker	manchester, United Kingdom	
299.	Tayo Ajibade	Luton, United Kingdom	

	Name	From	Comments
300.	Dawn Davies	Maidenhead, United Kingdom	Option 1 is by far the most practical and cost efficient. It provides meeting space and training facilities with minimum disruption whilst preserving reader spaces and most importantly, keeping this invaluable collection together.
301.	Emma Dowling	Southampton, United Kingdom	
302.	Maureen Nicholls	March, United Kingdom	
303.	Liz Hawkez	London, United Kingdom	
304.	Helena Dean	baldock, United Kingdom	
305.	Sarah Lee	London, United Kingdom	Save the Inner temple !
306.	Jennifer Vass	London, United Kingdom	
307.	Davina Gifford	London, United Kingdom	
308.	Victoria North	Upminster, United Kingdom	Inner Temple library has a very valuable collection. Over the years the library staff have taken the trouble to preserve many old editions of key legal texts which continue to remain relevant to legal practitioners. There are few other organisations which have the space to keep such a large number of the texts so many people across the world rely on this library to do their work effectively. If the Inn is looking to generate more income it should consider offering a commercially viable copying and lending service.
309.	Kate Faulkner	Ely, United Kingdom	
310.	MIGUEL ÁNGEL FLORES GARCÍA	SEVILLA, Spain	
312.	lucy dillon	London, United Kingdom	
313.	Paul Stevenson	London, United Kingdom	
314.	Michael Skrein	London, United Kingdom	
315.	Rupert Myers	Ipswich, United Kingdom	This is a dreadful proposal which I hope will be halted. The Library is the probably the greatest part of Inner Temple.
316.	Thomas Mertz	Berlin, Germany	Rupert Myers is right!
317.	Phillip Thomas	London, United Kingdom	I am a member of the Inner Temple
318.	Amy Proferes	London, United Kingdom	

	Name	From	Comments
319.	aneurin brewer	London, United Kingdom	
320.	Shannon Eastwood	Liverpool, United Kingdom	
321.	Rebecca Drake	London, United Kingdom	
322.	Francis Hoar	London, United Kingdom	I am a Lincoln's Inn member but was a regular user of the library when in Chambers in the Temple. This is an outrageously destructive idea.
323.	James McDermott-Hill	Carshalton, United Kingdom	
324.	Thomas Gibson	Leicester, United Kingdom	Don't throw away your pearl for a mess of pottage.
325.	Senay Nihat	London, United Kingdom	
326.	Jon Harman	Volda, Norway	
327.	Gill Higgins	Stafford, United Kingdom	
328.	James kinman	London, United Kingdom	
329.	Oliver Grimwood	London, United Kingdom	
330.	Peter Coe	Banbury, United Kingdom	
331.	Rosie Cheshire	London, United Kingdom	
332.	John Oliver	London, United Kingdom	Member of Inner Temple (2008 call)
333.	Lydia Craemer	Sandown Johannesburg, South Africa	I'm a librarian at the Johannesburg Bar Library in South Africa, and Chair of the Organisation of South African Law Libraries (OSALL). I condemn this proposal in the strongest possible way. The Inner Temple Library in its totality is vital to help maintain the Rule of Law in the UK by enabling Barristers to do their work without fear or favour. This in turn helps the Judiciary carry out their work without for ir favour. I trust those propping this idea will realise the error of their ways and find an alternative expansion plan.
334.	Lauren Godfrey	Brighton Bn1 1UD, United Kingdom	I am an inner member from the regions who will be gravely effected by this proposal
335.	Bryan Shacklady	London, United Kingdom	I am an occasional user of the libraries of the Inns of Court, and what is needed is more space for library users, not less, as the profession expands.

	Name	From	Comments
336.	Bunny Veglio	London, United Kingdom	
337.	Jennifer Brenton	London, United Kingdom	
338.	Nicolas clark	London, United Kingdom	
339.	johanna bezuidenhout	Johannesburg, South Africa	
340.	Marcus Croskell	Debenham, United Kingdom	
341.	Robert Morris	London, United Kingdom	Member of Inner Temple (2008 call).
342.	Julia Niblett	Hove, United Kingdom	
343.	James Sharpe	Purley, United Kingdom	
344.	Jake Rowley	London, United Kingdom	
345.	Benz Vongtanee	London, United Kingdom	
346.	Laura McGinty	London, United Kingdom	
347.	Alicia Tew	London, United Kingdom	I am a member of Inner Temple and a regular users of Inner Temple Library
348.	Sarah Moon	Fareham, United Kingdom	
349.	Christopher Johnston	London, United Kingdom	
350.	mark ley-morgan	Bristol, United Kingdom	
351.	Colin Moore	London, United Kingdom	
352.	Matthew Moore-Halushka	london, United Kingdom	
353.	Natalie Moore	London, United Kingdom	
354.	Jacob Bindman	London, United Kingdom	
355.	Ranjeet Dulay	London, United Kingdom	
356.	Brearley Samuel	London, United Kingdom	

	Name	From	Comments
357.	Harriet Holmes	London, United Kingdom	
358.	Debra Powell	London, United Kingdom	User of the library
359.	Conrad Hallin	London, United Kingdom	
360.	Sky Bibi	Manchester, United Kingdom	
361.	Helyn Mensah	London, United Kingdom	
362.	David Graham	London, United Kingdom	
363.	John Beggs	London, United Kingdom	
364.	Bill Thompson	Cambridge, United Kingdom	There are many forms of cultural heritage, and damaging this one is an act of vandalism,
365.	Neil Bennun	London, United Kingdom	This really is unnecessary. It would be a terrible, terrible shame.
366.	Laura Tosney	London, United Kingdom	
367.	Andy Mabbett	Birmingham, United Kingdom	
368.	Gordon Joly	London, United Kingdom	Yet another loss of heritage. Please stop it.
369.	Heidi Tworek	Somerville, MA	
370.	Chris Moran	Leeds, United Kingdom	When I lived in London I used this impressive library almost daily. It is an incredible and important space and I still use it on occasion when in London for example when going to the Court of Appeal. Please reconsider
371.	Christopher Levers	Camana Bay, Cayman Islands	
372.	William Ralston	Newcastle upon Tyne, United Kingdom	
373.	Constance Purdy	Brough, United Kingdom	
374.	Ang Simpson	Get stukeley, United Kingdom	
375.	Inga Jones	Ely, United Kingdom	
376.	Lorraine Mustard	Durham, United Kingdom	
377.	nicola rigelsford	Huntingdon, United Kingdom	

	Name	From	Comments
378.	Tian Peralto	Camana bay, Cayman Islands	
380.	Harriet Wakelam	Melbourne, Australia	Because I believe more ideas come from libraries than meeting rooms
381.	Anna Vernon	London, United Kingdom	
382.	Jessie Harrington	London, United Kingdom	Great library, should be kept as it is
383.	Douglas Lloyd	London, United Kingdom	
384.	Adrian Burd	Athens, GA	As an ex-pat and ex-Londoner I am appalled at this arrogant nature of this terrible decision.
385.	Graham Littlewood	London, United Kingdom	
386.	Bee Yi Lim	Kuala Lumpur, Malaysia	
387.	Alice Hodgkinson	CAMBRIDGE, United Kingdom	I'm signing this because I believe in preserving beautiful buildings which are used by members of the public for ongoing use. I am just about to start a law degree and the availability of this library would be a real help as somewhere to come and study. Please don't destroy something with so much history and that has been, and could continue to be, used by so many people
388.	Thomas Orrell	London, United Kingdom	This is a terrible and short-sighted idea.
389.	Claire Greening	London, United Kingdom	
390.	Helen casey	northampton, United Kingdom	
391.	Jonathan Lally	Manchester, United Kingdom	Inner Temple Member
392.	Lara Kuehl	London, United Kingdom	
393.	Emma Waldron	London, United Kingdom	
394.	Lyndia Thomas	London, United Kingdom	
395.	Kate Oost	Cape Town, South Africa	
396.	Paul Spencer	LONDON, United Kingdom	
397.	Kim Gilmour	Marrickville, Australia	Heartbreaking to see so much heritage beig destroyed without any thought to the impact for future generations who will be left with bland storage areas

	Name	From	Comments
398.	Susanna Rickard	London, United Kingdom	
399.	Ben Zurawel	London, United Kingdom	
400.	Richard Doman	London, United Kingdom	
401.	Andrey Korobkov	Ulyanovsk, Russian Federation	
402.	Mila Campeira	toronto, Canada	
403.	James HOGG	Manchester, United Kingdom	
404.	Mark Fenhalls QC	London, United Kingdom	
405.	antonio menichini	pomigliano d'arco, Italy	
406.	Alex Macmahon	London, United Kingdom	
407.	Caroline Brown	Calgary, Canada	
408.	Paul Banks	London, United Kingdom	
409.	Stephen Hunt	Bristol, United Kingdom	
410.	Erin Ferguson	AUSTIN, MN	
411.	Howard Errey	Northcote, Australia	
412.	Lilly Evans	Ascot, United Kingdom	
413.	Harriet Johnson	Manchester, United Kingdom	
414.	Danny Birchall	London, United Kingdom	This looks like a terrible thing to happen to a lovely library.
415.	Gina Kernutt	Reading, United Kingdom	
416.	Joshua Munro	London, United Kingdom	
417.	Linda White	London, United Kingdom	This ought to be a protected building and the library is part of our shared heritage. We bleat about historic sites overseas being destroyed - let's not vandalise our own at home!
418.	Alice Nash	London, United Kingdom	Strongly opposed to this proposal. The loss of so much shelf space will have a significant adverse impact on practitioners and students
419.	Anna Burmajster	Marlow, United Kingdom	Do not destroy a fine library of huge historic and professional importance

	Name	From	Comments
420.	Christine Child	Maidstone, United Kingdom	
421.	Jane Webber	London, United Kingdom	
422.	Hester Swift	London, United Kingdom	
423.	Sarah Watts	London, United Kingdom	
424.	Angels Codina	London, United Kingdom	
425.	Kate Coulson	Northampton, United Kingdom	
426.	Tina Tse	London, United Kingdom	
427.	Gillian Goodger	Primrose St, United Kingdom	
428.	Leon Kazakos	LONDON, United Kingdom	
429.	dermot keating	london, United Kingdom	
430.	Christopher Coltart	London, United Kingdom	
431.	Hannah Smith	London, United Kingdom	
432.	David Hood	London, United Kingdom	The proposed development is, as has so wisely been said, a commercial venture which is "at best ancillary to the Inn's chartered purposes".
433.	David Emanuel	London, United Kingdom	
434.	Benjamin Myers	Manchester, United Kingdom	
435.	Robert Banks	Burwash, United Kingdom	I object to this vandalism to a much loved and used institution which we have on trust and should hand it on to the next generations in tact. The claimed business centre is ill-conceived. Robert Banks.
436.	Piers von Berg	London, United Kingdom	
437.	Kate Bex	London, United Kingdom	
438.	Simon Mayo	London, United Kingdom	
439.	Joseph Bird	Maldon, United Kingdom	

	Name	From	Comments
440.	James Macdonald	London, United Kingdom	
441.	Alistair Mitchell	Bridgnorth, United Kingdom	I object to this inappropriate scheme as it will vandalise one of the most beautiful libraries in London at a time when shrinking Chambers' budgets mean resources provided by Inner Temple Library will be essential for students, pupils and junior tenants.
442.	Charlotte Brewer	London, United Kingdom	
443.	Jennifer Kay	London, United Kingdom	
444.	Richard Christie QC	London, United Kingdom	I am an Inner Temple member and have been for 30 years. I am head of chambers of an 80 strong set of chambers and am wholly against option 2 both on behalf of myself and my members. Plainly much more thought is required in to the devastating impact of option 2 when a viable and cheaper option exists.
445.	Helen Khan	London, United Kingdom	
446.	Graham Russell	Birmingham, United Kingdom	I am a member of Inner Temple. I use the library when in London as a quiet place to work. It is a magnificent library. Option 2 is misconceived.
447.	JULIAN NUTTER	LIVERPOOL, United Kingdom	
448.	Soraya Lawrence	London, United Kingdom	
449.	John McDermott	LIVERPOOL, United Kingdom	We don't need more meeting-rooms; we do need to preserve beautiful and historic libraries. The proposal would make Isis proud.
450.	Clare Dowse	Epping, United Kingdom	At a time where the publicly funded criminal & family bars are under such pressure and sustained attack from Govt, it is very disappointing to find Inner Temple (of which I am a member) expending their funds on chasing outside commercial interests when providing no assistance at all to members affected by funding cuts.
451.	John McGuinness QC	LONDON, United Kingdom	I regularly use the library. It is a haven for quiet work and research. The proposal will despoil something that is both cherished and practical.
452.	Dawn Southgate	Maidenhead, United Kingdom	
453.	Ezra Macdonald	London, United Kingdom	
454.	Timothy cray	London, United Kingdom	

	Name	From	Comments
455.	Daniel Thomas	Manchester, United Kingdom	
456.	Joao Arsenio	Hatch warren, United Kingdom	
457.	Ally Wilkes	London, United Kingdom	
458.	Alison Nuqui	Las Piñas, Philippines	
459.	Jack Rundall	London, United Kingdom	
460.	andrew smith	bolton, United Kingdom	
461.	Alec McCluskey	London, United Kingdom	
462.	Sophie Shotton	London, United Kingdom	
463.	Mark Hedges	Cookham, United Kingdom	
464.	Brigid Baillie	Manchester, United Kingdom	
465.	Michael Levy	London, United Kingdom	
466.	Rob Kearney	Manchester, United Kingdom	A disgrace that they even considered destroying this beautiful building.
467.	Irena Valouchova	Carshalton, United Kingdom	
468.	Jane Hutton	London, United Kingdom	
469.	charles Parry	Temple, United Kingdom	
470.	Lindsey Caffin	London, United Kingdom	
471.	Leonorah Smith	London, United Kingdom	
472.	Victoria Ellis	London, United Kingdom	
473.	Victoria Hill	Bournemouth, United Kingdom	
474.	Miranda Butler	London, United Kingdom	
475.	Donal Lawler	London, United Kingdom	
476.	Kim Preston	London, United Kingdom	

	Name	From	Comments
477.	Jo Poke	Chudleigh, Devon, United Kingdom	This unique , world class resource must not be allowed to be desecrated by the Philistines who appear neither to understand nor appreciate its unique historical and current day contribution to the legal profession. It stands as a testament to the decades of exemplary professional service and leadership given by present and previous Librarians and Keepers of Records and their staff.
478.	Anne Felton	London, United Kingdom	
479.	Jennifer Lee	London, United Kingdom	
480.	Fiona Darroch	London, United Kingdom	The losses inflicted will be incalculable. I joined the Inner Temple precisely because of its peaceful and powerful resources of all kinds. Do you really really need the money that badly?
481.	Paul Dovey	Birmingham, United Kingdom	
482.	Jose Olivares-chandler	London, United Kingdom	
483.	Diana Ellis	London, United Kingdom	
484.	Elisabeth Evans	London, United Kingdom	
485.	Simon Phillips QC	Ripon, United Kingdom	
486.	Michael Hammett	Cardiff, United Kingdom	
488.	Naomi Parsons	London, United Kingdom	
489.	Timothy Compton	Southampton, United Kingdom	Having read all the material provided by the CBA to its members, the plans seem to be ill thought out, of dubious economic viability and benefit and show a woeful ignorance of the purpose of and need for a library, whether by a barrister based in London, or, like myself, based in Southampton, and therefore needing a decent library for occasional detailed research.
490.	Ben Summers	London, United Kingdom	
491.	Emma Dewinton	Nottingham, United Kingdom	With two options, and a historic building well used, why choose option 2?
492.	Charles Pycraft	London, United Kingdom	
493.	Andrew Delamare	London, United Kingdom	The place is a damned institution. What the hell are you thinking with such a massive amount of spaces in the surrounding that can be used for training.

	Name	From	Comments
494.	Peter Glenser	London, United Kingdom	Inner Templar
495.	William Day	London, United Kingdom	The library has supported me both as a student and as a practitioner and is a beautiful and peaceful place to work - it would be a shame to lose it
496.	Charlotte Bates	London, United Kingdom	
497.	Oleg Askeri	Moscow, Russian Federation	
498.	David Appleton	Christchurch, New Zealand	
499.	Andrew Espley	London, United Kingdom	I've heard some stupid ideas in my time but this takes some beating.
500.	Francesca Ticozzelli	London, United Kingdom	
501.	Melissa Bezar	London, United Kingdom	
502.	Philip Moss	Monmouth, United Kingdom	
503.	Sue Rodham	London, United Kingdom	
504.	Heather Platt	London, United Kingdom	
505.	colleen oasgood	Canterbury, United Kingdom	
506.	Heather Oliver	London, United Kingdom	
507.	neil Saunders	London, United Kingdom	It defeats the aims of the library within the Inns that barristers have used as a part of their on-going education no matter what call they are.
508.	Clive Nicholls Q.C.	London, United Kingdom	I have been at the Bar for more than 50 years. In practice I have used the Library, especially for Commonwealth decisions. Its lay-out and atmosphere is, unlike the other Inn library halls, conducive to study and ought to be retained.
509.	Katie Bedford	SHREWSBURY, United Kingdom	Inner Temple member and former barrister
510.	Mark Samuelson	London, United Kingdom	I agree with the sentiments of m'learned colleagues; why sacrifice such a much admired and well used historic space complete with integral library for a lesser re development with seemingly few virtues ? Seems illogical to me....

	Name	From	Comments
511.	Lydia Waine	Lutterworth, United Kingdom	The Inner Temple Library is an incredibly important resource for practitioners and students and I would have been lost without it. I can see no merits whatsoever in this proposal.
512.	Alison Rose	London, United Kingdom	
513.	kate mallison	london, United Kingdom	This is the library that I use when I want to work in peace- I cannot believe that. Inner has become so greedy and selfish
514.	Emma Collins	London, United Kingdom	
515.	Christopher Foulkes	London, United Kingdom	
516.	peter barr	Liverpool, United Kingdom	
517.	Riel Karmy-Jones Q.C.	Norwich, United Kingdom	
518.	Alec Small	Bristol, United Kingdom	
519.	Catherine Breslin	Winchester, United Kingdom	
520.	Marian Boyd	Maidstone, United Kingdom	
521.	Charlotte Venn	Edgehill, United Kingdom	
522.	Graeme Harrison	Southampton, United Kingdom	
523.	Lorraine Birkett	Hemel Hempstead, United Kingdom	
524.	James Berry	London, United Kingdom	
525.	Oliver newman	london, United Kingdom	
526.	Catherine D Goldring	Chichester, United Kingdom	
527.	Catherine Farrelly	London, United Kingdom	
528.	Jonathan Hall	London, United Kingdom	
529.	Sian McKinley	London, United Kingdom	I am a user of Inner Temple library.
530.	Martyn Bowyer	London, United Kingdom	Member of the Inner Temple

	Name	From	Comments
531.	B H GORE	Isle of Man, United Kingdom	
532.	STEPHEN WAINE	CRANFORD, United Kingdom	PERHAPS ISIS HAVE TAKEN OVER THE EXECUTIVE COMMITTEE
533.	Gordon Wignall	Rutland, United Kingdom	"Vandalism" is the right description of the current proposals.
534.	Kate Beattie	London, United Kingdom	
535.	Andrew Jebb	Wrexham, United Kingdom	
536.	Bernadette Higgins	Rothley, United Kingdom	
537.	Jessica Wood	Bristol, United Kingdom	
538.	Leanne Woods	London, United Kingdom	
539.	Hannah Noyce	London, United Kingdom	
540.	Oliver Sanders	London, United Kingdom	
541.	Mike McCabe	London, United Kingdom	
542.	David Manknell	London, United Kingdom	As a user of the library I would be hugely disappointed if this went ahead.
543.	Emily Scott	London, United Kingdom	
544.	Jennifer Manknell	Derby, United Kingdom	
545.	Alison Harding	Swansea, United Kingdom	
546.	Charlotte Beaupere	Croydon, United Kingdom	
547.	Martin Yale	Gillingham, United Kingdom	
548.	Sarah Parker	London, United Kingdom	This seems like the kind of decision that would be source of regret in years to come. I am a student member of the Inn and my use of the library has only just begun but I anticipate it being a place I spend many hours in the course of my training.
549.	Linda Hopkins	St Paul, MN	Although space is precious in London, you are not just destroying a history and beautiful structure but also a community of users who cherish the space.

	Name	From	Comments
550.	Rosemary Burns	London, United Kingdom	How many hours did I spend in the Library as a student? And why do I not want to see its depletion? Because it's part of our heritage and provides an irreplaceable resource.
551.	Liz Walder	Cardiff, United Kingdom	
552.	David Boothey	London, United Kingdom	
553.	Helen Jackson	Marlow, United Kingdom	
554.	Ruth Davis	London, United Kingdom	
555.	Emmq Maher	Watford, United Kingdom	
556.	Peter Smith	Sheffield, United Kingdom	
557.	Jeremy Hyam	London, United Kingdom	Totally against.
558.	Hilary Vieitez	Morden, United Kingdom	
559.	Peter Skelton	London, United Kingdom	
560.	Chanda Sekar	London, United Kingdom	I, along with many other criminal and common law barristers (and some Chambers I know of), rely on Inner Temple Library as being a comprehensive and well organised collection, with knowledgable and helpful librarians (BTW what is going to happen to them if it is shut for 1.5 years and then is half the size). I can understand that online editions may mean some paper can be archived, but surely only if all are evaluated - and many online editions are useless for updates and searching. That is apart from the Aesthetics, and being of Indian origin, the pleasure I get at passing Gandhi and Nehru as I enter a temple of learnedness.
561.	Brian Hill	London, United Kingdom	
562.	Faraz Shibli	London, United Kingdom	I used this wonderful library throughout my training for the Bar. It is a superb resource and beautifully designed. The proposal decimates the floor space and reader spaces, and will change the character of the library as a whole. It should not go ahead, especially given that there is a viable alternative.
563.	Jonathan Dunne	Spalding, United Kingdom	

	Name	From	Comments
564.	James Jackson	London, United Kingdom	
565.	Natalie McNamee	London, United Kingdom	
566.	Nick Chapman	London, United Kingdom	I find the Inner Temple Library to be an invaluable resource for hard copy law reports and practitioner texts and am deeply concerned at the proposed Option 2.
567.	Sim Owolabi	Brentwood, United Kingdom	
568.	Warwick Tatford	London, United Kingdom	
569.	Chiara Maddocks	London, United Kingdom	
570.	David Mantle	London, United Kingdom	
571.	Edward Warren	Doncaster, United Kingdom	
572.	Lloyd Davis	London, United Kingdom	Ouch! No, thank you!
573.	Richard Jory	London, United Kingdom	I am a QC at 9-12 Bell Yard. I have used the library extensively in the past and very much hope this petition has the impact required
574.	Jessica Tate	London, United Kingdom	
575.	Clare Ireland	Sidcup, United Kingdom	
576.	Joshua Neff	Kansas City, MO	
577.	Jill Oliver	Barnsley, United Kingdom	
578.	Christopher Sharp QC	Bristol, United Kingdom	I have used the library as a student and then over many years as an 'out of London' Inner Temple barrister. It is an essential resource, already often overcrowded. These plans would be a disaster on many levels.
579.	Charyn Thompson	Norwich, United Kingdom	
580.	Emily Allbon	Swindon, United Kingdom	The decision to choose Option 2 defies belief. I know so many of my students and alumni who use this amazing space and its collections, and rely upon its expert librarians. Halving study spaces and vastly reducing the opportunities for its users to browse materials will have far-reaching effects on the Bar, young and experienced alike. Please think again.
581.	Zara McGlone	London, United Kingdom	

	Name	From	Comments
582.	Christopher Reid	London, United Kingdom	
583.	alex bennie	London, United Kingdom	
584.	Tina Reynolds	London, United Kingdom	
585.	angela mackechnie	Brierley, United Kingdom	
586.	Stuart Manknell	Derby, United Kingdom	
587.	Charles Cole	Brooklyn, NY	
588.	Martin Mitchell	London, United Kingdom	
589.	nicola Hornsby	Cheshire, United Kingdom	
590.	John Eaton	Winnipeg, Canada	
591.	Katherine Cowdrey	London, United Kingdom	
592.	Kerri Rendell	Winsford, United Kingdom	
593.	Denise Watkins	Birmingham, United Kingdom	
594.	John Purkiss	London, United Kingdom	Save this library!
595.	Catherine Dryden	Johannesburg, South Africa	
596.	Hesma van Tonder	Bloemfontein, South Africa	
597.	Glynis Steer	Norwood, South Africa	
598.	Clare Dunbar-Brunton	Eastbourne, United Kingdom	
599.	Gail Dendy	Johannesburg, South Africa	
600.	Anthony Eskander	London, United Kingdom	It would be a huge shame for the library to undergo the proposed changes. It has been of immense value to my education and my practice.
601.	Jacqueline Zoest	London, United Kingdom	
602.	Julia Faure Walker	London, United Kingdom	
603.	Pamela Okende	Romford, United Kingdom	

	Name	From	Comments
604.	paul walker	Temple, United Kingdom	
605.	Anthony Orchard QC	London, United Kingdom	
606.	Marina Rubidge	Johannesburg, South Africa	
607.	Henri Craemer	Johannesburg, South Africa	<p>As a rule I will almost never ask you to sign a petition. This one is the exception to that rule.</p> <p>The Inner Temple library, London, which has existed since 1440, is one of the finest law libraries in the world. It is now under threat due to a proposed re-development of the Treasury Building to create additional space.</p> <p>Libraries are spaces of learning, thinking and discovery. It's not simply a matter of book storage and a few computers, or stuff that can be transferred to an electronic resource. The books themselves represent a historical resource. They the hard copy of "black on white". You're talking of centuries of learning, thought and tradition. From an architectural point of view, it represents one of the key Buildings of England.</p> <p>Then there is the consideration of those who use the library. All the implications of option 2 represent a huge inconvenience for all the people who would rely on this library as a resource for any reason, especially those of the legal profession.</p>
608.	Andrew Knight	Le Vésinet, France	
609.	OLiver Bennett	London, United Kingdom	I am a barrister and have had the privilege of using the library on many occasions.
610.	Thom Dyke	London, United Kingdom	
611.	David Lyons	London, United Kingdom	
612.	Luke Marsh	Sha Tin, Hong Kong	
613.	Stuart Hatcher	London, United Kingdom	
614.	Sharon McCarthy	Chesterfield, United Kingdom	
615.	Keith Painter	London, United Kingdom	
616.	John Nee	Canterbury, United Kingdom	
617.	Caroline Waweru	London, United Kingdom	
618.	David Roberts	Chester, United Kingdom	

	Name	From	Comments
619.	Rachel Law	London, United Kingdom	
620.	Joanne Ecob	London, United Kingdom	The library was an essential feature of my life as a student and junior barrister. Of more importance it remains, even in the age of the internet, an essential resource for this generation's students, pupils and barristers.
621.	Robin Miric	LONDON, United Kingdom	
622.	Timothy Green	London, United Kingdom	
623.	Greg Unwin	London, United Kingdom	
624.	Danielle Rawlinson	Liverpool, United Kingdom	
625.	Ian Berkeley-Hurst	Camerton, United Kingdom	
626.	Robin Hopkins	London, United Kingdom	
628.	James Laughland	Temple, United Kingdom	
629.	Margaret James-Barber	Warton, United Kingdom	
630.	Carol Harris	London, United Kingdom	
631.	Alexander Cunliffe	Ickenham, United Kingdom	
632.	Anne-Marie Clulow	Johannesburg, South Africa	
633.	Daniel Grutters	London, United Kingdom	
634.	Amit Karia	-, United Kingdom	
635.	Patrick Hennessey	London, United Kingdom	
636.	Katharine Marshall	Tonbridge, United Kingdom	
637.	Chetna Varia	London, United Kingdom	
638.	Joe Ury	London, United Kingdom	As a former University Law Librarian of the University of New South Wales and currently Executive Director of the British and Irish Legal Information Institute (BAILII) I recognise the Inner Temple Library as one of the great libraries of the world and a great facility for the legal and academic communities. There are far to few such (continues on next page)

	Name	From	Comments
638.	Joe Ury	London, United Kingdom	<i>(continued from previous page)</i> resources available and as a Librarian of thirty years standing I know that the loss of space and displacement of books resulting in the adoption of Option 2 will be a cost dearer than many may realise. To sacrifice Library space for other purposes especially for education and training purposes, which most likely will increase the need of reader space and library facilities, will prove to be a false economy.
639.	Chris Milsom	Richmond, United Kingdom	
640.	sean hocking	Portland, OR	As editor of Law Librarians news for the last decade i find this development truly depressing
641.	Sam Way	Woking, United Kingdom	
642.	Peter Alexander-Fitzgerald	Carmarthen, United Kingdom	
643.	Gillian Mayrick	Tunbrisse Wells, United Kingdom	
644.	Emma Harris	Esher, United Kingdom	
645.	Piers Martin	London, United Kingdom	
646.	Helena Marshall	London, United Kingdom	
647.	Jane Del-Pizzo	Gyfelia, United Kingdom	
648.	Clare Montgomery	London, United Kingdom	
649.	Sarah White	Watford, United Kingdom	
650.	Jane Kilgannon	London, United Kingdom	
651.	Alice Tyson	113 Chancery Lane, United Kingdom	
652.	Alex Bailin	London, United Kingdom	
653.	Charlotte Gilchrist	Liverpool, United Kingdom	
654.	Sarah Nichols	London, United Kingdom	Why would you ever consider Option 2 when Option 1 is cheaper and more practical. Why destroy the library and lose valuable space for research.
655.	Paul Sandles	Tunbridge Wells, United Kingdom	Once it has gone, it will never come back. Please think again as to the necessity of this decision.

	Name	From	Comments
656.	Anna Leach	London, United Kingdom	
657.	Michael Maher	Sutton Coldfield, United Kingdom	
658.	Matilda Watson	Stamford, United Kingdom	
659.	Matt Budd	London, United Kingdom	
660.	Guy Mitchell	London, United Kingdom	
661.	Tom Crowther	Cardiff, United Kingdom	
662.	Jonathan Sharp	Leeds, United Kingdom	The proposal makes no business, aesthetic, academic, cultural, historical or professional sense.
663.	Anne Wilson	Bps Stortford, United Kingdom	Some things are sacrosanct!
664.	Douglas Edwards QC	London, United Kingdom	
665.	Cain Ormondroyd	London, United Kingdom	
666.	Erin Gow	Croydon, United Kingdom	
667.	James Kemp	London, United Kingdom	
668.	Rebecca Clutten	London, United Kingdom	
669.	Stephanie Hall	London, United Kingdom	Option 2 represents, in my view, an unwarranted loss both of attractive architecture and of utility to the bar in terms of library provision. The construction impacts would also be severe on those living and working in the Inn.
670.	Hereward Phillpot QC	London, United Kingdom	
671.	Ned Westaway	Inner Temple, United Kingdom	The loss of the existing facilities at Inner Temple library would be of great detriment to students and practitioners, not justified in my view by any financial imperative - Inner Temple is, I understand, in good health financially. The library is part of the patrimony of the Inn, just as, if not more so than the gardens and Hall, it should be retained and cherished.
672.	George Mackenzie	London, United Kingdom	The Inn should be providing first rate library and research facilities for its membership and users. It should not be providing conference accommodation for commercial consumption of which there is an ample supply in London generally. There is no compelling justification for the Inn to <i>(continues on next page)</i>

	Name	From	Comments
672.	George Mackenzie	London, United Kingdom	<i>(continued from previous page)</i> diversify into this new sphere of business at the expense of providing its core function. The project would also cause serious noise and disruption and this does not seem to have been considered at all by the committee.
673.	Vikki Versey	ipswich, United Kingdom	
674.	Andrew Briton	London, United Kingdom	
675.	james rankin	London, United Kingdom	
676.	Denis Edwards	London, United Kingdom	
677.	Hugh Flanagan	London, United Kingdom	
678.	Isabella Tafur	London, United Kingdom	
679.	Annabel Graham Paul	Inner Temple, United Kingdom	
680.	Jamie Muir Wood	London, United Kingdom	
681.	Rebecca Loughhead	London, United Kingdom	
682.	Ruth Jones	TWICKENHAM, United Kingdom	As a lifetime law librarian I know from experience the value of the collections at Inner Temple and the other Inns, including the specialist Commonwealth materials held at Inner. In this increasingly technological age, there is still a very important place for printed sources, and nowhere else in the country has such comprehensive coverage of law. Reducing the floor space will not only cut the size of the stock, but could also lead to loss of staff and the considerable experience and expertise they have offered to members until now. The total loss of this valuable facility while the work is completed will put the other Inns under great strain and be unacceptable to many users of the library.
683.	Mark Lloyd	London, United Kingdom	Libraries represent the collective memory of a society and its values. Diminish one and you devalue us all.
684.	Catrin Griffiths	London, United Kingdom	
685.	sian harrison	london, United Kingdom	
686.	mark pummell	Hunstanton, United Kingdom	

	Name	From	Comments
687.	Emily Dicks	Southampton, United Kingdom	
688.	Rachael Osborne	London, United Kingdom	
689.	Tom Rook	London, United Kingdom	
690.	Mark Westmoreland Smith	London, United Kingdom	
691.	Vicki Cousins	Inner Temple, London, United Kingdom	
692.	Nils Hoppe	Hannover, Germany	
693.	Hannah Milne	London, United Kingdom	
694.	Justin Gau	London, United Kingdom	
695.	Max Smy	London, United Kingdom	
696.	Graham Brodie	London, United Kingdom	
697.	Alex Pooley	Surbiton, United Kingdom	
698.	Deirdre Mahon	London, United Kingdom	
699.	Ann Del-Pizzo	Chertsey, United Kingdom	
700.	Tom Ellen	Edinburgh, United Kingdom	
701.	Janet Dixon	London, United Kingdom	
702.	Paul Coveney	Berkhamsted, United Kingdom	
703.	Sean Jones QC	London, United Kingdom	
704.	Joy Caisley	Southampton, United Kingdom	I've never had the pleasure of using this library, but it's clearly an environment which supports and fosters serious research. To destroy that would be short-sighted.
705.	Richard Honey	London, United Kingdom	
706.	Erja Gunn	London, United Kingdom	
707.	Ivan Fuentes	Orlando, FL	

	Name	From	Comments
708.	Andrew Brooks	London, United Kingdom	
709.	Jonathan Goddard	London, United Kingdom	
710.	Gillian Ward	London, United Kingdom	
711.	Chloe Ashley	Great Malvern, United Kingdom	
712.	Vanessa Hayward	Hurstpierpoint, United Kingdom	As a recently retired Inns of Court Librarian, I strongly agree that option 2 will be devastating to this vitally important library. I find it unbelievable that its content and expert staffing can be taken so lightly by those who profess to support the law. There are many other much less expensive and less damaging options that can be explored. The focus should be on the contribution to education the library provides. Closing it for any length of time will only serve to destroy that.
713.	suzanne OrnsbyQ.C.	Temple, United Kingdom	Daft proposal
714.	Melissa Murphy	London, United Kingdom	
715.	Jeremy Phillips	London, United Kingdom	
716.	John Jolliffe	London, United Kingdom	
717.	Daniel Flynn	Isleworth, United Kingdom	
718.	DAVID MATTHIAS QC	London, United Kingdom	As a member of Inner Temple in chambers situated next to the library I am very strongly opposed to Option 2.
719.	Cheryl jones	London, United Kingdom	
720.	Anarkali Musgrave	London, United Kingdom	
721.	Victoria Yates	London, United Kingdom	
722.	Rufus Taylor	London, United Kingdom	
723.	Imogen Robins	London, United Kingdom	
724.	Emma Waldron	London, United Kingdom	Such a beautiful building with such history and heritage should not be interfered with. To remove such a vast number of books from this library would also be devastating.

	Name	From	Comments
725.	James Petts	London, United Kingdom	The libraries are part of the raison d'etre of the Inns. It is totally inappropriate greatly to reduce this provision when it is invaluable to practitioners, not all of whom can afford electronic subscriptions to all the important works.
726.	Richard Tyson	London, United Kingdom	Even in this digital age, this Inner Templar deplores Option 2 when Option 1 appears to provide good new facilities and also saves our library
727.	Philippe Freund	London, United Kingdom	
728.	nicholas levisieur	London, United Kingdom	
729.	Martin Hirst	London, United Kingdom	
730.	Blanche Girouard	London, United Kingdom	
731.	Juan Lopez	Temple London, United Kingdom	
732.	Daniel Margolin QC	London, United Kingdom	
733.	Miranda Grell	London, United Kingdom	
734.	Carl Brewin	London, United Kingdom	
735.	Henry Day	London, United Kingdom	
736.	Richard Onslow	Blandford forum, United Kingdom	Member of the Inner Temple
737.	Charlotte Hadfield Hadfield	London, United Kingdom	
738.	Selina Mills	London, United Kingdom	
739.	Chloe Barton	Bromley, United Kingdom	
740.	Adam King	London, United Kingdom	
741.	Rachael Singh	Bordeaux, France	
742.	Lisa Cottle	Hayes, United Kingdom	
743.	Greg Ó Ceallaigh	London, United Kingdom	
744.	Tom Tyler	Lonfon, United Kingdom	It would amount to an act of vandalism. Have they gone mad ?

	Name	From	Comments
745.	Karen Moss	London, United Kingdom	
746.	Natasha Choolhun	Essex, United Kingdom	
747.	Peter Khoury	London, United Kingdom	
748.	Mark Allum	Dorchester, United Kingdom	
749.	Alexander Line	London, United Kingdom	
750.	Ian Partridge	London, United Kingdom	The implementation of Option 2 would be an act of cultural vandalism and would do catastrophic damage to the fabric of the Inn, its reputation and the best interests of its members.
751.	Jonathan Gaydon	London, United Kingdom	
752.	Jack Wakefield	London, United Kingdom	
753.	max hardy	london, United Kingdom	
754.	L Duckers	Chester, United Kingdom	
755.	george woods	London, United Kingdom	
756.	Sherri Gillespie	LOS GATOS, CA	Save the Inner Temple Library from the devastating effects of Option 2.
757.	Alex Greaves	London, United Kingdom	
758.	Joseph England	temple, United Kingdom	
759.	Thomas Evans	Southampton, United Kingdom	
760.	Gwilym Wright	Bucks, United Kingdom	
761.	Carole Thomas	Tunbridge Wells, United Kingdom	
762.	A Walker	edinburgh, United Kingdom	Libraries are treasures that cannot be relplaced by training facillities. The library is a training facility when used correctly with trained staff.
763.	Jack Connah	London, United Kingdom	
764.	Uma Shahani	Lochwinnoch, United Kingdom	

	Name	From	Comments
765.	Brian Sharman	BLANDFORD FORUM, United Kingdom	Member of the Bar at 2 King's Bench Walk Temple
766.	Andrew Phillips	Dorchester, United Kingdom	
767.	Caroline Mack	Sevenoaks, United Kingdom	
768.	Iain Cassie	Lymington, United Kingdom	The great and the good of Bar are constantly emphasising the importance of 'excellence' as the quality which will guarantee the future of practitioners. It is hard to see how these proposals are compatible with that view. I am a member of IT and I use the library. I will be very saddened if this proposal is implemented. In my opinion, far too many in the law have been seduced by the fashionable notion of paperless practice and the end of books.
769.	Leo Charalambides	London, United Kingdom	
770.	Mena Gosling-Hughes	Telford, United Kingdom	How appalling. Surely, of all professions, the Law should be one that appreciates the importance of books. If option one is cheaper, less invasive and still provides meeting space and training areas, surely it is a "no-brainer"
771.	Richard Glover	London, United Kingdom	
772.	Robert Kealey	Twickenham, United Kingdom	
773.	Robert Rhodes	London, United Kingdom	If Option 2 is adopted, future generations of Inner Templars will never forgive us.
774.	Craig Howell Williams	London, United Kingdom	
775.	Robert Gilmour	glasgow, United Kingdom	
776.	Caroline Rowlands	Bristol, United Kingdom	Save the beauty of our libraries and the history that comes with them. Respect the library.
777.	Andrew Hart	ALTON, United Kingdom	Law is a subject centred around knowledge and reading. Whilst alternative methods of reading are to be encouraged, there is no substitute (when reading long text passages) for paper. Significantly scaling back these facilities in favour of training rooms and rooms available for hire cannot be in the interests of future members of the Inn, nor the profession in general. It appears that the current executive committee is in favour of a move to knowledge taught by rote rather than knowledge discovered through research. This is not a direction that I believe should be encouraged in an Inn of Court.
778.	Alex Booth	London, United Kingdom	

	Name	From	Comments
779.	David Bartlett	London, United Kingdom	The opinion of the last four Masters of the Library should be respected and acted upon.
780.	David Wood	London, United Kingdom	
781.	Susan Glanville	London, United Kingdom	As someone who uses Inner Temple Library regularly, I appreciate the library for its holdings and helpful, innovative staff. So sad that a library that was rebuilt so beautifully, and then maintained so well after destruction by the Nazis should now be facing destruction by the Inn itself.
782.	John Hunter	Manchester, United Kingdom	
783.	Elaine Wintle	Cambridge, United Kingdom	
784.	Nathalie Gagnon	Québec, Canada	This is a matter I take most seriously. If this option is not abandoned in favour of something rational, there will be serious consequences for all concerned. I can assure you of that. Don't mess with this law library.
785.	Jonathan Pratter	Austin, TX	
786.	Joanne Blinn	Boston, MA	Option 2 is terrible!!
787.	Elizabeth Myers	London, United Kingdom	
788.	Alex Gallyer	London, United Kingdom	Please save this valuable treasure that, almost uniquely among such treasures, has an important daily function of providing access to justice for its many constituents. This would be a terrible blow and loss to legal scholarship.
789.	Susan Reeves	Surbiton, United Kingdom	
790.	Yemisi Dina	Toronto, Canada	
791.	Barbara Bintliff	Austin, TX	Please save this valuable treasure that, almost uniquely among such treasures, has an important daily function of providing access to justice for its many constituents. This would be a terrible blow and loss to legal scholarship.
792.	Joe Dowell	Austin, TX	
793.	Katie de Kauwe	London, United Kingdom	Please don't give up your history and reader oriented premises for something that might look more attractive or profitable now. There are enough German examples where actions like these have killed more than the spirit of the <i>(continues on next page)</i>
794.	Tracey Dooley	London, United Kingdom	
796.	Catrin Verloren	Johannesburg, South Africa	Please don't give up your history and reader oriented premises for something that might look more attractive or profitable now. There are enough German examples where actions like these have killed more than the spirit of the <i>(continues on next page)</i>
797.	Steven Alexandre da Costa	Newtonville, MA	
798.	Andreas Knobelsdorf	Hamburg, Germany	

	Name	From	Comments
798.	Andreas Knobelsdorf	Hamburg, Germany	<i>(continued from previous page)</i> building, it has killed the spirit of the institution and staff alike. Yours sincerely, A. K.
799.	Laura Lemmens	Edmonton, Canada	
800.	arabella anani	dubai, United Arab Emirates	
801.	Katherine Thomas	Toronto, Canada	Option 2 is not an option. Scholarship and legal history surely must trump the need for meeting rooms and other facilities and the Executive Committee must go back to the drawing table.
802.	Lesley Dingle	Cambridge, United Kingdom	
803.	Judy Harvie	Calgary, Canada	Displacing history in libraries is never a good idea.
804.	Andrea Battiston	Toronto, Canada	
805.	Sheila Mazur	Oshawa, Canada	We must save both the resource and the historical significance of this library!
806.	Annette Demers	Harrow, Canada	This would be a tremendously short-sighted decision.
807.	Laura Woods	Huddersfield, United Kingdom	As a former law librarian, I know how vital the Inn libraries are to the legal community. Please do not destroy this valuable resource for such short-sighted plans.
808.	Joanna Spurling	Vancouver, Canada	The Inner Temple Library should be given heritage status and preserved as it is. It's irreplaceable.
809.	Jennifer Soutter	Windsor, Canada	Shocking that the quality of the library collection, the building and its services are being ignored in the decision-making process. Libraries are living things, not static objects easily thrown in the back cupboard.
810.	Alexandra Dimou	North York, Canada	
811.	Eva Revitt	Edmonton, Canada	
812.	Robert Mostar	Richmond, Canada	
813.	Geoff LeGouais	Reading, United Kingdom	
814.	Seb Oram	London, United Kingdom	I use the library frequently, and it is first class. The proposals would devastate it both as a resource and physically.
815.	Richard Haworth	Preston, United Kingdom	The four last Masters of the Library have said it all. Save our library from devastation.
816.	Dennis North	Brighton, United Kingdom	Option 2 is no option.
817.	Olive Nasedkin	Sudbury., Canada	SAVE THIS LIBRARY!!!!
818.	Anna Favre	London, United Kingdom	

	Name	From	Comments
819.	Thea Viney	London, United Kingdom	
820.	Tajuana Ewing	Providenciales, Turks And Caicos Islands	
821.	Amy Kaufman	Kingston, Canada	
822.	Jane Garry	Bethany, CT	The world is seeing too much destruction of cultural institutions. Find another place to put the meeting rooms.
823.	Stephanie Carr	Auckland, New Zealand	
824.	James Chatwin	Lingfield, United Kingdom	Unwanted and unwarranted vandalism. Why destroy something special needlessly?
825.	Heidi Brinkerhoff	Austin, TX	
826.	Gail Mackisey	Winnipeg, Canada	This is unbelievably sad. How can people want to decimate such historic places and want to remove so many books? This is history. Is this '1984'??
827.	Charlotte Pitts	Darwin, Australia	
828.	Chris Swan	Washington, DC	
829.	Thomas Palmer	West End, Australia	
830.	Léonie Nagle	Sydney, Australia	
831.	Lorraine Weinman	Canberra, Australia	The Barbarians are at the gate again. FIGHT!!
832.	Diane Martin	Bedford, Australia	Apart from the obvious architectural impact too many law collections are being devastated and the impact on collective knowledge is undermined - please DON'T choose Option 2
833.	Shawn Mann	Dover, FL	
834.	Allison Bale	Delta, Canada	
835.	Belinda Murphy	Reading, United Kingdom	"Without libraries what have we? We have no past and no future." □ Ray Bradbury
836.	Daniel Piper	St Albans, United Kingdom	The idea that a whole committee came up with this ghastly plan is simply astounding. I just hope they see sense before they destroy something beautiful and historic. Not to mention the huge impact on the staff who work there.
837.	Robyn Nielsen	Barton, Australia	
838.	Andrew Tampion	Hinckley, United Kingdom	
839.	Gavin Hamilton	London, United Kingdom	
840.	Barbara Peacock	Sandton, South Africa	
841.	Sarah Sackman	London, United Kingdom	

	Name	From	Comments
842.	Hilary Woodard	Hassocks, United Kingdom	Yet another shortsighted scheme which will effectively destroy the library. The emphasis is on education so what don't they understand about a library being a major contribution to education. It's a fantastic resource staffed by knowledgeable librarians why would anyone want to destroy it?
843.	Carol Botha	Johannesburg, South Africa	
844.	louise anderson	london, United Kingdom	
845.	Gill Rademeyer	Sandton, South Africa	
846.	adam glass	London, United Kingdom	
847.	David Wills	Cambridge, United Kingdom	
848.	Nico Ferreira	Pretoria, South Africa	How shortsighted can you get?
849.	Susan Watters	Silver Spring, MD	
850.	Alexandra Ward	London, United Kingdom	
851.	Justin Davis	London, United Kingdom	
852.	Daniel Shaw	London, United Kingdom	
853.	Lara Knight	London, United Kingdom	
854.	Daniel Shapiro	London, United Kingdom	
855.	Carlo Taczalski	London, United Kingdom	
856.	John Greenbourne	London, United Kingdom	
857.	Dermot Woolgar	London, United Kingdom	
858.	Alex Courtnage	Southwick, United Kingdom	
859.	Katherine Hardcastle	London, United Kingdom	
860.	marina wheeler	London, United Kingdom	
861.	David Sears	London, United Kingdom	
862.	Laura Milne	Hanoi, Viet Nam	

	Name	From	Comments
863.	Claire McGregor	London, United Kingdom	
864.	neil sheldon	London, United Kingdom	
865.	Jim Duffy	London, United Kingdom	As a junior practitioner I rely upon the breadth and variety of the library's collection regularly. I also often go there to spend a few hours working in peace and quiet - and in a spacious environment - when I have a tricky piece of work. I very much hope that the plans for the library are rejected.
866.	Ron Fuller	Washington, DC	This library is treasure. Times change but figuring out a way to preserve the jewels of the past is essential.
867.	Ruth Sutton	LONDON, United Kingdom	
868.	Michael Paulin	London, United Kingdom	This is a vital and historic resource that needs to be protect and nurtured.
869.	Christine Green	London, United Kingdom	
870.	Adrian Blunt	Lincoln, United Kingdom	
871.	Simon Brown	London, United Kingdom	
872.	Lois Williams	London, United Kingdom	
873.	Siobhan O'Hara	Glasgow, United Kingdom	
874.	Caroline Blackwell	Edinburgh, United Kingdom	This is a library of historical interest and value. Turning it into the modern development is philistinism at it best. Please preserve this historical building.
876.	Stefan Jurgens	Toronto, Canada	
877.	Caroline Cross	London, United Kingdom	
878.	shaheen rahman	london, United Kingdom	
879.	john stevenson	london, United Kingdom	
880.	james neville	London, United Kingdom	I use the library regularly. Its international and comparative law coverage is world class. Why would you want to change this and end up being second best?
881.	Henry Witcomb	London, United Arab Emirates	
882.	Robert Kellar	London, United Kingdom	
883.	Neil Garnham	london, United Kingdom	

	Name	From	Comments
884.	William Falshaw	Kettering, United Kingdom	
885.	Henry Mainwaring	London, United Kingdom	Although a member of Lincol's Inn, I use the Inner Temple library at least once a week and I am surprised and saddened by this astonishing proposal. Do you really need more commercial space at the cost of ripping the soul out of your Inn?
886.	Tony Dye	London, United Kingdom	
887.	Colin Andress	London, United Kingdom	Option 1 would be acceptable if disruption could be kept to a minimum. The other options are simply astonishing vandalism of this precious resource for the profession.
888.	Amy Mannion	London, United Kingdom	
889.	Paul Lodato	Harrogate, United Kingdom	
890.	Dot Adams	Belfast, United Kingdom	
891.	Clodagh Maguire	stockport, United Kingdom	
892.	Sarah Nicholas	Cardiff, United Kingdom	
893.	Du Cheigne	london, United Kingdom	
894.	James Aldridge	London, United Kingdom	
895.	Suw Charman-Anderson	Verwood, Dorset, United Kingdom	
896.	Rupert Holderness	London, United Kingdom	
897.	Paul Jarvis	Wimbledon, United Kingdom	
898.	Andrew Allen	London, United Kingdom	
899.	Harry Trusted	London, United Kingdom	This proposed development is vandalism. We have a delightful and historic library and it should be lost in this profligate way.
900.	Helen Saunders	Cardiff, United Kingdom	shocking
901.	Helga Speck	Christchurch, United Kingdom	
902.	patrick sadd	london, United Kingdom	

	Name	From	Comments
903.	Amelia Walker	London, United Kingdom	
904.	Ethan Connor	London, United Kingdom	
905.	Miranda de Savorgnani	London, United Kingdom	
906.	Peter Stubbs	Loomis, CA	
907.	James Rickards	London, United Kingdom	
908.	Adrian Wright	Southampton, United Kingdom	
909.	Tom Roscoe	London, United Kingdom	
910.	Christopher Knight	London, United Kingdom	This is a completely unnecessary proposal and the Inn should retain the library as it is. It is an essential resource and one of the few ways in which the Inn actually assists barristers in practice.
911.	Henrietta Paget	London, United Kingdom	
912.	Alexander Chadd	London, United Kingdom	
913.	Scott Ralston	London, United Kingdom	
914.	Matthew GRIFFITHS	Ramsgate, United Kingdom	
915.	Olivia Ford	Oxford, United Kingdom	
916.	Jacqueline Lawrence	Dartford, United Kingdom	
917.	Stephanie Graham	Basingstoke, United Kingdom	
918.	Stephen Tromans QC	London, United Kingdom	Option 2 seems a very short sighted decision which future generations will likely regret
919.	Yasmin Yasseri	Surbiton, United Kingdom	
920.	Stephen Brassington	London, United Kingdom	
921.	Karim Ghaly	London, United Kingdom	
922.	Lindsay Johnson	London, United Kingdom	
923.	Sean Aughey	London, United Kingdom	

	Name	From	Comments
924.	Patrick Halliday	London, United Kingdom	The current library is an invaluable resource for both law students and practising barristers. Option 2 would cause unjustified damage to that resource, at the expense of this generation and future generations.
925.	Colin Aylotr	London, United Kingdom	
926.	Simon Forshaw	London, United Kingdom	
927.	Eric Metcalfe	London, United Kingdom	
928.	Estelle Wolfers	Cambridge, United Kingdom	
929.	Katherine Eddy	London, United Kingdom	
930.	Paul Barley	Littlehampton, United Kingdom	
931.	Hannah Young	Southampton, United Kingdom	
933.	Catherine Taskis	London, United Kingdom	
934.	Crispin Winser	London, United Kingdom	
935.	Thomas Roe QC	London, United Kingdom	
936.	Amanda Harington	London, United Kingdom	
937.	Simon Fox	Cheltenham, United Kingdom	As a member of the Inn based in the Southwest I use the library regularly on any of my trips for conferences or hearings in London. It is still the perfect place to work, as it was in my student days 25 years ago, and in my opinion the jewel in the crown of Inner Temple. I cannot believe the Inn is even considering ruining such a wonderful work facility with Option 2.
938.	Martyn Griffiths	London, United Kingdom	
939.	Roger Harris	London, United Kingdom	
940.	Sarah Przybylska	Temple, United Kingdom	
941.	Emily Windsor	London, United Kingdom	
942.	Nancy Connor	Vancouver, Canada	Please do not destroy a heritage building and library. I have used this library in the past and hope to in the future.

	Name	From	Comments
943.	Carol Richards	London, United Kingdom	
944.	Thomas Munby	London, United Kingdom	
945.	Clair Walton	Carpenterstown, Ireland	
946.	Clodagh Bradley	London, United Kingdom	
947.	Sam Brown	London, United Kingdom	
948.	Daniel Peat	Cambridge, United Kingdom	
949.	Emma Deacon	London, United Kingdom	
950.	Simon Canter	London, United Kingdom	
951.	Tanya Szydlowski	Toronto, Canada	
952.	Clare Mauro	Toronto, Canada	
953.	Benjamin John	London, United Kingdom	
954.	Michael Edmonds	London, United Kingdom	
955.	Tom Day	London, United Kingdom	
956.	Sara Roberts	Christchurch, New Zealand	
957.	Richard Smith	London, United Kingdom	
958.	Jennie Hargrove	Leeds, United Kingdom	
959.	Joanne Moss	London, United Kingdom	
960.	Laura Gharazeddine	Kailua-kona, HI	
961.	Narita Bahra	London, United Kingdom	
962.	Susan Caird	Vancouver, Canada	There seems no reason to choose to destroy a beautiful, historic and working library; please choose option 1, which will preserve this library for current and future legal practitioners.
963.	Anne Forrester Barker	Howell, MI	

	Name	From	Comments
964.	Gayle Davies	North Sydney, Australia	This proposal is desecration. Unfortunately it is a symptom of a disease which is now rampant in the legal profession, based on a number of untested and erroneous assumptions that law libraries are no longer necessary. These assumptions are held by people who think they know everything, but actually don't even know what they don't know
965.	Sharan Sanghera	London, United Kingdom	Please don't destroy this beautiful workspace!
966.	Murray Shanks	London, United Kingdom	
967.	Peter Lownds	London, United Kingdom	
968.	Michael Sternberg KFO QC	London, United Kingdom	
969.	Patrick Faulkner	Sydney, Australia	It's essential to retain this important and unique store of legal knowledge in its present form. What is decimated cannot be put back.
970.	Holger Aman	Potts Point, Australia	An important resources for lawyers and librarians around the world
971.	Amy Chan	Sydney, Australia	
972.	Wendy Cousins	Balgownie, Australia	Please do not destroy this wonderful resource
973.	Richard Smith	Parramatta, Australia	There has to be a better option than option 2 surely!
974.	Sean Sullivan	London, United Kingdom	
975.	Emily Saunderson	London, United Kingdom	
976.	Timothy Fancourt	London, United Kingdom	It would be a tragedy to lose such excellent library space - an irreplaceable asset - in favour of meeting and teaching rooms, which could be provided almost anywhere.
977.	Rob Leach	London, United Kingdom	
978.	Nadia Whittaker	London, United Kingdom	The Inner Temple Library is one of the most amazing spaces I know. I am a practising barrister and a member of the Inner Temple. This space has always been a sanctuary for me. I spent many hours in the library as I studied to become a barrister and continue to go to there regularly as a practitioner for research and reflection. The proposed Option 2 will destroy the space. Please do not do something that we will all regret bitterly!
979.	Pam Allen	Cape Town, South Africa	
980.	Alisdair Smith	London, United Kingdom	

	Name	From	Comments
981.	Carla Revere	London, United Kingdom	
982.	Clare Gammond	Manchester, United Kingdom	
983.	Angus Bunyan	London, United Kingdom	The Inn should be ashamed that it is even contemplating these plans, which would reduce one of the finest libraries in London to a shell.
984.	Ben Long	Solihull, United Kingdom	
985.	david mead	seething, United Kingdom	
986.	Renee Blackmore	Bangor, Gwynedd, United Kingdom	
987.	Joshua Baxendale	Brighton, United Kingdom	
988.	Brian Thomas	Swanley, United Kingdom	
989.	Alex McBride	LONDON, United Kingdom	
990.	Leo Seelig	London, United Kingdom	
991.	Miriam Rice	Greenford, United Kingdom	
992.	Belinda Corani	London, United Kingdom	
993.	Jeremy Pendlebury	London, United Kingdom	From my perspective, Option 1 would seem the optimum option
994.	Joseph Middleton	London, United Kingdom	
995.	Caroline Daly	London, United Kingdom	
996.	Deborah Reypert	Cape Town, South Africa	
997.	Benjamin Williams	London, United Kingdom	
998.	Simon Murray	London, United Kingdom	
999.	Sioban Healy	London, United Kingdom	
1,000.	Ronald Thwaites QC	London, United Kingdom	As lawyers, we need to be up-to-date but that does not mean we have to destroy our heritage.
1,001.	Edward Heaton	London, United Kingdom	

Name	From	Comments
1,002. Cecilia Bhanji	Chelmsford, United Kingdom	I worked at the Inner Temple Library 17 years ago and even then we were cramped for space. Please keep the much needed space for the students and members of the Bar! Thank you.
1,003. Connor Diver	Bulkington, United Kingdom	
1,004. Mark Davies	London, United Kingdom	
1,005. Sandra Martin	Las Palmas de Gran Canaria, Spain	
1,006. Emma Jolly	London, United Kingdom	
1,007. Bruce Silvester	London, United Kingdom	I have used the library for over 30 years, even studied for my bar exams there, and it would be a tragedy to allow Option 2
1,008. Kiri Forster	Cardigan, United Kingdom	
1,009. Susan Blake	London, United Kingdom	
1,010. Isabel Delgado	las palmas, Spain	
1,011. Michael Holmes	London, United Kingdom	
1,012. Alexander MacDonald	London, United Kingdom	
1,013. James Drake QC	London, United Kingdom	
1,014. James Brocklebank	London, United Kingdom	
1,015. Tim Jenns	London, United Kingdom	
1,016. Gavin Geary	London, United Kingdom	
1,018. Chris Philpot	London, United Kingdom	
1,019. Lorna Meyer	birmingham, United Kingdom	
1,020. James Stoll	Bristol, United Kingdom	
1,021. James Turner	London, United Kingdom	
1,022. Tim Marland	London, United Kingdom	

Name	From	Comments
1,023. Benjamin Coffe	10 Fleet Street, United Kingdom	
1,024. Christopher Jay	London, United Kingdom	The Inner Temple resource is an invaluable resource to barristers working in and around the Temple. The plans agreed at the meeting of the Executive Committee on 21st July 2015 will have a serious and deleterious effect on the usefulness of the resource and, accordingly, I oppose the proposed changes.
1,025. Lucas Bastin	London, United Kingdom	
1,026. Emily Shirley	Canterbury, United Kingdom	I am a member of the Inner Temple. This is an utterly stupid plan. The library and books provide an invaluable service to all members worldwide not just for research, work purposes but also for quiet contemplation.
1,027. Adrian Keeling QC	Birmingham, United Kingdom	
1,028. Gareth Palmer	Cardiff, United Kingdom	
1,029. Stephanie Barrett	London, United Kingdom	
1,030. Sam Cook	City of London, United Kingdom	
1,031. Andrew Colman	London, United Kingdom	
1,032. Sarah Martin	London, United Kingdom	
1,033. philip saunders	london, United Kingdom	To remove more than 50% of the shelf space would be a tragedy for one of the world's leading law libraries. It would be a shameful move which this and future generations would lament
1,034. Yash Kulkarni	WOKING, United Kingdom	
1,035. martyn berkin	London, United Kingdom	I AM TOTALLY AGAINST THE DESTRUCTION OF THE LIBRARY. IS ANY ONE IN FAVOUR. THE INNER TEMPLE MUST LISTEN TO THE WISHES OF ITS MEMBERS
1,036. Geoffrey Bennett	Berkhamsted, United Kingdom	
1,037. Surjit Sanghera	Preston, United Kingdom	
1,038. Benjamin Parker	London, United Kingdom	
1,039. Harrison Denner	Cardiff, United Kingdom	

Name	From	Comments
1,040. Ruth Hosking	London, United Kingdom	
1,041. Andrew Powers	Chandlers Ford, United Kingdom	
1,042. Nicholas Johnson	Liverpool, United Kingdom	As a member of the Inn I am strongly against re-developing the library.
1,043. Charles Holroyd	London, United Kingdom	These plans would be disastrous. The Library is magnificent and should be preserved.
1,044. John Passmore	London, United Kingdom	
1,045. Owain Thomas	London, United Kingdom	
1,046. Sarah Pilmer	London, United Kingdom	
1,047. martin hicks QC	London, United Kingdom	
1,048. Stephanie Lahey	Victoria, Canada	Shame on the Executive Committee for even considering this utterly disgraceful plan. The Inner Temple Library is an invaluable resource for researchers, members of the legal profession, & the broader public. As a PhD student specializing in medieval common law, I decry this proposal to destroy such an important piece of our cultural heritage. Option 2 is barbaric.
1,049. David Semark	London, United Kingdom	
1,050. Rachel Jay	Pangbourne, United Kingdom	
1,051. Sarbjit Khangura	Whitnash, United Kingdom	
1,052. Stephen Kenny QC	London, United Kingdom	The only room of real distinction in the whole of the Inner Temple. Why destroy it?
1,053. Andrew Pearson	London, United Kingdom	
1,054. Nicky Farmer	London, United Kingdom	Having worked in the library for a short space of time I recall vividly how well regarded and useful the library appeared to be.
1,055. Robert Bright	London, United Kingdom	
1,056. Sara Hunton	London, United Kingdom	
1,057. Chris Hunton	Teddington, United Kingdom	

Name	From	Comments
1,059. Charles Joseph	London, United Kingdom	I am a member of the Inn. The library is a fantastic resource and the loss of such a substantial proportion of it would be deeply damaging, not only for the members of the Inn and any others who use it, but for the reputation of the Inn itself. It is unnecessary too. Don't do it!
1,060. Sue Kendall	Warwick, United Kingdom	How could this vandalism ever be contemplated by educated people?
1,061. Tamsin Hickling	London, United Kingdom	
1,062. Marcus Mander	LONDON, United Kingdom	
1,063. Alan Richards	London, United Kingdom	
1,064. Simon McKay	Knaresborough, United Kingdom	
1,065. James Fireman	London, United Kingdom	
1,066. Donata Szabo	London, United Kingdom	
1,067. Jenny Hurley	EPSOM, United Kingdom	
1,068. Simon Kerr	London, United Kingdom	
1,069. Alex Carington	London, United Kingdom	
1,070. Aneska Button	Leicester, United Kingdom	
1,071. Stephanie Jackson	London, United Kingdom	
1,072. Rebecca Farrell	London, United Kingdom	
1,073. Paul Nicholls QC	London, United Kingdom	
1,074. David Sanderson	London, United Kingdom	
1,075. James Candlin	Temple, United Kingdom	
1,076. Jack Wright	London, United Kingdom	
1,077. James morrison	Freefolk Priors, United Kingdom	
1,078. Daniel Follon	London, United Kingdom	

Name	From	Comments
1,079. Laura Hoyano	Oxford, United Kingdom	I am a member of Middle Temple, and a winner of the Inner Temple Book Prize 2008. I am horrified at what will be done to the Inner Temple library. I recognise the need for advocacy suites, if only to keep advocacy training out of the monopoly of the BSB/BPP. I hope the Benchers will consider alternatives.
1,080. James Sullivan	London, United Kingdom	
1,081. Peter Hargreaves	Stockport, United Kingdom	Libraries such as this enable the most detailed research to be conducted. They are at the heart of our law. A great deal of immense value would be lost by Option 2. Please do not go down this road.
1,082. Gemma Scott	London, United Kingdom	
1,083. Sandra Smythe	Croydon, United Kingdom	
1,084. Thomas O'Donohoe	London, United Kingdom	
1,085. Julia Woolcott	Johannesburg, South Africa	British heritage actually belongs to all English-speaking people (and in fact to the world). Our ancestors created it! Do not diminish it lightly.
1,086. Stephen Worthington	London, United Kingdom	
1,087. Edward Ramsay	London, United Kingdom	
1,088. Erica Bedford	Manchester, United Kingdom	
1,089. Emily Duckworth	Manchester, United Kingdom	
1,090. Harry Steinberg	London, United Kingdom	
1,091. Jo Pooley	Isleham, Ely, United Kingdom	the library is a wonderful facility and the option for training and commercial hire facilities should not be visited on such a lovely space
1,092. Michelle Celik	London, United Kingdom	Inner Temple Library is a vital source of information for members of chambers.
1,093. Vanessa Cashman	London, United Kingdom	
1,094. James Nieto	London, United Kingdom	
1,095. Charles Robertshaw	London, United Kingdom	
1,096. Daniel Tomlin	London, United Kingdom	

Name	From	Comments
1,097. Isaac Hogarth	London, United Kingdom	
1,098. EMILY GORDON WALKER	London, United Kingdom	
1,099. Ghazaleh Rezaie	London, United Kingdom	
1,100. David Callow	London, United Kingdom	
1,101. Frank Burton QC	London, United Kingdom	The library is a wonderful resource for all barristers and students to sacrifice so much of it for educational and training purposes is misguided and wrong when it is the finest example of an educational resource throughout the whole of a barrister's career.
1,102. Henry Charles	London, United Kingdom	<ol style="list-style-type: none"> 1. Would not the cost of the works fund the rental of commercial space elsewhere/foregoing rent on existing building? 2. The library is beautiful space, part of the heritage, and future of this Inn. Its destruction would swiftly become a matter of regret. 3. If the real draw of the scheme is income from arbitration why not a joint Inns of Court scheme - but not in the library.
1,103. Emily read	london, United Kingdom	
1,104. Sam Brodie	London, United Kingdom	
1,105. Angela Frost	london, United Kingdom	There has got to be a better option for education and training than destroying the beautiful and historic library. Education and training is important but not at the expense of the library.
1,106. David Gilmour	Alkerton, United Kingdom	
1,107. Patrick Kerr	London, United Kingdom	
1,108. Charlotte Reynolds	London, United Kingdom	
1,109. David Boyle	Manchester, United Kingdom	
1,110. Anna Symington	wickwar, United Kingdom	
1,111. Colin Mendoza	London, United Kingdom	
1,112. Andrew Davis	London, United Kingdom	
1,113. gavin Kealey	London, United Kingdom	

Name	From	Comments
1,114. Nick Goodwin	London, United Kingdom	
1,115. Marie Kelly	Attiki, Greece	
1,116. Charles Sinclair	London, United Kingdom	
1,117. Jessica Powers	London, United Kingdom	
1,118. Jerome Silva	London, United Kingdom	
1,119. Nicola Wallace	London, United Kingdom	
1,120. Neville Lewis	London, United Kingdom	
1,121. Paul Russell	London, United Kingdom	
1,122. Jacqueline Foister	Gloucester, United Kingdom	
1,123. Nigel Lewers	London, United Kingdom	
1,124. Rory Badenoch	London, United Kingdom	
1,125. Andrew Watson	London, United Kingdom	
1,126. Ben Leech	London, United Kingdom	
1,127. Richard Methuen	London, United Kingdom	
1,128. Sebastian Kokelaar	London, United Kingdom	
1,129. Paola Wilson	London, United Kingdom	
1,130. Andrew Roy	LONDON, United Kingdom	This is a dreadful proposal. It is myopic at best, unprincipled at worst. The Inn would be betraying its stated values. The proposal Submission itself correctly records that the library "is one of the finest law libraries in the world ... It merits protection as part of the Inn's intellectual and cultural heritage ... It serves the core charitable function of the Inn, and we owe a duty to those who come after us, to protect and enhance it." Option 2 is wholly irreconcilable with this duty.
1,131. Alan Gordon Walker	London, United Kingdom	
1,132. Gareth Branston	West Malling, United Kingdom	

Name	From	Comments
1,133. Keke Maldi	Suideroord, South Africa	
1,134. Veronica Benjamin	London, United Kingdom	
1,135. Jacqueline Benjamin	Birmingham, United Kingdom	
1,136. Nicola Martin	Chesham, United Kingdom	
1,137. Karl Hirst	London, United Kingdom	
1,138. Christopher Stirling	London, United Kingdom	
1,139. Roisin Kennedy	London, United Kingdom	
1,140. Victoria Adams	Crowthorne, United Kingdom	
1,141. Claire Jackson	Leeds, United Kingdom	
1,142. Jenifer Howie	London, United Kingdom	
1,143. James Badenoch	LONDON, United Kingdom	
1,144. Thomas Banks	London, United Kingdom	
1,145. David Platt QC	London, United Kingdom	
1,146. Emma Coletti	Rom, United Kingdom	
1,147. Sarah Clover	REdditch, United Kingdom	I think this is a truly dreadful idea - the library is much loved and much wanted. It would be a terribly sad loss.
1,148. Emma Dufty	Porlock, United Kingdom	
1,149. Clara Hamer	London, United Kingdom	
1,150. Catherine Peck	London, United Kingdom	
1,151. Lucy Seale	Truro, United Kingdom	
1,152. Dianne Seale	TRURO, United Kingdom	
1,153. Sue House	Cardiff, United Kingdom	
1,154. Steve Burnett	Cardiff, United Kingdom	Think again before perpetuating the cultural holocaust

Name	From	Comments
1,155. John Eidinow	London, United Kingdom	
1,156. Jolanta Leszczynski	Sydney, Australia	
1,157. Francesca Meller	Croydon, United Kingdom	
1,158. Benja Gray	London, United Kingdom	
1,159. David Garner	London, United Kingdom	
1,160. Kevin Latham	Manchester, United Kingdom	
1,161. Sally Phillips	London, United Kingdom	
1,162. Mary Tastad	Saskatoon, Canada	
1,163. Daniel Sokol	London, United Kingdom	
1,164. Niall Maclean	London, United Kingdom	
1,165. Louise Thomson	London, United Kingdom	
1,166. Mary Newnham	London, United Kingdom	
1,167. Janet Portman	London, United Kingdom	
1,168. Patrick Vincent	London, United Kingdom	
1,169. Max Archer	London, United Kingdom	
1,170. Sarah Benson	Sydney, Australia	
1,171. Alison Jones	Canberra, Australia	I have no interest in the Inner Temple - as an Australian law librarian, I do have an interest in high quality collections and libraries being retained. I hope that option 1 can instead be adopted as a great library supporting a great new learning space sounds ideal.
1,172. Rachit Buch	London, United Kingdom	
1,173. Ann bagshaw	basingstoke, United Kingdom	
1,174. Olivia Wybraniec	london, United Kingdom	The short summer closure of ITL was hugely inconvenient for those with practices that rely on its special collections, and such a long closure will be disastrous. Please reconsider.

Name	From	Comments
1,175. Simon Levene	Richmond, United Kingdom	
1,176. stuart bagshaw	basingstoke, United Kingdom	Knowledge = power
1,177. Joel Kendall	London, United Kingdom	
1,178. James Cornwell	London, United Kingdom	
1,179. Paul Letman	London, United Kingdom	How absurd to sacrifice so much of the library for a few training rooms, which are two a penny!
1,180. Isabel Barter	London, United Kingdom	Inner Temple library has been and is a key resource for aspiring and practising barristers. Option 2 would reduce the value of that resource considerably.
1,181. Kate Boakes	London, United Kingdom	
1,182. Marcus Dignum	London, United Kingdom	
1,183. Ronald Walker Q.C.	London, United Kingdom	
1,184. Andrew Hogarth QC	London, United Kingdom	
1,185. Greg Perrins	London, United Kingdom	
1,186. Kaz O'Callaghan	London, United Kingdom	
1,187. David Sharpe	London, United Kingdom	Destruction of an iconic and historic law library for the provision of 'training facilities' is short-sighted and will destroy what is currently a wonderful resource for practising barristers.
1,188. Sacha Ackland	London, United Kingdom	
1,189. Emma Northey	London, United Kingdom	
1,190. Ben Casey	London, United Kingdom	
1,191. Justyn Turner	London, United Kingdom	
1,192. Georgia Whiting	London, United Kingdom	
1,193. Alison Griffiths	London, United Kingdom	
1,194. Emily Wilsdon	London, United Kingdom	

Name	From	Comments
1,195. Elizabeth Gallagher	London, United Kingdom	
1,196. Sophie Chaplin	Temple, United Kingdom	
1,197. Paul McGrath	London, United Kingdom	
1,198. Heather Allen	Beckenham, United Kingdom	
1,200. Caroline Pounds	Woking, United Kingdom	
1,201. Helen Yates	London, United Kingdom	
1,202. Sarah Wheeler	London, United Kingdom	
1,203. Paul Phillips	London, United Kingdom	
1,204. Jordan Patterson	Toronto, Canada	
1,205. Helen Wood	Southampton, United Kingdom	
1,206. Polly Harper	Birmingham, United Kingdom	
1,207. Annie Bland	London, United Kingdom	It's hard to think of a more philistine plan.
1,208. Alex Reid	Bedford, United Kingdom	Bean-counters. A curse on you all
1,209. Susan Flegg	Exeter, United Kingdom	This is a national treasure - hands off this wonderful resource. You will regret it once it has gone.
1,210. Julia Smyth	London, United Kingdom	
1,211. Denise Roberts	Carlisle, United Kingdom	
1,212. Margaret Ford	Exeter, United Kingdom	
1,213. Oriole Newgass	Dartmouth, Devon, United Kingdom	All over the world irreplaceable historic sites are being wantonly destroyed - surely it shouldn't be allowed to happen here?
1,214. Jacob Levy	London, United Kingdom	
1,215. Michelle Anderson	Bristol, United Kingdom	

Name	From	Comments
1,216. Helen Doyle	London, United Kingdom	I undertook part of my library training at Inner Temple and thus experienced first-hand the wealth of its collections - the Library is an invaluable resource to the legal field and option 2 would be a devastating blow. The Library works in conjunction with the other 3 Inn libraries to house materials, so such a drastic change to Inner Temple's library will have a knock-on effect and will impact, for the worse, the 4 Inn's collective library materials. Option 1 seems to me a perfectly reasonable compromise, creating some new space whilst maintaining the integrity of the collection.
1,217. George Woodman	Belfast, United Kingdom	This short term thinking must be resisted and a great library saved.
1,218. Nicola Atkins	London, United Kingdom	
1,219. John Bate-Williams	London, United Kingdom	I firmly oppose the proposal to remove such a significant amount of library space. This cannot be justified, especially in the context of the Inn renting out what was the Niblett Hall. John Bate-Williams
1,220. Tim Sharpe	London, United Kingdom	
1,221. Surinder Bhakar	London, United Kingdom	
1,222. Gareth Munday	London, United Kingdom	
1,223. Oliver Rudd	London, United Kingdom	
1,224. Edward Culver	Temple, United Kingdom	
1,225. Arjun Krishnamoorthy	London, United Kingdom	
1,226. Brian Lett	London, United Kingdom	
1,227. James Plunket	OXFORD, United Kingdom	This is a wonderful service and it would be a shame to see it go. It's probably the only service 90% of Inn members use - why on earth would they decimate it?
1,228. Ashley Wood	Manchester, United Kingdom	
1,229. Paul Ayris	Cambridge, United Kingdom	
1,230. Aaron Mah	Manchester, United Kingdom	
1,231. Laura Briggs	London, United Kingdom	

Name	From	Comments
1,232. James Butler	Tunbridge Wells, United Kingdom	A terrible plan. If it went ahead the committee and members involved would forever be tainted with this decision and remembered as part of the Inn's history in the most negative light.
1,233. Aileen Downey	Hampton, United Kingdom	
1,234. Ian Patterson	Cambridge, United Kingdom	I sign in my capacity as the Fellow Librarian of a Cambridge College as well as a private individual, to express my sense of outrage at the proposal on Option 2, which would see the effective destruction of a very significant and much used, well-liked library. This is a very short-sighted proposal, setting short-term gain against cultural heritage in the broadest sense. Please don't take Option 2.
1,235. Louise Jones	London, United Kingdom	
1,236. Holly King	London, United Kingdom	
1,237. Graham Prior	crewe, United Kingdom	
1,238. George Bennett	Maidstone, United Kingdom	
1,239. Joanna Brownhill	London, United Kingdom	
1,240. Jamie Carpenter	London, United Kingdom	As a professional negligence practitioner I rely on the library for materials relating to areas of the law which are outside my Chambers' core practice as well as the invaluable collection of past editions of textbooks. Please do not go ahead with these plans
1,241. Morwenna Macro	Temple, United Kingdom	The library should be preserved in all its glory. It is a peaceful haven for study, an extremely useful resource, particularly at a time when Chambers are cutting back on their physical libraries, and is an aesthetic masterpiece. I have used it for 15 years, from law student to BVC student to Barrister. I urge the Benchers to pause and consider carefully the implications of the decision before them. Once gone, it will be difficult to restore.
1,242. Robert Percival	London, United Kingdom	
1,243. Raj Arumugam	London, United Kingdom	Option 2 is a most ridiculous proposal. I hope the Benchers will see sense and reject that.
1,244. Ben Maltz	London, United Kingdom	
1,245. sonia rai	london, United Kingdom	The library is an important part of the heritage of Inner Temple and is essential for those who are studying and are in Practice. Option 2 is unnecessary

Name	From	Comments
1,246. Mark Lyne	London, United Kingdom	
1,247. Philip Flower	London, United Kingdom	
1,248. mary glass	Richmond, United Kingdom	
1,249. Lizanne Gumbel	Temple, United Kingdom	
1,250. Victoria Burgess	London, United Kingdom	
1,251. Judith Pepper	London, United Kingdom	
1,252. Alasdair Henderson	London, United Kingdom	
1,253. Al Hogarth	London, United Kingdom	
1,254. Jonathan Miller	London, United Kingdom	
1,255. Alex Scott-Phillips	London, United Kingdom	
1,256. Paul Ozin	London, United Kingdom	As a barrister in chambers adjacent to the Inn, I know how important it is to the profession to have World-class library resources on our doorstep. The increasing reliance by most chambers on technological resources and the corresponding diminution in their own library collections means that it is essential to retain an accessible repository of books and journals; in particular, those that are not available in electronic form. Arks for the printed word are needed in the modern World. Their historic fabric and integrity should be sensitively preserved. There is no going back from Option 2. I urge the Masters of the Bench to reject this proposal.
1,257. Paul Oakley	London, United Kingdom	
1,258. Dominic Hockley	London, United Kingdom	I am a user of inner temple library. Option 2 is a terrible plan.
1,259. Emily Maycock	Bristol, United Kingdom	
1,260. Kate Jump	London, United Kingdom	
1,261. Simon Robinson	London, United Kingdom	I've used Inner Temple Library as both a student and a barrister, and continue to do so as it is the closest library to my chambers. It is a beautiful and functional design, whilst Option 2 is neither. There appears to have been <i>(continues on next page)</i>

Name	From	Comments
1,261. Simon Robinson	London, United Kingdom	<i>(continued from previous page)</i> insufficient thought given to how to pay for Option 2 and the idea of raising significant revenue from conferences and meeting room hire seems unlikely.
1,262. timothy godfrey	London, United Kingdom	the library is a wonderful resource which must remain as it is to be used by members of the Inns - the library is one of the few places where one can work in silence in these days of open plan office space
1,263. Robert Logan	Oxford, United Kingdom	I sign as a former President of the British and Irish Association of Law Librarians and a friend of the late Wallace Breem and the late Daphne Parnham who did so much to preserve this library and enhance its use. The reading room should be a protected part of our national heritage.
1,264. Nicholas Alexander	Temple, United Kingdom	
1,265. Peter Petts	London, United Kingdom	Sadly, I have little cause to use the library, nowadays. I have even less cause to use the Temple Church. However, I have no wish to see either vandalized.
1,266. Jill Riches	East Grinstead, United Kingdom	The library is a hugely important part of our heritage. The desecration that would be caused by Option 2 is horrendous.
1,267. Achas Burin	London, United Kingdom	
1,268. David Howker	London, United Kingdom	
1,269. Hugh Hamill	London, United Kingdom	I am strongly opposed to 'Option 2'. The Library is part of the Inn's heritage which it holds on trust for current and future generations. I endorse the submission made by the Inner Temple Library Committee and would support 'Option 1'. Additionally before any final decision is to be taken I would wish the Inn to publish the business case for the investment of over £20m in this project, and set out what returns they expect to see on this capital.
1,270. Helen Pugh	London, United Kingdom	
1,271. Charles Miskin	London, United Kingdom	
1,272. tristan chaize	london, United Kingdom	
1,273. Natasha Phillips	VIRGINIA WATER, United Kingdom	This library is really a national treasure. It should be given protected status, not torn down for financial gain.
1,274. Benedict Rodgers	London, United Kingdom	

Name	From	Comments
1,275. Heather McMahon	London, United Kingdom	Please reconsider: the library is an invaluable resource for practitioners and the loss of so much useable space is unnecessary and unjustified.
1,276. Roger Crawford	Meppershall, United Kingdom	This place should be sacrosanct. And now, I believe, open to the public as of right.
1,277. Kweku Aggrey-Orleans	London, United Kingdom	
1,278. Stephen Smyth	Chichester, United Kingdom	I used always to use this library when a student. It is the jewel in the Inner Temple crown. There are far too many training activities.
1,279. Roger Cross	Dublin, Ireland	
1,280. Philip Morrison	Oxford, United Kingdom	As an undergraduate currently contemplating membership of the Inn, I am dismayed by the proposals to truncate the library. It is certain to deter many from membership of Inner Temple, and to drive them elsewhere.
1,281. REBECCA HERBERT	Leicester, United Kingdom	
1,282. Mark Roscoe	London, United Kingdom	
1,283. Stephen Bishop	London, United Kingdom	
1,284. Carl Swift	Darlington, United Kingdom	
1,285. Sangita Modgil	London, United Kingdom	
1,286. Sue Grozdoski	Market Harborough, United Kingdom	My son just starting a law degree at Exeter and is also very interested in history. He's an avid reader and things like this place would be of great interest to him. Also the uk WAS known as the best justice system in the world it would be a shame to loose things like this that add to that USP.
1,287. tina conlan	london, United Kingdom	
1,288. Kakoly Pande	London, United Kingdom	
1,289. Ceri moore	Bowden road, thorpe langton market Harbo, United Kingdom	
1,290. marisa Jenkins	frodsham, United Kingdom	
1,291. Paul Clarke	Yarm, United Kingdom	

Name	From	Comments
1,292. Evie Gordon-Longley	Arundel, United Kingdom	
1,293. Philippa Daniels	London, United Kingdom	I'm one of thousands of barristers lucky enough to have spent time studying here as a student and in the early part of my career. The window bays overlooking the lawns and the river are the best place in London for quiet thought and studying - they should be preserved for future students.
1,294. peter dean	London, United Kingdom	This scheme seems utterly misguided and short-sighted
1,295. Richard Miles	London, United Kingdom	I would like to know much more about the options and the rationale before such a dramatic step is taken. Equally, as one of the Inn's Advocacy trainers it has long occurred to me that we (the Inn) could save much money by using our facilities to better effect - so there is a case for passing space to Advocacy training. The upper floor houses some fairly old tomes and isn't actually used that much. Equally it would destroy the splendour of the library to close off the top floor.... So the case for doing so needs to be very strong, with little viable alternative..... Need to know more about Option 1!
1,296. Anthony Lenanton	Wimbledon, United Kingdom	This will be a terrible loss and have a profound negative impact on the Bar and on students wishing to join the Bar.
1,297. Sheena Freeman	Swindon, United Kingdom	As an outsider who has visited the Inner Temple Library, I agree with the many people who are against Option 2. It is far more logical to build another floor, a) because it is quicker, easier and cheaper to create something new than extensively to modify an existing building, b) because it will cause less disruption to the lives of people who use the library, c) because it will protect and preserve both the library building and its contents for posterity, d) because it will take a shorter time to recoup the costs of the extension through hiring out the rooms. What Benchers need to consider is who benefits if Option 2 is implemented? Does that (presumably) private benefit outweigh the value of a national treasure and the disruption to the Profession?
1,298. Paula Thomas	Peterborough, United Kingdom	
1,299. Kelly Webb	London, United Kingdom	
1,300. Mary Aspinall	Southampton, United Kingdom	
1,301. Rebecca Rothwell	London, United Kingdom	What an outrageous proposal. This library was a life in during pupillage and continues to be so now that I am a tenant.
1,302. Angela Wright	Bromsgrove, United Kingdom	

Name	From	Comments
1,304. Susan Savage	New Malden, United Kingdom	
1,305. Dominique Smith	Bracknell, United Kingdom	
1,306. Stephanie Kenna	Bucks, United Kingdom	
1,307. Michael Widener	New Haven, CT	As a librarian at a sister library, the Yale Law Library, I urge the Inner Temple Benchers to preserve their valuable library and not gut it via adoption of Option 2.
1,308. alice herbert	sos, France	reminds one of alice through the looking glass, the wanton destruction of exactly what would draw people to the ste. Even temples are no longer sacred from the money power.
1,309. John Reynolds	Bristol, United Kingdom	
1,310. Martin Jones	London, United Kingdom	
1,311. Jason Drakeford	London, United Kingdom	
1,312. Daniel Woodbridge	West Malling, United Kingdom	
1,313. Jane Crowley	London, United Kingdom	
1,314. T. Baxendale	London, United Kingdom	
1,315. Jamie Susskind	London, United Kingdom	
1,316. Craig Rajgopaul	London, United Kingdom	The library is an invaluable resource, and a year without it will have a huge impact on barristers.
1,317. Alexander Robson	London, United Kingdom	
1,318. Martin Pal er	London, United Kingdom	I am a practising barrister who uses the library and values its resources for professional reasons.
1,319. Laura McNair-Wilson	London, United Kingdom	The library is a rich resource which I have used for the past decade plus a place of beauty. I am very sad to hear that the idiotic Option 2 is being seriously considered
1,320. Tara Vindis	London, United Kingdom	
1,321. Matthew Sheridan	London, United Kingdom	
1,322. Katherine Apps	London, United Kingdom	I used both MT and IT libraries' hard copy collections for English, Scottish, EU and US materials frequently while I was a student, Bar Student, pupil and junior practitioner. I have used them rather less frequently in the last year or <i>(continues on next page)</i>

Name	From	Comments
1,322. Katherine Apps	London, United Kingdom	<i>(continued from previous page)</i> so, but when I have I have needed rapid access to these materials for my clients' cases. IT and MT libraries collections were invaluable. Also, while I was a Bar Student and pupil, I worked frequently in both libraries. It would be a shame to lose reader space for future generations.
1,323. Stephen Grattage	Leeds, United Kingdom	Allowing students and junior barristers, as well as circuiteers visiting the RCJ, a quiet place to work is one of the most useful things our Inns offer. It would be a great shame if this institution is lost. One wonders who the Inns are really for.
1,324. Sophia Berry	London, United Kingdom	
1,325. Sophie Williamson	Basingstoke, United Kingdom	
1,326. Laura Ray	Cleveland, OH	
1,327. Sam Neaman	London, United Kingdom	
1,328. Jane Hodgson	London, United Kingdom	
1,329. Valentyna Holloway	London, United Kingdom	I have visited the Inner Temple Library. To lose this valuable resource, this historic library and it's contents would be a travesty.
1,330. Nicholas Goodfellow	London, United Kingdom	
1,331. Selwyn Bloch	London, United Kingdom	
1,332. Steve Corbett	Sutton, United Kingdom	Losing both reading room spaces and valuable and well-used displays of important texts, all for largely administrative and some commercial reasons, is a complete own goal and will result in fewer resources for practitioners and importantly students, who will be future pratcitioners
1,333. James Wynne	London, United Kingdom	
1,334. Lucy Bone	London, United Kingdom	
1,335. Clare Liggins	Bristol, United Kingdom	
1,336. Jack Beatson	London, United Kingdom	
1,337. Anne McCrossan	London, United Kingdom	This is ridiculous and must be stopped.

Name	From	Comments
1,338. Kathrin Grannemann	Bochum, Germany	
1,339. Richard Azia	Gingins, Switzerland	I love libraries. They are part of our cultural heritage and history. Libraries can inspire people to learn and to study. We need to preserve them.
1,340. Patrick Hadfield	Edinburgh, United Kingdom	
1,341. lee triming	8r8r8r, United Kingdom	
1,342. Charlotte Beatson	Oxford, United Kingdom	
1,343. Michael Maris	London, United Kingdom	As an aspiring barrister having recently been given a tour of this beautiful library, the effect of Option 2 can indeed only be described as devastating. These spaces are of utmost importance, providing aesthetically beautiful sites in which to study and research. The notion that the Inner Temple library should be converted primarily into meeting rooms and offices is worrisome and could deter young lawyers from applying to the Inner Temple.
1,345. Janet Davis	Newcastle upon Tyne, United Kingdom	It seems sheer vandalism to wreck that library, and counter-productive.
1,346. Lois Aldred	Nottingham, United Kingdom	This option would be a tragedy for the bar and those aspiring to the bar. Particular impact would be felt by those without the benefit of London chambers for whom this space is an invaluable resource.
1,347. Helen Keegan	Mitcham, United Kingdom	
1,348. Peter Paige	Borden, United Kingdom	
1,349. Sushma Ananda	London, United Kingdom	
1,350. Lydia Banerjee	London, United Kingdom	
1,351. Kaj Scarsbrook	Redhill, United Kingdom	As a pupil in Inner Temple, the loss of the majority of the library would be devastating.
1,352. Christian Howells	Cardiff, United Kingdom	I regularly use this great facility when I am listed in London. I strongly oppose the proposed changes.
1,353. Andrew Ashworth	Oxford, United Kingdom	As a bencher I urge a reconsideration of the recommendation of option 2. One of the great law libraries should be retained and not re-branded for a different use.
1,354. Timothy Mathews	London, United Kingdom	Custodians of historic libraries have a duty of care to protect them from vandalization. Their significance to research and the cultural heritage involved are more (continues on next page)

Name	From	Comments
1,354. Timothy Mathews	London, United Kingdom	<i>(continued from previous page)</i> important, and more profitable, than meeting spaces that can be created anywhere.
1,355. Iain Hughes	Winchester, United Kingdom	
1,356. Nicholas Bradley	Plymouth, United Kingdom	Having access to properly equipped library facilities is essential for legal practitioners and those who wish to study the law. The current library is such an asset and should be protected particularly in this age when there appears to be an enthusiasm to dispense with books and to rely on electronically stored data instead. Furthermore the historical value of the building and the library itself should not be underestimated and swept aside in the name of commercialism. I may not be able to access the library myself on a daily basis due to the location of my practice, but it is there should I need it and many others do use it. I am a member of Inner Temple.
1,357. Jill Halford	TADWORTH, United Kingdom	Option 2 would be vandalism of a precious legacy. I am a user of the Inner Temple Library
1,358. Nicola Green	Somerset, United Kingdom	Please protect one of the finest law libraries in the world, which has been in existence since 1440.
1,359. Andrew Lomas	London, United Kingdom	
1,360. Kit Whitfield	London, United Kingdom	
1,361. Margaret Young	Chatham, Canada	
1,362. Murray Young	Chatham, Canada	
1,363. Geraint Thomas	London, United Kingdom	
1,364. Alastair Hudson	haywards heath, United Kingdom	
1,365. Peter Todd	Milton keynes, United Kingdom	Save the Inner Temple Library!
1,366. Joanna Moore	Didcot, United Kingdom	The closure and renovation of Inner Temple library are unnecessary in achieving the education and training department's aims. Office space is available all over Temple, please repurpose something (anything!) else for your future plans and leave this important information resource and work space untouched.
1,367. Rachel Sullivan	London, United Kingdom	
1,368. Clare Duffy	Wimbledon, United Kingdom	
1,369. maria Koekenhoff	oxford, United Kingdom	

Name	From	Comments
1,370. Jennifer Clapham	Bicester, United Kingdom	
1,371. Richard Atkins QC	Birmingham, United Kingdom	
1,372. Celia Rooney	London, United Kingdom	This would be a travesty. Education should not come at the expense of the library!!!!
1,373. Joshua Levine	London, United Kingdom	
1,374. Sam Clarke	Little Compton, United Kingdom	
1,375. Sandy dutczak	broadstairs, United Kingdom	
1,376. Ronald Yeoh	Ipoh, Malaysia	
1,377. Kevin Chan	Liverpool, United Kingdom	
1,378. Alison Baccar	Ashford, United Kingdom	I am shocked this option is even being considered. Sites such as these should be protected. Option 1 is the winner hands down, don't destroy our heritage and limit these resources.
1,379. Richard Moss	Temple, United Kingdom	
1,380. Elaine Ashplant	London, United Kingdom	
1,381. Stephen Hackett	London, United Kingdom	
1,382. Richard Samuel	London, United Kingdom	The library is the soul of the Inn.
1,383. James Donovan	London, United Kingdom	
1,384. Sian Prosser	London, United Kingdom	
1,385. Benjamin Pilling	London, United Kingdom	
1,386. Alex Polley	London, United Kingdom	
1,387. Patricia Hitchcock	London, United Kingdom	
1,388. Rupert Hallows	London, United Kingdom	
1,389. catrin evans	london, United Kingdom	
1,390. Yvette Genn	London, United Kingdom	

Name	From	Comments
1,391. Adam Chambers	Temple, United Kingdom	
1,392. Adrian de Froment	London, United Kingdom	
1,393. Ned Helme	London, United Kingdom	
1,394. Niall Coghlan	Cambridge, United Kingdom	
1,395. Timothy Sherwin	London, United Kingdom	Barrister and user of the Library.
1,396. Benjamin Weaver	London, United Kingdom	
1,397. Nicholas Mercer	London, United Kingdom	It is without doubt the best Inn library
1,398. Julia Doidge	London, United Kingdom	
1,399. Shonagh Mc Aulay	Roma, Italy	
1,400. Colm Devlin	London, United Kingdom	
1,401. Steven White	Leeds, United Kingdom	The space and quietness of the library is one of its most attractive features as a working environment. The removal of so many books also suggests that there may be access issues if archived elsewhere. As a visiting user i.e. visiting from circuit this could cause difficulties.
1,402. Arthur Gardner	Warrington, United Kingdom	
1,403. Emilie Morrison	London, United Kingdom	
1,404. David Le Quesne	Jersey, Jersey	
1,405. Lynne Counsell	London, United Kingdom	Disgraceful to jeopardise such an important piece of history and learning
1,406. Jill Sutherland	Hertford, United Kingdom	
1,407. Abigail King	London, United Kingdom	As a regular (minimum biweekly) lay user of the existing library, it is vital to my professional life that the library remains open both to the profession and public as one of the most comprehensive existing compilations of law in the country. It is a necessity that this resource remains intact and as freely accessible as it is today. To diminish this amazing resource in order to provide a lesser resource for a small minority of those who will be affected by the change seems to fly in the face of the purpose of the Inns and their libraries. Please do not implement Option 2. It will devastate the library for generations to come.

Name	From	Comments	
1,408. Mark Cannon	London, United Kingdom	I use Inner Temple Library for legal research. It is an invaluable resource which should not be diminished.	
1,409. Julie Weaver	London, United Kingdom		
1,410. Milles Harris	London, United Kingdom		
1,411. Leigh-Ann Mulcahy	Solihull, United Kingdom		
1,412. Jamie Smith	London, United Kingdom		
1,413. Carl Troman	London, United Kingdom		
1,414. Graham Eklund	London, United Kingdom		The alleged benefits do not outweigh the clear disadvantages.
1,415. Hamid Khanbhai	London, United Kingdom		
1,416. Mathew Gullick	London, United Kingdom		
1,417. Marie-Claire O'Kane	London, United Kingdom		
1,418. Fiona Sinclair	London, United Kingdom		
1,419. Catherine McArdle	Please select..., United Kingdom		Inner Temple Library must be saved as a resource for future members of the legal profession
1,420. Christopher Greenwood	London, United Kingdom		
1,421. Pippa Manby	London, United Kingdom		
1,422. Glen Tyrell	London, United Kingdom	A quiet place with the law reports and textbooks to hand, is an invaluable resource for student barristers. When I was doing my Bar examinations it was the only place I could work (I was living on a boat at the time).	
1,423. Mehdi Baiou	London, United Kingdom		
1,424. Nehali Shah	London, United Kingdom		
1,425. Michael d'Arcy	London, United Kingdom		
1,426. Michael Fealy	London, United Kingdom		
1,427. Orlando Gledhill	London, United Kingdom	I am opposed to option 2, which I think would spoil a beautiful library, which is a great place to work and do research.	

Name	From	Comments	
1,428. Abra Bompas	London, United Kingdom	The library provides an invaluable resource for barristers. I regularly use its facilities, and if the library were to closed for an extended period, or a significant number of its books be put into storage, the value of the resource would be greatly diminished.	
1,429. Craig Orr	London, United Kingdom		
1,430. Craig Ulyatt	London, United Kingdom		
1,431. Rachel Oakeshott	London, United Kingdom		
1,432. Oliver Butler	London, United Kingdom		
1,433. Alexander Brown	London, United Kingdom		
1,434. Eleanor Campbell	London, United Kingdom		This is the loveliest and best stocked of the libraries of the Inns and the proposed plans would greatly reduce its utility as a resource and working space.
1,435. Emma Jones	London, United Kingdom		
1,436. Henry Smith	London, United Kingdom		
1,437. Rhodri Davies	London, United Kingdom		As a regular user of the library from another Inn, this petition has my fervent support.
1,438. Douglas Paine	Temple, United Kingdom		
1,439. Simon Gilson	London, United Kingdom		
1,440. Clementine Paine	Basingstoke, United Kingdom		
1,441. Georgina Petova	London, United Kingdom		
1,442. Paul Henton	London, United Kingdom		
1,443. Saira Paruk	London, United Kingdom		
1,444. stephen cogley	london, United Kingdom		
1,445. Andrew Guy Blackwood	London, United Kingdom		
1,446. Pauline Roberts	London, United Kingdom	I cannot believe that IT are seriously considering such a radical overhaul of such a beautiful building. It will be a complete travesty of IT's values if this is allowed to go through.	

Name	From	Comments
1,447. Greg Rose	Letchworth, United Kingdom	
1,448. Nicola Shaldon	London, United Kingdom	
1,449. Andrew Carruth	London, United Kingdom	
1,450. Andrew Leung	London, United Kingdom	
1,451. Hannah Sanderson	London, United Kingdom	
1,453. Sue Graham	Alresford, United Kingdom	This Library is really important both historically and as a leading information resource.
1,454. Richard Scott	Brentwood, United Kingdom	
1,455. Neil Coe	London, United Kingdom	<p>I am particularly fond and proud of the Inner Temple buildings and estate, as during my 7 years in the Surveyors Department, I helped carrying out numerous and sensitive conservation, restoration and refurbishment projects to its vast array of wonderfully historic and architecturally significant properties and grounds. It is therefore with extreme dismay to hear of the proposed gross overdevelopment of the Treasury Building and Hall, with the resultant near total destruction of the finest of libraries, which has been in continued use for over 500 years.</p> <p>Scheme 1 to add mansard roof accommodation, over the Library and Hall, has some merit as the original plans by the architect Henry Worthington envisaged this, but it was not constructed after the war due to cost restraints. However, the recent requirement of the planners to limit the height of the proposed new mansard apparently means the existing structural roof slab over the Library has to be lowered, thereby requiring the removal of the refined main ceilings below, and effectively putting the Library out of use for over a year. The simple alternative of craning in mansard modules to sit on top of the existing flat roof, and no/minor disruption to the Library appears to have been lost, perhaps intentionally to make Scheme 2 appear fractionally less monstrous.</p> <p>Scheme 2 to add the same destructive mansard roof, the loss of the entire Gallery floor and hence the beautifully proportioned double height Reading Rooms with their delightful functionality, ambience and quality craftsmanship, together with the complete loss of principle Reading Rooms to insert an auditorium, is almost beyond belief. The whole scheme is seriously misconceived and should be aborted.</p> <p><i>(continues on next page)</i></p>

Name	From	Comments
1,455. Neil Coe	London, United Kingdom	<p><i>(continued from previous page)</i></p> <p>There would appear to be no business case to justify Scheme 2 and little to commend Scheme 1. The Inner Temple has a large and varied estate, and space could be found elsewhere for Education & Training and/or Advocacy Training. If the Inn really needed an auditorium, then why did it knock down Nibblet Hall, and not incorporate a new one within Littleton Chambers. Finally, if the Inner Temple is so desperate for additional space, that it is contemplating trashing its own core and years of disruption, then perhaps it should consider the rebuilding of the Lamb Building instead (which used to stand in Church Court) to house these extra functions. It would be controversial for certain, be quick and cost effective, and could even be the first truly modern building of exception quality to be built within the Inn.</p>
1,456. Fiona McLean	thornton heath, United Kingdom	
1,457. Karyn Gladwish	Canberra, Australia	the loss of libraries and their resources is a loss not only to the history of a nation/country but also to the iconic and vital information resources for legal research
1,458. nicholas strauss	london, United Kingdom	
1,459. Katharine Calder	Edinburgh, United Kingdom	
1,460. Edward Ebdon	Llanarth, United Kingdom	
1,461. John O'Donovan	Barcelona, Spain	
1,462. Corinne Iten	Winchester, United Kingdom	Even in the age of online resources, a physical library with enough space to sit and read is essential, particularly for students and pupils. When I started out, the Inner Temple Library was a haven of tranquility and a complete life saver. The current and future generations of students and pupils must not be deprived of its full benefits.
1,463. elfi metz	NES, Germany	
1,464. Michaela Evans	Aberystwyth, United Kingdom	
1,465. Michael Gray	Newton-le-Willows, United Kingdom	
1,466. Julla Lewis	London, United Kingdom	
1,467. Vivienne Sedgley	London, United Kingdom	
1,468. Vivienne Alp	London, United Kingdom	This is a very historic library and of great use to the chambers it would be a shame to see it reduced in such a way.

Name	From	Comments
1,469. David Shaffer	London, United Kingdom	
1,470. Farhana Mukith	London, United Kingdom	
1,471. Allie Lustigman	London, United Kingdom	
1,472. ann helm	lafayette, OR	
1,473. Robert McKay	london, United Kingdom	
1,474. Sahar Bhaimia	London, United Kingdom	
1,475. Anastasia Cohen	Ashford, United Kingdom	Being a collector of old books it would break my heart to see our heritage and tradition slip away page by page in the name of progress. Libraries have throughout history been most precious centres of learning and history. Lets hold onto this one in its entirety.
1,476. Graham Partridge	Alfreton, United Kingdom	
1,477. Julee Carroll	London, United Kingdom	
1,478. Caroline Budden	London, United Kingdom	The Inner Temple library is a place of great beauty and a much valued resource for all members and tenants of the Inn. I was interested in the comments of Neil Coe given his experience of working in the Inn. I understand the need to provide a modern facility for education and training but feel sure a plan can be made that does not have such a devastating impact on the library.
1,479. amanda mckenzie	Northampton, United Kingdom	
1,480. Paul Cross	Newcastle upon Tyne, United Kingdom	
1,481. Jacqueline Lyon	Uxbridge, United Kingdom	
1,482. Penelope Draffan	Oxford, United Kingdom	I cannot believe that such sacrilege can be envisaged. How could this proposal even have got on the table? What about our history, our heritage, of which we are so proud? What is the point of educating potential barristers if they will not have this quiet, tranquil space full of every source of information you could want, to work in? I have known and loved this place for 36 years and to emasculate it would be a tragedy which should not even cross the mind of our governing benchers.

Name	From	Comments
1,483. Fionn Pilbrow	London, United Kingdom	
1,484. Jeremy Ford	Harleston, United Kingdom	
1,485. Caroline Ford	Sheffield, United Kingdom	
1,486. Steven Flynn	Manchester, United Kingdom	
1,487. Peter Gilmour	Manchester, United Kingdom	As a barrister based in Manchester, I use the library when in London and would be very disappointed to see it turned into meeting rooms that will not benefit me or others like me.
1,488. Philip Andrews	Manchester, United Kingdom	
1,489. Natalie Connor	London, United Kingdom	
1,490. Charlotte Mackenzie	Kenley, Surrey, United Kingdom	
1,491. Peter Nicholas Price	York, United Kingdom	
1,492. Zahra Baqri	MANCHESTER, United Kingdom	
1,493. Corinne Smith	Ilford, United Kingdom	
1,494. Martin Budworth	Manchester, United Kingdom	
1,495. david geey	Liverpool, United Kingdom	
1,496. C Middleton	Liverpool, United Kingdom	
1,497. Nicholas Davies	Temple, United Kingdom	I am a frequent user of the library mainly for its textbooks and would be very disappointed if this resource and the space for study was reduced to the extent envisaged by Option 2.
1,498. Margot Sanderson	Burwash, United Kingdom	
1,499. Pek Lan Bower	Beckenham, United Kingdom	As a former government librarian, I strongly feel that the loss of such a huge portion of the Inner Library's stock due to this action will be irreparably damage information services to the legal profession. Furthermore, the unique environment of this historical library will be destroyed for future generations of legal researchers and practitioners, and will also be a devastating blow to architecture historians.

Name	From	Comments
1,500. Rose Harvey	London, United Kingdom	
1,501. Concerned Citizen	NEW CITY, NY	
1,502. Richard Beynon	stansted Mountfitchet, United Kingdom	
1,503. Gaurav Srivastava	London, United Kingdom	
1,504. Pat Wu	Hong Kong, Hong Kong	
1,505. Edward Cazalet	East Sussex, United Kingdom	In my view a disasterous plan for our beloved Inn
1,506. Debbi Smith	WEST FRANKFORT, IL	
1,507. David Ibbetson	Cambridge, United Kingdom	
1,508. Andrew Post QC	Temple, London, United Kingdom	
1,509. Liz Morris	WADE HEADS WHANGAPARAOA, New Zealand	As a librarian myself, all libraries are temples of knowledge. This library MUST be preserved.
1,510. James MacGee	Auckland, New Zealand	
1,511. Gabrielle McAvock	London, United Kingdom	
1,512. David Gottlieb	London, United Kingdom	
1,513. Emma Lodge	London, United Kingdom	From a legal librarian's perspective, this library is a national asset and should be retained in full. Training rooms can never replace the knowledge a good library can give.
1,514. Zee Wan	Ely, United Kingdom	
1,515. Pem Tshering	Durham, United Kingdom	
1,516. Kathryn Blair	London, United Kingdom	
1,517. Ellen Robertson	London, United Kingdom	
1,518. Valerie Leonard	Monroe, NJ	
1,519. Liza Red	Zwijndrecht, Netherlands	
1,520. Lesley Neenan	Woodford Green, United Kingdom	

Name	From	Comments
1,521. Alex Mez	Nassau, Bahamas	<p>As a practitioner in a Commonwealth jurisdiction, it is unsurprising that some of our laws mirror historic English legislation. Such provisions, that may be "archaic" by UK standards, remain relevant and current to Commonwealth jurisdictions including The Bahamas.</p> <p>The resources available as well as the staff at the Inner Temple Library have been indispensable in providing valuable research into the rationale behind legislation (where its counterpart was previously amended or repealed over the past decades in the UK). Having easy access to such old authorities continues to provide real insight into current Commonwealth legislation which modern authorities often neglect.</p> <p>It seems a great shame that so many books may be displaced from daily use as a source of reference in the main part of the Library when their worth may be unexpected and underestimated. If Option 2 is adopted, it goes without saying that many who rely on the Library will have to go cap-in-hand to other Inns for a service that should be provided by our own.</p>
1,522. Michael Brace	LONDON, United Kingdom	
1,523. Dan Tobin	London, United Kingdom	
1,524. Zena Easman	Romford, United Kingdom	
1,525. David Webb	London, United Kingdom	
1,526. Christine Coletti	Romford, United Kingdom	
1,527. Del Banham	romford, United Kingdom	
1,528. Emily Pumfrett	Norwich, United Kingdom	
1,529. Victoria Simpkins	Romford, United Kingdom	
1,530. Theresa Thom	London, United Kingdom	
1,531. Joanne Rook	Sandy, United Kingdom	
1,532. Sian Heath-Halley	Solihull, United Kingdom	
1,533. Sharon Pegg	Norwich, United Kingdom	
1,534. Julia Saniuk	Oakbank, Canada	

Name	From	Comments
1,535. Gay Jenkins	London, United Kingdom	
1,536. Anne Carrington	Stockport, United Kingdom	
1,537. julie smith	Bradford, United Kingdom	
1,538. essa jallad	TAPPAN, NY	
1,539. Andrew Smith	Bradford, United Kingdom	
1,540. joanna Cowell	Chichester, United Kingdom	
1,541. Jennifer McBride	London, United Kingdom	
1,542. Andy Fellows	Leeds, United Kingdom	
1,543. Aine Astbury	Birmingham, United Kingdom	A worrying prospect that such an immense and important resource can be threatened in such a way.
1,544. Cera Vaughn	Baytown, TX	
1,545. Kate Chandler	London, United Kingdom	
1,546. Bruce Houlder	London, United Kingdom	
1,547. Carol Tullo	London, United Kingdom	
1,548. Stephen Parish	Winchester, United Kingdom	
1,549. Kate Davey	London, United Kingdom	
1,550. Jordan Perris	Grimsby, Canada	<p>Were all fighting the good fight, trying to make the world a better place, so please help to spread the word. We can no longer afford to remain silent when we have something to say, we can do longer afford to remain passive when action needs to be takin, we must do what we can, what is best for each of us with what we have so that we can help to set a solid foundation for future generations to stand upon:</p> <p>You want to know how to make world peace a reality, well, here you go folks :)</p> <p>Along with food forests, wire/tunnel like structures over sidewalks made of material that will not rust and stuff that have food and other plants growing/wrapping around them making for a beautiful walk and plenty of free food that you can grab along the way, countless things can be done to cities/buildings/etc to green things up, multi storied/layered (continues on next page)</p>

Name	From	Comments
1,550. Jordan Perris	Grimsby, Canada	<p><i>(continued from previous page)</i></p> <p>plant troths/trays/pots, gardens, etc many people around the world can grow enough food in there backyards and cities to more then feed the entire populous, you can have multi layered gardening/growing/food trays, trays placed on walls, growing ops in houses/buildings, on walls and so on with the proper lightings (And yes we can build underground and in other cool areas too for those who wish to do so).</p> <p>There is more then enough room for greenery and the lot and we will have several times more then enough green energies/power/etc, as well as water/liquid/food for everyone/thing (With no money there is no worries about processing the salt water and converting it to fresh water through desalination plants and other methods like reusing/recycling your own water, complex/flexible/highly effective and pyramid +Self moving automated solar panels and magnifying glass like effects and complex wind turbines and countless other things with systems/methods and so on that would cost an absolute fortune back in the days of money that people can now actually use and have many do at home methods and there will be more then enough changes made to allow for people to figure out how to make sure that we no longer require pesticides and other harmful things and that rabbits and other creatures do not eat/ruin/destroy everything and get out of control with population, diseases/etc, so that we can all, humans and non humans alike properly benefit and have full lives, not to mention all of the water recycling/reusing methods and all the rest of it that will be put into place for everyone - No more money folks, no more money)</p> <p>Plus many more non polluting energy sources/etc to support everyone with a comfortable lifestyle, including the once homeless/etc who will be living in what were once banking/corporate buildings/etc/etc, these buildings and other structures/etc being converted into living spaces and other useful outlets for true/guaranteed sustainable living for all (there will be no more insane waste of space/resources and all the rest of it and just here on Earth alone there is far more then enough materials/etc for everyone and we can clean up our mess and make this planet better then it has ever been) and speaking of space, yes we should pay attention and learn from it, as in having enough professionals/equipment to monitor 100% of the skies for killer rocks and other dangerous cosmic activities and have more at tenting on plans to take care of an otherwise lethal situation, to be healing/monitoring the earth/ourselves/life, we can explore Mars and the rest of it later once we have solved enough of our own troubles. You've got all kinds of web services that allow you to</p> <p><i>(continues on next page)</i></p>

Name	From	Comments
1,550. Jordan Perris	Grimsby, Canada	<p><i>(continued from previous page)</i></p> <p>design your own home, gardens and countless other things, including ideas/inventions and the likes, those along with schooling/teaching websites with different courses, hobbies and so on and so forth can all be easily available to us (obviously not a how to guide on how to build a nuke and such) and managed by the experts in those said fields so that you know all the info you are getting is legit.</p> <p>Peace is great yet we should not let down our guard all the same as others may be just biting their time and waiting for the perfect moment to strike with their nukes or what have you, but no worries I am certain that in the not too distant future that we will all be able to manage everything and not have to worry about such things.</p> <p>Transportation, not a problem, especially with so many brilliant minds finally being freed up to make it greener/better/etc for us all, plus with so many people being much more community based, in their own towns/homes/cities so to speak we will not be needing to use transport so much, besides how many drive back and forth to jobs that are not even needed or farther away then they need to be (Many jobs out there today should already be obsolete "not the skills of the workers just the jobs" and as for the ones that are truly vital there will always be more then enough people with more then enough skills who love the vital ones/will be more then happy enough to take care of them and us as a whole are naturally a cooperative species and long to share our talents, be with others and just help one another out and even now tons of people volunteer and help others, the community/etc who still have jobs and especially when we are free things will be far better then they are now, which is what will happen when we stop using money and move passed the monetary system) and the rest, we will take care of, handle things/help each other as a community, so it wont even be an issue (We'll figure everything out together)</p> <p>Not to mention the countless materials (Such as all of the plastics, rubbers, glass, metals/etc/etc/etc) that have been tossed (Including many that currently cannot be recycled) wish can be used for countless things and several people with very creative minds in their field will continuously think up awesome Ideas/innovations to keep things advancing/going and have continuous, inventions/innovations/creativities that will be so vast and as we truly enter this new resonance era.</p> <p>We can have greenhouses and other stuff galore and we don't have to give up chips, pop, pizza and countless other great things, plus scientists have already created bacon from stem cells and it wont be long before medical science</p> <p><i>(continues on next page)</i></p>

Name	From	Comments
1,550. Jordan Perris	Grimsby, Canada	<p><i>(continued from previous page)</i></p> <p>can do the same for all body parts, no scars or nothing, perfect health and immortality if we wish it and vitamins can be automatically added to foods/drinks/etc to best meet our individual needs (3D printers can create the parts needed to self replicate themselves and even print edible food) and we can even have more grocery stores then ever before with all the good stuff while still keeping things tasting great without the chemical and all the cheeping out that so many do to save a buck, soon having humane dairy/meet/etc created in the lab then in the comfort of your own home...so many countless/awesome things can be done for the world today (One of many other things that can be done, well, those beautiful/fancy ice hotels/sculptures/etc, many can be made in areas where they will not melt).</p> <p>With so many brilliant minds free to invent/improve things by continuous leaps and bounds without the countless atrocities/sufferings of money/greed, creativity/life/etc will truly keep evolving by never ending leaps and bounds, but like Egypt there are most likely going to be undercover people and others hired to try and make things worse, people rioting, wars started by propaganda and the likes, so we must keep our heads together and our hearts strong, love will win and we must not fall pray to the bullshit of the few (Percentage wise, there are very few people on earth who are committing crimes and far more who are keeping the peace, and given the way things are today, that tells me that we will make it, we are a smart/caring/cooperative/peace loving species), and as for those few who are trying to keep us in the dark they will not want to loose this current system and will fight till the end and cause as much fear and the likes that they can to try and keep it, so no matter what fear, rumours, false footage, reports/etc that they spew out and events that they try to create, we can't fall pray to hate and revenge, we cant be the fuel that feeds their flame, we can not give those with deadly weapons reasons to use them.</p> <p>Also, what they teach in schools you can find on the internet, which in turn can be far better structured to make it easy to find/study what you wish with plenty of online discussion forms/help available as well as your community/etc - Doctors and such you will need hands on training as well, but what I am trying to say is most everything does not require that you have to be present in an actual classroom and this can leave even more areas that can be set up for the gifted inventors, thinkers, futurists and so on to come up with new/improved ideas/inventions/etc for those that prefer not to work from home. We can all have seeds/food/plants that can grow</p> <p><i>(continues on next page)</i></p>

Name	From	Comments
1,550. Jordan Perris	Grimsby, Canada	<p><i>(continued from previous page)</i></p> <p>each year, produce seeds of their own/etc, empty lots/etc can be planted/forested (Best to go by natures rules/growth patterns/etc for planting trees and so on as well as repairing areas and reintroducing native plants/species/etc and Masanobu Fukuokas Seed ball method as well as his natural farming techniques are great and so is the homegrown revolution, amongst many others) and places set up where innovators can invent, talk and get what they need, to also work from home if they wish.</p> <p>In todays' world we have more than enough resources and smarts at our disposal to make much more wondrous lives for every human being while being able to give the very best of care for all of the suffering (Even if our population was to suddenly double overnight) while still maintaining a very healthy planet, and yes, it is true, we could still make this world far better then it has ever been for humans and non humans alike even if there were roughly 15 to 20 billion+ people in the world today and we will always be able to continue to keep life awesome for all generations to come.</p> <p>So awesome in fact that that we may have to use a new word to describe this beyond awesome state, and/or possibly even this new era, maybe something like this one that I thought up, "Phosomanceess" - pronounced as "Faw-Sohm-An-Sisss/Fawsohmansisss :)" (A cross between "Phoenix, Awesome, Om, Renaissance and the hissing sounds of a species once hated/feared by many, know as Snakes") Definition: A state/place of continuous transcendent evolution :)</p> <p>I for one would weep to no end if humanity as a whole were to abandon technologies, science/etc/etc as they are (As far as I am concerned) absolutely vital keys to our quality of life, salvation and continuing ascension, completion, awesome lives for the world over, for true freedom and so much more (Someday, because of them we ourselves can become everything that we need so that we will no longer need many of these things, but for now and for a while to come, I say, let those of us who want tech/etc embrace and continue to benefit from all of these things and in turn make lives as best we can for everyone in every way that they wish while remembering to keep their lifestyles/beliefs/etc in mind, lets go wild with museums, amusement parks, religious/holy structures and countless other life enriching/enhancing things.</p> <p>As for posting videos and other stuff, so long as you don't plastering your name on other peoples photos/etc you should be allowed to post whatever videos you want (Including music, news/etc videos, again, so long as you</p> <p><i>(continues on next page)</i></p>

Name	From	Comments
1,550. Jordan Perris	Grimsby, Canada	<p><i>(continued from previous page)</i></p> <p>don't plaster your name/credit on them) and to also post your own video creations (Even if you use others photos, clips/etc and giving yourself credit for creating the video is fine just so long as you don't claim that you created those individual pics/clips/etc if they are not of your creation) and if people state that they don't want you to use/post their material for obvious and legit/non crap and non monetary reasons then their personal/etc materials should be kept to them and just having stuff posted on the net, especially if its for the world too see runs the risk of others finding and using it. Also, like so much other stuff, aside from the obvious stuff most of us shouldn't have/etc, everyone being able to have the computer programs/software/etc/etc/etc of their choosing including otherwise outrageously expensive ones, the sky is no longer the limit, remember, money is no longer an issue) When things are truly changing, people will truly be able to heal/bleed out the emotional bullshit and free themselves/there minds, life will be very fulfilling and far from boring for you guys without money, to start there will be countless activities/tasks/things to keep you preoccupied whenever you want to do something, not to mention the joys of working together knowing that your helping to clean up the planet and doing countless feel good stuff, help other people/creatures/plants/etc and with people having far more freedoms to invent, create and improve life/etc things will only continue to get better for us as we will in many respects connect like we have connected before and be like one gigantic native american indian global type of community, we will at last know/feel true/real freedom the world over.</p>
1,551. Mariana Lukacova	Moldava, Slovakia	
1,552. Kamma Westenholz	København Ø, Denmark	
1,553. Jennifer Roberts	HILL AFB, UT	



Bhakti Depala,
Case officer,
Department of the Built Environment,
City of London,
London EC2P 2EJ.

2 March 2017

Dear Ms. Depala,

Ref: Planning Application 17/00077/FULMAJ Inner Temple Treasury Building

I write to record my support for this planning application.

I have been a member of the Honourable Society of the Inner Temple since 1978. I am a Bencher of the Inner Temple and a practising barrister who uses the library on a regular basis. I have been an advocacy trainer for Inner Temple for many years and I am a member of its Advocacy Training Committee and of its Outreach Committee.

I have studied the plans and I have visited the exhibition at the Inn, in order to refresh my memory of the details and of the impact of the project on the Library, on the Inn and on the Temple.

In my view the proposed development would improve the external appearance of the Treasury Building and enhance its standing within the conservation area. It would not impinge negatively on any of the buildings around it; to the contrary, it would be even more in keeping with the surrounding buildings than it is currently.

Inner Temple needs a high quality advocacy training and teaching facility to meet the needs of its students, pupils and other members in the rapidly changing legal world. Several years have been

spent in seeking to develop the teaching facility we need elsewhere in the Inn or close to it. We cannot afford to wait any longer. Our own facility at the heart of the Inn is required urgently so that we can continue to maintain our primary purpose of providing education and training for the Bar.

As an advocacy trainer I am aware that the quality of training that we deliver is being compromised by the inadequate facilities and I believe that Inner Temple faces a shrinking intake of students unless the situation is remedied as soon as possible.

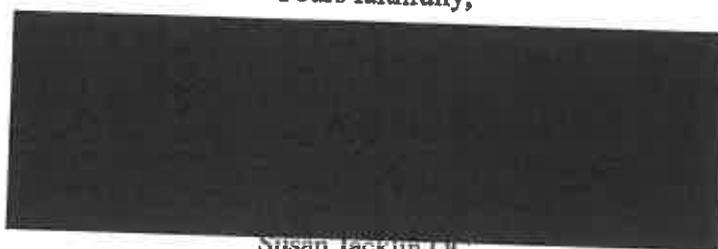
The cost of training to become a barrister has become prohibitive and is having an adverse effect on the diversity of intake into the profession. The proposed development would enable Inner Temple to participate in the provision of more cost-efficient training and thereby enable more young people from economically disadvantaged backgrounds to enter the profession.

As a user of the library I am confident that all of the resources and facilities would be preserved. The space in the gallery and rooms H and J are not needed in terms of accommodating users of the library. In the period of nearly forty years during which I have been using the library I have been up to the gallery on only a handful of occasions and rarely have I seen others using it.

There is no doubt that the Inner Temple Library is beautiful and much admired. The loss of the gallery would cause me some sadness. I thought carefully about such a loss when considering whether or not to support 'Project Pegasus' when Benchers voted on the issue.

I have thought about it again and also considered the paper submitted by Richard Humphreys QC. I have arrived at the same conclusion: that the provision of a modern and comprehensive training facility in the Inn and the wider improvements to the Treasury Building embodied in this planning application would bring benefits to the conservation area as well as to members of the Inn that reach far into the future and outweigh the loss of the gallery and rooms H and J.

Yours faithfully,

A large black rectangular redaction box covers the signature area.

Susan Jacklin QC

Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 03 March 2017 15:26
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.
Comments were submitted at 3:26 PM on 03 Mar 2017 from Miss Susanna FitzGerald QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Miss Susanna FitzGerald QC
Email:
Address: One Essex Court Temple London

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Reasons for comment:
Comments: I am a Bencher of Inner Temple and I wholeheartedly support the proposed project. It is vitally important that the Inn moves with the times and provides proper, indeed excellent, facilities for teaching for its students

and barristers, as education and training are central to the purpose of the Inn. These facilities are seriously lacking at the moment. The extended roof with its vertical dormers will add to the Treasury building not detract from it. The vertical dormers are in keeping with the rest of the building and with other buildings in the Inn's estate, and will provide good daylight to those using the new rooms. The lift shaft in the far corner of Church Court will not impinge on or spoil the surroundings of Temple Church.

I use the library and I have rarely found more than about 10 people working there during the day with a few more at lunch time and shortly after court. Most of those in the library were using the Inn's computers rather than accessing the books and that is the modern way of study.

Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 03 March 2017 12:56
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 12:56 PM on 03 Mar 2017 from Miss Raquel Agnello QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Miss Raquel Agnello QC

Email:

Address: Erskine Chambers 33 Chancery Lane London

Comments Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: The Inn has been in desperate need of increased and improved education facilities. Education is the focus and the core function of the Inn and currently those needs are simply not met. The current proposal is so impressive in being able to meet those requirements as

well as retaining the traditional and historic feel of the building. In particular, the proposal enables the original vision for the building to be realised but alongside other key alterations which enable the building to be fit for its purpose moving into the future. I am strongly in favour of the proposal.

From: Depala, Bhakti
Sent: 06 March 2017 18:17
To: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 03 March 2017 17:23
To: Depala, Bhakti
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 5:23 PM on 03 Mar 2017 from Mr Michael Spencer.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sul generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooftop; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Michael Spencer
Email:
Address: 2 Crown Office Row Temple London

Comments Details

Commenter Type: Neighbour
Stance: Customer made comments in support of the Planning Application
Reasons for comment:
Comments: I am writing as a past Chairman and present member of the Inner Temple's Pegasus Project. I was for 5 years the Chairman of the Inner Temple Estates Committee and it

was under my chairmanship that the Inner Temple embarked on its search for proper accommodation and facilities for student and young barrister education and training some 5 years ago.

The Pegasus Project, a proposal to build a roof-top extension to the Inner Temple Treasury and to bring that and part of the existing library space into use as an education and training facility, comprising an auditorium, seminar rooms and conference/office accommodation is the third attempt to create the space within the confines of the Inner Temple that the Inn needs for the education and training of prospective and young barristers. The two sites identified and explored prior to choosing the Treasury Building proved not to be workable either in terms of engineering or in terms of planning or both. It is clear to the Inn that the only possible site for this much needed accommodation is the Treasury Building. The building itself has planning protection given its position within the Temple Conservation Area. The City planning department has expressed approval in principle of the roof-top extension and has no real interest in how the interior of the building is configured. The Inn decided at a special Bench Table meeting of the governing Masters of the Bench last autumn to proceed with the scheme. The Inn is governed by its Royal Charter granted just over 400 years ago by King James I. One of the principal objects imposed on the Inn by the Charter in return for the grant of its lands is the Education of its Students and Barristers in the Laws of the Realm. Clearly the provision of library facilities has always been regarded by the Inn as necessary for the fulfilment of this core object. It is not surprising then that after the destruction of the Treasury Building and library by enemy action during WWII the Inn expended very substantial sums on constructing a new Treasury Building containing a fine library to contain the Inn's books. The size of the library reflected its anticipated usage at the time. Thus it contains individual seating for over 100 readers. However the arrival of electronic transfer of written material has resulted in minimal use of the facility. In a survey of library usage conducted about 5 years ago the maximum occupation of the library never exceeded 20 readers, even at the busiest times. Our proposal for remodelling the library would still leave about 85 readers' seats. However I believe that the Inn's governing benchers who approved the library construction after the war would have been mortified had they realised that the facility they constructed and the money expended would be such as to prevent future development. Had they appreciated that risk, I am sure that they would have constructed a very different facility at far less expense, permitting more flexibility of use and occupation as required by changing needs. It would be a terrible irony if the Inn were to be prevented now from fulfilling its core objects because of its own munificence in seeking to fulfil the same object after the war. The effect of this could be profound. The Inn would fall well behind the other Inns in the provision of proper facilities for its students. The students would vote with their feet and join the other Inns all of whose facilities are or will be vastly superior. If this were to happen the Inn would

slowly die.

So I urge the Planning Committee not to prevent the Inn from pursuing this essential development by what would in effect be a listing of the library. The Inn should, so far as possible, be left to decide for itself how its facilities should be best used in furtherance of its core objects. The Inn has decided to develop part of the library space to provide a centre for education and training of its students and young barristers at an estimated cost (including the roof-top extension) of about £20m, while leaving a library facility that will still be the envy of most other institutions. The proposed extension at the top of the building is elegant and reflects the original design of the building left unconstructed by money shortage after the war. It completes rather than challenges the setting within which it will be placed. A decision to allow this limited expansion in order to fulfil the Inn's quasi-charitable object would have attracted the approval of the government of the day at the time of the grant of the Royal Charter, and is equally worthy of wholehearted support from the City of London today.

17/00077

Apartment 141
8 Kew Bridge Road
Brentford
Middlesex
TW8 0FG

Chairman
Planning Committee (Dept of the Built Environment)
City of London
Guildhall
PO Box 270
London EC2P 2 EJ

March 4, 2017

Dear Chairman,

Planning application 17/00077/FULLMAJ by Inner Temple

I am writing to express wholehearted support for the detailed objections made by Mr Richard Humphreys QC, a Master of the Bench of the Inner Temple, to the application by the Inn for planning permission to carry out extensive building works to the Inner Temple law library. I have read Richard Humphreys' representations in full and agree with every word.

I am not a planning expert and don't believe I can improve on what Richard Humphreys has said. However, I would like to add a few personal observations. First, I am a member of the Inner Temple and have been for 30 plus years. Secondly, I have used the library on countless occasions over the years. Thirdly, it was only by a narrow majority of the governing benchers of the Inn who voted that this proposal was passed. The governing benchers are only a tiny fraction of the membership of the Inn as a whole. I have no doubt that, had the membership as a whole been consulted, the overwhelming response would have been against the proposal. In 2015, a petition in opposition to the proposal attracted approximately 1,500 signatures from a huge range of people, both in the United Kingdom and from around the world. I would urge you to take this into account.

Fourthly, I have been "in the law" and using law libraries for almost 50 years now, having commenced my undergraduate law degree in 1968. I have had the opportunity to work in many fine law libraries, including the libraries of all four Inns of Court, all the University of London law libraries, the Squire Law Library in Cambridge and the library of the Institute of Advanced Legal Studies. I have no hesitation in saying that the finest of them all is that of the Inner Temple. As a haven of tranquillity, with its peaceful atmosphere, it has always

been conducive to serious study, often for hours on end; its rooms benefit from an abundance of natural light; and the double-height galleried rooms are a thing of beauty that should be preserved at all costs for the benefit of generations to come.

Removal of the galleries in the way that is proposed would in my opinion be an act of gross vandalism. The project is being pushed in the name of "education and training". The reality is that it is being dressed up as "education and training" when in fact it is the commercial conference business that is being sought. The most important requirement for a sound legal training is not a fancy lecture theatre, but a fine law library.

I therefore very much hope that your committee will reject this unworthy application.

Yours sincerely,

James Richardson Q.C. (Hon.)

PLANNING APPLICATION 17/00077/FULMAJ

SUBMISSION TO THE CITY OF LONDON PLANNING COMMITTEE

SIR STEPHEN SEDLEY

1. I have been a member of the Honourable Society of the Inner Temple for more than half a century, a bencher for almost 30 years and, in that capacity, Master of the Library from 2004 to 2010. I was a judge of the Court of Appeal until I retired in 2011, when I was appointed a visiting professor of law at Oxford.
2. This submission is made by way of objection to the grant of planning permission to the Inner Temple for the redevelopment of its Treasury Building, of which the library forms a central part. I accept that change and development are a recurrent need for any institution, but the impact of the proposed development on the Inner Temple's library is, in my respectful submission, unjustified and unacceptable.
3. For the reasons set out in his written submission by Richard Humphreys QC, the Library plainly ranks as a non-designated heritage asset. It is accordingly entitled to particular consideration in the planning process, to the extent that unjustified or disproportionate harm to it may constitute grounds for rejection of the scheme.
4. The harm which the scheme will do to the Library is manifest from the before-and-after illustrations appended to paragraph 33 of Mr Humphreys' submission. The entire two-storey space will be truncated by a false ceiling; the great access of light from the windows looking south over the Temple gardens and north to the Temple church will be impoverished; and the uniquely fine balustraded galleries which form the upper part of the library will be destroyed.
5. This is to be done in order to install a lecture theatre for which no sufficient need has been demonstrated. Bar students being trained in advocacy need a courtroom (of which a large number are readily available on the other side of the Strand), not a lecture hall. Although its use for hire has been canvassed, there is no quantified evidence of demand and no business plan to support it. While no doubt uses can be found for it, a lecture theatre of this magnitude is not a demonstrated need capable of justifying the partial destruction of the Library.

6. As to the value of the Library as a heritage asset, I fully endorse and will not repeat all that Mr Humphreys and Save Britain's Heritage say about it; but I take the liberty of appending to this submission the paper submitted to Historic England by four recent Masters of the Library in support of listing. (As Mr Humphreys notes, an application for review of the refusal to list the Library is at the time of writing undetermined.) Attention is invited in particular to paragraphs 4-5, 11-14 and 18-22. The remark in the paper that none of the four signatories knows of a handsomer law library anywhere in the world is not rhetoric: between them the signatories have worked in or visited a large number of law libraries in the common-law world, including of course those of the three other Inns of Court. The British and Irish Association of Law Librarians endorsed this view.
7. The truncation of the Library's elegant vault by the insertion of a false ceiling and the destruction of its balustraded galleries would be an irreparable loss, aesthetic, cultural and historical, requiring a level of justification which the Inner Temple's application entirely fails to supply.
8. May I add two further points:
 - (a) It is unfortunate that the Conservation Area Advisory Committee appears to have met as early in the process as 23 February and to have expressed a view about the sensitivity of the scheme in the absence, at that date, of public objections to it. I wish to reserve my position on the legal propriety of this procedure.
 - (b) It is to be hoped that no member of the Planning Committee, and no officer advising it, will form a view on the present application without first visiting the Library.

Stephen Sedley

Cloisters, Temple, London EC4Y 7AA
and 15 Walton St., Oxford OX1 2HG

6 March 2017

APPENDIX
(see paragraph 6 above)

**SUBMISSION TO HISTORIC ENGLAND
IN SUPPORT OF THE LISTING OF THE
INNER TEMPLE TREASURY OFFICE, LIBRARY AND HALL**

(CASE NO. 1430035)

1. This submission is made by the four most recent past Masters of the Inner Temple Library. It is anticipated that other benchers and members of the Inner Temple and users of the Library may make their own submissions in support of it.
2. The purpose of the submission, which is made with the benefit of professional advice¹, is to request Historic England to advise the Secretary of State that either the Treasury/Hall Building ("the Building") or as much of it as houses the Inn's law library should be listed Grade II.
3. More particularly it will be submitted that the Building as a whole
 - (i) merits listing
 - (a) in its own right (from the ancient Buttery at its west end to, and including, the Library in its eastern part); or
 - (b) taking additionally into account the desirability of preserving the Library, which constitutes "a feature of the building consisting of a ... structure fixed to the building", on the ground of its architectural or historic interest; and/or

¹ Dr Christopher Miele, MRTPI, IHBC, a senior partner and head of Heritage and Culture, Montagu Evans, chartered surveyors and planning consultants.

- (c) taking additionally into account the contribution of its exterior to the architectural or historic interest of the group which it forms with the Temple Church.²
- (ii) Alternatively, if none of the above is considered appropriate, the Building may still be listed but the entry in the list may provide that, apart from the Buttery (which is already listed) and the Library (which should be listed on the ground of its special historic and architectural interest, including its exceptional spatial and visual qualities), the Building is not otherwise of special architectural or historic interest.³

Background

4. It is public knowledge that the future of the Library has been called in question by a narrow majority vote of the Inn's governing benchers to proceed with a redevelopment scheme that involves the loss of the Library's gallery floor and of many of its rooms. The details of the plan are not material to this submission, but the potential listing of the structure has become an issue of immediate concern because it will condition, though not of course determine, any planning application which the Inn makes in order to carry through the development.
5. It is understood that the Inn, through its Executive Committee, proposes to submit to Historic England that no part of the Building (apart presumably from the Buttery) is worthy of being listed. The view of many of its members, including the undersigned, is that it is not a proper function of the Inn, as the custodian of a large estate of great historical and aesthetic importance, to underrate one of its holdings in order to pave the way for development. Our view, which has been made known to the Treasurer, is that the Inner Temple's stance on listing should be one of neutrality.

Listing principles

6. There is no relevant Selection Guide. This is to be expected, since the role of the Inns of Court constitutes a sui generis planning use; but it highlights the special interest of the premises in their historic location.

² Planning (Listed Buildings and Conservation Areas) Act 1990.

³ Enterprise Regulatory Reform Act 2013, s.63 and Sch.17 §8(3).

7. The submissions which follow bear closely in mind the DCMS's current *Principles of Selection for Listing Buildings*, particularly §12 (age and rarity), §13 (aesthetic merits), §14 (selectivity), §15 (national interest) and §16 (state of repair). It will be submitted that under all these heads the building of which the Library forms part merits listing, either in its entirety or so as to protect the Library.
8. Careful note is also taken of the definitions in §9 of architectural interest ("...importance in ... architectural design, decoration or craftsmanship") and historic interest ("important aspects of the nation's social, economic, cultural or military history, and/or ... close historical associations with nationally important people"). It will be submitted that the Building, and its Library in particular, possess both in very good measure.
9. As to the age of the building, we note that the *Principles* include "particularly careful selection" in relation to the period after 1945. The submissions which follow explain why the Library and its building cross this threshold.

The Treasury Building

10. Historic England is already familiar with the Treasury Building and its Library, making a full description unnecessary here. HE's report will provide the Secretary of State with a clear and neutral account of the structure.
11. The Hall and Treasury are taken to form a single building because they interconnect seamlessly. The Building stands between the 3-acre Inner Temple gardens and the Grade I-listed Temple Church, with which they form a group. The Building is finely detailed to a very high standard, using good-quality materials. This alone makes it rare, if not unique, in the austere context of postwar reconstruction.
12. The proportions of the Building are elegant and relate comfortably to the scale of its immediate environment. Its style or character is neo-Georgian, with some contemporary refinements in the detailing, reflecting the sensibility of such leading inter-war practitioners as Edwin Lutyens (with whom Sir Hubert Worthington trained) and Herbert Baker. This, with the restrained composition, befits a legal enclave.
13. The Building is well maintained and in good condition, showing no signs of structural movement. Its interior is homogeneous and is executed to a high standard in modern Georgian style. The lower floor of the Treasury Building, including in particular the Parliament Chamber, features panelled interiors and an elegant open stairwell which is of a piece with the Library's joinery.

14. The benchers' entrance from Church Court to the north is through a finely carved Portland stone aedicule skilfully sculptured in low relief. From the east, the Library can be separately accessed through a similar but simpler stone architrave. From the south, the main entrance to the Treasury building is through an elegant and well-proportioned porch.
15. At the west end of the Hall is the Buttery, restored after the war and retaining two late mediaeval vaulted chambers. These are entered from the Hall and so form a whole with the building – a good example of adaptive reuse and an illustration of the continuity of the Inn's historical development which the architecture embodies.
16. The group value of the Building lies in its proximity to the Temple Church (one of only four round churches remaining in England, and the historical seat of the Knights Templar).
17. Like each of the four Inns of Court, the Inner Temple's Hall, benchers' rooms and Library are associated with scores of major historical figures. To pick a few almost at random, they have included
 - the great jurist and writer Sir Edward Coke;
 - the brutal Lord Jeffreys;
 - the great Victorian Lord Chancellor Lord Halsbury;
 - many other Lord Chancellors including (among those still living) Lord Mackay, Lord Irvine and Lord Falconer;
 - literary figures such as James Boswell and Sir W.S. Gilbert;
 - Dr Ivy Williams, the first woman called to the Bar of England and Wales;
 - Judge Dame Rosalyn Higgins, the first woman president of the International Court of Justice;
 - great colonial lawyers such as Mohandas Gandhi and Jawaharlal Nehru;
 - celebrated advocates like Sir Edward Marshall Hall KC;
 - leading political figures such as Clement Attlee;
 - numerous judges of the High Court, the Court of Appeal, the House of Lords and, today, the Supreme Court.

Thus both a close association with nationally important people and a central role in the nation's cultural, economic and social life are well evidenced.

The Library

18. Photographs of the library are annexed to this submission, but it is respectfully submitted that nobody taking or advising on a listing decision should do so without an accompanied visit. Attention is drawn to the other contents of the annexure, which comprise extracts from relevant publications.⁴
19. In the light of the above we limit ourselves to the following observations:
- (i) There has been a reading room on this site since the beginning of the 16th century or earlier, and a functioning law library since Sir Edward Coke donated his foundational reports to the Inn in 1608.
 - (ii) The present Library stands out in Britain's postwar reconstruction as a graceful adaptation to contemporary needs of traditional style (echoing late 17th - early 18th century library design) and traditional materials (English oak). The three-chamber central layout echoes that of the great Hofburg Library in Vienna. Both the principal architects, Worthington and Sutcliffe, are significant figures.
 - (iii) The elegance of the Library helps to demonstrate that, contrary to a commonly held view, the classical tradition in England was not lost or eradicated during the 1930s and that traditional architecture did not cease to be practised. While it may have fallen from favour, the tradition was continued in England by many architects, notably Raymond Erith and Sir Albert Richardson; and there is a particular historical moment in the 1950s when this is picked up in the state-funded reconstruction of war-damaged buildings.
 - (iv) It was in the Inn's own publication, *The Inner Temple – a community of communities* (2007) that the noted architectural historian Dr Geoffrey Tyack wrote of the Library:

“Ingeniously divided into bays by beautifully crafted oak bookcases, with galleries above, it is the most successful of the post-war interiors of the Inn.”
 - (v) The proportions of the Library are unusually elegant. They depend in particular upon the high ceiling, the balustraded galleries, the oak panelling

⁴ Three photographs of the Library; Pevsner, *The Buildings of England*, p. 350-351; Tyack, *Buildings of the Inner Temple*, p. 76-7; *The Times*, 8 April 1948; *Country Life*, 24 April 1958; Save Britain's Heritage letter, 14 Oct. 2015.

and decoration, the sequence of spaces and above all the quality of light admitted by the two tiers of windows. The high windows give a generous access of light with a perspective to the south over the Temple gardens to the river and, to the north, the Temple Church.

- (vi) None of the undersigned knows of a handsomer or more attractively situated law library anywhere in the world.
- (vii) The Inner Temple's Library, like those of the other Inns of Court, plays a central role both in the higher education of Bar students and in the daily work of practising and academic barristers. Its spaciousness, quietness and light all contribute to making it an unparalleled working environment

Submission

- 20. It is acknowledged that the listing of post-WWII buildings is a highly selective exercise, reflecting among other things their relatively recent date. It follows that in most instances historical associations will carry less weight. Here, however, it is submitted that there are compelling historical associations which need to be taken into account alongside architectural quality.
- 21. Historically the building as a whole is special for the following reasons:
 - (i) It houses facilities which have stood on this site for centuries as part of the collective life of the Inn.
 - (ii) It is associated in its present form with the War Damage Commission, which distributed public funds to restore buildings of social or civic importance, including many churches both ancient and post-mediaeval.
 - (iii) Its internal spaces are associated with numerous major figures in this country's history, and with notable architects active in the mid-twentieth century.

22. Architecturally the Building, and particularly the Library which it houses, is important for the following reasons:

- (i) A neo-Georgian building, it demonstrates the continuity of that tradition into the postwar years.
- (ii) It displays a high standard of building craftsmanship and employs high-quality materials.
- (iii) The Hall and Treasury, while of differing detailed design, form an attractive whole which is well sited and relates elegantly to two important spaces, the gardens and Church Court. The proportions of the elevation and the size of openings are well considered, and the composition of each block is pleasing.
- (iv) The interiors are executed to a high standard and feature attractive main spaces, notably the Hall, the Parliament Chamber and the Library.
- (v) A large proportion of the volume of the building (a third or more) is dedicated to the Library, making it the principal interior and defining its identity.
- (vi) The Library, both in its main space and in its sequence of galleried spaces, is beautifully proportioned. The proportions are enhanced by the quality of light.
- (vii) The plan form of the Library, comprising several rooms, one opening into another, creates a series of characterful and distinct spaces conducive to quiet study.
- (viii) The Library's joinery is executed to a high and consistent standard, producing a distinctive and memorable space appropriate to its purposes.

Conclusion

23. If the listing of the entire Building is not considered to be as compelling as the need to protect the Library which forms part of it, it is submitted that the Library should in any event be listed.

SIGNED:

Michael Morland

(The Hon. Sir Michael Morland, Master of the Library 1989-91)

Jonathan Sumption

(The Rt. Hon. Lord Sumption, Master of the Library 1992-2003)

Stephen Sedley

(The Rt. Hon. Sir Stephen Sedley, Master of the Library 2004-2010)

Jack Beatson

(The Rt. Hon. Lord Justice Beatson, Master of the Library 2011-2013)

Newman, Conor

From: PLN - Comments
Sent: 06 March 2017 09:02
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 9:01 AM on 06 Mar 2017 from Mr Philip Moser QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Philip Moser QC

Email:

Address: 1 Raymond Buildings Gray's Inn London

Comments Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Reasons for comment: - Residential Amenity

Comments: This is an urgently needed project, in order to preserve and enhance a principal purpose for which the Inn exists, specifically advocacy training for those wishing to practise at the Bar. The administrative buildings of the Inn are not to be viewed as a mid-20th Century museum, but only fulfil their function and purpose if they are used as intended and updated where required. That includes the library, which will be largely unaffected in terms of floorspace, yet greatly enhanced by becoming

once more the heart of a learning Institution. Finally, care has been taken in the design to make the final result closer to the original architectural concept than funds allowed 70 years ago.

Newman, Conor

From: Depala, Bhakti
Sent: 06 March 2017 16:51
To: PLN - Comments
Subject: FW: PLN FW: Support for Planning Application COL:04603749

From: Vivian Robinson [mailto:]
Sent: 03 March 2017 14:38
To: PlanningQueue
Subject: Support for Planning Application

Dear Sir/Madam,

Inner Temple Treasury Building, The Terrace Crown Office Row, London EC4Y 7HL

Reference 17/00077/FULMAJ

Would you please note my full support for the above Planning Application.

I am a barrister member of Inner Temple and a tenant of residential accommodation within Inner Temple.

Yours faithfully,

Vivian Robinson

Vivian Robinson QC
Partner
McGuireWoods London LLP
11 Pilgrim Street
London EC4V 6RN, United Kingdom



Newman, Conor

From: Guy Fetherstonhaugh QC [REDACTED]
Sent: 06 March 2017 12:41
To: PLN - Comments
Subject: RE: Comments for Planning Application 17/00077/FULMAJ

From: PlnComments@cityoflondon.gov.uk [<mailto:PlnComments@cityoflondon.gov.uk>]
Sent: 03 March 2017 16:07
To: Guy Fetherstonhaugh QC
Subject: Comments for Planning Application 17/00077/FULMAJ

Mr Guy Fetherstonhaugh,

You have been sent this email because you or somebody else has submitted a comment on a Planning Application to your local authority using your email address. A summary of your comments is provided below.

Comments were submitted at 4:06 PM on 03 Mar 2017 from Mr Guy Fetherstonhaugh.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown
Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Guy Fetherstonhaugh
Email:
Address: Falcon Chambers London

Comments Details

Commenter Type: Neighbour
Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: Had the Inner Temple's post-War rebuilding plans come to fruition, the roof scape of the Treasury and Hall would have been fully mansarded, with chimneys. The current proposals implement those plans in some respects, and go further in others, taking forwards and improving upon Worthington's vision, by raising the mansard height minimally to optimise the internal space, inserting handsome dormer windows that will complement others on the Inn's estate, and adding a sympathetically designed new lift and escape stair that will enable use of the new internal facilities by many more people. Taken together with the glazed rooflight, the result will be to optimise and extend the useful life of this building, in a way that respects its beautiful listed setting. As the objections show, reasonable people may take different views as to the internal use of the building. The majority of the Inn's Benchers favoured a use that would offer excellent and much needed education and training facilities, at the expense of a small part of the post-War library. Those considerations should not be allowed to distract from the planning considerations, which overwhelmingly favour the Inn's proposals.

Guy Fetherstonhaugh QC

Representatives of Falcon Chambers will be attending MIPIM.

If you would like to meet-up with the team please contact Steve Francis steve@falcon-chambers.com

[REDACTED]

Falcon Chambers, Falcon Court, London EC4Y 1AA
DX 408 Lond/Chancery Lane



www.falcon-chambers.com

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The terms on which members of Falcon Chambers accept instructions, save where otherwise expressly agreed, are set out on our website at www.Falcon-Chambers.com

17/000077

From: [John Bate-Williams](#)
To: [PLN - Comments](#)
Subject: Inner Temple Library proposals
Date: 07 March 2017 11:16:14
Attachments: [image58835a.PNG](#)
[image4bd026.PNG](#)
[image001.jpg](#)

I would like to register my very firm objection to the present proposal which would involve the destruction of the double height panelled library in the Inner Temple.

This proposal would ruin the wonderful library, which has been an inspiration to those of us who have studied there as pupils and as barristers for the last half century.

The Inner Temple has plenty of accommodation elsewhere which could be used to provide the facilities proposed.

John Bate-Williams

John Bate-Williams
Barrister



temple garden
chambers



LONDON
1 Harcourt Buildings
Temple, London, EC4Y 9DA

THE HAGUE
Molenstraat 14, 2513 BK
The Hague, Netherlands

W tgchambers.com
DX 382 London Chancery Lane

17/00077

From: [Sir Stephen Tomlinson](#)
To: [Newman, Conor](#)
Subject: RE: Inner Temple Planning Application Ref: 17/00077/FULMAJ
Date: 07 March 2017 14:50:56

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

From: Sir Stephen Tomlinson [mailto:]
Sent: 03 March 2017 17:42
To: PLN - Comments
Subject: Inner Temple Planning Application Ref: 17/00077/FULMAJ

Dear Sirs

I do not currently have access to your website and I understand that today is the last day for registering comments on the above application. I hope that it is acceptable for me to register my comment in this way. I wish to register my strong support for the application. Quite apart from fulfilling the original concept of the distinguished architect who designed the post-war reconstruction of the Inner Temple Treasury Building, the current proposal will provide an iconic building overlooking the open space of Inner Temple garden and the river. It is entirely in keeping with the surroundings and will enable the Inn better to perform its historic function, ordained by Royal Charter, of educating its student cohort.

Is true that the proposal will entail modification to the existing library space which is gracious and much loved. The library is however a woefully underused space, designed for a different era when library provision was effected in an entirely different manner. The proposal will not compromise the ability of the library to continue to provide its current service and will in effect simply reduce the available number of reader-spaces. The existing number of reader spaces is vastly in excess of what realistically is required.

It is essential that ancient institutions such as the Inner Temple should be able to use their assets in accordance with contemporary methods of fulfilling their historic functions. I hope that it will be recognised that the current proposal, the product of long and careful consideration of how the Inn can modernise its historic estate without compromising its essential character, will be recognised as a logical and acceptable development.

I write as a former Treasurer of the Inner Temple who has had responsibility for the conduct of its affairs, and I am still a Governing Bencher of the Inn. I should also disclose that I am one of four trustees in whom the Inn's estate is vested.

Yours faithfully

7, King's Bench Walk,
Temple
London EC4Y 7DS
Stephen Tomlinson

Sent from my iPad



FRANCIS TAYLOR BUILDING
INNER TEMPLE
LONDON EC4Y 7BY

Caroline Dwyer
Director
Built Environment
City of London
Guildhall
PO Box 270
EC2P 2BJ
Attn: Bhakti Depala

8 March 2017

Dear Ms Dwyer

Planning Application 17/00877/FULLMAJ (Inner Temple)

This representation is made by the Library Users Group of the Inner Temple.

Our law library is a high quality resource, routinely available to pupils and law students but also an essential asset for the working barrister; in every sense our Library represents the lawyer's workshop. It is, we think, justifiably prized for both the range and depth of its many collections and for the ease with which it is possible to access and use those collections which are on two linked adjoining floors (second floor and library gallery). Despite online information, the print collections continue as ever to be important if not vital to members working across the whole range of practice areas.

Appended to this submission are comments from library users describing what they value about the Library.

Many of us feel that though not technically "listed", the library does have special architectural and historic significance and thus ought to be listed. However we also believe that notwithstanding the absence of that official designation it nevertheless has a distinct and obvious 'heritage' characteristic. But here we invite you not simply to rely on our assessment. We urge you to come both to judge and see for yourselves what a wonderful place the present library is and why we believe it must be preserved.

Government policy on planning (NPPF paragraph 135) requires the effect on a heritage asset to be taken into account. Here there would be significant loss and harm to the Library. We invite you to attach very considerable weight to the harm to the Library.

We would draw attention to a feature of the proposals that will see the entire two-storey space truncated with the insertion of a false ceiling and the consequent removal of the beautifully arranged and functional galleries that form the upper lines of the present day design. The new ceilings will be substantially lowered

and the remaining reading rooms will be between 2.45 and 2.9 metres in height. The extreme modification is bound to create a sense of confinement. The present plans must also have implications for temperature control and light ingress features that at present are as close to perfection as one might hope to imagine and highly valued by the users of the Library. Moreover the plans also envisage the library collections now located in the gallery will be relocated. This must severely impact the present ease of access. The reading environment by a happy combination of brilliant design and materials has achieved what we believe is a rare harmony of comfort and functionality. Obviously the present plans do not replicate that rare achievement of design and construction.

For our part, not surprisingly, we place a high value upon the excellent facilities provided by the Library. Others clearly place a lesser value upon them including, very sadly, the majority (by a small margin) of those Benchers who voted on the project. We feel that it is not for the City to seek to take a view on the absolute importance of library facilities or training facilities or the relative importance of one measured against the other. However, what it can and should say to the Inn is - *given the extent of the harm, demonstrate to us that you need to cause it.*

We are agreed as library users that it would require a high level of need to warrant the level of harm which we have identified. It seems to us that no one seriously disagrees that the proposals will represent a reduction in the present amenity and will have a seriously negative impact on the present design. Rather the Inn seeks to argue that there is a need to cause this harm. It has not done so. No business case has been provided and neither has it been demonstrated that there are no alternative locations whether within the Inn or other Inns or other available buildings (such as the vast Royal Courts of Justice), whether in combination or otherwise.

It is not for us to show why planning permission should not be granted but for the Inn to show why, when there would be harm, it should be granted. However in this context we would refer you to two telling matters. First, in the "optioneering" that occurred before the Inn decided to move forward with its current proposals there was an Option which preserved the Library, indeed an Option on which the Inn received favourable pre-application advice from the City. (A floorplan for this Option is appended to this submission.) It did not, unsurprisingly, give the Inn as much floorspace as the current scheme but it did provide a lecture theatre and training rooms. We suggest that it represents exactly the sort of compromise that the NPPF encourages in order to preserve assets of value. Second, the Benchers of the Inn are not unanimous about their proposals, nor were the vast majority of members of the Inn able to vote. With Benchers of the standing of Sir Stephen Sedley and Lord Lloyd of Berwick clear in their opposition, the Inn's case on need lacks credibility. Our objections are supported by the "great and good", practitioners both of long standing and of recent call, and by students (as you will have seen by the representations and petition submitted to you).

We urge the City to reject the application for planning permission. The present proposals will destroy the special qualities of something that is precious: a working law library of high architectural quality. The need for this has not been demonstrated.

Yours sincerely



Philip Petchey
On behalf of the Library Users Group

The Inner Temple Library

Comments from barrister, pupil and student members of the Inn.

- I have been a member of the Inner Temple since 1962 and a Master of the Bench since 1992. Right from the start of my membership I was strongly impressed by the design, architectural quality and historical significance of the Library. The building is particularly remarkable as an example, probably in quality the leading example, of post-war reconstruction. It stands as a striking demonstration of what could be done even in a period which is often written off as impoverished in terms of architectural as well as financial resources. It is imperative to protect this significant and iconic building as an exemplar for future ages of historical continuity: quite apart from the sheer quality, testified to by many leading experts as well as ordinary users, of the building itself.
- The Library for its part must be one of the best library buildings with fittings of its era, and better than any I can remember at Oxford University. It is particularly splendid by reason of its gallery and woodwork, and it would be a great loss and disappointment ever to lose all its features.
- The intention is to cut it [the Library] down substantially in size and also remove its distinctive double storey, galleried design. This will at one swoop change it from the elegant proportions that it has to little more than a functional mundane library with low ceilings and many of the elegant rooms removed along with the light that floods into the library as the result of the double storey. The consequence would be a tragic loss to members of the Inn, students, the wide public and to the architecture of London.
- All this is due, in very large measure, to the design and layout of the library and its shelving, to the daylight that enters through the windows on both floors, to the materials with which it is furnished and to the quality of the joinery. Put simply, it is an inspirational place to work, and as such is an architectural masterpiece. I am anxious that it should be preserved for those law students and practising barristers who come after me.
- Of all the four Inn Libraries, Inner Temple Library is the most elegant. It has harmonious and graceful proportions, high quality furnishings and is a joy to behold. Its high aesthetic merit is beyond doubt. It is a post-War interpretation of Enlightenment library design. As such, it must be unique in the country.
- I pose this question. Where else in England is there a law library (or any library) which (a) has such a combination of harmonious proportions, fine craftsmanship, varied spaces and practical utility (b) is therefore such a delight both to observe and in which to work and (c) with materials which continue to improve with age (as the oak and other wood has)? I have visited and worked in libraries in many parts of the world—and none has this combination. It is an outstanding example of 'firmness, commodity and delight' in library design.
- The building as a whole is a fine building which blends well with the surrounding Inner Temple buildings and garden, while the Library, used by students, practising lawyers and judges, is one of the finest and most elegant in England reconstructed to the highest

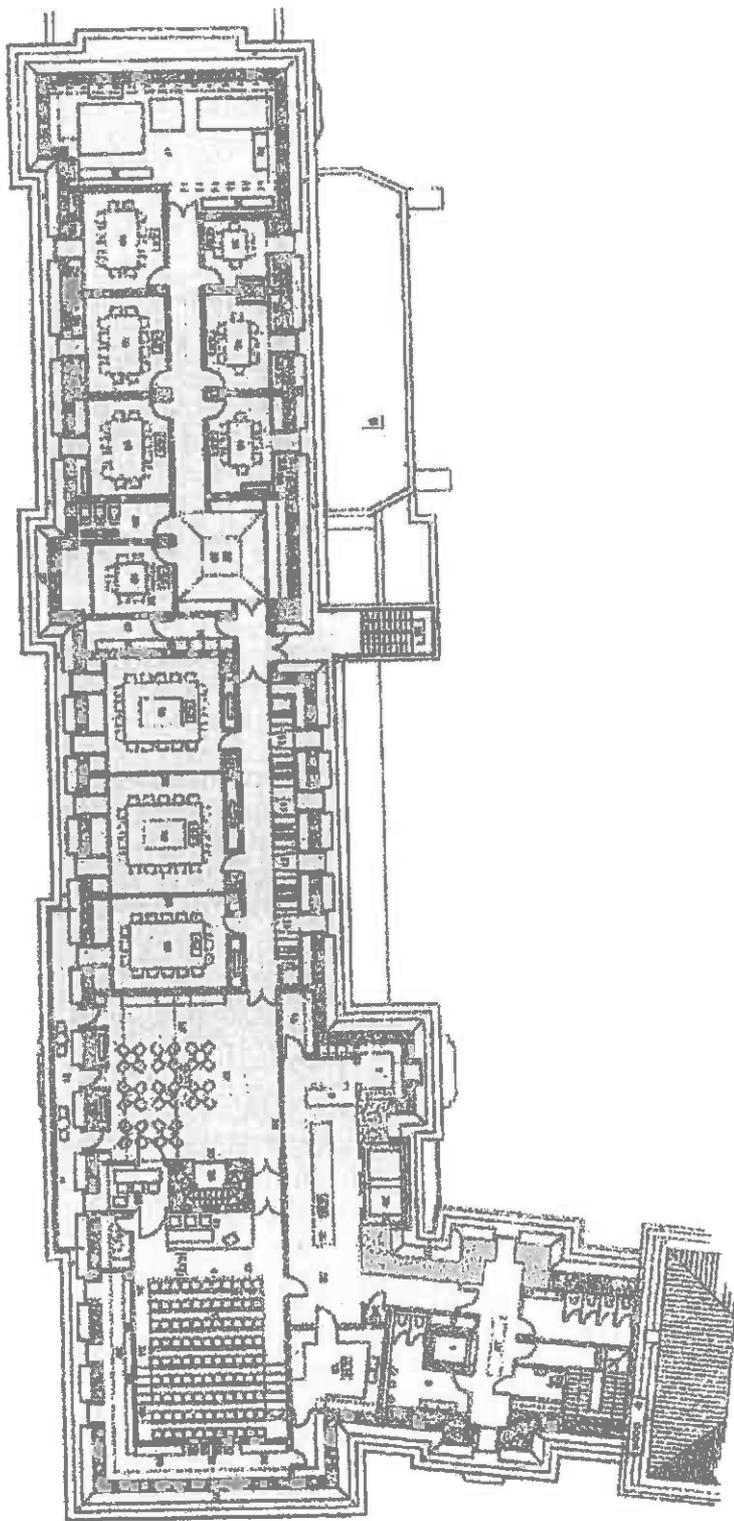
quality after the destruction of the former library during the war. The major building works proposed by a small majority of the Inn's governing benchers would in my view be an act of wanton destruction and, moreover, one which is on a scale quite unnecessary for the purposes it is designed to achieve.

- First, the library cannot be divorced from the building which contains it and the building cannot be divorced from the adjacent Temple Church. All are part of an entity that represents a unique history of scholarship, both ecclesiastical and forensic. Second, the present library is regarded by many as the finest post-war law library in the country. This is a view held by many of the Inn's students and barristers who spend much time undertaking legal research in the library.
- Primarily, there is the overall integrity of the architecture itself, as the very visual heart of the Inn. One of the great features of the Inner Temple Library is the light and spacious feel of the building. The aesthetics are one of the most pleasing aspects of the library. The oak fittings and the gallery give the library a particular air and grace as a study and research environment. The quiet ambience created by the internal design is highly conducive to legal research and, as I understand it, is greatly valued by those practitioners and students who use the library. For all these reasons, the library space, as originally designed, deserves to be preserved.
- The IT Library is one of the loveliest working libraries in the Commonwealth. This comes from a unique combination of high, dignified galleried rooms, views (to North as well as South), sunshine, tables, shelving, chairs, collections and bindings. It compares favourably, for example, with university libraries such as, at Oxford, the Lower Library in Worcester College and the Codrington at All Souls.
- The Library is not only one of the Inn's most precious assets; it is one of the world's great law libraries. It enjoys an unparalleled outlook and an unusually general access of natural light. Its ambience, layout, materials and construction are of a very high standard, particularly when one recalls the period of post war austerity in which it was rebuilt. Above all, it is a coherent and striking piece of architecture and one which is central to the Inn's purposes.
- The Inner Temple Library particularly is the flagship of the Inner Temple - it is the one building that knocks people out who visit the Inn for the first time. It is impressive and a fine building that enhances our standing as a worthy body. To change or get rid of it or reduce its importance - however you dress it up, and whatever excuses are made - would be shameful. We should be proud of our library, and not fiddle with it or pretend that we are "improving" it by making changes.
- I absolutely love working in the Inner Temple library and I would be absolutely devastated to see it negatively affected by any "rationalisation" process. It is well laid out for working (all those little bays), its collection is extensive, and the staff are helpful. Above all it is a quiet place with an atmosphere conducive to thought. When I have a tricky problem I often go there to sit and read and think, away from the phone and the small.
- There is no other Inn Library so conducive to legal research. The peace and quiet, the layout of the rooms and the spaciousness of the rooms all contribute to this unique

characteristic. The provision of the Library and its services is a core function of the Inn. It is essentially a reference library. It should therefore be valued and appreciated first and foremost for the immense range and depth of its collections and the ease with which it is possible to access and use those collections. It is universally acknowledged to be an architectural masterpiece. The Inn therefore holds in trust a priceless asset build up over many decades and handed down to us as part of our heritage. While it might be justifiable to desecrate such an asset in circumstances of dire necessity no such circumstances exist now or are likely to exist in the foreseeable future.

- Inner Temple library is very conducive to quiet research and preparation. The layout of the upper floor, with quiet nooks and crannies to sit and read, is without rival in any other Bar library.
- I have been using law libraries for nearly 50 years ... including all four inn libraries, the law libraries of University College, London, the London School of Economics, Senate House, London, the Institute of Advanced Legal Studies, the Squire Law Library and the library of the Auckland District Law Society in New Zealand. While many of these are fine libraries with wonderful collections, Inner Temple library is easily the best, all things considered, including not just the materials in the collection, but the ambience, aesthetics, natural light, quiet, space and library staff. If there is a finer law library in the world, I would like to know where it is.
- I have used the Inn library at all stages of my career - student, pupil and practitioner ... I am grateful that it is available to me on the inevitable occasions when Chambers' resources are inadequate. I have always found the Hansard galleries to be particularly valuable.
- Consistent with its status as a seat of learning, the Library - one of the greatest law libraries in the world in terms of its location, content and design - is a central part of the Inn's educational and professional support for its members, and one of the core facilities provided.
- ... a physical environment created by the happy coalition of atmosphere control, lighting and design is second to none. I hope this combination is not interfered with because it would be hard if not impossible to replicate both technically, I guess, and aesthetically.
- I have become very attached to the elegant and attractive Inner Temple Library over many years, ever since it was built, with much creative thought, after the wartime destruction of the old library.
- I find the layout and structure of the Inner Temple Library much more conducive to pleasant and productive research.
- Inner's library is built in such a way as to allow semi-private spaces, which are not dissimilar to large but very quiet and stately spaces in a Chambers or Collegiate environment.
- The layout, atmosphere and light make Inner Temple the most conducive library to work in.

- I'm a very big fan of the Inner Temple library. The atmosphere and decor are exemplary. It is a nice environment to work in.
- One of the best things about the library is the environment, which is quiet and spacious.
- Inner provides a quiet place with an amazing working environment. I should know I've just written a book there.
- The key resource the Inner Temple provides is the space, the 'real estate' if you will in which to work, together with hard copies.
- Inner Temple's [Library] has an environment which is more conducive to research and work than any other of the Inns' libraries. Having that environment in which to work has been key to my being able to successfully revise at post and undergraduate level.
- The space available in the Library (and particularly the relatively low 'packing density' of people in there, providing an environment most conducive to research).
- Photocopying a few pages and reading them elsewhere doesn't serve my purpose, whereas the ability to settle down, read in peace and cross-refer to other works, allows me to use my time to best effect. This requires there to be no obvious pressure on space in the library.
- [The Library] ... offers for all practitioners a quiet place to work away from telephone and human interruptions of chambers. Also chambers are increasingly under pressure of space and resources therefore the Library is a valued and essential part of Bar life.
- The value of a quiet place in which all materials are accessible whether in hard copy or online must not be ignored.
- The value of access to all materials in one place and in an appropriate environment is incalculable and assists the Bar in providing an excellent service.



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The First Floor
 Prigmore Project
 Proposed First Floor Plan
 Sheet 1
 11/01/01
 11/01/01

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 11/01/01

Hassall, Pam

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 08 March 2017 16:59
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 4:58 PM on 08 Mar 2017 from Mr Robert McCracken QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Robert McCracken QC
Email:
Address: Francis Taylor Building Temple London

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment: - ~~noise~~



Comments: Objection of Robert McCracken QC to Application 17/00077/FULMAJ PP-05648455

1. I have been a member of the Inner Temple for 40 years. I have used the library as student, practitioner and teacher. The integrity of the library should be respected. I object.

2. The City will be faced with challenges over the coming years from ever present world competition exacerbated by Brexit. The preservation of the character and appearance of beautiful places such as the Temple will be an important part of the City's ability to compete successfully in the world. This proposal would seriously damage the City's heritage, but do very little, if anything at all, to enhance the City's strength and resilience.

3. I endorse what has been said by Inner Temple resident Richard Humphries QC and Library Committee chairs, Sir Stephen Sedley and Lord Sumption. I would emphasise that

(i) the proposed changes to the interior would seriously harm both the character and appearance of the Conservation Area and must be considered in the light of the statutory duty in respect of each.

(ii) the proposed fenestration of the South elevation (facing the garden) is inconsistent with the original designs and would be noticeably discordant. The size of the proposed windows does not respect the gradation of window size in either the originally planned or existing building. The roof windows are, awkwardly, substantially larger than the windows immediately below. This offends fundamental, and well recognised, principles of design for this style of architecture.

(iii) the proposed fenestration of the North elevation (facing Church Court) is also discordant--especially at the east end. Church Court is now a major tourist destination. Every day large numbers of tourists come to Church Court.

(iv) the proposed colour (lurid green, oxidized copper) of the east and west sides of the dormer windows would increase their prominence thus exacerbating the harm of (ii) and (iii) above

(v) the long run of the relentlessly straight line of the highly visible roof above the Treasury and Library would not reflect the subtle existing projection below the (presently invisible) roof and be a further external visual discordance. This existing projection avoids the unattractiveness of a long, straight run.

(vi) the view from outside of the library

chandeliers at dusk and after dark is at present lovely and suggestive of the double height interior richness, but would be lost.

(vii) the IT Library is a heritage asset of the City even though not listed as of national importance.

4. The IT Library is one of the loveliest working libraries in the Commonwealth. This comes from a unique combination of high, dignified galleried rooms, views (to North as well as South), sunshine, tables, shelving, chairs, collections and bindings. It compares favourably, for example, with university libraries such as, at Oxford, the Lower Library in Worcester College and the Codrington at All Souls College.

5. A key feature of the character of this Conservation Area is that it is collegiate. It is a place where people can enjoy beautiful surroundings held in common regardless of their wealth, status or other worldly success. This is important even for those who do not often visit it; it is good to know that it is there, like Antarctica even when one is working on circuit or in remote town halls (as many of my years of practice have been).

6 Those who have access to the interior of the Library are so many--not only the thousands of members of the Inner Temple, but all barristers (regardless of their Inn), students from King's College London (where I teach) and other scholars-- that it should be regarded as effectively a place to which such a large section of the public has access that the interior of the library cannot lawfully be viewed merely as the concern of the Inn.

7. It is important to remember that, even if a large section of the public did not (as in fact they do) have access to the interior of the Library, the public could still enjoy the thought of it. I will never attend a Lord Mayor's Banquet or live in the Mansion House--but I, like many others, derive great pleasure from the thought of this communal elegant grandeur which is to some extent mine as a City worker and elector.

8 The alleged 'need' is unconvincing.

(i) The Law Courts are not used for hearings in the evening and at weekends. They would be well suited to advocacy training

(ii) other alternatives have not been seriously examined--for example

(a) retractable tiered seating for the Hall (see Corpus Christi, Oxford garden building)

(b) underground lecture theatre and

training room. Unjustified assertions of impracticability have been made

(c) my own chambers, that of Andrew Tait QC, at Francis Taylor Building (next to the Library) has a seminar room which is generally available, and could be much more often used, for Inn teaching.

(d) conversion of office buildings within the Inn

(iii) Perceptions by the unelected benchers of the Inn's needs change over the medium term.. Towards the end of the C20, a large group of buildings including the Niblett Hall was converted from educational use by students to office use. (Niblett had been so moved by the sacrifice of British servicemen in the First World War that he gave substantial property to the Inn.). It would be dangerous to rely on present perception of need to justify permanent, irremediable damage. The City should take a long term view in performing its statutory duties in relation to its heritage.

9 . The majority of benchers in favour of the scheme was very narrow. Past members of the Inn would be appalled by the equally narrow perspective of the promoters of the project.

Robert McCracken QC

Francis Taylor Building, Temple 8/III/17

Dear

Elected Alderman,
City of London planning committee
And Planning officers,

8th March 2017

I object to the planning application made by the Inner temple.

The government minister sec of state has still to decide upon the application of the library and hall and treasury building being listed.

The conservation area would mean the plans proposed are not in keeping with the planning guidelines and SPDs and the heritage.

This would be if granted an over development of the site.

The application had not business plan and so the amount of traffic that would occur as a result of the larger size of the attendees, to the new site would be significant.

The noise levels would also increase.

Pollution would increase.

HERITAGE

The library heritage asset has not been adequately assessed by the architects or the planners.

The loss of the heritage asset is extreme to the area.

Kings bench walk where the great fire of London was stopped is opposite and is of huge historical significance and the application is located in a very

Significant area of huge historically meaning.

The loss of heritage design library space by lecture theatres is unwarranted in such a conservation area. Natural original beam English oak and mahogany would be destroyed.

Public money was used to rebuild this area form taxpayers.

It would be frivolous to allow this planning application consent.

Double height gallery rooms would be lost for vast English speaking world renowned collections.

GARDENS



ACKNOWLEDGED

Located in the gardens of English heritage register of special historic interest.

Opposite Temple church grade 1 listed and an ancient church court grade II. The design would not be in keeping with this area and would be an over development.

It would also be an eye sore and would damage the special character and architectural quality of these world renowned areas.

I would respectfully ask you as Alderman to oppose this planning application and refuse it.

Ms. Cate Tuitt

Student member Inner Temple

1 O' Leary Square

London E2 3APP

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

Neil D. Coe
90 Alexandra Cottages
Edward Road
Penge
London, SE20 7JS

For the attention of Bhakti Depala (Case Officer)

9th March 2017

Dear Ms Depala

1.0 Representation of objection

I am writing to confirm my strong objections to the planning application **17/00077/FULMAJ** for the Project Pegasus scheme, as set out below.

I also write as a former Deputy Surveyor in the Surveyor's Department of the Honourable Society of the Inner Temple for 7 years, with considerable knowledge and passion for the buildings and estate of the Inner Temple.

PT_BXD/17/00077/FULMAJ

Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising;

- i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed roof-light;**
- ii) Installation of a rooftop plant area;**
- iii) Reconstruction of the hall roof resulting in an increased ridge height;**
- iv) Insertion of dormer windows in the hall roof;**
- v) Extension at the north east corner to create a new lift shaft;**
- vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall;**
- vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.**

Inner Temple Treasury Building, The Terrace, Crown Office Row, London, EC4Y 7HL

2.0 Planning Application Description

The planning description is incomplete and does not adequately describe the full scope of the scheme. The proposed destruction of the Library at 3rd floor and impact on the remaining 2nd floor rooms is a significant element of the scheme, together with the requirement to Preserve or Enhance the Temple Conservation Area.



3.0 Validity

The Design and Assess Statement, Heritage Study, Heritage Statement and Planning Statement are insufficient to fully explain the proposed external extensions and internal alterations, and to adequately justify the scheme.

The proposed use class of 'sue generis' has not been demonstrated and the potential for increased commercial hire to the new Education and Training facilities, and existing Benchers Function Rooms (relieved of their current occasional Education and Training uses) has not been explained.

4.0 Design

The brief for Project Pegasus has expanded in an attempt to provide more facilities than the existing building can realistically accommodate.

The resultant proposed over-development of the interior has manifested itself onto the exterior appearance of the building, with dire consequences.

The scheme has been designed to maximize the accommodation, with 'form following function' to its illogical conclusion.

5.0 Scale

The resultant scale of the proposed roof extensions, due to the proposed 4th floor accommodation and extended mansard slopes to screen plant areas and rooflight above, is disproportionate to the size of the host buildings.

The size of the proposed dormer windows would overly dominate the scale of the mansard roof and that of the other windows in the host buildings.

The Treasury and Library Building was redesigned as a flat roofed building with a parapet and an additional set of small scale windows inserted at 3rd floor level, to compensate. It is a well-conceived, modest and attractive design, and is subservient to the adjacent Inner Temple Hall, which has a mansard roof.

6.0 Massing

The proposed new mansard roof over the Treasury and increased height of the existing mansard roof over the Hall would lead to over massing to both buildings, due to their steep slopes and excessive heights to hide the accommodation, plant and roof-lights.

The bulk of the proposed mansard roofs and their large/tall dormers is disproportionate to the host buildings and that of adjacent buildings, both Georgian and Neo-Georgian.

The height of the hip ends to the various mansard roofs would lead to a non-traditional architectural and historic appearance, and is more akin to a French chateau or roof top extension to residential blocks from the 1980s.

Please see Figure 1

The proposed triple 'mock' dormer housing to accommodate the lift overrun is bulky and overly dominant. It is also alien to the architectural vocabulary of the Inn.

The excessive massing of the proposed roof-scape is dominant on all elevations, including that to the south (overlooking the Inner Temple Garden) and to the north (overlooking Church Court and the Temple Church). It is even more evident to the east (overlooking the carpark and King's Bench Walk) where the ridge height of the proposed new mansard is at the same level as that of Francis Taylor Building, which is in itself at a higher elevation. The proportions of the shallow roof on Francis Taylor Building and near upright roof on the Treasury are therefore at conflict with each other and architecturally/visually of poor and inappropriate design.

7.0 Authenticity

The proposed addition of the mansard roof over the Treasury and Library is claimed to be the completion of the intent of the original architect, Sir Herbert Worthington, but the design was scaled back and altered by his successor, TW Sutcliffe, to provide a flat roofed building and small set of additional windows at 3rd floor to complete the revised composition.

It is architectural and historic tradition that the window sizes reduce in height and grandeur from the main floor upwards.

I have been unable to find any comparable examples of Georgian or Neo-Georgian buildings, where there are large and dominant dormer windows, above a parapet, with smaller and less dominate windows below.

If the original intended design from Sir Herbert Worthington is overlaid with the existing building 'as built' and the proposed bulky mansards and large vertical dormer windows it is plainly apparent that the two are incompatible in both architectural and historic terms.

Please see Figure 2

The envisaged step down in roof ridge line and the elevations between the Hall and Treasury/Library, to emphasise the importance of the Hall, did not happen, as the mansard was omitted and the parapets to both elevations were lined through to compensate.

The Inn's architects and heritage consultants should have provided an elevational case study to demonstrate these anomalies and at least attempt to justify their incorrect design and presumptions.

The protruding and narrow proposed fire escape staircase enclosure, into Church Court, is woefully inadequate in terms of design and authenticity. The copying of existing materials and detailing on such a ridiculously proportioned and cramped scale, is totally unauthentic, with oversized window, constricted door and door-case/steps, and overly dominant ashlar corner detailing.

The examples given in the Design and Access Statement for types of dormer are inappropriate, as all the buildings shown have the correct progression in size of windows from large to small as they progress up the building, including their dormer windows, and not a smaller set of windows below the parapet to disrupt the architectural and historic tradition and principles.

The Georgian buildings in King's Bench Walk include a mixture of gently sloped roofs, with overhanging eaves and dentils or small parapet details, with appropriately sized modest dormers to suit the composition.

The Neo Georgian buildings at Carpmael and Harcourt Building both have double pitch mansard roofs, and the modest dormers sit either directly above a large projecting

cornice/eaves or behind a short parapet, which is contrary to the arrangement on the Treasury Building.

The Neo Georgian building at Serjeants Inn is a contrived architectural style to provide two storeys of accommodation above a large decorative cornice, and bears no resemblance to the Treasury Building.

The proposed increase in the inclination of the mansard roofs to both the Hall and Treasury from 65 degrees to 70 degrees, is greatly in excess of those found on the Georgian buildings this proposal is attempting to replicate, and would give the appearance of vertical tile hanging. It would also make the already unsatisfactory/unauthentic enlarged dormers twice as dominant.

8.0 Symmetry

The proposed fire escape staircase enclosure, into Church Court, has been crudely located between the Hall and Treasury/Library building, and would significantly harm the symmetry of the north facing elevations of both buildings.

The perfect symmetry of the Hall and carefully conceived junction with the Treasury/Library Building with matching corner detailing would be lost, together with the regular and spacious run of windows to the Treasury/Library Building.

The arbitrary lining through of the staircase enclosure exterior north wall with that of the decorative bin store screen, at ground level, which was only built in 1996 is ill-conceived and this element would have to be completely redesigned to make it symmetrical with the Benchers Entrance and clear of the Hall, or omitted completely and the staircase housed internally or elsewhere.

9.0 Amenity

The proposals would intrude into the Library and take away the entire gallery level at 3rd floor level and have significant impact on the main reading rooms below at 2nd floor level, including the loss of all book shelving to the Gallery and reduced height book shelving to rooms E and F.

A substantial proportion of the Inn's legal research facility for members, its Library, would be lost to an auditorium, break out space and offices, which could and should be located elsewhere adjacent or under the building, or in another part of the Inn's estate, or indeed close by outside of the Inn.

The undisputed quality of the Library interior would be destroyed by these ill-judged proposals including the fine craftsmanship, elegant and traditional design, serene ambiance, special views, variety and quality of reading positions, and loss of original period features and fittings.

The Temple Conservation Area is at its most magical at dusk and night with light streaming from the administrative buildings and chambers, giving a wonderful insight into the interiors with their chandeliers illuminating the fine interiors. The atmosphere and sense of cohesion and history is particularly reinforced by the clear views into the Library with its double height oak panelled series of grand rooms with galleries and original fitting, the Benchers Rooms

with their oak and painted panelling and ornamentation, and the spectacular collection of windows affording a similar insight into the historic interiors of Chambers at 1-7 King's Bench Walk.

The proposal within the Library of horizontal slicing through the double storey and galleries into two, would ruin this amenity, and provide a lifeless alternative, and ugly bulk head detailing to the windows below the proposed auditorium. The unfortunate consequences of this should have been demonstrated more clearly by word and visually by the applicant, in terms of impact on elevations fronting onto Crown Office Row/Temple Gardens, Church Court and King's Bench Walk.

10.0 Over-development

The original brief for an Education and Training suite at 4th floor only, over the Library Gallery and housed in a new mansard and within the existing mansard over the Hall, was acceptable in principle, subject to detailed design, and could potentially be accommodated as part of the existing building.

The subsequent expansion of the brief to include an additional floor level of facilities for Education and Training and commercial use, within the existing building at 3rd floor Library Galley level, to include an auditorium, equivalent break out space, and associated offices, would result in over-development of the existing building.

The over-development would also increase/compound the amount of new plant and displacement of existing plant and machinery to service the new and existing facilities. The enlarged capacity of the facilities would also necessitate a substantial increase/compound in the number of toilets, lifts, circulation spaces and catering provision, which cannot be satisfactorily accommodated.

The proposed incursion of the new Education and Training facilities into the 3rd floor would destroy the Library, with the consequent loss of reading positions and book storage of collections to the whole of the Gallery, irreversible loss of the fine double storey room heights, acoustics and ambiance to all of the principal reading rooms at 2nd floor level, and removal of original and authentic fixtures and fittings.

The proposed down-stand ceiling within Rooms E and F to accommodate the raking floor of the proposed new auditorium above would also sever the fine oak cornicing, door cases and pediments, and compromise the tall and gracious window openings with down-stand bulkhead detail. This proposed bulkhead detail being visible from the exterior, both north and south, and making the new ceiling heights none symmetrical, with bulkheads to the west and none to the remaining of the Library.

The proposed new ceiling heights within the truncated Library are not adequately explained in the application Design and Access Statement, Heritage Statement or on the Proposed Drawings, but appear to be about 2.8 metres in Rooms C, D and G and are particularly

meagre and claustrophobic at about 2.4 metres in height to Rooms E and F (under the proposed auditorium).

The resultant re-use and resizing of the oak panelling and bookcases and fittings to suit is similarly not explained to understand the impact and harm of the proposals to architectural integrity and usability of the Library.

The proposed scheme does not address the fundamental shortcomings of the Treasury Building, Library and Hall, in terms of circulation and arrival.

The proposed redevelopment of a building on this huge scale should have attempted to solve the following deficiencies: -

- Main entrance is too meagre and indistinct.
- Main entrance and reception are too small and cramped for the proposed shared use for public and private entry to the Treasury Office, Benchers Rooms, Library, Education & Training facilities.
- Hall would still be remote from the new Education and Training facilities, and the proposed new auditorium.
- Vehicle access is still restricted from King's Bench Walk into Church Court.
- The relatively new Pegasus Bar at ground level has not been that well used since it opened and could revert back to the Bar Common Room and E&T use as previously.
- A new tall building in front or behind the Treasury and Library, on the terrace or in Church Court, and up and over the existing building, could have given the administrative headquarters and facilities of the Inner Temple its rightful presence and height to obscure the detrimental views of the modern development behind in 12 Fetter Lane.

It is clear that a more radical and/or alternative approach is required to fully realize the Project Pegasus scheme, and that the accommodation should not be constrained within the existing building and the proposed mansard extension, and associated appendices, or unnecessarily intrude into the existing Library.

Please see Section 25.0 for alternative options which would avoid overdevelopment of the existing constrained envelope, preserve and enhance the Temple Conservation Area, save the Library from unnecessary destruction, reduce the need to decant the users from the buildings for a predicted 2 years of construction, reduce the resultant need for temporary accommodation within the Inner Temple Garden, King's Bench Walk or Crown Office Row carpark or elsewhere within or outside the Inn, and potentially reduce the massive cost of the scheme by up to a half.

11.0 Statement of Community Engagement

The Statement of Community Engagement is regrettably thin and unconvincing, and demonstrates the lack of any meaningful community engagement.

The engagement has been largely restricted to the Governing Benchers of the Inner Temple, who only voted narrowly in favour of pursuing Scheme 2 (which is essentially this application) rather than Scheme 1 which had one floor of E&T (with lecture theatre and training rooms) and left the Library largely intact, and the steering group set up by the Inn at senior level, and filtered through to the Departments.

It would appear that there has been extremely limited engagement with the 8,000 ordinary members of the Inn, Library users including those from the other Inns of Court, and practically nothing with the general public and other stakeholders.

The information available to ordinary members of the Inn, their tenants in Chambers, and the general public, via the Inner Temple website has been sparse and vague. The drawings and true impact on the Library only became available online via a petition to save the Library from destruction. Please find the link below: -

<http://www.thepetitionsite.com/en-gb/526/526/022/save-the-inner-temple-library-from-the-devastating-effects-of-option-2/>

The content of this petition, signed and contributed to by over 1500 members of the public, including regular Library users, eminent barristers and judges, academics and librarians make illuminating and powerful reading. It should be given due consideration as part of willing community engagement at all levels.

I am not aware whether the actual cost of the Project Pegasus scheme has been shared with the general public, the ordinary members of the Inn, Library users, or the Inn's tenants of Chambers, to enable any assessment of desirability, value for money or harm versa benefit. If it has been on the Inner Temple website, then I and others have missed it.

I note from the application states that the plans are currently available to view, and have been continuously previously, which I do not believe is the case.

I also understand that a 3-day exhibition with a model of the development and architects/staff on hand to explain the proposals, was held on the Dais within Hall. The ease of accessibility to this potentially useful consultation exercise is unclear to non-members of the Inner Temple, including myself as an ex-employee, Library users from the other Inns of Court, Middle Temple who will be greatly impacted by years of disruption, and the general public.

In summary, the level of Community Engagement and Involvement has been wholly inadequate for a scheme of this magnitude and impact, and the level of harm caused by the proposed development has not been articulated in a sufficient manner, for such a sensitive and important site.

12.0 Design and Access Statement

The Design and Access Statement by the Inn's architects, Hugh Broughton & Architects, is incomplete and does not cover the full scope of the scheme.

There has been a lack of research into the architectural and historical elements of the proposed scheme and therefore the conclusions are insufficient, ill-informed or largely incorrect.

The document includes poor and inappropriate examples of architectural forms and details and fails to justify the poor design and the extent of harm caused by the proposed scheme.

Please see separate submission for further response to the purported benefits of the scheme included in the Design and Access Statement.

13.0 Heritage Study

The Heritage Study by the Inn's architects, Hugh Broughton Architects, is brief and incomplete. It is particularly lacking in respect of: -

2.4 Historical Background, where the Library has been an integral part of the heritage and resulting architecture of the Inner Temple for over 600 years.

2.6 Contribution of Treasury Building to the Conservation Area, where there are only two token short sentences of analysis, rather than articulating on the significance that it deserves as the heart of the Inner Temple.

The promised description of Non Designated Heritage Assets and the Archaeology of the Site are missing and is a fundamental omission that should in-validate this application.

14.0 Heritage Statement

The Heritage Statement by the Inn's heritage consultants, KH Heritage, is lengthy and usefully describes 2.0 The Heritage Significance of the Site and its Context and 3.0 The Policy Context.

The statements particularly pertinent to this application are at 2.9, 2.10 to 2.13, 2.26, 2.31 and 2.42, and all of Section 3.

It is therefore disturbing that these have not been acknowledged in 4.0 The Proposed Scheme and Its Effect and that the conclusions drawn are predominately incorrect in my view.

It is glaringly apparent that the proposed scheme is not implementing the completion of the original architects' designs for the building, as his successor changed the architectural composition completely to make this no longer aesthetically or historically feasible, and the proposed boxed modern additions would overwhelm and ruin the integrity of both the intended design by Sir Herbert Worthington and that actually built by his successor TW Sutcliffe.

It therefore cannot be argued that the proposed scheme would Enhance or Preserve the Conservation Area or complement the adjacent Listed Buildings, Scheduled Monument, Registered Garden and Group Value (include the non-listed building in Neo-Georgian style). The conclusions within the Heritage Statement should therefore carry no planning weight.

15.0 Planning Statement

The presumption of the applicant, their architect, heritage consultant and planning consultant that the scheme is of good design and completes the intent of the original architect is patently incorrect and un-substantiated.

Please refer to points 2.0 to 29.0 of this letter for the grounds for objection and of where this planning application fails to meet the planning requirements and criteria, and to the learned submissions from planning barrister Richard Humphreys QC which I wholeheartedly support and endorse. See Appendix 6 for representations dated th & th March 2017.

16.0 Pre-application advice

The Pre-Application discussions with the City of London appears to have been rudimentary and the advice given insufficient and inappropriate for a scheme of this significance and sensitivity.

The Project Pegasus pre-application discussions required greater scrutiny, as huge elements of the scheme have not been taken into consideration and the applicant should attempt to justify them accordingly.

The City of London would be failing in their Statutory Duty to Preserve or Enhance the Temples Conservation Area if they were to grant planning permission for this controversial and flawed application.

The presumption in favour of the principle of development is fundamentally wrong and should be withdrawn prior to this application progressing any further.

17.0 Detrimental effect on Conservation Area

Development within Conservation Areas and of any new buildings/extensions should be of an exceptional quality to Preserve or Enhance the Temples Conservation Area. The proposed scheme is below satisfactory and would result in significant 'harm' to a highly unique and exceptional collection of buildings and features that form this important Conservation Area. The proposals would devalue the 'careful consideration' of the development of the Inner Temple Estate over hundreds of years, and introduce an ill-conceived mismatch of architectural styles in perpetuity, and should therefore not be permitted.

18.0 Detrimental effect on Statutory Listed Garden

The vista of the heart of the Inner Temple estate and its administrative, learning and social centre from the Statutory Listed Garden is highly significant and to be protected from harm. The proposals would impact detrimentally on the historic and beautiful setting of the Inner Temple Gardens with alien architectural styles and overbearing proportions, and forbidding appearance. This would be in direct conflict with the surrounding building of exceptional quality and classic proportions to frame the views towards the Treasury Building and Hall.

The lack of any meaningful exploration of alternative locations for the Education and Training Suite, and insistence of the Inn is carving up the interior of the building, will lead to near wholesale decanting of the main users, Library, Treasury Office, E&T, Hall and Catering, which will need to be rehoused for a least two years.

The options for decanting would undoubtedly include temporary structures within the Statutory Listed Garden and on Crown Office Row, for an indefinite period, which would have a long lasting impact on the access and appreciation of the Inner Temple Gardens, and the strategic views in and out of the Temple.

The impact and harm, in consequence of the proposed scheme, should form part of this application to fully assess the merit or otherwise of the application.

19.0 Detrimental effect on Ancient Monument

The medieval Buttery located to the west of the Hall is already partially hidden from view from Crown Office Row and Church Court, but can be appreciated from within Elm Court. The modest rubble wall building is backed by the brick elevation of the Hall west wall with arched and stained glass window, and the rather austere mansard roof of the Hall above. The proposed change of roof pitch from 55% to 60% would exaggerate this distraction and therefore have a detrimental aesthetic effect on the Ancient Monument. The proposed new finger staircase protruding into Church Court would provide another blank slab of elevation, to the vista into Church Court and only real glint of space/access in and out of Elm Court.

20.0 Detrimental effect on Listed Buildings

The lack of sensitive design for the proposed scheme with excessive massing and height, overly steep roof inclines and unauthentic proportions and detailing of roof, dormers and fire escape staircase, would conflict with the carefully conceived and authentic Listed Building and Temple Church, which are all of exception quality and significance. The proposed North, South and East elevations and mansard roof are all architecturally and historically contrived and would have an adverse and detrimental effect on the adjacent Listed Building and the Church.

21.0 Detrimental effect on Group Value

The Inner Temple is a spectacular collection of buildings of exceptional architectural and historic importance, and this proposed scheme would dilute the integrity and authenticity of the Georgian and Neo-Georgian buildings that form a cohesive group. The non-traditional architectural forms in the proposed scheme would have an adverse and detrimental effect on the Group Value of the Inner and Middle Temple.

22.0 Harm/Economic benefit

The proposed scheme would 'harm' the Temples Conservation Area and adjacent Listed Buildings, Scheduled Monuments, Statutory Listed Gardens, Group Value and designated and non-designated heritage assets, such as the Library, Treasury and Hall. The 'harm' would far outweigh the unsubstantiated 'benefits' of the proposals. Numerous alternative options which would have completely negate any 'harm' to the Temples Conservation Area and adjacent Listed Buildings, Scheduled Monuments, Statutory Listed Gardens, Group Value and designated and non-designated heritage assets, especially to the Library, have not been pursued or justified. The enormous and disproportionate cost of the scheme at about £20 million, made known only a few days ago on the planning consultation representations, throws an entirely new light on the assessment of 'Harm' versus 'Benefit'. This is especially relevant in view of the mediocrity and harmful nature of the scheme, especially as no meaningful alternatives have been explored or articulated.

23.0 Temporary decanting and accommodation

The proposed decanting of most of the building is an integral part of the redevelopment scheme, and the consequences have a material bearing on this planning application.

No details are provided to evaluate the impact on the setting of the Treasury Building and Hall, and the detrimental harm to the adjacent Listed Buildings, Scheduled Monument, Registered Garden, and the Temples Conservation as a whole.

The likely disruption to Middle Temple and the general public is also not explained, due to any portacabins and/or marquees potentially located in the Inner Temple Garden, Crown Office Row and King's Bench Walk car parks, and/or Church Court.

24.0 Site Confines/Opportunities

The Inner Temple estate is not confined and there are opportunities for development.

The Inn's provide flexible leases with short termination clauses that can lead to voids and allow for periodic rationalisation of Chambers, due to the turnover of tenants.

Redevelopment has been previously explored to the rear of King's Bench Walk.

Cooperation and sharing of facilities with Middle Temple and the other Inn's and the Royal Courts of Justice provide a more meaningful solution to Education and Training.

New building in conservation areas is not precluded but must be of exceptional quality of design.

The Inner Temple Treasury and Hall have been smaller and less distinguished since medieval times and Project Pegasus is a once in a lifetime opportunity to enlarge and enhance the buildings. This would give them the prestige to match the functions of the Inner Temple and that of the other Inns.

25.0 Business Case

The application has no meaningful business case and does not even mention the cost, which must be well in excess of £20 million, and therefore it is impossible to determine value for money, and significantly whether the substantial 'harm' to the interiors and external appearance and setting outweigh the unsubstantiated 'benefit' of the education and training facilities.

The brief from the Inn to work within the confines of the existing building, which is complex and robustly built, and greed for accommodation in the wrong parts of the building, has resulted in a luddite scheme, which would cause undue 'harm' and unprecedented disruption to the working of the Inner Temple.

The expansion of the brief to include more facilities than are actually needed for Education and Training, and thoughtless location of the facilities has resulted in major structural implications and disproportionate increased costs and disruption, with the resultant unnecessary destruction of the Library and requirement to decant effectively the entire building.

The application has no information on alternatives to the proposed destructive and hugely expensive scheme, viable or otherwise, and therefore it is not a credible business case for the current scheme.

The Inn presumably does not have tens of millions sitting in the bank and would need a loan to implement the construction works and for the decanting. I presume the lender would need a credible business case to afford a loan of this magnitude and confirmation that all other options within the site, on its boundaries and outside had been investigated and properly appraised.

The application displays a lack of vision by the Inn, as they could have both a world class Education and Training facility and retain their world class Library facility intact, with more imagination and flair. The two are not mutually exclusive.

There are numerous viable alternatives to the proposed ill-conceived scheme that should be explored further.

26.0 Alternative Options

- a) Create basement auditorium in Church Court with ground floor pavilion housing reception and breakout space, partially on the site of the former Lamb Building (which was never reinstated after WWII) and linked to the main building reception at ground floor and to the existing E&T offices in the basement.
- b) Redevelop and extend link building as a self-contained E&T facility, with ground floor reception/office, auditorium at 1st floor, breakout space at 2nd floor and training and function rooms at 3rd/4th floor, with link to new mansard over Library at 4th floor for E&T and Library offices. *Leaving 2nd & 3rd floor Library and Hall plant room in existing mansard intact.*
- c) Extend central bay of Treasury/Library onto terrace and correspondingly project out into Church Court, with enlarged reception at ground floor, 1st floor balcony, 2nd & 3rd floor external columns and heads, and 4th floor projecting pediment to house front of auditorium to the south elevation, and enclosed lightwell and circulation route, staircases and lifts to the north elevation. *Leaving the Library intact at 2nd & 3rd floors, and structurally spanning over the existing flat roof of the main building at 4th floor, and potentially adding a 5th floor for further rooms or plant.*
- d) Extend above Francis Taylor Building with two additional storeys and link to 4th floor E&T suite over Treasury/Library in scaled back and more appropriate new mansard with roof lights and correctly proportioned dormers to the rear roof slope.
- e) Create E&T suite including auditorium within basement of Treasury Building and relocate catering to extended kitchens and stores in Church Court. Revert Pegasus Bar back to E&T use as reception and offices.
- f) Extend Littleton Building up two storeys for relocated chambers and create E&T suite at basement and ground floor, or vice versa.

- g) Change overbearing mansard to traditional pitched roof with projecting eaves and remove parapets, with no dormers, to match Crown Office Row and King's Bench Walk. Insert roof lights instead.
- h) Enhance front elevation with colonnaded entrance porch, 1st floor balcony, external stone columns and projecting roof pediment, to provide more generous main entrance and additional floor area for auditorium at 4th floor level (relocated from proposed Library Gallery at 3rd floor).
- i) Remove parapet and add additional brick faced storey at 4th floor level with 5th floor accommodation within mansard or pitched roof with projecting eaves. *Leaving whole of 2nd/3rd floor Library intact.*
- j) Infill the 3rd floor set of small windows with brick inset panels in an attempt to make the large dormer windows work architecturally with the 2nd floor tall windows below. An extreme option to make the external appearance palatable/vaguely authentic but would preclude any daylight into the 3rd floor, so not recommended. It does, however, highlight the shortcomings with the proposed current scheme, that needs to be addressed by other means.
- k) Change proposed single pitch to double pitch and omit or reduce size of dormers and orientation, to be closer to the roofscape of Harcourt Buildings but this would result in reduced area for proposed roof plant areas and roof light over breakout space.
- l) Add an additional brick storey and clock tower to the central bay of the Treasury Building, to provide extra internal space for auditorium at 4th floor (relocated from proposed Library Galley at 3rd floor) and substitute internal space for breakout/training rooms at 5th floor.
- m) Add an additional brick storey and clock tower to the South East corner of the Treasury Building with the same uses/relocations as above.
- n) Add an additional brick storey and towers to the Hall projects, in lieu of the mansard hip ends to provide additional internal space for E&T and plant, and return whole/more of the 3rd floor back to Library use.
- o) Retain 3rd floor Galley arrangements for Library use and insert a temporary floating floor for office use, to one of the rooms, in a reversible manner so that the original arrangement could be reinstated in the future, to free up space elsewhere and still be able to appreciate the fine craftsmanship and quality of the oak balustrades and light filtering down to the room below.

The alternative options are limitless and only curtailed by a lack of vision and imagination. The constrained brief set by the Inn to work within the existing building and inflicted on their architect has resulted in a luddite scheme.

The Inn can have their world class E&T facility and retain the Library, plus the integrity of the building and respect its setting, with a host of alternative schemes to the one presented for planning permission.

The cost of the proposed scheme has finally been revealed in Michael Spencer's Support Comments dated 3rd March and made available to public view on 7th March 2017 at about £20 million.

The Inn could buy several new buildings for that amount, potentially from Middle Temple, where Carpmael Building would be ideal at the centre of both Inns (and originally belonged to Inner Temple anyway) or build a dedicated E&T facility adjacent the Treasury Building at a fraction of this cost and the associated decanting and disruption, and needless harm to their heritage assets and functional operations.

The cost of construction for the new facilities would equate to up to £4,000 per sqm for the alterations of the existing building and the proposed additions, which is double what could reasonably be expected for such a modest increase in net floor area.

The budget and potential of this project is now in the realms of TED 'The Future of Architecture in 100 Buildings' and the applicant and their consultants would do well to explore the initiative modern architecture in this book.

Hugh Broughton Architects are rightly featured on page 2 for their innovative and beautiful Arctic Space Station, and if the full potential of this gifted and world renowned architectural practice was permitted to use their vision and imagination on striking alternatives to the current dull and compromised scheme, Project Pegasus could be the jewel in the Inns crown, rather than a pale imitation.

Building and structures of particular note and perhaps further inspiration for the Inner Temple could include:

- 19 142 Park Street, South Melbourne
- 36 Kukje Gallery, Seoul
- 39 Trevox Apartments, Naucalpan, Mexico
- 42 Frog Queen, Graz, Austria
- 45 Glass Pavilion at the Tolodo Museum of Art
- Drive Facade of multi-storey car park, Skopje, Macedonia
- 55 Treehotel, Harads, Sweden
- 56 Treehouse, London
- 66 Italian Pavilion, Milan

and my favourite

- 89 3D Print Canal House, Amsterdam

which could be transformed into a modern take on the Georgian period of the Temple

Ref: TED Books: Small books, big ideas

www.ted.com/books

TEDTalk, now online go.ted.com/architecture

27.0 Planning Policy

The application does not meet planning policy on so many levels that it should not be entertained. It would take longer than the consultation period to address the non-compliance and I would respectfully refer to the representation from planning barrister Richard Humphreys QC for his learned appraisal that I fully support and append to reinforce my objection on planning matters.

28.1 National

The application fails to comply with the majority of the National Planning Framework and should be refused.

28.2 Regional

The application fails to comply with the relevant sections of the London Plan and should be refused.

28.3 Local

The application fails to preserve or enhance the Temples Conservation Area and should be refused.

28.4 Specific

The application would change the character and devalue the heritage of the Temples Conservation Area, and would need to be rewritten to include the harm, and should be refused.

28.5 Case Law

The explanation of case law and its interpretation in the KH Heritage submission is confused and has not been applied to the recommendations, and therefore should be give no planning weight in this application.

29.0 Conclusion

The validity of the application is questionable due to:

- Incomplete Planning Application Description to cover the proposed scheme
- Insufficient explanation and justification of proposed Use Class Order
- Incomplete Design and Access Statement, Heritage Study, Heritage Statement and Planning Statement.

The design of the proposed scheme is poor and of insufficient quality for such an architecturally and historically significant site.

The proposed scheme does not substantially comply with Planning Policy, at National, Regional, and Local level.

The proposed scheme would be highly detrimental to Designated and Non-Designated Heritage Assets, which include the adjacent Listed Buildings, Ancient Monument, Registered Garden, Temple Conservation Area and the Inner Temple Library, Treasury and Hall.

The substantial 'harm' to the above Heritage Assets from the proposed ill-conceived scheme would far outweigh any unsubstantiated 'benefit'.

The level of Community Engagement and Involvement has been highly selective and wholly insufficient for the Inn's ordinary members, Library users, Tenants of Chambers, neighbouring institutions, the learning profession, and the general public, for a proposed scheme of this magnitude and sensitivity.

The business case for the proposed scheme and the requirement for E&T facilities and associated detrimental impact on the site has not been justified.

The proposed destruction of the fine Inner Temple Library to facilitate the proposed luddite scheme is not necessary or warranted.

The Inn and their consultants have made no meaningful efforts to explore or articulate numerous alternative options that exist, which would improve the design and authenticity of the proposed scheme, and negate the any 'harm'.

The Inn can have a world class Education and Training facility and retain its world class Library, as the two are not mutually exclusive.

The Inn has been timid with its proposed scheme, by restricting the brief to working within the existing building, which would result in overdevelopment, poor design and significant harm to its Heritage Assets.

The current scheme (application) lacks vision and a more radical solution is available that would meet all of the Inns requirements in a more economical manner, and satisfy the necessary stringent planning requirements.

The application for the proposed scheme Ref: 17/0007/FULMAJ should be duly refused.

Yours sincerely

Neil D. Coe

Please find attached the followings:

Copy of Richard Humphreys QC submissions that I full support and endorse.

Please refer to separate document for the following Appendices: -

Appendix 1 Photos

Appendix 2 Drawings

Appendix 3 Listing

Appendix 4 Architects Quotes

Appendix 5 Inspiration

Appendix 6 Design and Access Statement response & further representation from HBA

Appendix 1 - Photographs

Heading

Figure 1a- Photo P7101 – Proposal veering towards 1980's residential addition with steep mansard slopes



Figure 1b- Photo - Proposal veering towards French chateau in style to mansard hip ends and dominant dormers



Figure 2a - Photo – Comparison of Worthington intent, Sutcliffe actual and HBA additions

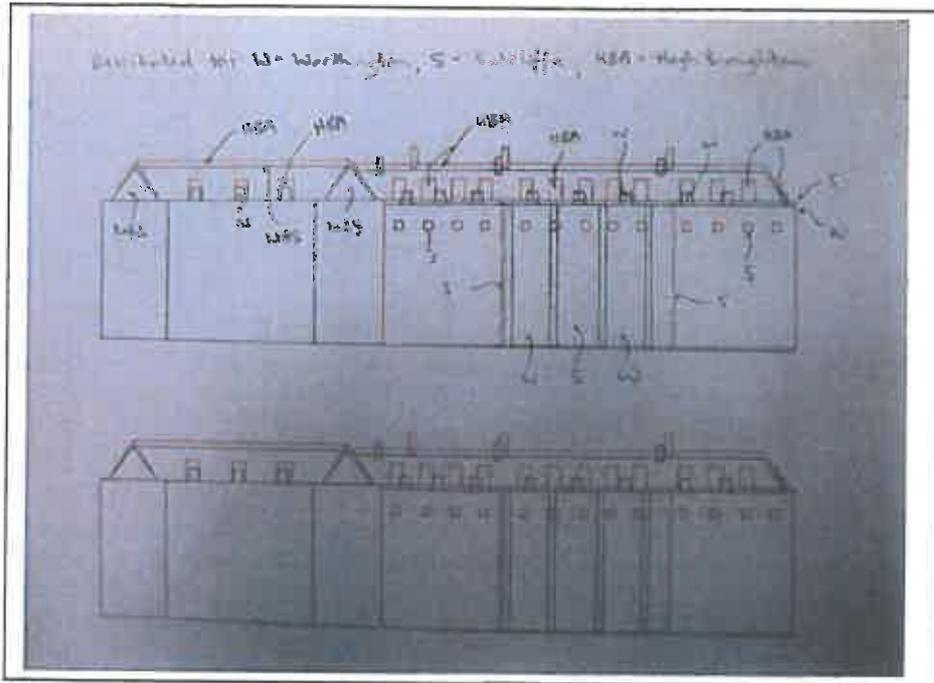


Figure 2b – Photo – Comparison showing increased height, steepness of roof slopes and double sized new dormers by Hugh Broughton Architects. Small dormers in Worthington design never built and substituted for small top windows in elevation instead by Sutcliffe. Drop in elevation height between Hall and Treasury dropped by Sutcliffe to marry up Hall and Treasury, and to give better proportions to 3rd floor windows.

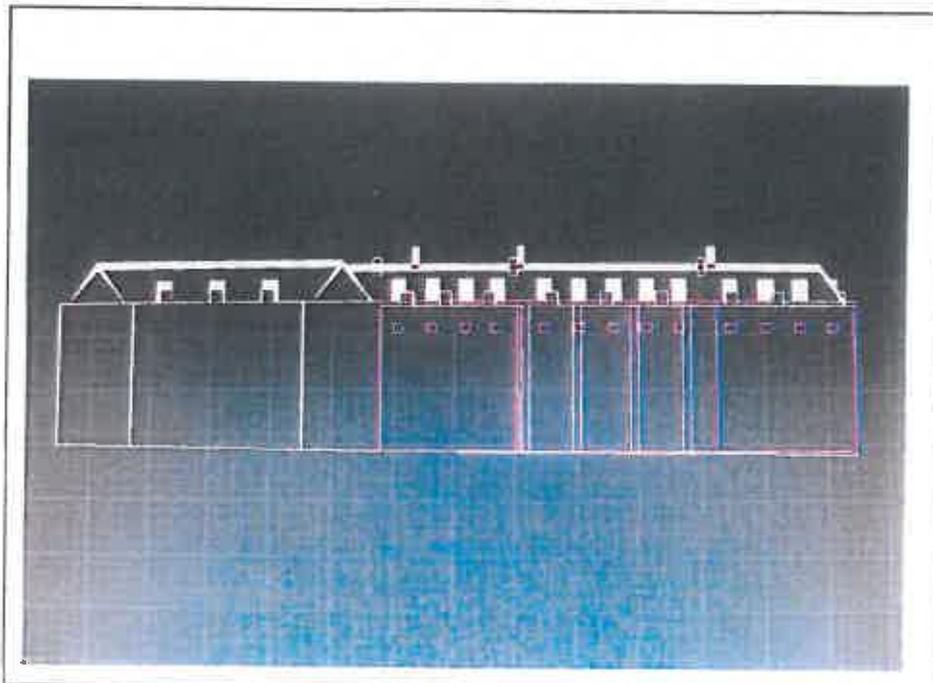


Figure 3a – Photo P7107 – Example of portico entrance to neo-Georgian building - Derby

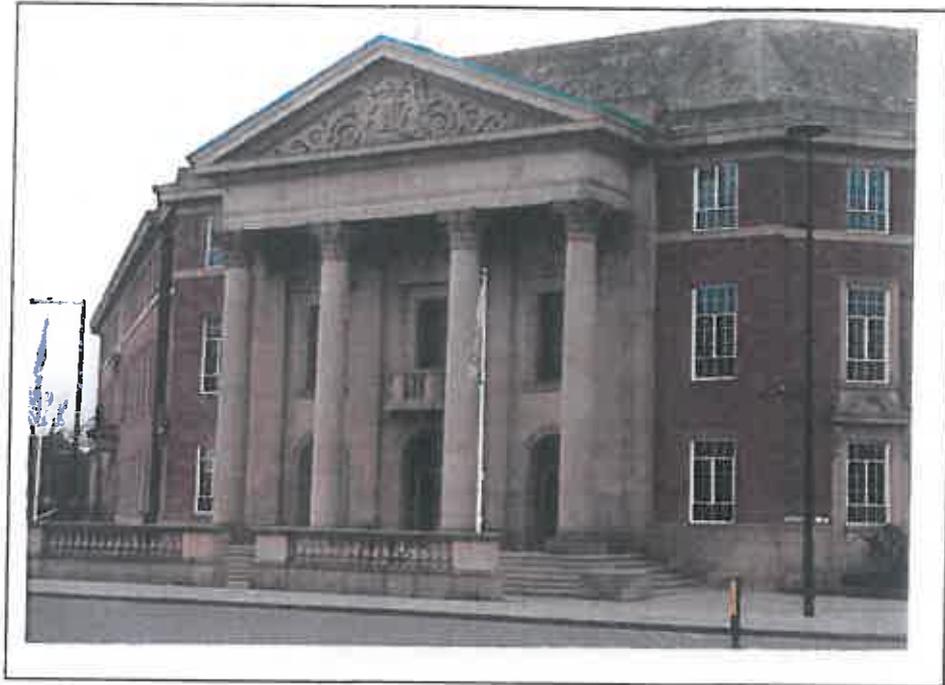


Figure 3b – Photo P7109 – Example of glazed insertion to neo-Georgian elevation to bring public into interior



Figure 4 – Photo P7084 – Example of overdevelopment to mansard roof-scape - Brighton



Figure 5 – Photo P 7009 – Example of small upper windows 3rd with additional storey and smaller dormers with double pitched mansard – Regency period - Brighton



Figure 9 – Photo P6996 - Example of small 9 pane upper windows 3rd and smaller 6 pane dormers with double pitched mansard showing classic proportions and no over-dominance– Regency period - Brighton

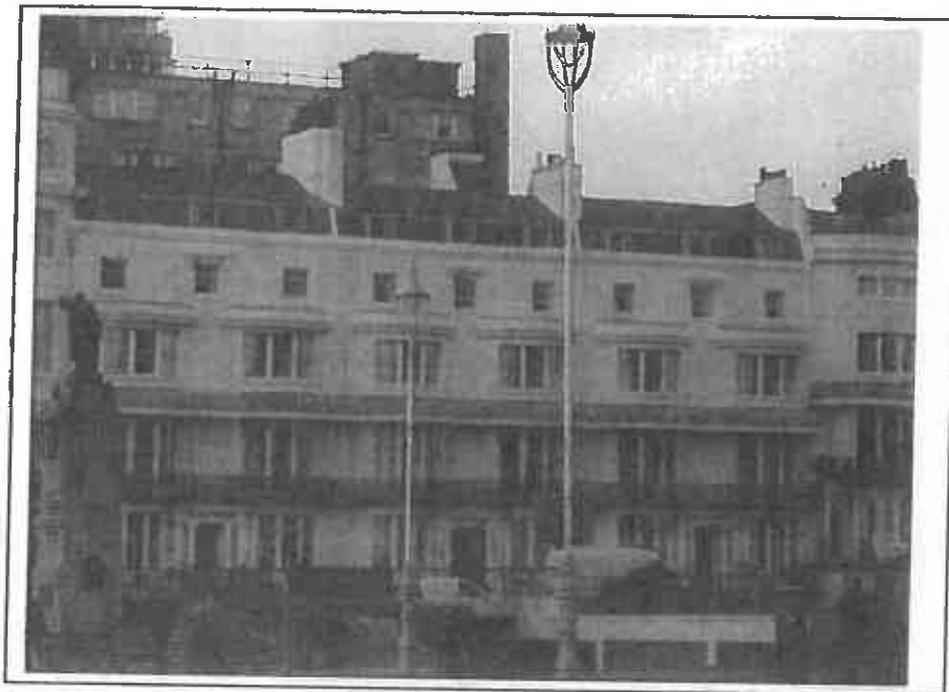
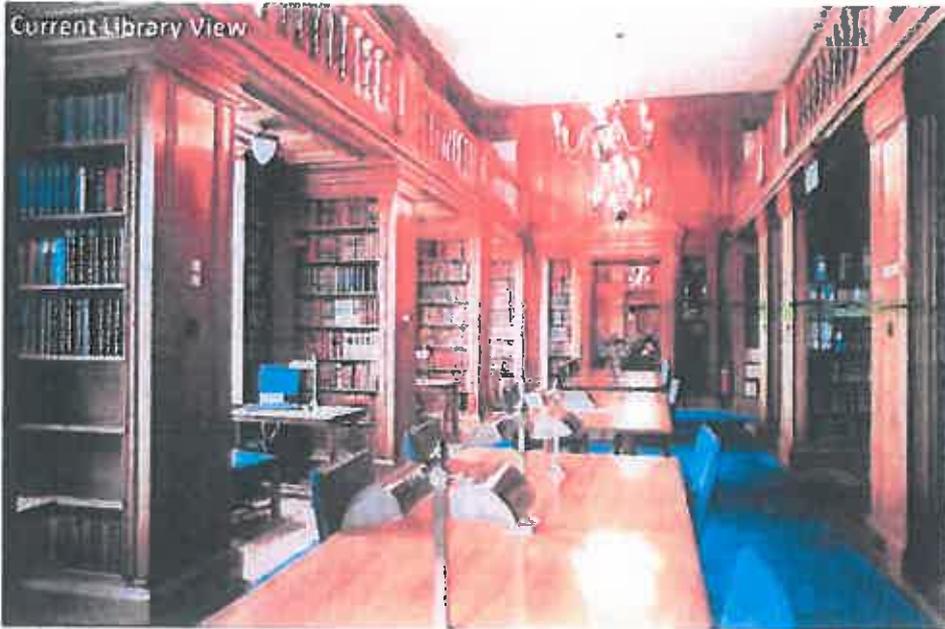


Figure 10 – Photo 6980 – Existing typical view into Library from Church Court with oak panelling and chandeliers clearly visible



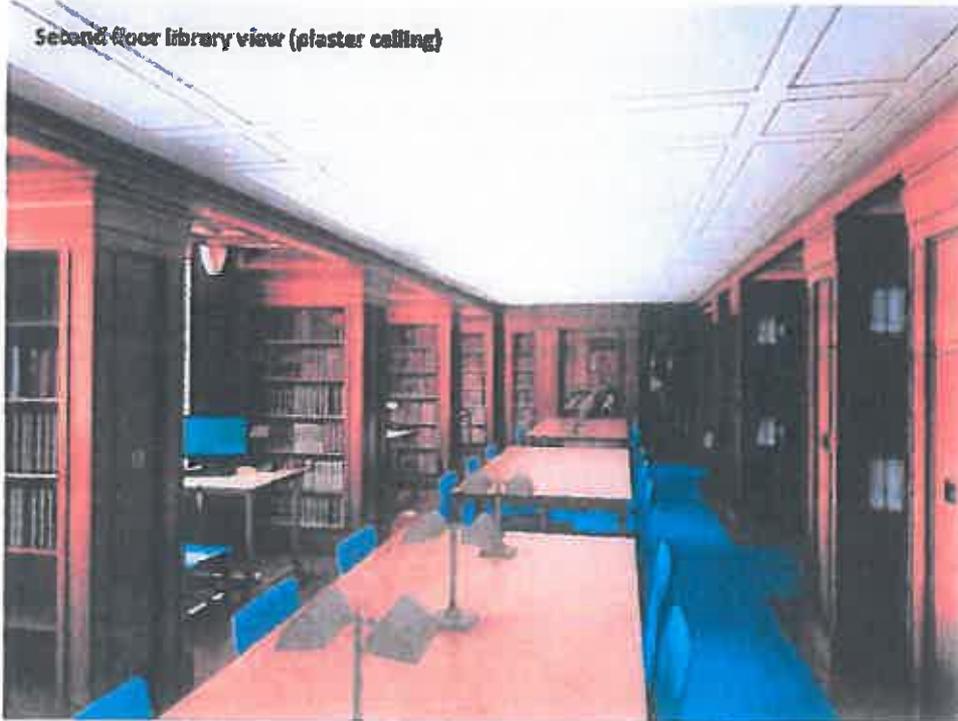
Figures 11, 12, 13, & 14 – Annotated photos – Showing impact of proposed sever through Galley with new flat ceilings generally throughout Library and additional down-stands under proposed auditorium

Current Library View



auditorium
downstand,
location

Second floor library view (plaster ceiling)



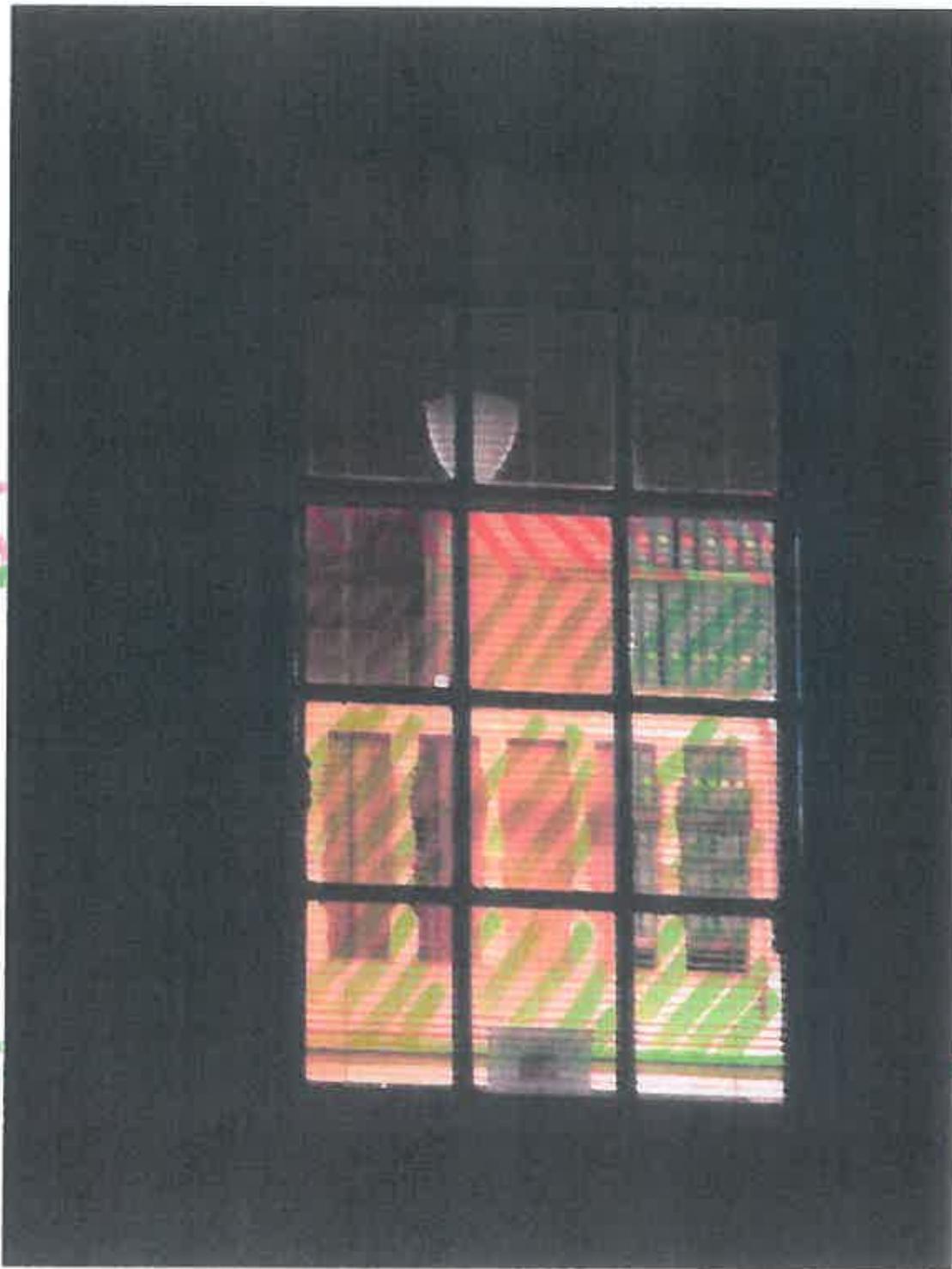
auditorium
down stand
300mm
lower and
visible to
end library
room

/// Downstand
Dark
cream



All cream ceiling
with modern spots.

with modern spots



Downstand dark cream ceiling

All cream ceiling

Comparison view into 2nd floor of Library from Crown Office Row / Temple Garden

Comparison view (general) into 2nd floor Library
from Crown Office Row / Inner Temple Garden



dark cream
ceilings
down slatted.



cream
ceilings

Figure 15- Photo representation – Showing impact of proposed sever through Galley with new flat ceilings generally throughout Library and additional down-stands under proposed auditorium from Crown Office Row/Inner Temple Garden. Loss of view of oak panelling, Galley balustrades, bookcases and Library usage, chandeliers – New view of flat ceiling with modern spotlights instead.

The existence of a Library will be largely not visual from the exterior and appreciated from the Temples Conservation Area



Figure 16a – Photo P6959 – Example of brick inset panels above graduated size of windows with modest dormers above – Wood Green



Figure 16b – Photo P6958 - Example of brick inset panels above graduated size of windows with modest dormers above – Wood Green



Examples of Georgian and neo-Georgian buildings, many with set off small top windows and roof composition to suit architectural and historical traditions, and embellishments.

Figure 17 – Aspley House



Figure 18 – Troon Town Hall

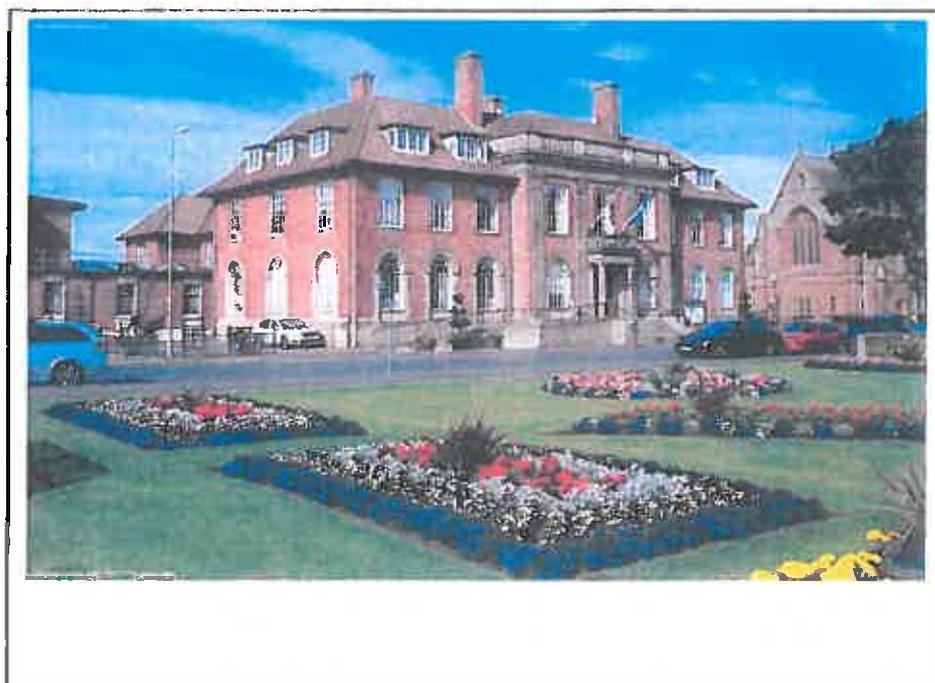


Figure 19 – Somerset House

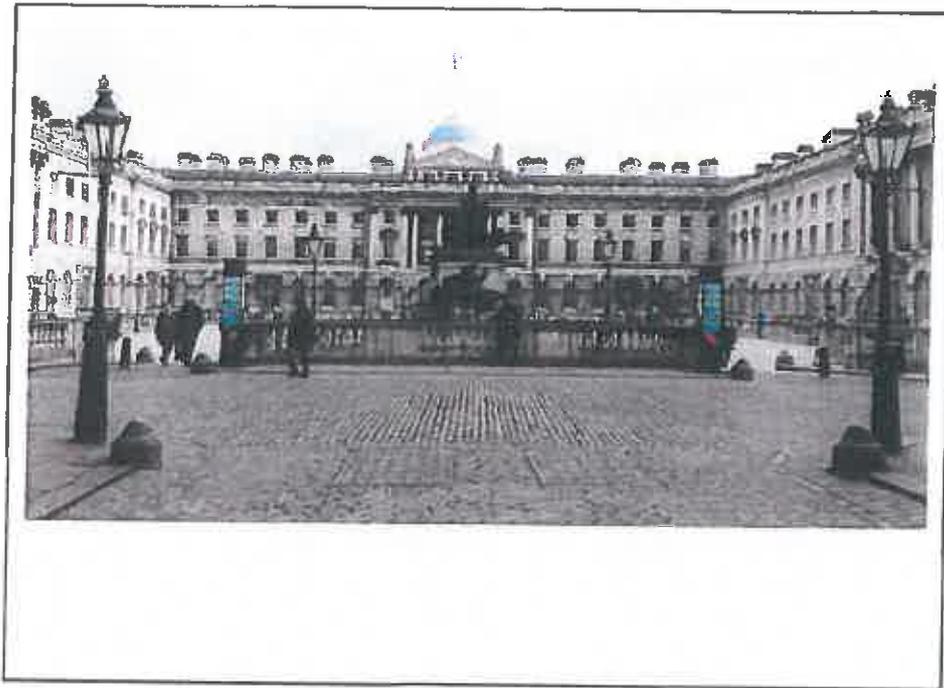


Figure 20 – Newark Town Hall

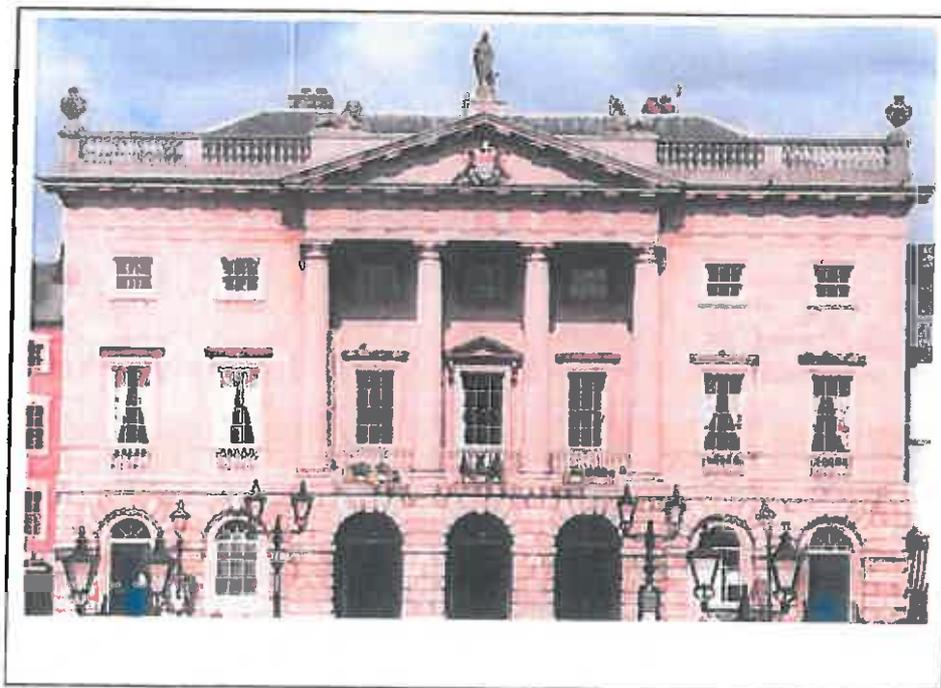


Figure 21 – Belfast City Hall



Figure 22 – Nostell Prior



Figure 23 – Marble Hill

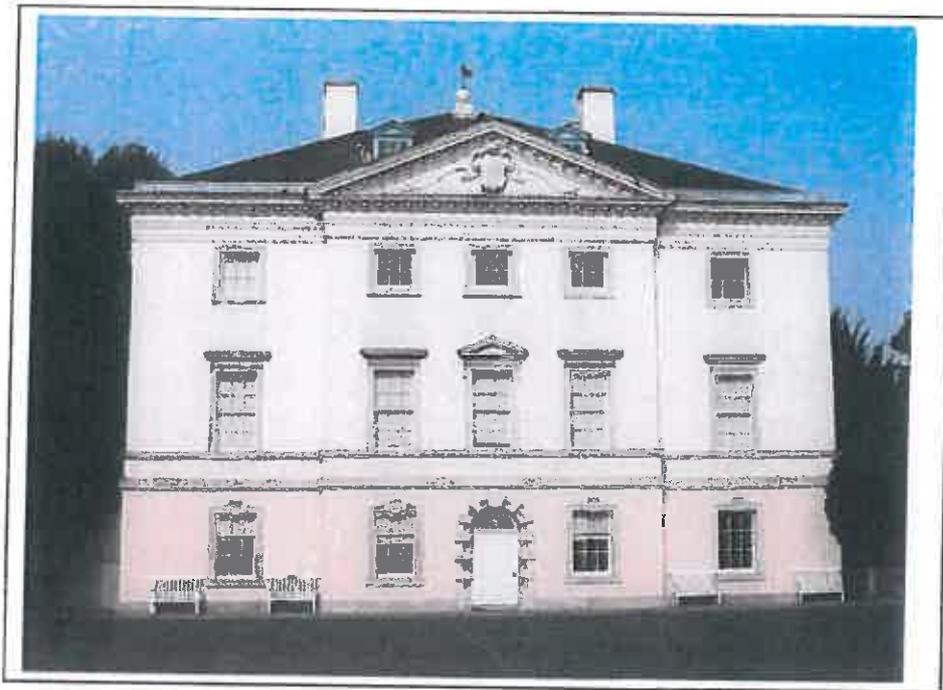


Figure 24 – Morden College



Figure 25 – Royal Artillery Barracks, Woolwich

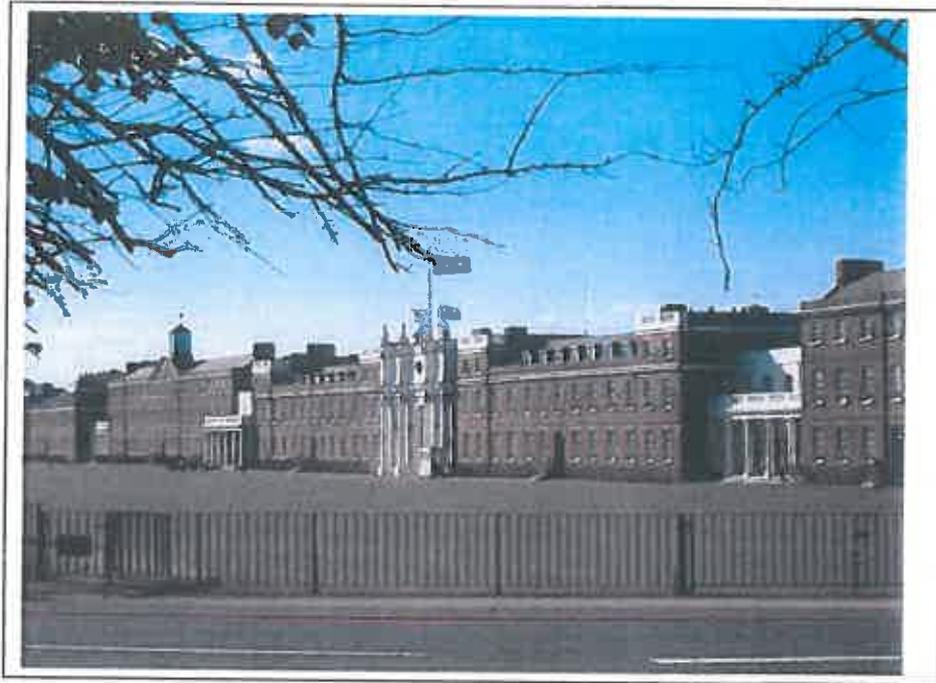
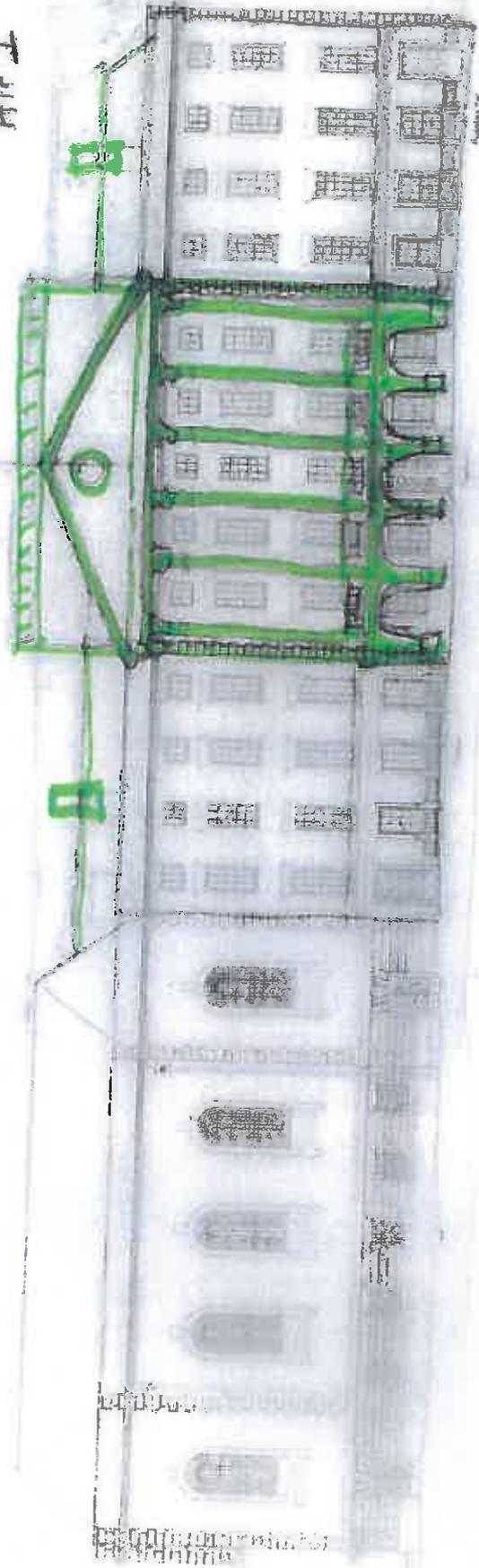


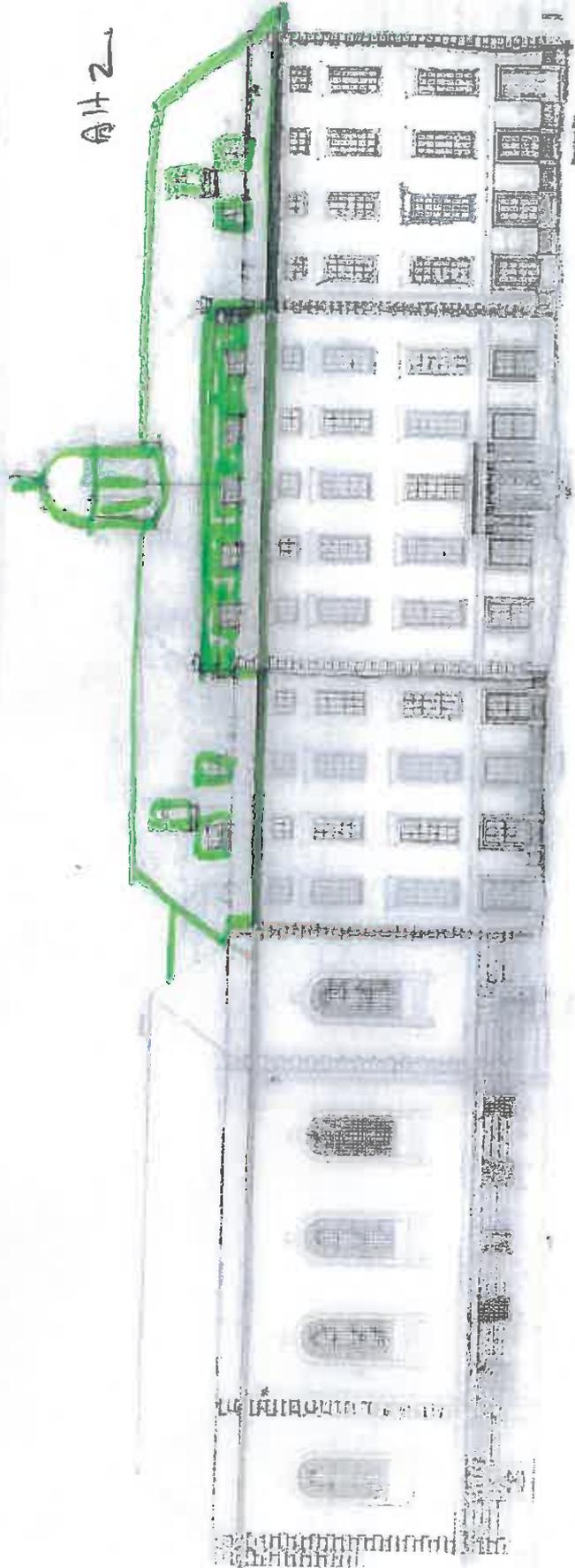
Figure 23 – Worthing Town Hall



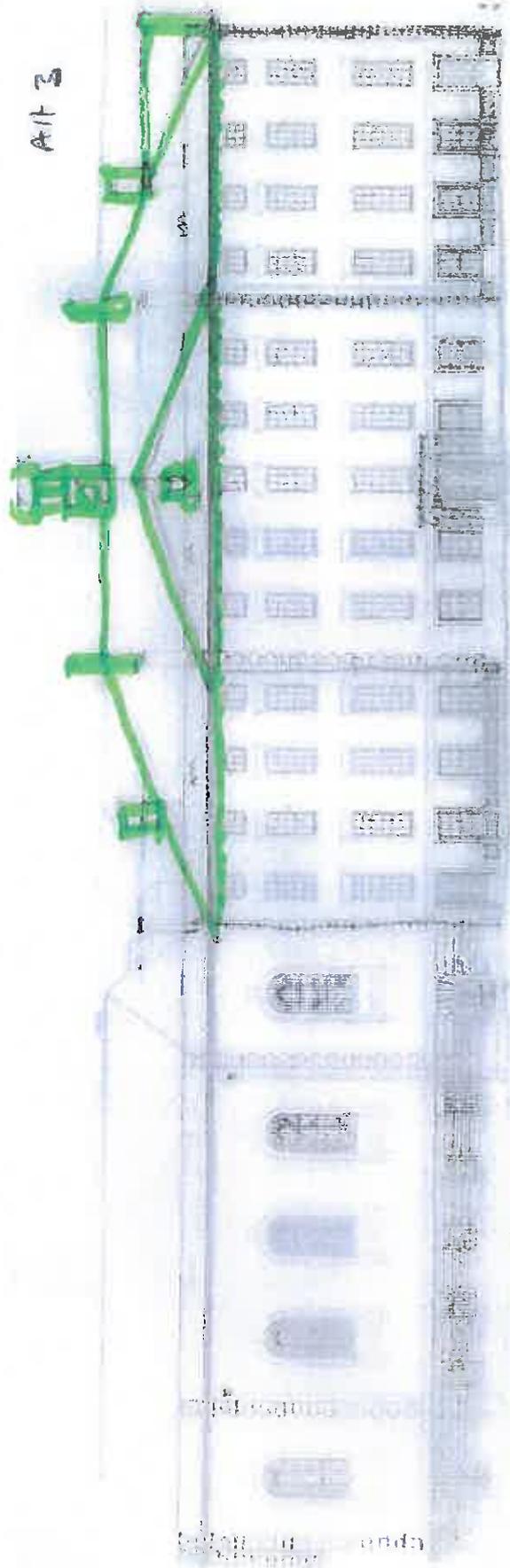
Alt 1



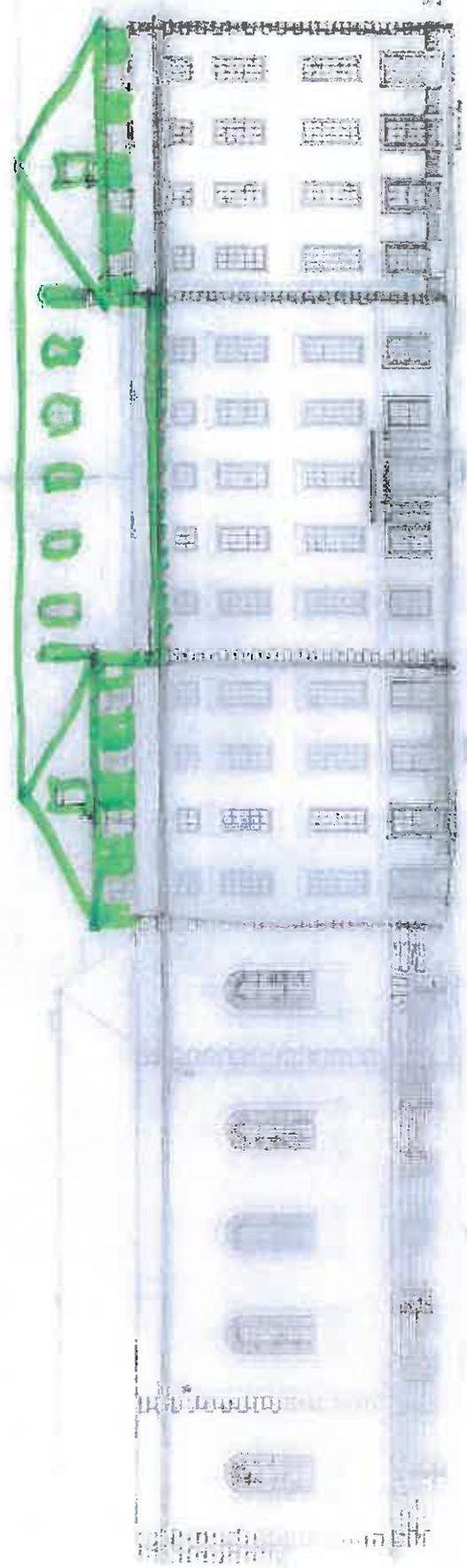
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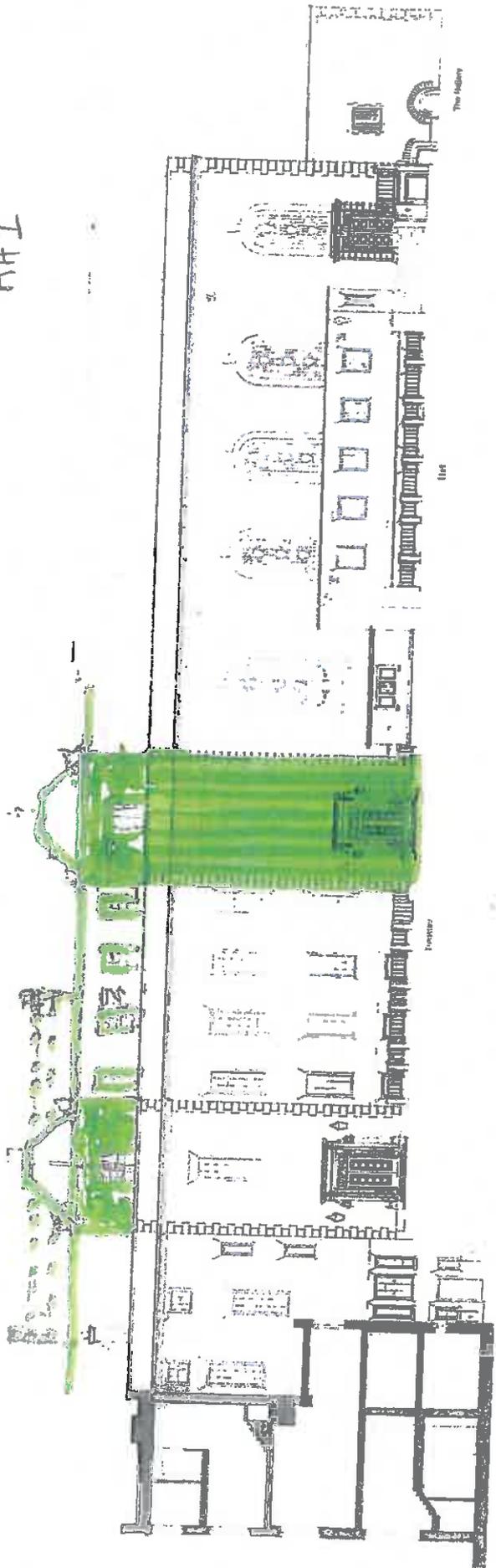
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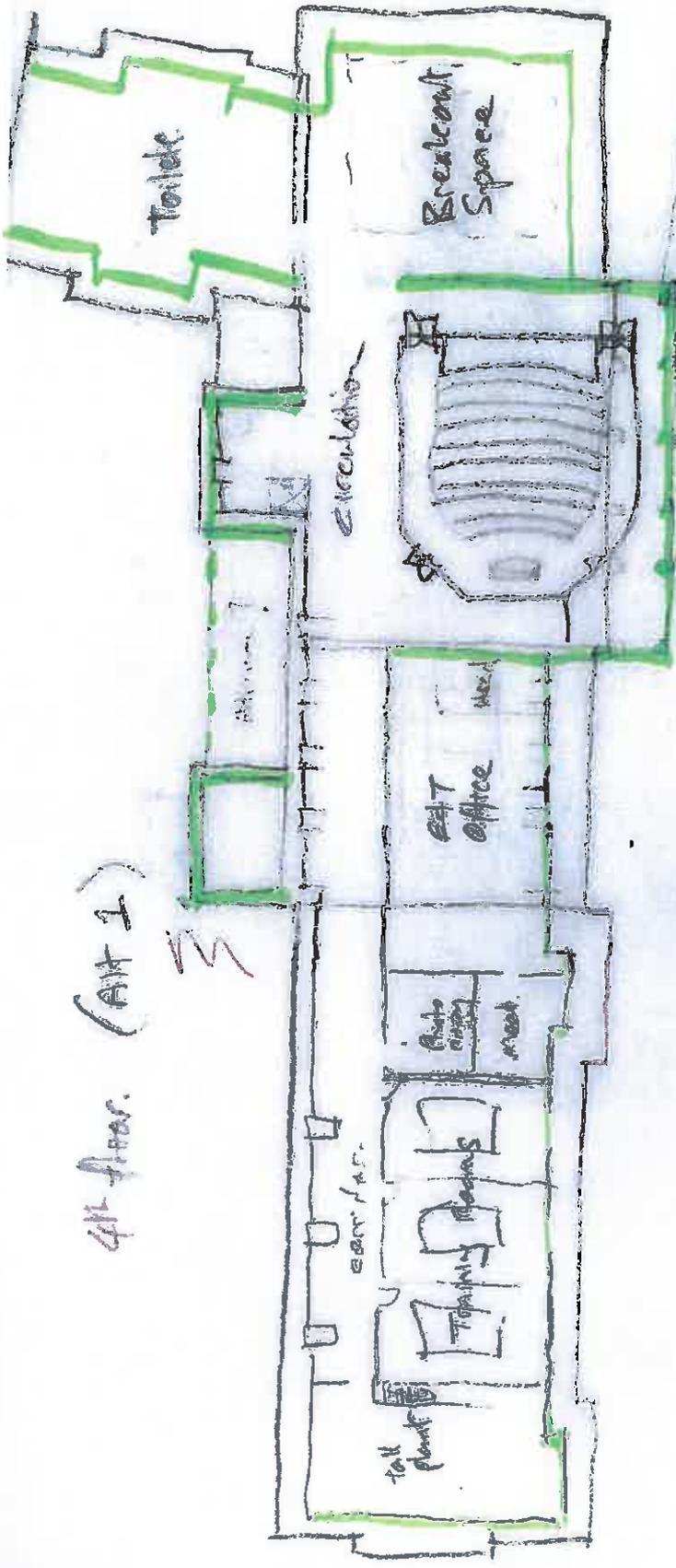
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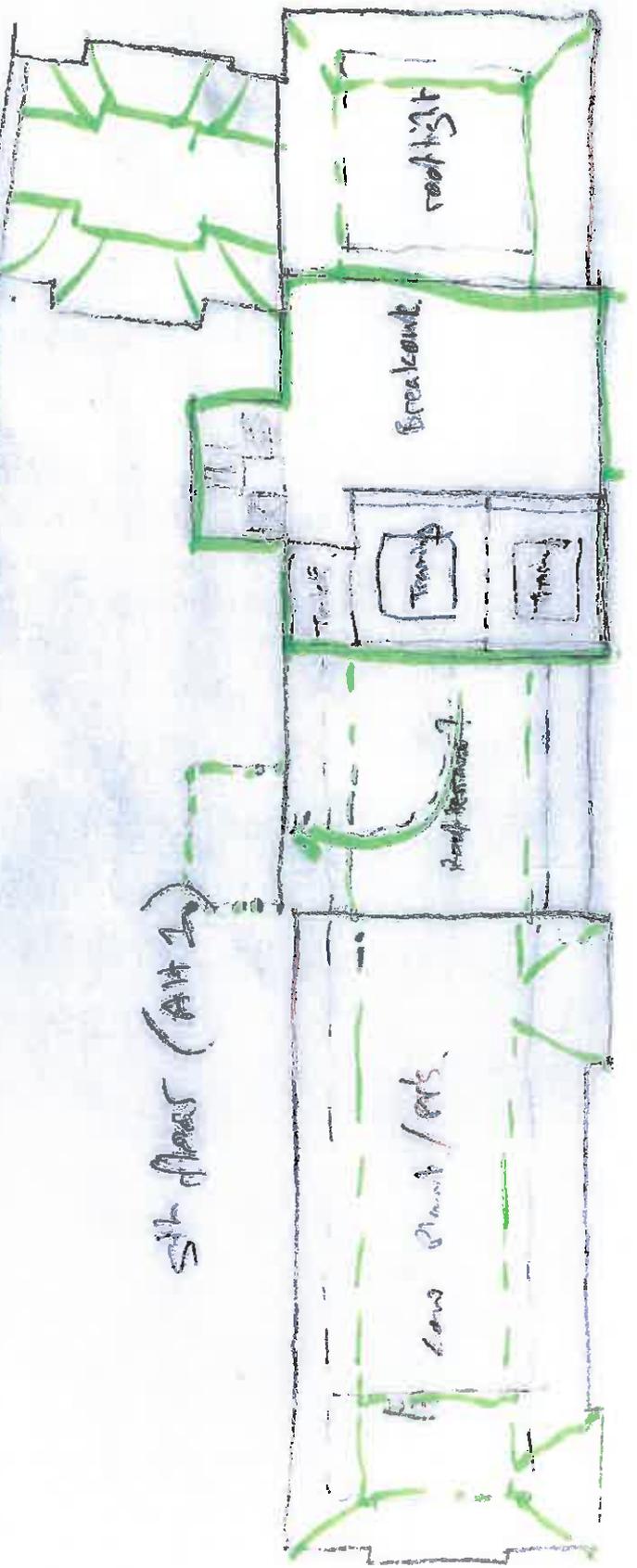
AH1

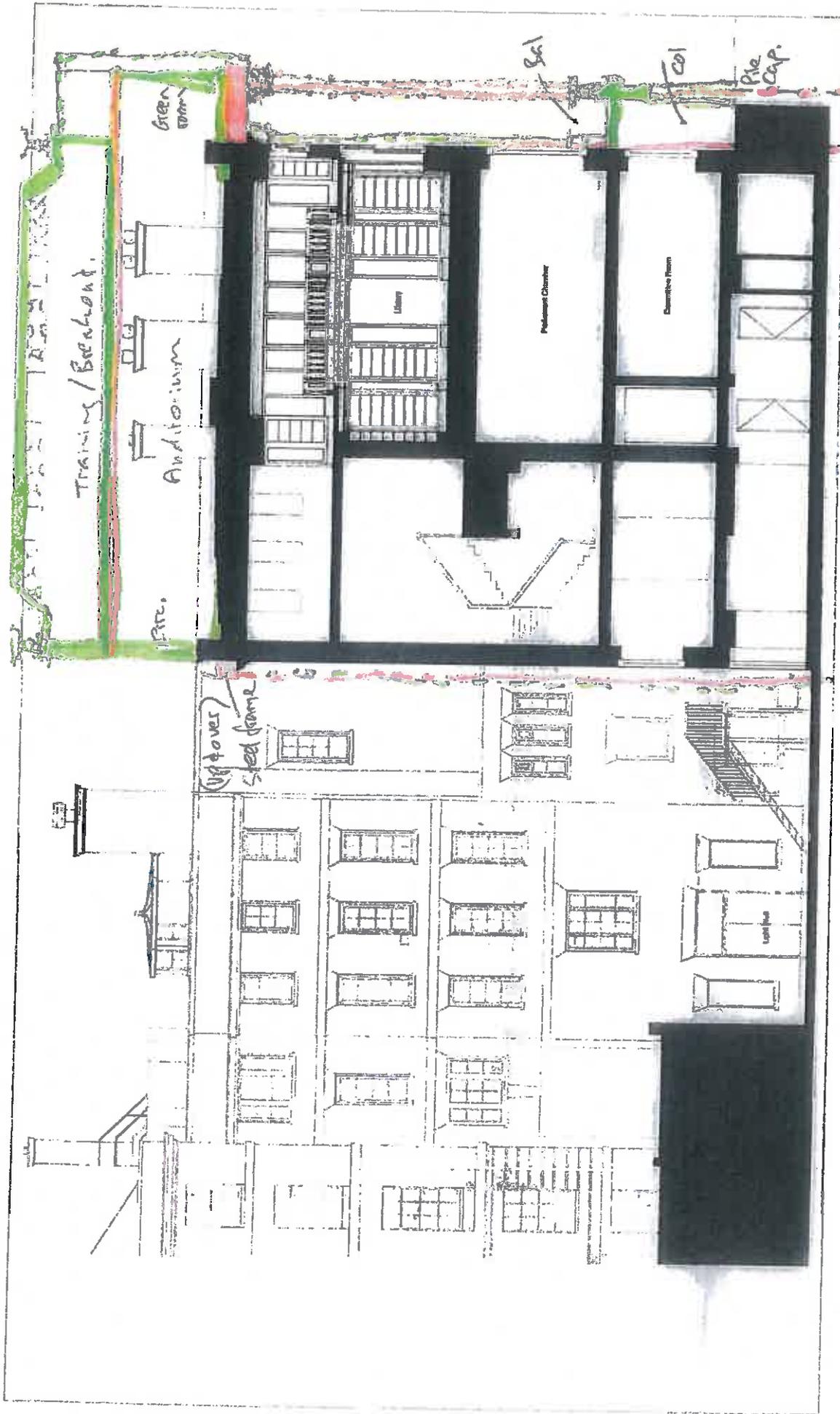


4th floor (A11 1)



5th floor (A11 2)





Training / Breakout

Auditorium

Pile

Green room

Library

Performance Chamber

Classroom

Up to over
steel frame

ALT 1

Pile cap.

Piles

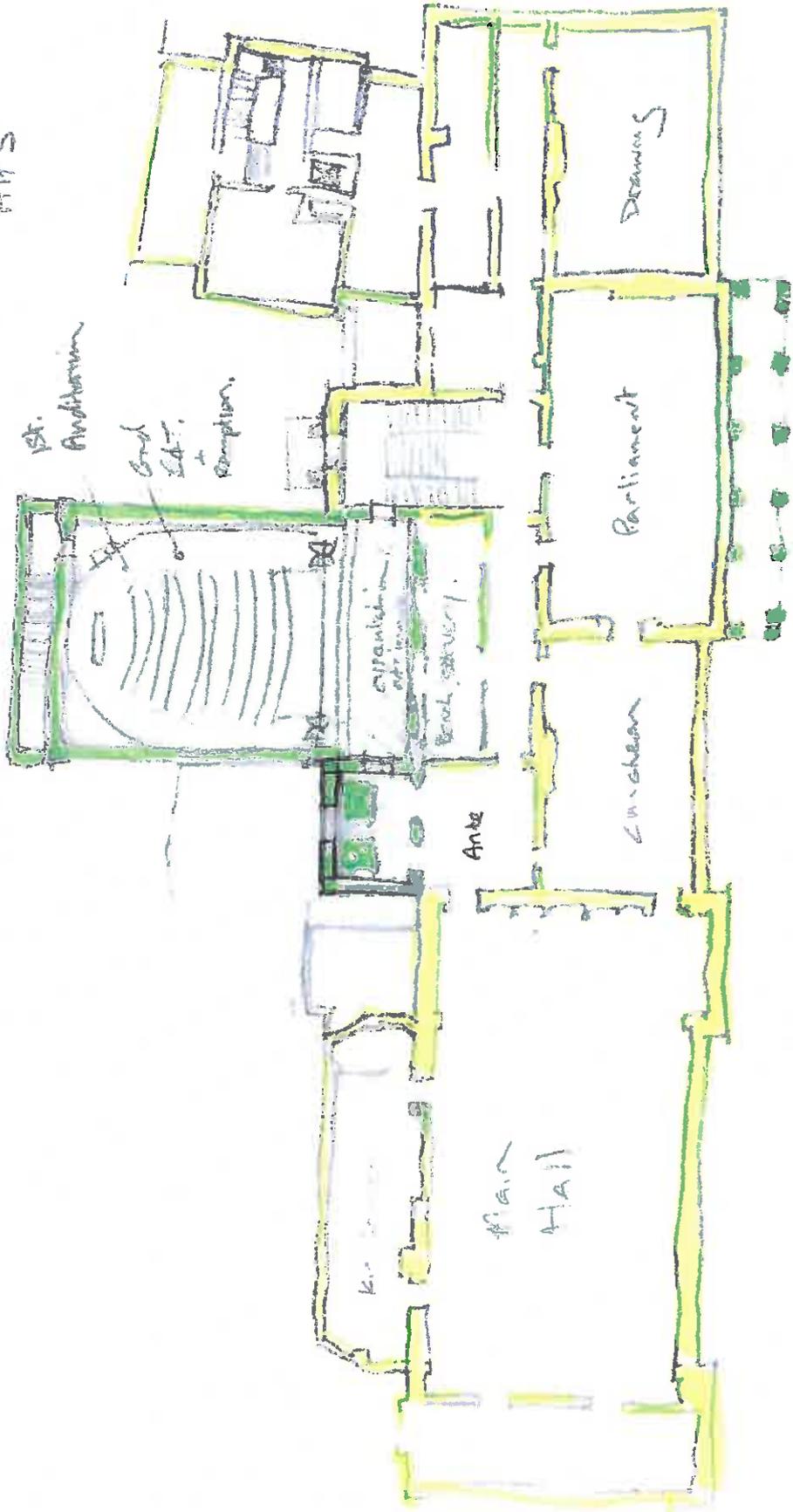
Piles

Pile cap

col

col

115



1st Floor

I fully support & endorse this representation by Richard Humphreys QC and wish to include in my strong objection to planning application 17/00077/FULMAJ

Planning Application 17/00077/FULMAJ

Signed

Representation by Richard Humphreys QC



40 Alexander Asa Cottages
Edward Road, Penge
London, SE20 7SS
9th March 2017

Introduction

1. I am a member, Benchers and resident of the Inner Temple. I specialise in town and country planning and local government law. Of those Governing Benchers of the Inn who voted¹, I was one of the 46%² who did not support the proposed scheme.³
2. The views I express below are my personal views.
3. I respectfully request that the proposed application be refused planning permission.
4. Members of the Planning Committee are requested, if possible, to visit the Inner Temple Library before reaching a decision on the application.

The harm to, and partial loss of, the Library

5. Firstly, I should mention that, whilst neither the Treasury Building, Hall or Library have been listed by the Secretary of State, it is understood that an application to the Secretary of State to review his decision has not yet been determined.
6. *Irrespective* of the outcome of that review, it is respectfully submitted that the Library itself (i.e. its rooms and gallery) should be regarded by the City of London

¹ 219 (including 10 abstentions).

² Excluding the 10 abstentions.

³ Design and Access Statement page 29. There are 319 Governing Benchers. Non-Governing Benchers members of the Inn (It is believed that there are some 8,000 qualified barrister members in total) were not entitled to vote; nor were sets of Chambers (professional tenants many of whom are not members of the Inn).

Corporation ("City of London") as a "non-designated heritage asset".⁴ The Library is a place (and part of a building) which has a degree of significance meriting consideration in the planning decision because of its heritage interest.⁵

7. The effect of the proposed scheme on the significance of the Inner Temple library (its rooms and gallery) as a heritage asset (non-designated) has not, however, been assessed in any of the planning application documentation.

8. The NPPF advises that:

"135. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

9. The Design and Access Statement acknowledges that:

"one of the inevitable consequences of the scheme however is the reduction in size of the library to make way for some of the facilities of the education and training centre."

10. The principal reduction in size of the Library would be caused by the inclusion of a ramped lecture room (spanning 2 floors) which would involve the removal of the entire gallery of the existing library; with the consequential additional loss in particular of library rooms H and J on the main (2nd) floor.

⁴ "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)": the NPPF Glossary.

⁵It is noted that the Library building is identified by the City of London in the Conservation Area Character Summary for the Temples (2000). The planning applicant's Planning Statement also acknowledges (page 10, paragraph 7.4) that the Treasury Building, Hall and Library is "a non-designated heritage asset in a Conservation Area".

11. There will thus be direct and significant loss of, and harm to, the significance of the heritage asset. No assessment of this in the context of paragraph 135 has been undertaken in any of the application documents.
12. **why the Library should be regarded as a non-designated heritage asset (assuming that it is not listed following review)**
12. The Inner Temple library is considered to be one of the most handsome law libraries in the English-speaking world. The Library is free to use by all members of the Inn and members of the 3 other Inns (more than 15,000 practising and student barristers). Academics from all over the world visit and work in the Library too. Library tours for school and university students and other prospective members, as well as librarians, academics and lawyers are also freely provided on request.
13. The library houses, presently in an easily accessible manner, one of the most important law libraries in the world.
14. A reading room, and subsequently a library, are known to have existed in the Inner Temple since about 1506. Professor Sir John Baker Q.C., LL.D., F.B.A. In *The Inner Temple: a brief historical description* (1991) says that:
- "The Inn had a library by the time of Henry VII, and the original building (in existence by 1506) joined the east end of the old hall, close to where it still is."
15. Great care and attention was given to the design and execution of the Library after the Second World War. The Library is panelled throughout; the woodwork of the tables, book-cases, doors and balustrades are of natural English oak and the floors of sapele mahogany. Much of the wood for the panelling (in very short supply after

the War) is understood to have been acquired from the Bank of England. The best skilled craftsmen were employed. The Library work was overseen by Treasurers of the Inn (the highest office in the Inn), including Lord Goddard (Lord Chief Justice 1946 – 1958) and Lord Somervell of Harrow (a Lord of Appeal in Ordinary 1954-1960).

16. The design and layout of the Library was influenced by late 17th and early 18th century libraries, reflecting the insistence of the Inn on "recreating the qualities which made the place special"⁶; a then (in the 1950s) unfashionable approach, but now properly recognised and appreciated.⁷
17. Public monies were given to the Inn for rebuilding by the War Damage Commission.
18. The Library was considered sufficiently important to warrant the inclusion of a photograph of the main room as a feature in The Times on 16th April 1958 under the heading: "The Inner Temple Library finished".

⁶ Conservation Bulletin (2007) written by Philip Davies, Planning and Development Director (South), English Heritage: "Political Landscapes – Governing and Defending the Land - The post-war decades saw unprecedented investment in public building. But how much of that legacy will survive into the 22nd century? – Post-war place making":

"Today it is possible to walk from the Embankment through the Inner and Middle Temple, past Street's magnificent Law Courts, through Lincoln's Inn, across High Holborn to Gray's Inn and beyond into Bloomsbury and still appreciate the qualities which so captivated George Edinger and his pre-war contemporaries. The primary reason for this is the unfashionable approach adopted by the Inns of Court in insisting upon recreating the qualities which made the place special, based on a deep understanding that the importance of the place transcended the sum of its component parts. While the intrinsic architectural quality of the post-war ranges may vary, the overall unity derived from a common classical vocabulary deploying traditional materials and details confers a very distinct and serene sense of place."

⁷ The Temples Conservation Area was designated in 1991. The Conservation Area Appraisal also notes the existence of the Library.

19. The Library was opened on 21st April 1958 in the presence of the then Lord Chancellor, Lord Kilmuir.

20. The *Law Times* of 2nd May 1958 noted that

"those who were present on the occasion cannot fail to be impressed both with its general design and with the workmanship which has been bestowed on its furnishings and equipment".

21. On 24th April 1958 *Country Life* included an article⁸: "The Inner Temple Library Re-housed" with photographs of the "Great Central Room" and the "gallery floor":

"The Plan of the library is approximately L shaped ...the main rooms are in the long branch of the L, which runs west from King's Bench Walk. On its south side is a splendid run of three great rooms, of which the central and biggest measures approximately 53 ft. by 27 ft. These rooms go up through two storeys, with galleries running around them at the intermediate floor level

These rooms ... are unashamedly modelled on late-17th – and 18th-century prototypes ...the heart of every book-lover must immediately be warmed on coming into them; for they are supremely workable-in rooms and give him exactly what he wants, the possibility of reading in comfort, and in spacious and yet intimate surroundings. The smaller rooms are friendly and unassuming; the big rooms extremely dignified, but never pretentious or pompous. The whole library is carefully planned on a principle that was first worked out in the pre-war library, that of giving the maximum variety of choice

⁸ Referred to in the Inn's own "History of the Library".

to the reader, who can sit at tables of every kind and size, and in rooms that range from the grand to the small and informal. The material and workmanship of the fittings are of high quality. The woodwork, including the tables, is of very attractive colouring, with bookcases, doors and balustrades of grey-brown English oak, and floors of polished sapele mahogany. The big pedimented doorways leading into the central room are fine examples of traditional design. The long line of brass candelabra that hang at regular intervals along the centre of the ceiling is one of the pleasantest features of the main rooms."

22. Pevsner's "Buildings of England: The City of London" (1997) expressly notes the Library's

"double-height galleried rooms".

23. In 2007 Dr Geoffrey Tyack F.S.A.⁹ described the library as:

"Ingeniously divided into bays by beautifully crafted oak bookcases, with galleries above".

24. Vistas of the 3 acre Inner Temple Gardens (the Inner Temple Garden is included in the English Heritage Register of Parks and Gardens of Special Historic Interest in England (Grade II)) are afforded from all south-facing windows, including the Gallery windows. On the northern elevation the Library looks over Church Court, with clear views, and as part of the setting, of the Grade 1 listed ancient Temple Church opposite.

⁹ "The Inner Temple – A Community of Communities" (Third Millennium, London) a book published to mark the 400th anniversary of the Letters patent granted to the Honourable Societies of the Inner and Middle Temple by King James I. Chapter entitled "The Buildings of the Inner Temple".

25. The Design and Access Statement (Hugh Broughton architects) acknowledges the proposed reduction from "double height to single height space"¹⁰ and recognises that

"the Inn's archives express Members' particular pride in the quality of interior spaces, especially ... the Library ..."¹¹

26. The Design and Access statement itself now acknowledges¹² the Library's

"special character and architectural quality."

27. It is assumed that this more recent acknowledgment of the Library's special character and architectural quality has not yet been drawn by the Inn to the attention of Historic England or the Secretary of State for Culture, Media and Sport in connection with the listing review.

28. As is well known, our common law legal system is based on precedent. It has been adopted by about one third of the countries around the globe and in particular the countries of the Commonwealth and the United States. Because of this the libraries of the four Inns of Court including the Inner Temple have a special place in the culture and learning of a great many lawyers from many different jurisdictions. This is because of their association in the minds of lawyers with the development and evolution of the common law.

¹⁰ Page 3.

¹¹ Page 6.

¹² Page 11.

29. As acknowledged by the Heritage Statement¹³, the Inner Temple library is a function of "great historical relevance within the evolution of the Inner Temple".

30. In summary, the heritage interest¹⁴ is considered to be that:

- there has been a library on the present site continuously since at least the 15th Century; the library is of great historical relevance within the evolution of the Inner Temple;
- the present library came into existence following Second World War bombing and with the considerable assistance of public monies;
- its design and layout reflect the best qualities of traditional design, layout and execution; Hugh Broughton Associates now recognise its "special character and architectural quality";
- Pevsner notes its "double-height galleried rooms"; Tyack noted that it is "Ingeniously divided into bays by beautifully crafted oak bookcases, with galleries above";
- It is now regarded as one of the handsomest law libraries in the English-speaking world;
- it is associated in many parts of the world with research of the law, as well as the education, work and research of many eminent post-war judges and barristers; and it has a central importance in this mediaeval Inn of Court.

¹³ Page 9, paragraph 2.26.

¹⁴ See the NPPF Glossary definition of "heritage asset".

- **Impact**

31. As noted above, the Design and Access Statement acknowledges that:

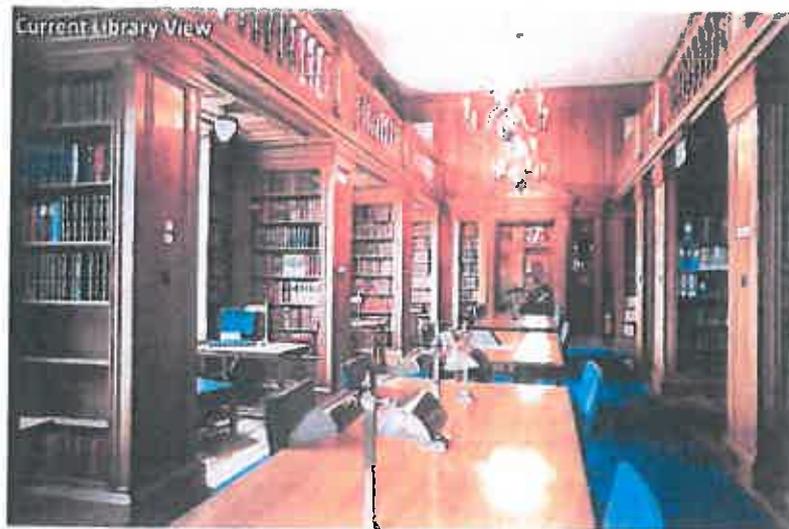
"one of the inevitable consequences of the scheme however is the reduction in size of the library to make way for some of the facilities of the education and training centre."

32. The principal reduction in size would be caused by the inclusion of a ramped lecture room spanning two floors which will involve the removal of the entire gallery of the library; with the consequential additional loss in particular of library rooms H and J on the main floor. The Design and Access Statement describes¹⁵ the layout as being

"significantly adapted by the infilling of the third floor above."

33. What the application fails to spell out is that the 'reduction in the size of the library' is therefore to be achieved by severing the entire balustraded gallery of the existing library, reducing it from its present spacious and elegant proportions to the low-ceilinged structure, as shown in the two images which follow on the next page.

¹⁵ Page 14.



34. Whilst, as noted above, the Design and Access Statement acknowledges¹⁶ the need to ensure that the Library's "special character and architectural quality can be maintained as far as possible", it is self-evident that "the double-height galleried rooms"¹⁷ will be completely lost.

¹⁶ Page 11.

¹⁷ Pevsner.

35. As confirmed by Pevsner's and Tyack's independent views, this constitutes a major reduction in the significance of the Library as a heritage asset.
36. The proportions of the Library are particularly elegant. They depend in particular upon the high ceiling, the balustraded galleries, the oak panelling and decoration, the sequence of spaces and above all the quality of light admitted by the two tiers of windows.
37. The gallery, which provides this well proportioned height to all 3 main interlinking rooms¹⁸, as well as important bookshelves, desk space, daylight, garden views and circulatory space, will be totally lost. The remainder of the main rooms in the library will be a continuous, very long (somewhat oppressive) run under a single height ceiling¹⁹, lacking proportion; and the library will be unable to display the whole current collection of books.
38. The applicant seeks to attract up to 240 students at any one time to the lecture and training rooms as well as to the reduced-in-size library. Irrespective of laptop use by students, it is clear from the experience of other institutions currently providing education courses for barristers that shelf provision for substantial numbers of additional books for students may well also need to be made.
39. As already noted, the National Planning Policy Framework ("NPPF") paragraph 135 provides that:

¹⁸ Rooms C, D and E.

¹⁹ Rooms C and D would be 2.8 metres high (as in proposed illustration) and 2.5 metres in Room E and in side Rooms F and G.

"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

40. This paragraph is not considered or applied to the Library in any of the application documents.

41. The Heritage Statement provides no assessment of the Library as a non-designated heritage asset. There is a brief, single reference to the wording of paragraph 135²⁰ in the "policy context" section of the Statement but no application thereafter of the paragraph. The Statement refers only to the effect of the scheme on the Temples Conservation Area and nearby statutory listed buildings.

42. The Heritage Study (Hugh Broughton Architects) devotes paragraphs 2.23-2.29 to the history of the *previous* libraries since the 15th Century but makes no comment on the present library which was constructed almost 60 years ago.

43. The only reference to non designated heritage assets is a brief reference²¹ to buildings adjacent to the Treasury Building, Library and Hall.

²⁰ Page 16, paragraph 3.13.

²¹ Page 18 paragraph 3.8.

44. The Planning Statement (Adrienne Hill Limited) makes no express reference to paragraph 135 either. However at paragraph 7.4 it is acknowledged that the Treasury Building, Hall and Library building is a non-designated heritage asset.

45. It is submitted that considerable weight should be given by the City of London to the significance of the heritage asset and to the harm to and partial, but significant, loss of the asset.

- **Benefits**

46. Whilst there is no objection, indeed there is of course support for improved facilities in principle, it is considered that the proposed development is a classic example of a "quart into a pint pot": it tries to accommodate far too much on the site. A scheme²² which utilised the roof space without affecting the library could be supported in principle.

47. No business case for the proposed scheme has been presented with the application. There is very considerable concern as to whether the scheme (which would inevitably cost 10s of millions of pounds) would be viable. The viability, in terms of the long-term sustainability, of the scheme is of course highly relevant to the weight which can be given to the benefits when balancing them against the substantial harms.

²² As was originally envisaged and, it is believed, informally discussed with planning officers in 2014.

48. Moreover, it has not been demonstrated that there are no alternative locations (existing buildings) within the Inn and/or in conjunction with the Middle Temple (or Lincoln's Inn) which could be used/successfully adapted for education and training.

49. It is also now understood that the Inn's education and training department offices are moving soon to 2 King's Bench Walk.²³

50. In conclusion, in my view the benefits do not outweigh the harms.

The library as part of the character of the Temples Conservation Area

51. The Temples Conservation Area is a designated heritage asset.²⁴

52. It is submitted that the character of the Temples Conservation Area includes the library rooms and gallery.

53. As the Temples Conservation Area Character Summary notes:

"Of all of the City's conservation areas the Temples is perhaps the most distinctive and has a character that is not only unique to the City, but rarely found elsewhere. It has a private quality that is emphasised by its gated entrances and most buildings are designed to face the interior of the Temple, it appears to turn its back on the noise and bustle of the City. The area is

²³ This is not mentioned in the Planning Statement. The existing basement level plan – Draw No. 231-E1009-RevP1 – will need to be amended accordingly.

The existing third floor plan – E1013-RevP1 - is also inaccurate: there is an area marked "Book Store" which implies that this is the only area in the Gallery which houses books, which is not, of course, the case. Further, the plan does not show any of the existing seating (8 tables with computer terminals and 13 reading stools in the windows.

²⁴ NPPF Glossary: "A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation."

more than an outstanding collection of buildings of historic importance. It is a subtle combination of buildings and spaces with a character and environmental quality that is reminiscent of the collegiate atmosphere of Oxford and Cambridge.

The area's character is influenced, in no small measure, by the use to which the activities of the legal profession has evolved and continues to carry on here. There is a sense that change over time has been carefully considered"

54. Again, the effect of the proposed development on the character of the Conservation Area, by reason of its significant harm to the library rooms (including gallery) has not been addressed at all in the application documentation.

55. The NPPF advises that:

"138. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area ... should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area ...as a whole."

The library rooms including gallery make a positive contribution to the significance of the Conservation Area. As already noted, the applicant's architects now recognise the "special character and architectural quality" of the library.

56. Paragraph 134 states:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."

57. Paragraph 134 is referred to above because it is considered that the harm to significance of the Conservation Area as a whole would constitute "less than substantial harm" rather than substantial harm. Considerable importance and weight should, however, be given to that 'less than substantial harm'²⁵ as confirmed by the Court of Appeal in East Northamptonshire District Council v. Secretary of State for Communities and Local Government (the Barnwell Manor case)

"a finding of harm to the setting of a listed building is a consideration to which the decision-maker must give "considerable importance and weight".

58. As Lindblom J. (as he then was) subsequently observed in R (Forge Field Society) v Sevenoaks DC²⁶ :

"As the Court of Appeal has made absolutely clear in its recent decision in Barnwell, the duties in sections 66 and 72 of the Listed Buildings Act do not allow a local planning authority to treat the desirability of preserving the

²⁵ See East Northamptonshire District Council v. Secretary of State for Communities and Local Government (2015) 1 WLR 45, at page 54 letter F (paragraph 22) (the Barnwell Manor case) "a finding of harm to the setting of a listed building is a consideration to which the decision-maker must give "considerable importance and weight".

²⁶ [2014] EWHC 1895 (Admin), paragraphs 48-51, in particular paragraph 48.

settings of listed buildings *and the character and appearance of conservation areas* as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building *or the character or appearance of a conservation area*, it must give that harm considerable importance and weight." (italicised text added)

59. Paragraphs 138 and 134 have not been applied by the applicant's advisers to the library. It has not been demonstrated that the benefits would outweigh the harms.

The design of the proposed dormers

- Southern elevation

60. The design of the proposed dormer windows is in my view inappropriate and harmful.

I have raised this issue since 2014. In my view they should have a horizontal, not a strongly vertical, emphasis. They should be subordinate, as the gallery windows of the library below are.

61. Reference is made by the applicant to Worthington's original scheme. It is clear, however, from the Design and Access Statement²⁷, that the dormer windows intended for the roof in Worthington's scheme were not vertical in emphasis, but had a horizontal emphasis completely missing from the proposed dormers. Thus the proposed dormers (as designed) are not a fulfilment of the original objective.

62. Secondly, and as, if not more, importantly, as built the building includes smaller windows (with a horizontal emphasis) at the gallery level of the Library (which are

²⁷ Page 9.

immediately below the proposed dormers). The strongly vertical emphasis of the proposed dormers will in my view be eye-catching rather than subordinate.

63. Hugh Broughton Associates shows other examples²⁸ of roof dormer windows in the Inn. Many including, for example, 1-3 Kings Bench Walk – Grade 1 listed buildings – have a horizontal emphasis.²⁹ Key, however, is the appropriateness of the proposed dormers in this building and in views of this building from the south and the garden in particular.

64. In my view, the eye-catching nature of the proposed dormers would not be consistent with the "quiet demeanour" which the Design and Access Statement recognises the character of the Temples Conservation Area to have.³⁰

65. As the Design and Access Statement further acknowledges³¹ "the premise of the design should be ... so that the new parts compliment (sic) the old without drawing attention to themselves."

- **Northern elevation**

66. On the northern elevation the run of 3 contiguous windows within a dormer above the proposed lift shaft³² would, in addition, be particularly eye-catching, discordant and inappropriate, especially in the setting of the adjacent ancient Grade I listed Temple Church.³³

²⁸ Page 19.

²⁹ Those above Carpmael Building are (i) above a road archway and may thus justify a different treatment there; (ii) they would not be read with the proposed dormers from the south, north and west.

³⁰ Page 6 paragraph 2.5.

³¹ Page 12 paragraph 3.4.

³² P1040-RevP1 – item 12 – lift overrun.

³³ E.g. Drawing 1040-RevP1 and Proposed View from Church Court 1.

- **Eastern elevation³⁴**

67. Similar points to those made in respect of the southern and northern elevations are made in respect of all four proposed dormers.

68. In conclusion the design of the proposed dormers would harm the character and appearance of the Temples Conservation Area (a designated heritage asset).

The effect of the proposed development on the setting of the Temple Church and thus on the church's significance.

69. I am also concerned that the effect of the proposed development on the setting of the Temple Church and thus on the church's significance has not been fully assessed; in particular:

- (i) the effect from late afternoon/early evening onwards of lighting being visible through the additional fenestration particularly (but not only) at high (new 4th floor) level. Comparing Drawing No 231 – E1040-RevP1 with Drawing No 231 – P1040-RevP1 at 4th floor there will be the following new windows: 12 dormer windows, 6 generally larger windows than the 4 existing (immediately below the 3 contiguous windows referred to above); and an additional window above the proposed new entrance in Church Court;
- (ii) the potential visibility in views in Church Court of the underside of the suspended floor of the proposed lecture theatre. See, for example, proposed section drawing E-E.
- (iii) the run of 3 contiguous windows in the dormer above the proposed lift shaft.

³⁴ Drawing No. 231-P1042 – RevP1.

70. In my view there would be harm to the setting, and therefore significance of, the Grade 1 listed building. This would be "less than substantial" within the meaning of NPPF paragraph 134, but it is harm to which "considerable importance and weight" should be attached.³⁵

Conclusion

71. The application should be determined in accordance with the development plan unless material considerations indicate otherwise.

72. The application does not accord with important policies of the development plan and does not therefore accord with the development plan as a whole. Material considerations (in particular the NPPF) do not indicate otherwise.

(1) The London Plan notes that "London's diverse range of designated and non-designated heritage assets contribute to its status as a World Class City".³⁶

(2) Policy 7.8 Heritage Assets and Archaeology requires that:

"C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

³⁵ See paragraphs 56-57 above.

³⁶ Paragraph 7.30.

D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail."

Here the applicant should have identified the Library as a heritage asset particularly given that the applicant's advisers recognise the special character and architectural quality of it and that the Library will be "significantly adapted by the infilling of the third floor above." The heritage interest has been set out above. The proposed development cannot be said to accord with either C or D above. The loss of the gallery, a feature specifically recognised by Pevsner and Tyack, in particular will lead to harm to the Library's significance as a heritage asset.

(3) Similarly, contrary to D above, It has not been demonstrated that the setting, and thus the significance, of the Grade 1 listed Temple Church would not be adversely affected by the proposed development whether in terms of the effect of lighting from all of the additional windows, particularly but not only at high level, and/or the strong vertical emphasis of the proposed dormers as well as the run of 3 contiguous windows in the dormer on the northern elevation.

(4) Policies CS10/DM10 of the City of London Local Plan promote/require:

"a high standard of design ..., having regard to their surroundings and the historic and local character of the City ..., by:

1. Ensuring that ... detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

The design of the proposed dormers would not in my view be appropriate to the character of the Temples Conservation Area and the setting of surrounding buildings and spaces.

2. Encouraging design solutions that make effective use of limited land resources.

Effective use of limited land resources should and could be made, however, without causing the harm which would result from the proposed development.

(5) CS12/DM12.1

"To sustain and enhance heritage assets, their settings and significance."

This applies to the Library and the setting and significance of the Grade I listed Temple Church. The proposed development would not sustain them.

(6) DM12.2

"Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area."

The legal requirement³⁷ is that "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

It is submitted that the character of the Conservation Area includes the library.

³⁷ Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The harm caused to the library would not preserve or enhance the character of the Conservation Area.

The design of the dormers would not preserve the character or appearance of the Temples Conservation area either.

(7) DM12.5 To resist development which would adversely affect gardens of special historic interest included on the Historic England register.

It is assumed that there would be no permanent adverse affect on the Inner Temple Garden, by reason of the need for substantial temporary structures to be placed in the Garden before and for the duration of the construction period. The likely length of the construction period is not stated in the application documentation. It is assumed that use of the Garden will be required for up to 2 years.

Reference is made in the Design and Access Statement³⁸ to a letter dated 30th November 2016 from Mr Rayment of the City of London. This letter has not been appended to the application documentation. The adverse effects of the scheme as a whole should have been set out for consideration.

(8) The NPPF is of course a material consideration. This suggests again that planning permission should be refused. Whilst development will bring (for example) construction jobs and some other benefits set out in the documentation, (i) these are not considered to outweigh the significant harm to the library as a non-designated heritage asset; (ii) the lack of the demonstration of a robust and viable business case for the proposed development means that little weight can

³⁸ Page 12.

properly be given to the benefits of the scheme. As NPPF paragraph 173 advises: "Pursuing sustainable development requires careful attention to viability and costs in ... decision-taking." This principle logically applies also when considering what weight should be given to claimed benefits.

(9) Attention is also drawn to the following paragraphs with which the development conflicts:

Paragraph 17 – core planning principles:

- "always seek to secure high quality design"
- "conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations"

Paragraph 56 – good design

- "The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."

Paragraph 134 – less than significant harm to designated heritage assets

- "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be

weighed against the public benefits of the proposal, including securing its optimum viable use.”

This applies to the setting of the Grade I listed Temple Church. As confirmed by the Court of Appeal in East Northamptonshire District Council v. Secretary of State for Communities and Local Government (the Barnwell Manor case) “a finding of harm to the setting of a listed building is a consideration to which the decision-maker must give “considerable importance and weight”³⁹

Paragraph 134 also applies to the harm to the Conservation Area (a designated heritage asset). Considerable importance and weight should also be given to that harm.

Paragraph 135 – non-designated heritage assets

This has already been referred to above.

Paragraph 138 – Conservation Area

This has already been referred to above.

73. It is therefore respectfully submitted that the application should be refused.

17th February 2017

Richard Humphreys QC

³⁹(2015) 1 WLR 45, at page 54 letter F (paragraph 22).

I fully support & endorse this representation by Richard Humphreys QC and wish to include in my strong objection to planning application 17/00077/FULMAJ

Planning Application 17/00077/FULMAJ

Further Representation by Richard Humphreys QC in response to [REDACTED] submitted on behalf of the Inner Temple¹

90 Alexandra Cottages
Edward Road, Pease
London, SE20 7JS
21st March 2017

Introduction

1. This Note responds to the various points made in 3 documents submitted by the applicant in response to my original representation. For convenience only, Hugh Broughton Associates are referred to below as HBA, KM Heritage as KMH and Adrienne Hill Limited as AHL.
2. None of the points made in them materially alters the views I have expressed.

Review of listing decision

3. The outcome of the Secretary of State's review of the decision not to list the Treasury Building, Hall and Library, or any part thereof, is still awaited.
4. It is notable that none of the response documents claim that the applicant or its advisers have drawn to the attention of the Secretary of State HBA's acknowledgment that the interior of the library has "special character and architectural quality". This is very close to an admission that the statutory test for listing - "special architectural or historic interest" - is met.
5. Despite HBA's acknowledgment, KMH continue to seek to belittle the interior. KMH suggest that the reception of the contemporaneous architectural press to the "construction of the building" was "lukewarm". There are a number of points in response to this.
6. The "evidence" relied upon by KM Heritage appears to be merely the claimed absence of comment by the architectural press. Firstly, this is not factually correct: for example the architectural correspondent of the Times wrote an article dated 8th April 1948 about Sir Hubert Worthington's plans for the rebuilding of the Hall, Treasury Building and Library, entitled "Tradition Maintained in Scale and Character"; and the Times' architectural correspondent wrote a further article on 5th October 1955 entitled "New Inner Temple Hall Opened".²

¹ It is believed that the documents were submitted to the City of London on 28th February. Only AHL's response is dated. They were received from the City of London on 2nd March.

² attached.

7. Secondly, it could not fairly or reasonably be inferred either from the claimed absence of comment that the reception to the interior of the library was lukewarm when the contemporaneous Country Life article had already been published and been both comprehensive, and in praise, of its interior.
8. Moreover that article was written by Mr Mark Girouard³, then an architectural writer for Country Life before he became its architectural editor. Subsequently he was appointed Slade Professor of Fine Art; and made a Fellow of the Society of Antiquaries of London. KMH, astonishingly, make no acknowledgment of the foregoing.
9. Presumably KMH also seek to belittle Pevsner's observations about the library's double-height galleried rooms and Dr Tyack's views. The latter's views were published in a book commissioned by the Inn.⁴
10. KMH were instructed only after the Inn had decided to proceed with the present scheme and after the application to list the buildings had been made. It is unfortunate that the Inn appears content for its heritage to be belittled in this way.
11. The most important and significant point, however, is that KMH do not now contradict HBA's acknowledgment that the interior of the library has "special character and architectural quality."
12. Irrespective of the outcome of the review, that acknowledgment, along with the views of Girouard, Pevsner and Tyack are all highly relevant to the issue as to whether the interior of the library should be regarded as a non-designated heritage asset.

The Library's interior as a non-designated heritage asset

13. KMH state that the interior is not of "exceptional quality". Leaving aside the question as to whether or not it is, KMH is, again, wholly incorrect to imply⁵ that the interior has to be of "exceptional quality" to be a non-designated heritage asset.
14. That is not the test. Whether the interior is a "heritage asset" depends on whether the asset has "a degree of significance meriting consideration in planning decisions, because of its heritage interest."⁶

³ His initials appear at the end of the article.

⁴ See footnote 9 of my original representation.

⁵ Paragraph 8.

15. My representation submitted that the interior of the library could in law, and should, be regarded as a non-designated heritage asset. Contrary to KMH's apparent assumption, this is an entirely separate point from the contribution that the interior of the library makes to the character of the Conservation Area. (I refer to this later.)
16. There is no reason in law, policy, logic or (if different) common sense why the interior of the library may not be a heritage asset: heritage assets, as defined, are not confined to the exterior of buildings; nor to the whole of a building - there is no reason why the expression may not apply to a part of a building; nor are heritage assets confined to buildings at all: a heritage asset, as defined, could be a site or place or area or indeed a landscape. Here, as previously stated, the interior is a part of a building and a place.
17. The interior of the library plainly has heritage interest. As summarised at paragraph 30 of my representation:
- there has been a library on the present site continuously since at least the 15th Century; the library is of great historical relevance within the evolution of the Inner Temple;
 - the present library came into existence following Second World War bombing and with the considerable assistance of public monies;
 - its design and layout reflect the best qualities of traditional design, layout and execution; Hugh Broughton Associates now recognise its "special character and architectural quality";
 - Pevsner notes its "double-height galleried rooms"; Tyack noted that it is "Ingeniously divided into bays by beautifully crafted oak bookcases, with galleries above"; ...
 - it is associated in many parts of the world with research of the law, as well as the education, work and research of many eminent post-war judges and barristers; and it has a central importance in this mediaeval Inn of Court.
18. It is notable that the responses do not contradict any of the foregoing.

⁶ The statutory test for listing depends upon whether a building or a feature of the building have "special architectural or historic interest". The precise statutory wording is "any feature of the building consisting of a manmade object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building" (see section 1(3)(b) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended). The fact that the interior is not listed does not in any way – law, policy or logic - prevent the interior from being a heritage asset.

19. The very narrow focus of criticism by KMH is simply on whether the additional claim that the library is now regarded as one of the handsomest law libraries (and one of the most important) in the English-speaking world is of heritage interest. Whilst obviously not of itself of heritage interest, these claims are nevertheless entirely consistent with its heritage interest. KMH question do not provide a single contrary example of their own, let alone of the applicant.
20. It should suffice to rely on the collective view of four past, highly distinguished Benchers and Masters of the Library (covering the period 1989 – 2013); and to the view of the British and Irish Association of Law Librarians, as set out in a letter dated 4th December 2015 written by its President, to Historic England: "The Inner Temple Library is one of the finest law libraries in the world."⁷ A recent past Treasurer (His Honour Judge Cryan) himself, in a newsletter preceding an Open Weekend in 2015, described the Inner Temple and Middle Temple libraries as "great legal libraries".
21. Again, it is unfortunate, indeed seemingly self-serving, that the Inn appears content now to question the status of its library. The important point, however, is that the points made in paragraph 17 above as to the heritage interest of the interior of the library are not contradicted by the Inn.
22. Contrary to KMH's inaccurate assertion⁸, a designated heritage asset is not equated in my representation with a non-designated heritage asset in terms of significance or weight. NPPF paragraph 135 applies to the latter heritage asset, as already made very clear in my representation.
23. AHL consider it relevant to draw attention to the fact that interior works do not require planning permission. AHL does not, however, draw attention to the statutory wording⁹: it is only works which (i) affect only the interior of the building, or (ii) do not materially affect the external appearance of the building, which do not involve 'development' and thus do not require planning permission.
24. Here, neither (i) nor (ii) apply: the scheme of works affect more than the interior; and, separately, materially affect the external appearance of the building.
25. Moreover, in respect of (i), it would be fanciful to suggest (and it is not of course suggested by the applicant) that the Inn would ever seek to carry out the proposed

⁷ Reference can in addition be made to the petition submitted to the City by Guy Tritton (uploaded onto the City's website on 2nd March 2017).

⁸ Paragraph 9.

⁹ Section 55 (2) of the Town and Country Planning Act 1990 (as amended).

interior works to the Library alone: such a scenario is not therefore a 'fallback' position to which, as a matter of law, the decision-maker may have any regard.¹⁰

26. In summary, there is therefore no reason in law, policy or logic why the interior of the Library should not be regarded as a non-designated heritage asset. The very significant impact on the interior of the library as a non-designated heritage asset, which HBA acknowledge to have "special character and architectural quality" should have been addressed in the application documentation and assessed against NPPF paragraph 135. This has still not been properly assessed.
27. It is notable that the impacts on the interior of the library described in paragraphs 31-34 and 36-38 of my representation are not in any way contradicted.
28. It is notable too that the points made in paragraphs 46-48 of my representation concerning the claimed benefits, serious concerns as to viability, lack of business plan, existence of alternatives etc are not addressed or rejected by the applicant. The Inn will inevitably seek to let out the new space for commercial use too and clarification in respect of this should in my view be sought by the City of London and provided by the Inn: on this basis the application is inaccurately and (inadvertently) misleadingly limited to "education, training and office use (sui generis)."
29. AHL clarifies¹¹ only a minor point about the present relocation of the education and training department offices to 2 Kings Bench Walk¹². AHL also states¹³ simply that the education of barristers is "the Inn's primary charitable objective, a function that is currently constrained by the limitations of the available accommodation."
30. No reference is made to Scheme 1 which the Inn originally intended to promote (involving use of the extensive existing and proposed roofspace alone) and in respect of which the Inn received favourable pre-application advice in 2014.

¹⁰ See, for example, New Forest District Council v Secretary of State for the Environment (1996) 71 P. & C.R. 189 and Brentwood Borough Council v Secretary of State [1996] 72 P. & C.R. 61, cited in R. v Secretary of State for the Environment Ex p. Ahern [1998] Env. L.R. 189; [1998] J.P.L. 351 (Christopher Lockhart-Mummery Q.C. sitting as a Deputy High Court Judge, p.9); South Buckinghamshire DC v. Secretary of State for the Environment, Transport and the Regions (1999) PLCR 72.

¹¹ Paragraph 17.

¹² my paragraph 49.

¹³ Paragraph 10.

The interior of the library as part of the character of the Conservation Area

31. KM Heritage¹⁴ inaccurately (again) asserts that my representation “attempts to link the internal quality of unlisted buildings in conservation areas to the overall character and appearance of conservation areas”.
32. My representation could not have been clearer: the late 17th/early 18th design and plan form of the library, including its gallery, and their skilled execution are part of the character (again I underline that word as I did in my representation – see paragraph 52 and the heading preceding paragraph 51). Character (as opposed to appearance) does not require the interior to “be seen” from a public viewpoint or the Conservation Area, contrary to KM Heritage’s response. This is, with respect, a basic and fundamental error. It is precisely why the words “character or appearance” of a Conservation Area appear in section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended). In any event, the rest of the Conservation Area is “experienced” to use KM Heritage’s words from the interior of the library (through its windows towards the Church to the north and the gardens to the south) which is of course itself part of the Conservation Area.
33. KM Heritage again¹⁵ incorrectly states that my representation equates unlisted buildings with listed buildings: it does no such thing; nor does NPPF paragraph 135.
34. NPPF deems Conservation Areas to be designated heritage assets. Harm to the character of a Conservation Area requires the application of paragraph 134 in *that* context, as explained in NPPF paragraph 138. Paragraphs 51-59 of my representation could not have been clearer.

Design of dormers

35. HBA repeat the point made in the Design and Access Statement that the project “offer[s] the opportunity to complete the roofscape of the building, as originally intended by its architects.” The accompanying drawing showed Sir Hubert Worthington’s original plan with dormer windows with a horizontal emphasis. Self-evidently Sir Hubert’s roofscape which included dormers with that emphasis is not proposed by the applicant; as my representation stated, however, “as, if not more,

¹⁴ Paragraph 11.

¹⁵ *ibid.*

importantly¹⁶ as built, there are small windows with a horizontal emphasis at Library gallery level which were not in the original plan.

36. HBA recognise that *form* matched the proposed *function* in Worthington's design (the dormers were intended for a bookstore in the roof). The dormers were therefore always intended to be subordinate in appearance and function. As built, the gallery windows are subordinate too. The proposed dormers will not be subordinate in appearance or function. That is why they will be eye-catching, in my view. The first and principal issue is what is appropriate for this building (rather than other buildings). HBA refer¹⁷ to Harcourt Buildings, but the proposed dormers in the scheme will plainly not be of the same size (or horizontal emphasis) as the gallery windows below.
37. As regards the impact on Church Court and on the setting of the Grade 1 listed Temple Church, I need only refer again to e.g. Drawing 1040-RevP1 and Proposed View from Church Court 1: the view of these large dormer windows will be very noticeable in Proposed View from Church Court 1; and this viewpoint does not support the contention that the run of dormer windows above the lift shaft will be "tucked in". The fact that it provides natural light into the lift shaft is hardly relevant to the significance of the setting of the Church or to the appearance of the Conservation Area. In my view there will be harm to both. It is difficult to see how a run of 3 windows within a single dormer will "match" other, single windowed, dormers, as claimed by KMH.¹⁸ they will be noticeable by virtue of their size. KMH implicitly recognise the potential for harm by stating that they are "furthest away from the Temple Church"; the applicant's Proposed view from Church Court 1 says it all.
38. Lighting for the first time from these large dormers at this new fourth floor/roof level will, moreover, appear well above the height of the Church opposite. Church Court and the space around the Church is especially sensitive. The Church and Building are not shown together in the Proposed views from Church Court 1 or 2. Again, in my view there will be harm.

¹⁶ Paragraph 62.

¹⁷ Paragraph 6.

¹⁸ Paragraph 12.

39. It is noted that KMH¹⁹ accept for the first time that the underside of the lecture theatre would be visible, albeit that it would be "very limited". I leave this and all other judgments of course to the City.

40. Finally I await sight of the letter dated 30th November 2016 from Mr Rayment of the City of London to the applicant which has led the applicant not to seek planning permission (as part of this application) for the erection of substantial temporary structures in the Inner Temple Garden for some 2 years. The applicant's responses provide no clarification at all in respect of the point made at page 23 of my representation that the adverse effects of the scheme as a whole should have been set out for consideration. Although the applicant makes express reference to the letter in its Design and Access Statement, the City believe that the letter is confidential but are giving this further consideration at the time of writing.

6th March 2017

Richard Humphreys QC

¹⁹ Paragraph 12.



Rt Hon Lord Lloyd of Berwick
Treasurer 1999

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	09 MAR 2017	LTP
OM		SSE
No	128439	PP
FILE		DD

PARLIAMENT CHAMBER,
INNER TEMPLE,
LONDON,
EC4Y 7HL
2 Mitre Court
Temple
EC4Y 7BX

Planning application 17/008/FULLMAJ by Inner Temple

I am writing to express my support for the representations made by Richard Humphreys QC. The principal objection is, of course, the effect on the Library. I will not repeat what he says. The two photographs on page 10 of his representations say it all. The plan will effectively destroy a beautiful piece of architecture and craftsmanship, and substitute something of which we shall always be ashamed.

Let me give an example. It has been the custom of the Inner Temple on Great occasions, such as Grand Day, to display some of the Inn's many treasures in the library before dinner, where they can be enjoyed by our guests in beautiful surroundings. I cannot imagine that we will ever want to take our guests into the library as it will be, with a ceiling height of just 8' at one end, and 9'6" at the other end, giving the impression of being in an elongated railway carriage. There is nowhere else where the treasures can be displayed on such occasions.

But it is of course not our guests only who will suffer. I have in my possession a petition signed by 1,552 ordinary users of the Library, as well as librarians and academics from all over the world. The petition will be submitted separately by Guy Tritton, who organised the petition. I suggest that it deserves great weight.

In addition to the effect on the Library, there is the effect on the conservation area, as a whole, to which Mr Humphreys draws attention at para 51 et seq. It is sometimes said that the new mansard roof reflects the original plans of Sir Hubert Worthington. But Sir Hubert would never have accepted the

vertical dormers now proposed. They look completely out of place, and nowhere is this more obvious than in Church Court.

During my year as Treasurer we decided to enhance the appearance of Church Court to celebrate the Millennium. In agreement with the Middle Temple we asked Tom Stuart-Smith, the well-known garden designer, to make suggestions. He advised that we should plant four London Planes on the south side of the court, to soften the northern elevation of the Hall, and erect a column reflecting the architecture of the church in the centre of the remaining space. This we have done; and the result is rightly regarded as the heart of the conservation area. The column was designed by Ptolemy Dean, and the sculpture is by Nicola Hicks.

The five conspicuous vertical dormers now proposed in the south-east corner of the court would look completely out of place, and undoubtedly harm the setting of the Temple Church, especially in the late afternoon and evening.

As for the auditorium, the need for which is said to justify the harm to the library and to the character of the conservation area, Lincoln's Inn are already building an auditorium which is due for completion next spring. It is difficult to believe that the education of future lawyers requires more than one tiered auditorium.

For these reasons I respectfully invite the City to refuse planning permission.



Rt Hon Lord Lloyd of Berwick

Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 09 March 2017 16:17
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 4:17 PM on 09 Mar 2017 from Mr Tom Mitcheson.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Tom Mitcheson

Email:

Address: 3 New Square Lincoln's Inn London

Comments Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: I am writing in strong support of the scheme to modernise the Inner Temple Treasury Building. The future of the Inn and the Treasury Building as a whole depends upon the Inn's ability to act as a centre of excellence for the education of its members and



students. I have been involved in Education and Training at the Inn for a number of years and consider that modernisation of (and completion of the original plans for) the Treasury Building is essential for the Inn to maintain its purpose as an educator of trainee and practising barristers. If the Inn fails to keep up with the requirement to educate then its very purpose could be called into question. I acknowledge that there are some who consider that the existing library should not be interfered with at all, but I consider that the current plans achieve a reasonable and necessary compromise between maintaining the existing structure and building for the future. The Inn is not a museum and it cannot be a modern, forward-looking centre of excellence without the proposed adjustments to the existing structure being made. The balance overall strongly favours the proposed scheme and I hope that for this reason it is allowed to proceed.

Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 09 March 2017 12:25
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 12:24 PM on 09 Mar 2017 from Mr Clive Newberry QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Clive Newberry QC

Email:

Address: NO5 Chambers 4-7 Salisbury Court London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I have read the representations submitted to the council by Richard Humphreys QC and agree with him and I ask the council to take them fully into account. Like Mr Humphreys I conclude this application should be refused.



Broughton, Helen

From: PLN - Comments
Subject: FW: Re Planning Application 17/00077/FULMAJ

From: JULIET CAMERON
Sent: 10 March 2017 09:34
To: PLN - Comments
Subject: Re Planning Application 17/00077/FULMAJ

Dear Sirs,

I strongly support this planning application which was endorsed by a large majority of the Inn's governing body at a vote last year. That vote followed many months of extended discussion and debate during which several iterations of the development plans were anxiously pored over and scrutinised. The resulting scheme represents, I believe, an admirable compromise between the understandable desire to retain a calm, gracious Library space and the pressing need to expand and modernise the Inn's Education and Training facility. Where space to build is at a premium, something has to give.

The Inner Temple, like the other three Inns of Court, is an important City institution; like all such bodies it has endured because it has adapted to the changing needs of its constituency over the hundreds of years of its existence. These days most legal research is done online, there is no going back. As a result the current Library space is grossly underused. It is overgenerous. By contrast the Inn's Education and Training department is housed in cramped and unattractive conditions in the basement, yet this is the busiest and most vibrant section of the Inn, as it should be. One of the Inn's primary Charter purposes is the education and training of new and existing barrister members. Students come to the Inn not only from the UK but from around the world. All are provided with world-class legal and advocacy training. The buildings of the Inn must adapt to ensure that this primary function continues from a 21C facility. My concern is that without students who themselves go on to become barrister members and governing benchers in their turn the Inn will wither and fade. I would ask for the City of London's support to see that this does not happen by giving effect to the majority decision of the Inn's benchers.

Juliet May

The Hon. Mrs Justice May DBE



Broughton, Helen

From: PLN - Comments
Subject: FW: Project Pegasus: Inner Temple

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

From: Nick Coleman
Sent: 10 March 2017 12:27
To: PLN - Comments
Subject: Project Pegasus: Inner Temple

I am a Bencher of the Inn so I should declare an interest.
I am firmly of the view that this project should be approved.
The principal raison d'etre for the continued existence of the Inns of Court is that they provide outstanding education for the advocates of the future. This proposed development which does not materially undermine the overall appearance of the Treasury Building provides the teaching rooms for the future.
It will allow the Inn to develop its renowned teaching courses in house with quality facilities.
The changes to the application to minimise the effect on the library are a suitable compromise.
HH Nicholas Coleman

Sent from
Nick Coleman



Broughton, Helen

From: PLN - Comments
Subject: FW: Inner Temple Planning Application Ref: 17/00077/FULMAJ

From: John Ross QC
Sent: 10 March 2017 18:18
To: PLN - Comments
Subject: Inner Temple Planning Application Ref: 17/00077/FULMAJ

Dear Sirs,

I have read the submission of Sir Stephen Tomlinson and wish to endorse all that he has said.

I have been a member of several Inner Temple committees that have been concerned with the future use of the Inn's estate and its education obligations to its student and pupil members. These include, first, the Pegasus Committee that has sought over many years to identify a location where the current educational needs of these students and pupils could be met. The planning committee will be well aware of the Inn's endeavours in this regard when it sought to secure planning permission within the curtilage of Serjeants' Inn for this purpose. Secondly, I have recently served on the Education & Training and Advocacy Training Committees which are dedicated to the task of educating the student and pupils of this Inn and providing them with training in ethics and advocacy. This has given me a good insight into what is currently required to enable this obligation and aim to be fulfilled, as well as what the future demands and requirements for such education and training will be in the year to come. Thirdly, I currently serve on the Estates Committee of the Inn and therefore believe I have a reasonably good understanding of what may and may not be capable of being delivered within its estate and of the aesthetics of the estate.

That experience leads me to the conclusion that new facilities for delivering to these students and pupils the modern-day training that professional standards demand and the public will require, are desperately needed. All of the alterations to the interior of the Library wing have been dictated by the requirement to deliver first class training to these students and pupils and their concomitant desire to be able to perform advocacy tasks and exercises in real-life settings. This level of teaching and training is but the first step in the Inn's desire to establish itself as a world-class advocacy training centre. It hopes to be able to provide on-line and other types of training to all parts of the English-speaking world, in particular to the Commonwealth countries from which many of its students come in their desire to be sufficiently well trained to be able to be admitted to the Bar of England and Wales.

In short, the planning application that has been submitted is a necessary application. It is also one which I believe seeks to preserve to the fullest extent possible as much of the old (non-listed) library interior as is consistent with the minimum needs of the proposed new advocacy training centre.

Turning to the effect of the proposed scheme on the external appearance of the library wing, I consider that the alterations enhance the appearance of this wing – as they do the overall appearance of the adjacent Hall by creating a sense of design and architectural cohesion. Finally, these proposed alterations blend with the buildings in its immediate vicinity, both as regards the roof lines created and as regards the dormer elevations. Once the car parking area has been recovered in more aesthetically pleasing surface materials (as will occur once the development is completed) the overall effect of the intended changes will, I believe, have restored the appearance of the Inn's buildings in the immediate location of the area between King's Bench Walk, Paper Buildings and Mitre Court to that which it was before the current car park surface was laid down – as can be confirmed by reference to the historic paintings owned by the Inn.

Yours faithfully,



John Ross QC



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John Ross QC



Broughton, Helen

From: PLN - Comments
Subject: FW: Planning Application 17/00077/FULMAJ

From: John Whittaker
Sent: 10 March 2017 10:49
To: PLN - Comments
Subject: Planning Application 17/00077/FULMAJ

Planning Application 17/00077/FULMAJ
Library at Inner Temple

Dear Sir,

I write to make an objection to the granting of planning permission for the projected alterations to the Library at Inner Temple under the above reference.

The works would effectively destroy one of the gems of interior architecture in the City, to the cultural and aesthetic loss of the whole community.

Yours faithfully

John Whittaker

Coombe Crest
George Road
Kingston-upon-Thames
Surrey KT2 7NU



Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 10 March 2017 15:29
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 3:29 PM on 10 Mar 2017 from Mr Humphrey LLOYD.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Humphrey LLOYD
Email:
Address: 1 Atkin Building Gray's Inn London

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: I am a Member (since 1958) and Bencher (Supernumerary) of the Inner Temple. I was a member of and chaired the Estates Committee of the Inn from 1987 to 1994. I was a judge of the High Court's Technology and Construction Court from 1993 to 2005



and chaired the Architects' Registration Board from 2003-2007. I also grew up in the Inner Temple as my parents lived in Crown Office Row from 1934 (until the flat was destroyed in the blitz) and from 1946 until 2006 in Paper Buildings. I saw the demolition of the ruins of the previous Hall and Library Building and observed the erection of the new buildings. As a student I used the Library whilst at university and when reading for the Bar and for decades thereafter (until relatively recently).

I have read and fully support the numerous objections to this application, for example that by Richard Humphries QC.

I wish to emphasise that that the Library interior is an example of craftsmanship which, even at the time, was difficult to obtain and which would now be hard to reproduce. Indeed some of the teams were dispersed once work in the Inn ceased as the contractors had no more for them. The Library is an exceptional example of such fine workmanship, presented in a beautiful manner, and strikingly fitting for the collections.

Humphrey LLOYD

Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 10 March 2017 10:08
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 10:08 AM on 10 Mar 2017 from Mr Grahame Aldous.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Grahame Aldous
Email:
Address: 9 Gough Square London

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Reasons for comment:
Comments: This is a welcome development that **will** enhance the external appearance of the site and ensure that the facilities remain useful and relevant for the future, so helping to preserve the heritage value of the site as well as the future development of the Bar.



Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 10 March 2017 10:08
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 10:08 AM on 10 Mar 2017 from Mr Nicholas Green.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Nicholas Green

Email:

Address: 1 Devonian Road, Islington London

Comments Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: I strongly support the project. The building which is to be redeveloped is a relatively modern structure with no great architectural value. The new development will provide absolutely essential new training and educational



facilities and will be consistent in style with the existing building. It will have minimal impact upon the amenity of others. There are in my view no good reasons not to grant the application.

Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 10 March 2017 10:06
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 10:05 AM on 10 Mar 2017 from Mr Alastair Hodge.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

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Customer Details

Name: Mr Alastair Hodge

Email:

Address: 3 Kings Bench Walk Temple London

Comments Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments:



Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 10 March 2017 12:13
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 12:12 PM on 10 Mar 2017 from Mrs Kathryn Arnot Drummond.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Kathryn Arnot Drummond

Email:

Address: 25 Bedford Row London

Comments Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: As a member of Inner Temple and a barrister who trains students at the Inn, I am strongly in favour of these works. They will hugely benefit current and future members of the Inn providing significantly improved



teaching areas and facilities.

Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 10 March 2017 11:55
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 11:55 AM on 10 Mar 2017 from Mr John Chadwick.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr John Chadwick
Email:
Address: One Essex Court Temple London

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Reasons for comment:
Comments: I support this application. The proposed development will enable the Inner Temple (of which I have been a member for fifty years) to provide much needed educational facilities for its students.



From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 12 March 2017 09:17
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 9:17 AM on 12 Mar 2017 from Lord Jonathan SUMPTION.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Extension and refurbishment in association with an education and training facility and office use (sul generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii)

Proposal: Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Lord Jonathan SUMPTION
Email:
Address: The Manor House Crooms Hill LONDON

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I wish to be associated with the representations made by Richard Humphreys QC. I am currently a Justice of the Supreme Court, but for most of my career I have worked in or near the Temple and used the Inner Temple Library. The proposed works will destroy entirely a



significant part of one of the finest modern library interiors in the United Kingdom, and ruin the proportions of what is left. This is a very unfortunate act of aesthetic vandalism, for a purpose of limited value and none which cannot be replicated on another site. I earnestly invite the local authority to reject it.

Adjei, William

From: PLN - Comments
Sent: 13 March 2017 15:17
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 3:16 PM on 13 Mar 2017 from Ms Alison Levitt QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Ms Alison Levitt QC
Email: [REDACTED]
Address: Mishcon de Reya LLP London

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: As Chair of the Inner Temple Education and Training Committee, I am strongly supportive of this proposal. There is a significant public benefit for two reasons. First, the new facilities will take the education function of the Inner Temple into the next generation, making it possible to offer high quality training to young lawyers regardless of their background. This is important for the future of the legal system as a whole including the judges, the majority of whom are still drawn from the



ranks of barristers. Secondly, the extended and improved facilities should make it possible to have extended outreach activities, aimed at schoolchildren and adults alike in relation to the rule of law, citizenship etc.

From: PLN - Comments
Sent: 15 March 2017 12:08
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 12:07 PM on 15 Mar 2017 from Mr Simon Baker.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Simon Baker
Email: [REDACTED]
Address: 2 Bedford Row London

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Reasons for comment:
Comments: I wholeheartedly support the application for a number of reasons:

1. The provision of Education & Training is the core of the Inn's charitable purpose. The Inn has been looking to develop the sort of facilities that this project will provide for many years, and a great many options have been investigated without success. The reality is that this project is the only credible way to provide the Inn with



the modern working facilities that are needed to fulfil that core purpose for student and barrister members (both now and for the foreseeable future);

2. The needs of the Bar (and therefore the Inn) are constantly evolving. The flexibility that the additional space created by the proposal would provide would place the Inn in a far stronger position to provide for those changing needs both now and in the longer term; and

3. As far as the library itself is concerned, it is important to remember that it is not a museum but a working facility for the benefit of the Inn's students and members. Increasing digitisation of legal texts and law reports (and the fact that future generations are likely to prefer working and researching electronically) will inevitably affect the way barristers access legal information from a range of locations.

Overall, the proposed scheme is a once in a lifetime opportunity to provide the facilities to ensure that the Inn is not only able to satisfy the needs of its members in the next 10 to 20 years, but also the flexibility to ensure that the Inn will continue to be able to offer the necessary facilities (whatever they may end up being) to future generations of Inner Temple members and students. In my view, the long-term practical benefits of the scheme more than outweigh any disadvantage (aesthetic or otherwise) to the library.

Adjei, William

From: PLN - Comments
Sent: 15 March 2017 13:14
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 1:13 PM on 15 Mar 2017 from Mr Kleron Beal QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii)

Proposal: Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Kleron Beal QC

Email: [REDACTED]

Address: Blackstone House Temple London

Comments Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: I write to express support for the application, as a bencher of the Inn. The proposed external works will complete the original architect's vision for the building. They are in keeping with the overall character and amenity of the area. The placing of the mansard roof and the sensitively designed lift core and escape stair should be noted. Many of the comments made to date relate to the proposed use of the re-designed internal space. But the internal use of a non-listed building does not appear



to be a material consideration for planning purposes. If, in fact, it is a material consideration for the issue of the nature and extent of the amenities, then the works represent an excellent opportunity to provide first class facilities for use in the education and training of future generations of barristers.

Hassall, Pam

From: PIn - CC - Development Dc
Subject: FW: PLN FW: INNER TEMPLE planning reference 17/00077/FULMAJ. COL:05091799

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

From: Vicky Stewart [REDACTED]
Sent: 16 March 2017 18:10
To: PlanningQueue
Subject: INNER TEMPLE planning reference 17/00077/FULMAJ.

I strongly object to any plans to change the Inner Temple Library. It's a beautiful space which won high praise for its rebuilding in the 1950s following bombing during in WW2.

However much a lecture theatre is needed this is not the place. The quality woodwork and light airy space would be destroyed.

I'm amazed this is being proposed at all by Inner Temple!

Vicky Stewart
10c Petticoat Tower
Petticoat Square
London
E1 7EG



Adjei, William

From: PLN - Comments
Sent: 17 March 2017 11:51
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 11:51 AM on 17 Mar 2017 from Mr Peter Birkett.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Peter Birkett

Email: [REDACTED]

Address: gable end, nursery lane, Nether Alderley Macclesfield

Comments Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Reasons for comment:

Comments: I have been a member of the Inn for 45 years and a Bencher for 21. Although I am based in the North West I am a regular attender at the Inn in connection with educational and training events. There is an overwhelming need for extra space which this proposed development would provide.

The Inn has members throughout the UK and indeed beyond. Its function is becoming more and more the



promotion and development of Advocacy. I have trained in many jurisdictions throughout the world and these facilities would be used and appreciated by not only our own students but those from the former Commonwealth jurisdictions whom we would encourage to train alongside our own. The Library is of course an attractive facility but only utilised by a small minority of members. I wholeheartedly support the proposal.

Hassall, Pam

From: Tim Walpole-Walsh <[REDACTED]>
Sent: 18 March 2017 22:46
To: Hassall, Pam
Subject: Re: PLN FW: 17/00077/FULMAJ COL-05091796

My postal address is

**Tim Walpole-Walsh
Mannington Hall
Norwich Norfolk
NR11-7BB**

RE: 17/00077/FULMAJ

Simply put, I am amazed that this is even being considered.

This must be stopped, not amended, straight away.

This sort of quality and history should not be destroyed nor tampered with.

**Regards
Tim Walpole-Walsh**

2 Harcourt Buildings 4th Floor South,
Temple, London EC4Y 9DB

Your ref.: 17/00077/FULMAJ

19 March 2017

Planning Application : Inner Temple Treasury Building EC4Y 7HL

Dear Sir/Madam,

I am writing about the above application by the Honourable Society of the Inner Temple. I do not do so to object as such to the application, since I believe that, as a former Treasurer of the Inn, it would not be right for me to do so. However, I am also a resident in the Inn at 2 Harcourt Buildings and in that capacity I wish to put down a marker in respect of any application to use the Inner Temple garden in connection with the implementation of the project for which permission is now sought.

I do so because my understanding is that the project envisages that, if planning permission as now sought is granted, there will be "temporary" buildings erected on the Inner Temple garden for a period estimated at some two years. That may not formally constitute part of the present application but it seems likely to be a consequence of it. The flat which my wife and I occupy largely looks out across this very attractive and important open space – our two main living rooms and our bedroom do so. There are other residents in Harcourt Buildings, Temple Gardens and Paper Buildings who enjoy the same residential amenity. To have that amenity damaged for a period of two, or maybe more, years would be highly objectionable.

There is a wider public aspect to this. The garden is, as many members of your committee will know, a hugely important green space in this congested part of Central London. For much of the year it is open to the public in the middle part of the day, and those who work in the area, as well as residents, make great use of it. It is crowded at lunchtime on sunny days. To lose such a valuable green lung, even for a period of two years, would constitute a serious public loss and would be very regrettable in planning terms. The effects of the buildings on the garden would be likely to persist even after they had been removed, maybe for a considerable time.

Were permission to be granted for the present application, I would not want it to be argued that this harmful impact on residential amenities and public enjoyment of open space had to be accepted as the inevitable consequence of such a permission. I would be grateful if members would take this into account in their consideration of the scheme. It may be that they would wish to treat this consequential effect of the present building proposal as part of the material planning considerations when taken as a whole.



Sir David Keene

Newman, Conor

From: PLN - Comments
Sent: 21 March 2017 14:48
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 2:48 PM on 21 Mar 2017 from Mr Richard Southwell QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)



Customer Details

Name: Mr Richard Southwell QC

Email:

Address: Serle Court, New Square Lincoln's Inn London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: My objection is as a Bencher of the Inner Temple and a former Treasurer. The grounds of my objection are those set out in the comments of Richard Humphreys QC and Rt Hon Lord Lloyd of Berwick. I therefore need not repeat what they have already stated, except to make one point. If the proposed re-development goes through it will succeed in destroying what is probably the most beautiful library built since the Second World War.

PLANNING APPLICATION		CPD	PPD
TPD	24 MAR 2017		LTP
OM			SSE
No	128573		PP
FILE			DB

Stephen W Williamson Q.C
Treasurer 2007

Sherwood
Vine Garth
Clifton
Brighthouse
HD6 4JZ

Planning Application 17/ 00077 FUL MAJ by Inner Temple.

I write not only as a former Treasurer of the Inner Temple but I was also a resident of the Inn for over 18 years, a member of chambers in the Inn for some years and have been using the facilities of the Inn during a period in excess of fifty years and one obvious facility is the Library.

Having considered the representations made by Lord Lloyd of Berwick I wish to endorse all the objections he raises as to the effect of the planning application on the Library but also on the architectural ambiance generally. I am further concerned about the need for such a structure as is envisaged because:

a. a suitable building for the Inn's Education and Training Department has been identified within the Inn;

b. I question the need for , and the amount of use that will be made of, lecture facilities on the top floor of the Treasury Building given the availability of other facilities in the City, the lack of residential facilities in the Inn, and the somewhat restricted access to the Inn.

I also wish to raise my concern about the devastating effect the work of "construction" will cause to the Inn during a considerable period of time, generally, and to the community who live and work there.

Therefore I respectfully invite the City to refuse the planning permission sought.



Stephen W Williamson Q.C.
21st March 2017

ACKNOWLEDGED 29/03/2017

From: Mike Sutcliffe
 To: PLN - Comments
 Subject: 17/00077/FULMAJ OBJECTION
 Date: 21 March 2017 21:47:53

I strongly object to this Application for reasons of Design, External Appearance and affecting the setting of Listed Buildings within a Conservation Area.

1. North Elevation

- **Escape Staircase**
- This proposal overrides the visual separation of the Hall from the Treasury/Library and impinges on the windows of both buildings in an unfortunate manner.
- The balance and rhythm of the Windows/solid brickwork will be disturbed and unbalanced; let alone the differing brick bond and colours. Fussy in appearance with prominent quoins and therefore out of character .
- **The Lift Shaft** does not sit comfortably at the internal return between the north and west elevations; it appears to be a pastiche with blind 'paired' dummy sash windows and capped with an imitation dormer at variance in size and appearance with the other proposed new dormers.
- These two proposed elements with a strong vertical emphasis will be intrusive in Church Court
- The single dormer on the return hip roof over the existing staircase is unnecessary.

Neither of these new elements meet the simple test of enhancing the Conservation Area and both adversely affect the setting of Listed Buildings.

2. Proposed Roof Alterations

- The Application seeks to justify the roof extensions by reference to an earlier and unbuilt design. The LPA has to consider the effect of the proposals on the design and appearance of what exists now and not on what might have been constructed some sixty years ago. This justification is not consistent;- the earlier design did provide for dormers, but 'square' not tall and with Lead tops not copper, no stone quoins to the Library Block , but it did include for splayed bays (in the manner of Harcourt Buildings) aside the Treasury entrance on the South side. The use of a rather different building building as a reference point adds little weight to case for the proposed alterations.
- The proposed new accommodation within the raised roof will significantly increase the overall volume and bulk in an intrusive way within the Conservation Area. The roof line when viewed from Temple Gardens will appear too dominant: at present the Hall roof is clearly separated from adjacent buildings and indicates the order of importance of of this building

3. Insertion of addition floor within the Library.

- The 20th Century Society in supporting an application for Listing commended the **'intactness of the elegant, restrained and carefully crafted interior.'** The Library with its Galleries is a much admired interior space or series of interlinked spatial volumes, each clearly demonstrating the forgoing qualities. The completeness and quality of the English Oak paneling, book cases, door linings , architraves and moulded skirtings are especially noteworthy and of the highest order of design and craftsmanship . To truncate this fine space by the willful insertion an addition floor will destroy an important asset : a fine example of English Joinery
- Without the protection that Listing by Historic England would have given to these

interior spaces, the LPA must now take all possible steps to protect this Non Designated Historic Asset and act accordingly within the NPPF.

With due respect , this Application should not be dealt with under Delegated Powers but by the Planning Committee so as to give the numerous supporters and objectors the opportunity to speak.

I should declare my personal interest; My father was the architect TW Sutcliffe; I have many items of his correspondence and photographs relating to these projects together with the original tracings and prints of the design and construction drawings which may be of assistance to all parties in considering this application.

I have been a member if the Royal Institute of British Architects sine 1961 and I continue in practice.

**Michael Sutcliffe Chartered Architect; School Cottages Newgate Street Hertford
SG13 8RA**



Bhakti Depala
Case Officer
Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Sent by email: Bhakti.Depala@cityoflondon.gov.uk

22 March 2017

Our ref: 15 11 08

Dear Bhakti Depala,

17/00077/FULMAJ Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building at the Inner Temple Treasury Building, Crown Office Row, London EC4Y 7HL

The above application has been brought to the attention of the Twentieth Century Society. We wish to **object** to the application, and the letter below sets out our views.

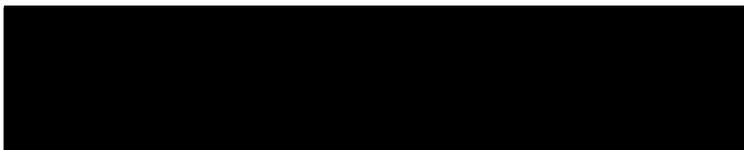
Significance

There has been a library on this site since 1506. The current library was re-built following bomb damage to the designs of Sir Hubert Worthington and TW Sutcliffe, overseen by Sir Edward Maufe and opened in 1958. It is largely unchanged since opening.

The library is comprised of a symmetrical series of rooms, the largest at the centre, all with original oak panelling, polished mahogany floors, brass candelabras and moulded plaster ceilings. A series of interlinked upper galleries with detailed carved balustrades allow light to flood through the space. The effect of measured opulence within an open, light-filled space was much admired at the time of the library's opening with *Country Life* describing the library as "carefully planned" and "dignified but never pretentious or pompous". In 1966 the architectural critic Ian Nairn described the buildings of Temple as "as memorable as anything in Oxford or Cambridge". The Society therefore considers that the Inner Temple is a non-designated heritage asset of significant historical and architecture interest. Although unlisted, it falls within the Temples Conservation Area (designated 1991).

The Proposals

The application seeks to reduce the library's height in order to accommodate an auditorium, break-out spaces and offices above by the creation of a mansard extension. The removal of the entire upper galleries is proposed, filling in the space with a lower ceiling at the point where the galleries currently occupy the perimeter of the rooms.



Twentieth Century Society Comment

The impact of these works would be not only to entirely alter the measured proportions of the space, truncating the original plan and greatly reducing the amount of light and space, but would also involve the loss of a great deal of fine interior fabric; oak panelling and architraves, the moulded plaster ceiling and the brass candelabras whose dramatic drop currently serves to punctuate the grand, open nature of the space.

The library at the Inner Temple Treasury Building represents one of the most sensitive post-war reconstructions in the capital; a dignified neo-Georgian interior, which possesses a lightness of touch and which despite its historicist style, embodies the prevailing trends of the 1950s – use of light wood, a consideration of progression through space, and an abundance of natural light. The high level of craftsmanship and quality of materials imbue the library a sense of continuity with the areas important past, and are particularly noteworthy given the date of construction so soon after the war when materials were scarce and expensive.

The NPPF states that 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset' (135).

The Twentieth Century Society considers that the proposals would greatly undermine the grandeur of the space through the demolition of original fabric, the reduction of space and the loss of light. We consider that these proposals will cause substantial harm to a non-designated heritage asset, and we therefore object to the application and recommend refusal.

I trust that these comments are of use to you in your consideration. Please do not hesitate to contact me if you have any further queries.

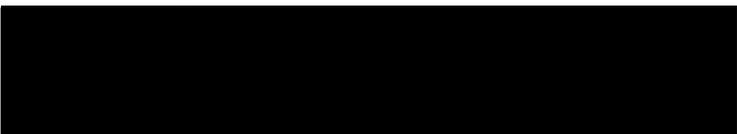
Yours sincerely,



Tess Pinto
Conservation Adviser
Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

cc. Mike Fox, SAVE Britain's Heritage



From: Rt Hon Professor Sir Bernard Rix

**20 Essex Street
London WC2R 3AL**



PLANNING & TRANSPORTATION		
PSDD	CFO	PPD
TPD	27 MAR 2017	LTP
OM		S&E
No	128591	PP
FILE		DD

Re: Planning Application 17/008/FULLMAJ by Inner Temple

22 March 2017

Dear Sirs,

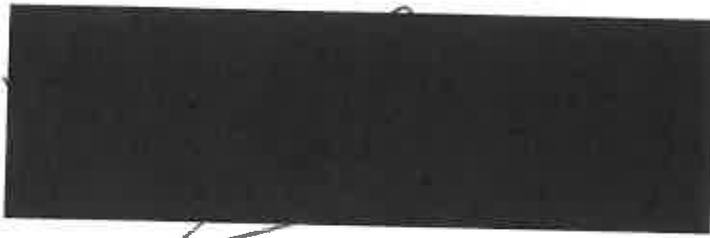
I was Treasurer of the Inner Temple in 2005.

I am writing to express my support for the representations made by Richard Humphreys QC, The Lord Lloyd of Berwick, Sir David Keene and others objecting to the above Planning Application.

And all other matters apart, the application would result in grave damage and prejudice to one of the loveliest libraries created in London in modern times.

I am in complete agreement with the objections referred to above, and also respectfully invite the City to refuse planning permission.

Yours faithfully,



ACKNOWLEDGED 29/03/2017
SB

Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 23 March 2017 11:19
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 11:19 AM on 23 Mar 2017 from Ms Inner Temple.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Ms Inner Temple

Email:

Address: Inner Temple London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I comment on this planning application as a resident of the Inner Temple, therefore I would like to remain anonymous. I do not object to the building works to the Treasury Building themselves but have concerns regarding the temporary structure which is planned to be



housed in the Inner Temple Garden whilst those works are undertaken.

I understand that this structure would occupy much of the Garden for a duration of at least two years to provide a facility for membership dining and commercial event catering. Alternative spaces such as our neighbouring Middle Temple Hall could be available for membership dining.

As the largest green space in the City of London, the garden provides an important amenity to the community of residents, barristers and members of the public. A temporary structure would have a great impact on this, particularly due to the length of time it is up and the size of it. The wellbeing of the nearby local business community is hugely boosted by access to this green space, the benefits of which are well charted (greater sense of wellbeing, decreased stress, encouraging people to be more active etc.).

I understand that once the structure is removed the Garden will then be required to undergo lengthy repairs to reinstate the Garden to the high standards it now achieves, which will limit access over a further period.

Although this temporary structure would be considered in a separate planning application, I feel it is important to raise these concerns here as it is intrinsically linked.

Yours sincerely,
Inner Temple resident

Broughton, Helen

From: Pln - CC - Development Dc
Subject: FW: PLN FW: Response to planning application 17/00077/FULMAJ Inner Temple library COL:05092246

From: Andrew Tait QC
Sent: 23 March 2017 15:41
To: PlanningQueue; 'PLN@cityoflondon.gov.uk'
Subject: Response to planning application 17/00077/FULMAJ Inner Temple library

Representations on application 17/00077/FULMAJ on behalf of the Chambers of Andrew Tait QC at Francis Taylor Building, Temple, London.

1. The Chambers of Andrew Tait QC comprises 57 barrister members and 12 full-time members of staff. Collectively, we occupy the whole of Francis Taylor Building ("FTB"), Inner Temple, which is located directly to the north of the current entrance to Inner Temple Library, and therefore immediately adjacent to the site which is the subject of the above application.
2. On behalf of FTB, on 10 March 2017 Douglas Edwards QC discussed with the Case Officer the timing of submission of any representations in respect of this application. The Case Officer confirmed that in the light of problems arising with neighbour notification, the date for submission of any representations by FTB (and other neighbours) had been extended to 24 March 2017.
3. As its closest neighbour, these Chambers will be affected by the proposed development by the potential for severe noise and disturbance over a two year period arising as a result of the implementation of the scheme, should planning permission be granted.
4. Within FTB, barristers' rooms and meeting rooms (including our seminar suite which is made available widely for legal educational purposes to other sets of chambers as well as external organisations such as King's College London) face directly toward parts of the application site where intrusive works are proposed. As such, our Chambers will be highly exposed to noise and disturbance caused by the implementation of the project. The proximate and sensitive relationship between FTB and the application site is such that, in the event that planning permission is to be granted, it is necessary for clear parameters to be secured at this stage as to construction management rather than being left at large to a construction management plan (CMP) to be approved later. In particular, we consider that a planning condition should be attached to any permission which may be granted to preclude the locating of any construction, storage or welfare compounds within the forecourt to the east of FTB and that any such compounds should be located on the wide terrace to the south of Inner Temple Treasury Building and Hall. There is ample space within that terrace for such a compound to be located and, in such a position, there will be less potential for noise and disturbance, both to these chambers and to other chambers within the Inn. The Inn has indicated to us that, on the information available, it has identified no practical difficulty with such an arrangement. In any event, we request that there should be an explicit requirement for immediate neighbour consultation as part of the process of approval of the CMP.
5. In addition, we are aware that many members of our Chambers make extensive and frequent use of the invaluable service which Inner Temple Library offers, particularly in terms of ready access to otherwise inaccessible printed and other material. The Library is a highly valued resource. Many of our members are very concerned about the proposed loss of a significant part of the Library as a result of the proposed scheme, in terms of limiting the level of accessibility to resources which are currently enjoyed, in terms of the adverse effect upon the Library as an attractive and important, albeit non-designated, heritage asset and in terms of the apparent consequential loss of a substantial part of the open space of Inner Temple Garden to accommodate decanted facilities during the construction period. These are matters on which individual members of our Chambers have made separate submissions to the Corporation. It is vital that these important material

considerations are properly taken into account in reaching a decision on whether to grant planning permission.

Andrew Tait QC

on behalf of Francis Taylor Building

23 March 2017

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17/00077



The Rt Hon Lord Woolf, CH, FBA (Hon).

23 March 2017

Planning Application: Inner Temple Library

P O Box 270

London EC2P 2EJ

Dear Sirs

Planning Application: 17-008-Fullmaj by Inner Temple

I have read the representations made by Richard Humphries, QC, the principal objector and Lord Lloyd of Berwick and seen the photographs to which he refers. I strongly endorse their representations objecting to the planning application of the Inner Temple. I also refer to the petitions mentioned in the submissions of Lord Lloyd.

The Temple represents a site in which, over the centuries, our justice system has had its roots. Its architecture reflects this role. Over the period to which I referred there have of course, been many alterations, particularly after disasters such as the Great Fire of London and the bombing which took place during the last World War. In particular, the building to which this application seeks permission to alter may never have come into existence but for the War damage which was caused by the bombing.

The development which now exists in the area is already over-crowded but fortunately, despite this development, the character of the more modern buildings is very sympathetic to their predecessors. What is now proposed would do significant damage to this. It would perhaps justifiable if it could be shown that there was a critical need for it to take place. However, as Lord Lloyd makes clear, if there was a need at any time in the past it no longer exists. In these circumstances I would urge the Planning Authority not to permit a damaging intrusion for which there is no real need.

Yours ever,



House of Lords, London SW1A 0PW



Broughton, Helen

From: PLN - Comments
Subject: FW: Objection: Planning Ref. 17/00077/FULMAJ,

Sent: 21 March 2017 00:55
To: Hassall, Pam
Cc: Depala, Bhakti
Subject: Re: PLN FW: Objection: Planning Ref. 17/00077/FULMAJ, COL:05091928

Dear Pam Hassall

Thank you for confirming receipt of my email. My postal address is as listed below.

**College Hall (Room 215), Malet Street
London
WC1E7HZ**

Thank you once more for your time.

Kind regards
Karl Ulas-Ono

From: Ulas, Karl
Sent: 17 March 2017 19:02
To: PlanningQueue
Subject: Objection: Planning Ref. 17/00077/FULMAJ,

Dear City of London

I am writing today in heartfelt objection to the plans submitted to alter the Inner Temple Library.

As a local student reading Philosophy at King's College, the beautifully preserved buildings and surroundings of London's Inns of Court have helped me to understand and experience the history of this great city in ways that I could scarcely describe. These are some of the very institutions that anchor England's cultural and intellectual identity. We should aim to freeze these in time and safeguard them for future generations, that local residents, students and visitors alike may draw inspiration and wisdom from them in the same way I, and indeed so many before me, have done over the years.

The architectural quality of the existing library is outstanding; there is virtually no scope for argument surrounding this notion. It is easy to imagine that, were such plans submitted in Oxford for the Codrington Library or the Radcliffe Camera for example, they would be shelved as the mere folly of developers and modernisers ready to sacrifice the history of our oldest and greatest institutions for an extra conference space or two.

Ultimately, the principle that a library that has been used carefully and lovingly through the ages should not be lost to the short-sighted development plans of one generation far outweighs the potential benefit of an extra lecture theatre here or a meeting room there. If the Inner Temple seeks expansion to meet the demands of the modern day legal practice then expand it must, but surely not at the expense of this precious space.

The Inner Temple Library is one of London's precious treasures which, once lost, will be lost forever.

Thank you for your time.

Kind regards



Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 24 March 2017 08:29
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 8:28 AM on 24 Mar 2017 from Mr David Streatfeild-James QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii)

Proposal: Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr David Streatfeild-James QC

Email:

Address: 2 Hare Court, Temple London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: I have been a member of the Inn for over 30 years and am a Bencher and a resident of the Inn. I have read the objections set out by Richard Humphreys QC and wish to be associated with them. I am particularly concerned by the irreparable damage that will be done to the Library



in order to provide a lecture space of dubious value.

Broughton, Helen

From: PLN - Comments
Subject: FW: Comments for Planning Application 17/00077/FULMAJ

From: PLN - Comments
Sent: 24 March 2017 15:32
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 3:32 PM on 24 Mar 2017 from Mr Andrew Warnock.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Andrew Warnock
Email:
Address: 1 Chancery Lane LONDON

Comments Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Reasons for comment:
Comments: I am member of the Inner Temple and wish to register my strong support for these proposed alterations which will enable the Inn to remain a first-rate provider of advocacy training for student and barristers. The

proposed alterations are aesthetically pleasing and sympathetic to the character of the existing buildings. I believe that the addition of a floor will greatly enhance the buildings and also accord with the original plans for the Treasury building when it was first constructed.

*Third Floor North
1 Temple Gardens
Middle Temple Lane
London EC4 9BB*

From: Sir Konrad Schiemann

24 March 2017

Your Reference:17/00077/FULMAJ

Like Sir David Keene I live in a flat overlooking the Inner Temple Garden from its main rooms and am a past treasurer of the Inner Temple.

Like him, as a past treasurer of the Inn I do not think it right to take a position either for or against the application which the Inn has decided to make. Opinion in the Inn is divided on the desirability of carrying out this development.

However like him, I am concerned about the consequential physical effect on the garden for a number of years.

Perhaps the Inn could be encouraged by the planning department further to investigate methods of carrying out the development without placing structures on the lawn. I am not sure whether this could be achieved by the imposition of an appropriate condition on the present application. It seems to me that the effect on the lawn of carrying out the development of the treasury building must be a relevant consideration when deciding whether or no to grant permission for that development. So an appropriate undertaking might be a way of overcoming this problem.

ACKNOWLEDGET

Broughton, Helen

From: PLN - Comments
Subject: FW: Ref no: 17/00077/FULMAJ

-----Original Message-----
From: Desiree Artesi
Sent: 24 March 2017 10:18
To: PLN - Comments
Cc:
Subject: Ref no: 17/00077/FULMAJ

Dear Ms Depala,

I write as a member, Bencher and Resident of the Inn.

I write on behalf of myself and my two sons Fabio and Gianfranco Artesi (who are copied into this email). We reside at 4 Pair North, 3 Hare Court, London, EC4Y 7BJ.

I wish to support what is said by

1. Sir David Keene of 2 Harcourt Buildings contained in a letter dated 19 March 2017. As a Resident, the loss of this valuable green space particularly in the summer months when staying indoors in the flat becomes unbearable is difficult to contemplate. Moreover, it is well known that building timetables are subject to slippage, so that it is more realistic that we are looking at a 5 year period - between actual use of the garden for the Project, and the garden being returned to the state it now currently is in. When it can once again be referred to as a garden. Meanwhile we have nowhere else to go.

2. I also write to support the submissions of Richard Humphreys QC dated 17 February 2017.

Kindly acknowledge receipt of this email.

Signed

Desiree A A Artesi
Fabio D Artesi
Gianfranco R Artesi

4 Pair North
3 Hare Court
London
EC4Y 7BJ





THE HONOURABLE SOCIETY OF THE INNER TEMPLE
TREASURY OFFICE, INNER TEMPLE, LONDON EC4Y 7HL

Planning Application Reference: 17/00077/FULMAJ
Inner Temple Treasury Building London EC4Y 7HL

28 March 2017

I write as the Sub-Treasurer, Chief Executive Officer of the Inner Temple.

I wish to correct the impression that may inadvertently have been given by some of the objectors to the effect that the redevelopment project for which planning permission is sought has, at best, a very slender majority among the Inn's Governing Benchers. The true position is to the contrary, as I now explain.

Following a meeting of the Inner Temple's Bench Table on 21 October 2015, the Governing Benchers were asked to vote on whether to approve proposals to add an additional floor to the Treasury Building in order to create an Education and Training Centre and additional facilities for the Inn. The meeting was an open, well-argued and passionate debate and all views were fully aired in the process.

There were extensive discussions among Governing Benchers on the method of voting to be adopted. Bench Table approved a proposal for two rounds of voting on the grounds that it would produce an effective majority decision. The first round consisted of two questions: the first asked whether the Inn should add an additional floor to the Treasury Building and the second asked, if a majority of those voting answered "yes" to Question 1, which of the three schemes Benchers preferred. Scheme 1 restricted the redevelopment to the roof. Scheme 2 involved the addition of a floor at roof level, and the incorporation of part of the Library space below. Scheme 1.5 was a hybrid between the two schemes.

Voting closed on 29 October 2015. Voter turnout was 219 Governing Benchers out of 319 (68.7%).

The Governing Benchers voted to approve re-development by 131 votes to 88. Scheme 2 received the support of the majority, carrying 113 votes (51.6%), followed by Scheme 1, which received 90 votes (41.1%). Scheme 1.5 received 6 votes (2.7%) and 10 voters abstained from selecting any Scheme (4.6%). As a sizeable majority of Benchers voted in favour of a redevelopment, and Scheme 2 obtained

ACKNOWLEDGED



more than 50% of the votes cast in response to the second question, the Inn proceeded to prepare a planning application for Scheme 2, which is the application submitted.

Education and Training, both of students and barristers, is a core function of the Inn and there is a recognised need to ensure that the Inn's facilities meet the demands of modern legal education. The development option approved by Governing Benchers will ensure that the Inn is able to fulfil its educational function by providing modern purpose-built facilities, including an auditorium and training rooms, to match the world class training which the Inn already delivers.

The Inn fully accepts that in creating these new facilities it must ensure that the Library is able to continue to deliver all its core services, so that the Inn's members continue to have access to its collection and receive the highly valued assistance of its Library team.

The Inn appreciates that its proposals have aroused strong feelings amongst those that cherish its Library. However, since the Benchers voted in October 2015, the Inn's architect has worked hard to reduce the intrusiveness of Scheme 2 on the Library space. In fact, the intervention into the Library is now largely confined to its gallery level whereas the original Scheme 2, for which Benchers voted, provided for the loss of reading rooms below the gallery level as well.

The Inn wishes to make its position clear in the way set out above.

Yours sincerely,

A large black rectangular redaction box covering the signature of Patrick Maddams.

Patrick Maddams Hon FRIBA
Sub-Treasurer

Sehmi, Amrith

From: PLN - Comments
Sent: 29 March 2017 17:38
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.
 Comments were submitted at 5:38 PM on 29 Mar 2017 from Mr Thomas Roe QC.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
 Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Thomas Roe QC
Email:
Address: 3 Hare Court Temple, London

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: I strongly object to this extraordinary and ludicrous act of proposed vandalism to this finest of library buildings. I agree with the comments of Richard Humphreys QC.

Broughton, Helen

From:

Subject:

Pln - CC - Development Dc

FW: PLN FW: Application for planning permission -Inner Temple Your Reference:
17/00077/FULMAJ FAO: Bhakti Depala COL:04791829

From: Stanley Brodie QC

Sent: 23 March 2017 13:15

To: 'PNLComments@cityoflondon.gov.uk' <PNLComments@cityoflondon.gov.uk>

Subject: Application for planning permission -Inner Temple Your Reference: 17/00077/FULMA FAO: Bhakti Depala

Submissions and representation made by Stanley Brodie Q.C.

I am Stanley Brodie QC and reside at 9 Kings Bench Walk, Temple, London EC4Y 7 DX as a tenant of the Honourable Society of the Inner Temple. I have lived at that address since 2004, and hope to continue doing so for as long as possible. I am writing to express my opposition to the application now being made by the Inner Temple for permission to make extensive alterations to the Treasury building. I regard the whole scheme as being without merit or substance; it would result in the destruction (at great expense) of a historic building of immeasurable cultural and legal value , housing one of the most important law libraries in the World. The finished scheme would produce a building of indifferent design and relatively modest increase in usable space ; as compared with the outstanding design and interior architecture of the Library noted and praised by numerous experts and authors.

I have served as a Master of the Bench at the Inner Temple since 1984 ; was appointed Master Reader in 1999 ; and was elected as the Master Treasurer for 2000, the Millennium year . I have extensive knowledge and experience of the Inn's affairs. I have read the representations of Richard Humphreys Q.C. and agree with every word of them. I have also reviewed the representations of Sir David Keene , Sir Stephen Sedley and the Lord Lloyd of Berwick ; all of their views I unequivocally support. There is therefore no need for me to repeat all they have said.

There is , however, one point I would make. To my mind the Treasury Building and the Library are truly heritage assets , not just for the Temple, but for the City of London as a whole. They are an important City landmark representing a feature of London's history for at least 1000 years. A place where Magna Carta was debated , adjacent to the Temple church consecrated in 1185. Since the 13th century there has always been a Hall and Library at this site. The medieval hall endured until the 19th century, when it was replaced by the Victorians. Their hall was destroyed by Adolph Hitler. The present Treasury building (Hall) and Library were the response of the post-war generation to the barbarity of the Nazis and their disregard for the Rule of Law. They rebuilt their Hall and Library to reaffirm their belief in and respect for the common law and hundreds of years of legal evolution in England and the Commonwealth.

Thus the Treasury building and the Library are not just bricks and mortar 60 years old. They are a piece of history just as much as the medieval hall and the Victorians' hall would have been had they endured. The sublime architecture and design of the Library are a historic testament to the post war generation of Inner Temple lawyers and should be preserved.

Stanley Brodie Q.C.

23rd March 2017

This message has been scanned for malware by Websense. www.websense.com



Sehmi, Amrith

From: PLN - Comments
Sent: 04 April 2017 14:19
To: Depala, Bhakti
Subject: FW: Planning Application Inner Temple 17/00077/FULMAJ

From: Stanley Brodie QC
Sent: 30 March 2017 16:44
To: PLN - Comments
Cc: PlanningQueue; 'Jane Lloyd'
Subject: FW: Planning Application Inner Temple 17/00077/FULMAJ

FAO: Bhakti Depala
I am sending this again as you do not seem to have received my email timed at 12 .38 today
Regards,
Stanley Brodie QC

From: Stanley Brodie QC
Sent: 30 March 2017 12:39
To: 'PNLComments@cityoflondon.gov.uk' <PNLComments@cityoflondon.gov.uk>
Cc: 'Jane Lloyd'
Subject: Planning Application Inner Temple 17/00077/FULMAJ

Planning Application Inner Temple Ref. No: 17/00077/FULMAJ

Further representation by Stanley Brodie Q.C.

I am the same Stanley Brodie Q.C. who submitted to you a representation in the above captioned matter on the 23rd March 2017.
Since then I have been able to examine the representation submitted to your department by Patrick Maddams, the Sub-Treasurer of the Inner Temple , on the 28th March 2017

Sadly , I have to say that his supposed explanations are partisan and misleading , and should be ignored. On the main issue considered by the Benchers in October 2015 the voting was 52.6% in favour of the proposed development, and 48.4 % against it. That result can accurately be described as a wafer thin majority ; the voting could have easily gone either way . It is to be noted that no more than 68% of the Benchers voted.

Mr .Maddams purports to write on behalf of the Inner Temple , but I would question his authority to do so. I am a very senior member of the Inn, having been a bencher for over 30 years and its Master Treasurer in 2000. I would expect to be told of his intended representation before it was sent. I was not so informed. He does not therefore represent me. I am unaware of any other Bencher who has seen and approved of the representation.

I would respectfully suggest that this is not the time or place for debating this kind of issue
Please would you acknowledge receipt of this email.

Stanley Brodie Q.C.
30th March 2017

Newman, Conor

From: PLN - Comments
Sent: 08 April 2017 15:18
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 3:18 PM on 08 Apr 2017 from Mr Alan Birbeck.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Alan Birbeck

Email:

Address: Drystone Chambers, 35 Bedford Row London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Noise

Comments: I am strongly opposed to the proposals which it is submitted will not achieve the goal proposed. I understand the need for development and progress in the current climate. However losing space in the library would be a considerable detriment for the Inns main knowledge resource.

The Inner Temple library provides superb legal knowledge resources which are invaluable to barristers and benchers.

I endorse the representations made by Richard Humphries QC in favour of identifying the Library as a non-designated heritage asset and many of the comments by the eminent contributors opposing the scheme.

There are other locations within the Inn which could create additional accommodation for educational needs.

In addition to the contributions already made the scheme will impact on:

1. Quality of physical resources

The library stocks a unique unrivalled collection of material which is not and will never be available online such including historic and current versions a diverse range of law texts, case reports, command papers and overseas collections etc.

2. Quality of the study space

The libraries also provide an excellent quiet place to work. They also provide the impoverished pupils and members of the legal aid bar a chance of resources and peace in which to work.

3. Quality of the staff

The staffs at all the Inns libraries are helpful and knowledgeable but Inners staff are outstanding.

4. Impact on publicly funded and sole practitioners and BAME

Those least likely to have access to quality knowledge databases and space are those at the publicly funded bar, sole practitioners and BAME practitioners.

Alan Birbeck, Drystone Chambers

Sehmi, Amrith

From: COL - Contact Centre
Sent: 28 April 2017 16:11
To: Pln - CC - Development Dc
Subject: FW: PLN FW: planning reference 17/00077/FULMAJ. COL:05093784

From: Tom Devlin
Sent: 28 April 2017 13:18
To: PlanningQueue
Subject: Re: planning reference 17/00077/FULMAJ.

Dear Sirs

As a user of Inner Temple Library for the past ten years I am appalled by the plans to intrude upon its beautiful interior. It is without question one of the finest post-war interiors in London, as well as being a space wholly conducive to study and reflection. This quality undoubtedly proceeds from its current spatial characteristics, including its high ceilings and harmonious joinery and lighting. To hack it about in the way which is proposed would be nothing short of vandalism on the part of Inner Temple. To permit such vandalism for so little gain would be inexcusable on the part of the City. I urge that the application be rejected.

Best wishes,

Tom Devlin

Partner

Stephen Platt & Associates LLP

PO Box 711, 2 Mulcaster Street,

St Helier, Jersey JE4 0PR.

www.spa-llp.com

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From: COL - Contact Centre
To: Pln - CC - Development Dc
Subject: FW: PLN FW: 17/00077/FULMAJ COL:05093854
Date: 02 May 2017 14:55:48

From: Simon Jervis
Sent: 28 April 2017 18:08
To: PlanningQueue
Subject: 17/00077/FULMAJ

Dear Sirs

17/00077/FULMAJ Inner Temple Library

I am writing to protest against the present scheme for altering this handsome and sensitively detailed and beautifully made library. It is insensitive and destructive, and should be rejected

Yours faithfully

Simon Swynfen Jervis

45 Bedford Gardens, London W8 7EF

Professor Sir Roy Goode CBE QC FBA

42 St John Street
Oxford
OX1 2LH

PLANNING & TRANSPORT	
PSDD	CPO
TPD	15 MAY 2017
ON	
No	128943

Telephone: + [REDACTED]

Email: [REDACTED]

Ms Bhakti Depala
Development Division
Directorate of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

12 May 2017

Dear Ms Depala,

Inner Temple Treasury Building, Crown Office Row
Planning reference **17/00077/FULMAJ**

I should like to join the many people who have expressed strong objections to the proposed development as it affects the Inner Temple Treasury Building.

The building as a whole, situated in a conservation area, is a graceful building which blends well with the surrounding Inner Temple buildings and garden, while the Library, used by students, practising lawyers and judges, is one of the finest and most elegant in England reconstructed to the highest quality after the destruction of the former library during the war. The major building works proposed would in my view be an act of wanton destruction and, moreover, one which is on a scale quite unnecessary for the purposes it is designed to achieve. Nearly half the members of the Inn voting on the proposal objected to it. They included four former Masters of the Library as well as former Treasurers, judges and other senior members of the profession as well as junior barristers. The proposed development has attracted huge opposition not only from members of the Inner Temple but also from librarians, academics and users around the world.

I would therefore urge the planning committee to reject this proposal.

Yours sincerely

[REDACTED]

From Rt Hon Lord Lloyd of Berwick

Treasurer 1999

PLANNING & TRANSPORTATION		
PSDD	OPC	PPD
TPE	22 MAY 2017	LTP
QM		SSE
No	128 977	PP
FILE		DD

2 Mitre Court

Temple EC4

19/5/2017

Dear Mr Depala

Planning Application 17/00077/FULMAJ

Thank you for your letter dated 11 May.

I write in response to the Inner Temple's recent evidence dealing with the history of the Project.

I notice that the project is now described as "Extension and refurbishment of the Treasury Building in association with an education and training facility and office use (sul generis)."

The original concept was very different. Although the "facility" was always intended to include (1) new offices (the Education and Training department had for many years been housed in a windowless basement) (2) an auditorium and (3) a number of training rooms, E and T always made clear that their use of the auditorium would be "relatively slight, although totemic ... in the eyes of the City Corporation, in that planning permission would be rather less likely for a purely commercial use." That was their view as recently as 6th July 2014: See Pegasus Project Report para 10.

The plan at that stage was to use the auditorium as the core of an International Arbitration Centre. That plan was soon dropped, no doubt because arbitrations seldom take place in an auditorium. That left only the limited use of the auditorium by E and T. This use was subsequently calculated at 7% of the available capacity, based on current activities: see E and T submission dated 16 July 2015.

ACKNOWLEDGED



The use was recalculated by E and T on 14th October 2015, and given as 39%. But this figure, given at the very last moment, was clearly erroneous, since it included the offices as well as the auditorium.

As for the offices, E and T have at long last been relocated in a fine set of Chambers at 2 Kings Bench Walk as close as could be to the centre of the Inn. It is said that the move is temporary. But no reason is given. The only objection seems to be that there is no disabled access.

As for training rooms, a set of chambers will soon become available at 2 Mitre Court, recently let to a firm of solicitors. There are four good rooms, eminently suitable as training rooms. The original plan showed no more than 5 training rooms: see E and T's submission dated 16 July 2015. The entrance is only a few yards from 2 Kings Bench Walk. Do the training rooms really need to be under the same roof as the offices? No doubt another similar set will become available long before the completion of the proposed rebuild in 2/3 years time.

Finally it is said that such sets should be reserved for barristers which was their original purpose. But that is the very reason why they are so appropriate as training rooms, especially for students, rather than the identical little boxes now proposed. As for the loss of rent, it hardly measures against the likely £25 million capital cost.

I now return to the supposed need for an auditorium. For lectures the Inner Temple currently uses what was the old luncheon room. It holds 65 students in the desired horseshoe shape, and in a recent year it was used for this purpose on 69 occasions. For larger events we have the Parliament Chamber, which holds 96 students in

horseshoe shape. For still larger events, if any, we would be able to use the auditorium currently being built by Lincolns Inn. The whole purpose of COIC, to which James Wakefield refers on page 2 of his evidence, is that the four Inns should cooperate in providing education, and in other matters, rather than compete.

I cannot believe that James Wakefield is right in suggesting, as he seems to do, that we will get a black mark from the Regulator unless we build a second auditorium, for which nothing approaching a business case has ever been made out. The Regulator will be well aware of the world class service which our library and its staff currently afford to students and others. I cannot therefore agree with James Wakefield when he says that it would be "wonderful" to build an auditorium at the expense of causing irreparable damage to the library as we know it.

A solid black rectangular redaction box covering the signature of Lloyd of Berwick.

Lloyd of Berwick

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

Neil D. Coe
90 Alexandra Cottages
Edward Road
Penge
London, SE20 7JS

For the attention of Bhakti Depala (Case Officer)

24th May 2017

Dear Ms Depala

1.0 Representation of supplementary

I am writing in response to the Supplementary Planning Documents submitted by applicant and their architects, heritage consultant, and education and training specialist, to reconfirm my strong objections to the planning application 17/00077/FULMAJ for the Project Pegasus scheme, as set out below.

I continue to write as a former Deputy Surveyor in the Surveyor's Department of the Honourable Society of the Inner Temple for 7 years, with considerable knowledge and passion for the buildings and estate of the Inner Temple.

PT_BXD/17/00077/FULMAJ

Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising;

Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed roof-light;

Installation of a rooftop plant area;

Reconstruction of the hall roof resulting in an increased ridge height;

Insertion of dormer windows in the hall roof;

Extension at the north east corner to create a new lift shaft;

A new brick clad escape stair on the north side between the Treasury Building and the Hall;

Creation of new chimney stacks and associated internal and external alterations and cycle parking.

Inner Temple Treasury Building, The Terrace, Crown Office Row, London, EC4Y 7HL

2.0 Supplementary Planning Information: Design Approach by Hugh Broughton Architects

The content of the Design Approach document is disappointing as it only covers the interior design and fails to address the resultant and significant consequences to the exterior design, as a result of misguided overdevelopment of the interior and associated planned destruction of the Library.

The original Design and Access Statement did not sufficiently demonstrate the design intent and justification of the exterior design, and a properly researched and illustrated design approach for the exterior should have been included in this supplementary planning information.

The internal design approach uses phrases such as:

'Alterations and adaptations of the library will preserve the existing details and extend this language where necessary.'

*'Thoughtful and sensitive approach
The emerging interior design for the Treasury reflects the historic origins of the building.....'*

when most of the existing detail of the library (original double height rooms, oak pediments, balustrades, cornices, bookcases, chandeliers and pendent fittings) will be lost forever by these 'thoughtless' and 'un-sensitive' proposals.

It is immediately obvious from the model shown in 3.0 Layouts that the proposed steep mansard roof (greatly in excess of other roofs in the Inner and Middle Temple) and tall dormers are disproportionate to the host building, and do not complement the overall composition.

The purported requirement for large vertical dormers to the mansard rooms is not justified as the 4th floor Breakout Space is top lit by an enormous glazed ceiling, and the 3rd floor Breakout Space serving the same purpose can suffice with the original smaller windows which are at least a third of the size.

Similarly, the generous proportions of the window seats to the Training Rooms are not essential, as these rooms could also be top lit, to downscale the oversized and dominant dormer windows to the front and side elevations. The Training Rooms will frequently use black out blinds for AV facilities to work and daylight/views will be excluded.

The Indicative View of Library Room C/D should have shown the 'before' and 'after' to fully understand the impact and loss of the double height rooms, their galleries and chandeliers. The image gives the impression that the lowered ceiling is already installed which is misleading, and is to compare with the even lower ceiling proposed under the auditorium.

The Indicative View of Library Room E has been doctored to zoom in and look more towards the floor, and therefore gives a false impression of the extent of new ceiling under the proposed auditorium, and the likely claustrophobic nature of this long and wide principle library room. The use of a detailed section through the windows to show the ceiling levels and bulkheads, with the extent of alteration to the bookcases and numbering, should have been included to more fairly illustrate the actual proposals and impact.

The section on 2.0 Existing Attributes acknowledges that the warm lighting levels

'...combines with the timber panelling and suspended light fittings within to create an inviting ambience, which makes a contribution to the atmosphere of the Conservation Area.'

which will be reduced and substantially harmed by these proposals.

This also contradicts the statement made by the Inn's Director of Property & Surveyor as to the impact of the interior as a material planning consideration.

3.0 Supplementary Planning Information: Response to the points raised by Richard Humphreys QC concerning the design of the proposed dormers by Hugh Broughton Architects

The previous attempt by the applicant to justify the exterior design only covered the proposed dormers and did not address the fundamental issue that the proposed mansard is of non-traditional design, in both architectural and historic terms.

The Treasury Building was redesigned in the '*piano nobile*' style with dominant 1st and 2nd floor windows to demonstrate the principle functions, with sub-servient (smaller) windows at Grd and 3rd floor, and terminated with a cornice and parapet, with hidden roof behind.

The *piano nobile* (Italian, "noble floor" or "noble level", also sometimes referred to by the corresponding French term, *bel étage*) is the principal floor of a large house, usually built in one of the styles of Classical Renaissance architecture. This floor contains the principal reception and bedrooms of the house.

The Treasury Building as re-designed by TW Sutcliffe, and together with significant numbers of administrative buildings, country houses and larger domestic properties throughout the UK, follows these architectural and historic precedents, and is therefore a carefully considered and authentic composition.

The addition of a large and dominant roof-scape above an accepted building of a specific architectural style and period is no longer appropriate to the host building or the adjacent listed Georgian and Victorian buildings, or indeed to the Temple Conservation Area.

I have been searching the country for the last few months to find an architectural composition similar to that proposed in this application, and must have viewed tens of thousands of Georgian and Neo-Georgian or Queen Anne Revival buildings. None of these, in the Georgian (or Neo-Georgian) quarters of London, Manchester, Birmingham, Leicester, Nottingham, Derby, Ludlow and other historic towns and villages or country estates, have mansard roofs above a '*piano nobile*' elevation.

The roofs typically being hidden behind a parapet, gently pitched and partially hidden behind a stone balustrade, or having no parapet at all and the pitched slopes overhanging with dentile cornice and eaves. No examples have been found of where the dormer windows are larger and more dominant than the upper floor windows.

The Inn's architect purports to there being examples of vertical dormers within the Inn, but none of them are taller than the upper windows, typically being smaller or the same size, to accord with architectural and historic traditions and hierarchy.

I challenge the applicant and their architect, heritage consultant and planning consultant to provide any credible examples of an oversized mansard roof with dormers larger than the upper storey windows, on a host building of this architectural style and composition.

It is extremely disturbing that an independent view on the proposed exterior design has not be forthcoming from Historic England, the Georgian Society, the Society for the Protection of Ancient Buildings, or other heritage expert, to assist in the evaluation of this application.

The original Design and Access Statement, Heritage Statement and Planning Statement all conclude that the Inn is completing the roofscape of the building, as originally intended by its architect, Sir Hubert Worthington, but the DAS goes on to say:

'To ensure this level of harmony can be achieved, the new elements of the project need to draw inspiration from the host building, extending the language so clearly established by Worthington and delivered by Sutcliffe. The premise of the design should be not only one of physical extension but also of linguistic extension so that the new parts complement the old without drawing attention to themselves'

The placement of an oversized mansard that is taller, steeper with enlarged dormers, than that intended by the original architect (Worthington), on a building carefully redesigned in an opposing architectural style from a different architect (Sutcliffe) is not, with respect:

- Harmonious
- Extending the language
- Complementing the old
- Without drawing attention to themselves

The use of pastiche as a substitute for design is not considered sufficient to arrive at a coherent and authentic composition for the extended building, and would be detrimental to the host building, adjacent listed buildings, group value, scheduled ancient monument, registered garden, strategic views, and the Temples Conservation Area.

3.0 Supplementary Planning Information: Project History and the Consideration of Alternatives by RJ Snowdon, Director of Properties & Surveyor, Inner Temple

The supplementary information on the Project History and Considerations of Alternatives unfortunately provides a slightly muddled description of the Project History and includes limited detail on the Alternatives considered.

The discharged alternatives within the Garden are both attractive and feasible schemes, and perhaps no more challenging than adapting the existing Treasury Building and Hall, with its associated structural and decanting implications.

The northern boundary of Peony Garden extending under the car park is a logical scheme as this is already an area of built development, with the King's Bench Office formerly at ground/carpark level with two sets of chambers below, effectively at the current garden level. The cost of creating a self-contained E&T facility in this location with attractive views over the garden would be extremely favourable when contrasted with the cost of adapting and extending the main buildings to accommodate the additional facilities.

The High Boarder immediately to the south of the main gate/Crown Office Row is another attractive alternative with the direct benefit of access and servicing from the main buildings.

It would also provide the ideal opportunity for servicing the Inn's garden events, and for corporate hire when not in use for educational purposes.

The predominately underground nature of this development would suit the requirements of the lecture theatre and provide a natural vista for the training rooms and breakout spaces, with minimal impact on the Temple Conservation Area. This alternative is potentially far more exciting and cost effective than trying to squeeze the additional accommodation into the Treasury Building and Hall.

It is regrettable that the Serjeants Inn proposals were not pursued further as the scheme was far less controversial than Scheme 1 (4th floor mansard only) and Scheme 2 (E&T spread over 4th and 3rd floors) for the main Treasury Building and Hall, and the subject of this planning application.

There have been other opportunities, within the Inn, since 2010, for rationalisation of Chambers and the creation of additional E&T facilities, which have been missed and are not detailed in this submission.

The principle omission in this submission is the numerous alternatives to the Treasury Building and Hall itself, which include development under, adjacent or up and over the buildings.

The erection of new buildings (or extensions) are permitted in Conservation Areas, where they are of exceptional quality to preserve or enhance the character and appearance.

Areas of previous built development, not reinstated after WWII, such as the Lamb Building in Church Court, Library tower to corner of COR/KBW, King's Bench Office to south of current carpark, and amended footprint of Tanfield Chambers could lend weight to any alternatives.

The proposed external fire escape staircase in Church Court is one of the least successful elements of the scheme covered by this planning application and can be incorporated into the main building, to either the Ante Room, replace the existing Benchers stair or occupy the far end of the Luncheon Room.

The supplementary submission also fails to mention the alternative of extending upwards, which has been acknowledged by the Inn and their architects as beneficial to partially obscure the modern development in Fetter Lane. The recent trial pits also confirm that the main building can accommodate loading from a rooftop extension and it is likely that cost and disturbance of underpinning of the foundations will not be required.

Please find attached a range of alternative options to the existing buildings, listed in my original submission of 9th March 2017, showing plans of the usage proposed in the planning application to compare with the changes to the design and usage of the alternative options.

The alternative options would all preserve the Library and negate the need for wholesale decanting and rationalisation, and should be considerably more cost effective and less disruptive.

4.0 Supplementary Planning Clarification: Email by RJ Snowdon dated 15th May 2017

The email clarification from the Inn's Director of Property & Surveyor states

'that we are seeking to assist the Officers and the Elected Members in the deliberation of this application and provide the information requested without prejudice to our primary stance that the consideration of the interior of the building is not a material consideration, and that the interior works are a consequence of the application, but were not being specifically applied for'

The Inn is either providing supplementary information that is a material consideration or not. If they are not applying for permission, and it is not deemed a material consideration, then all of the Supplementary Planning Information should be formally withdrawn.

The City of London has rightly re-consulted with all those in support and objecting, and the responses to the Supplementary Planning Information and their bearing on the original documents should be given the appropriate planning weight.

5.0 Supplementary Planning Information: Heritage Statement by KH Heritage

The additional information provided by KH Heritage makes for illuminating and pertinent reading, and at last sets out the heritage significance of the current library and its predecessors. It usefully reinforces the case for the preservation of the present Library from this proposed scheme which is set to destroy it.

The Heritage Statement should be a statement of heritage significant and the selective use of source materials could be construed as biased and potentially misleading. The opinions of the author were felt to be inappropriate and should not carry any planning weight.

6.0 Supplementary Planning Information: Bar Educational Training & Role of the Inns of Court by James Wakefield, Paul Brown QC and Guy Fetherstonhaugh QC

The paper by James Wakefield, Paul Brown QC and Guy Fetherstonhaugh QC provides useful information on the intended provision of Education and Training but does not really provide a business case to balance the 'benefits' and 'need' against the known 'harm' proposed to the Inn's heritage assets.

7.0 Original Submission dated 9th March 2017

I would wish to reiterate my objections to this application on the grounds raised in my original letter of 9th March 2017 which included the following matters: -

- **Planning Application Description**
- **Validity**
- **Design**
- **Scale**
- **Massing**
- **Authenticity**
- **Symmetry**
- **Amenity**
- **Over-development**
- **Statement of Community Engagement**
- **Design and Access Statement**
- **Heritage Study**
- **Heritage Statement**
- **Planning Statement**
- **Pre-application advice**
- **Detrimental effect on Conservation Area**
- **Detrimental effect on Statutory Listed Garden**
- **Detrimental effect on Ancient Monument**
- **Detrimental effect on Listed Buildings**
- **Detrimental effect on Group Value**
- **Harm/Economic benefit**
- **Temporary decanting and accommodation**
- **Site Confines/Opportunities**
- **Business Case**
- **Alternative Options**
- **Planning Policy – National, Regional, Local, Specific and Case Law**
- **Conclusion**

9.0 Supplementary Conclusion

The Supplementary Planning Information submitted by the Inn, Hugh Broughton Architects and KH Heritage have revealed further material planning considerations that undermine the applicant's case for planning approval.

The grounds for refusal of planning permission have increased as a result of this supplementary information and I feel give additional weight to my original grounds for objection submitted by myself and many others.

The grounds for objection to the proposed scheme therefore remain as previously expressed and reiterated below for convenience.

The validity of the application is questionable due to:

- o Incomplete Planning Application Description to cover the proposed scheme
- o Insufficient explanation and justification of proposed Use Class Order
- o Incomplete Design and Access Statement, Heritage Study, Heritage Statement and Planning Statement.

The design of the proposed scheme is poor and of insufficient quality for such an architecturally and historically significant site.

The proposed scheme does not substantially comply with Planning Policy, at National, Regional, and Local level.

The proposed scheme would be highly detrimental to Designated and Non-Designated Heritage Assets, which include the adjacent Listed Buildings, Ancient Monument, Registered Garden, Temples Conservation Area and the Inner Temple Library, Treasury and Hall.

The substantial 'harm' to the above Heritage Assets from the proposed ill-conceived scheme would far outweigh any unsubstantiated 'benefit'.

The level of Community Engagement and Involvement has been highly selective and wholly insufficient for the Inn's ordinary members, Library users, Tenants of Chambers, neighbouring institutions, the learning profession, and the general public, for a proposed scheme of this magnitude and sensitivity.

The business case for the proposed scheme and the requirement for E&T facilities and associated detrimental impact on the site has not been justified.

The proposed destruction of the fine Inner Temple Library to facilitate the proposed luddite scheme is not necessary or warranted.

The Inn and their consultants have made no meaningful efforts to explore or articulate numerous alternative options that exist, which would improve the design and authenticity of the proposed scheme, and negate the any 'harm'.

The Inn can have a world class Education and Training facility and retain its world class Library, as the two are not mutually exclusive.

The Inn has been timid with its proposed scheme, by restricting the brief to working within the existing building, which would result in overdevelopment, poor design and significant harm to its Heritage Assets.

The current scheme (application) lacks vision and a more radical solution is available that would meet all of the Inns requirements in a more economical manner, and satisfy the necessary stringent planning requirements.

The application for the proposed scheme Ref: 17/0007/FULMAJ should be duly refused.

Yours sincerely

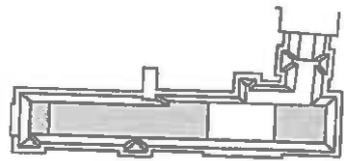


Neil D. Coe

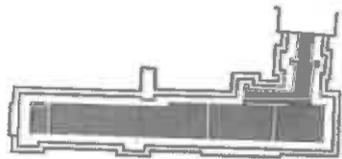
Please refer to separate documents for the following Appendices: -

Appendix 1	Photos	09/03/17
Appendix 2	Drawings	09/03/17
	Alternative Plans	24/05/17
Appendix 3	Listing	24/05/17
Appendix 4	Architects Quotes	24/05/17
Appendix 5	Inspiration	24/05/17
Appendix 6	Design and Access Statement	

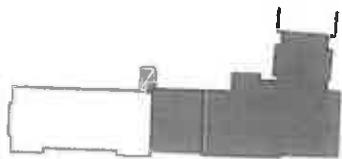
Appendix 2 – Drawings – Alternative Plans



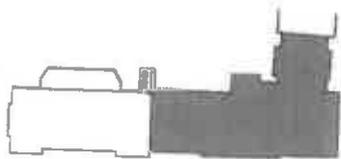
5th



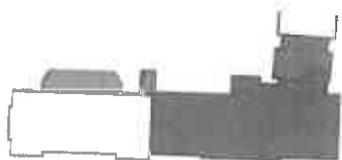
4th



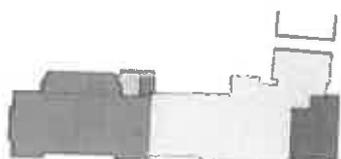
3rd



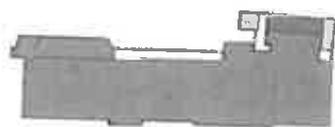
2nd



1st



Gnd



Bst

Planning

Key

E&T



Auditorium



Library



Benchers



Treasury

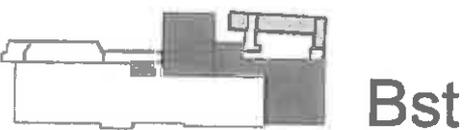
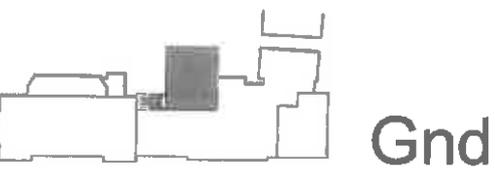
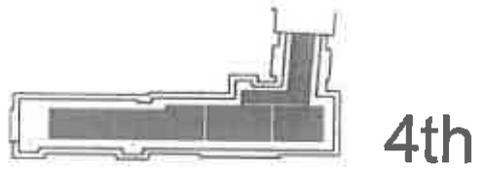
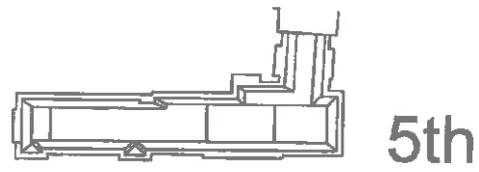


Catering

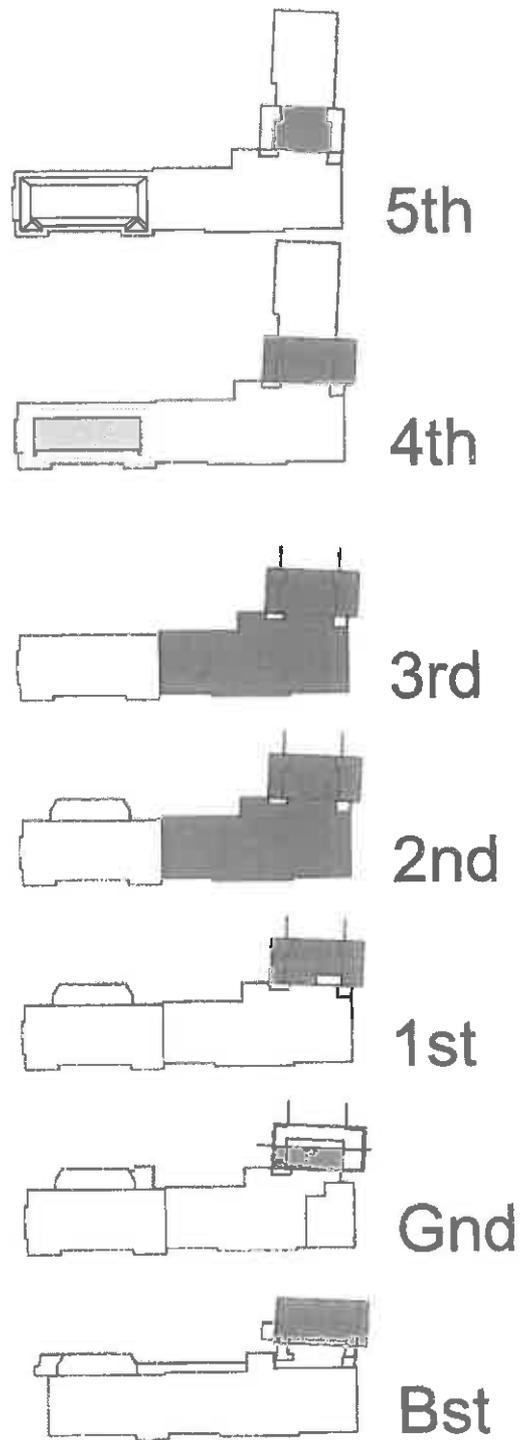


Plant

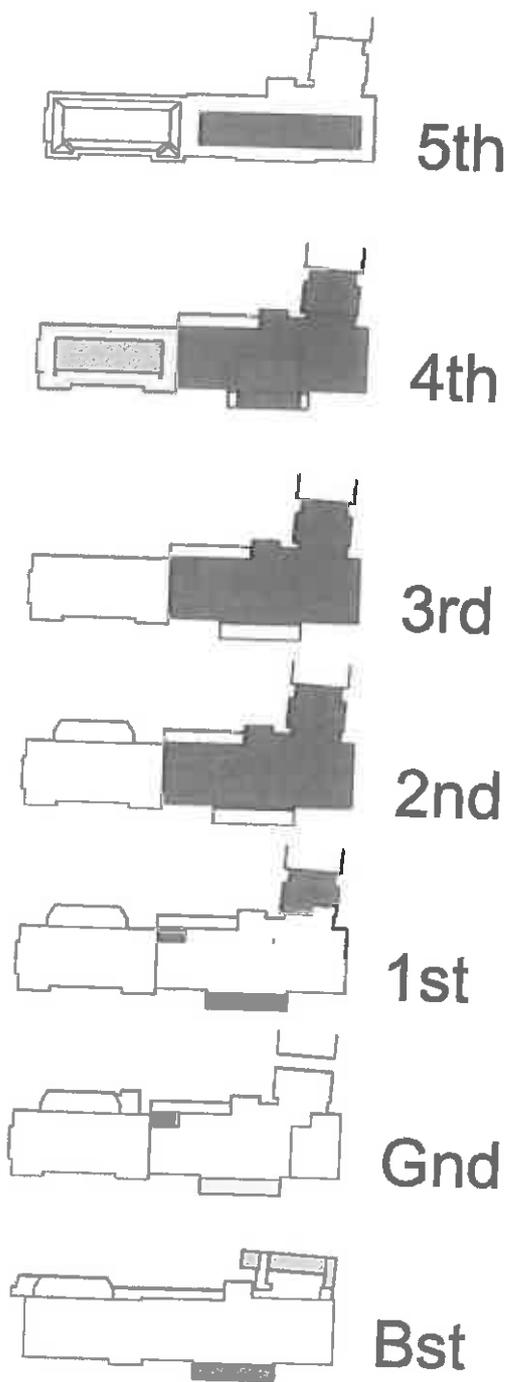




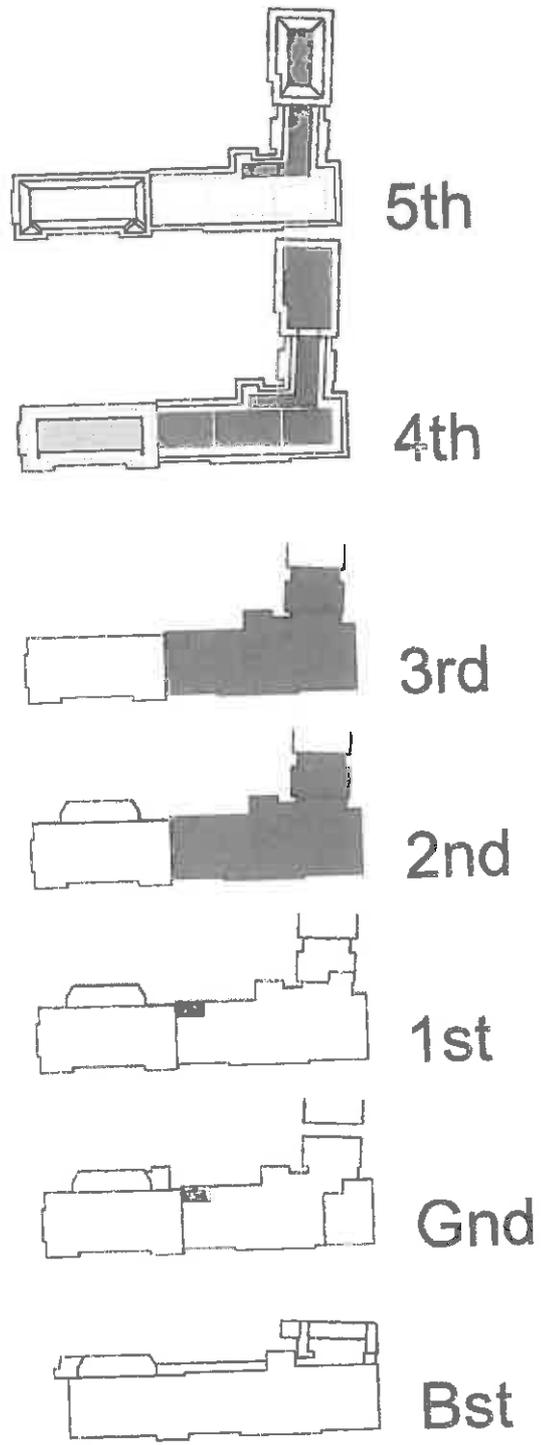
Option a)
Church Court
extension for E&T



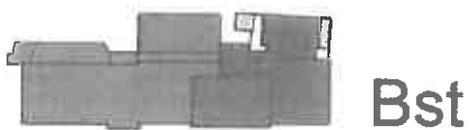
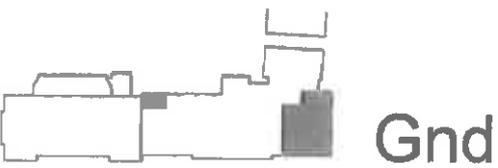
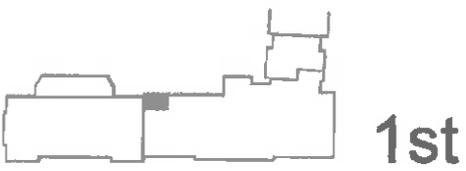
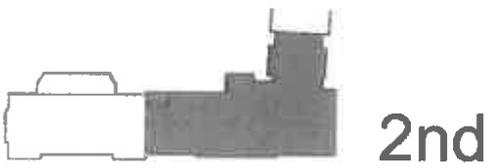
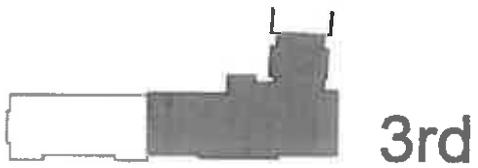
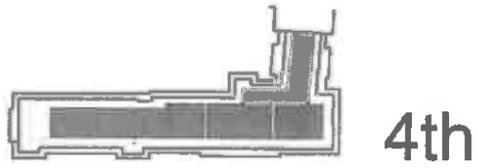
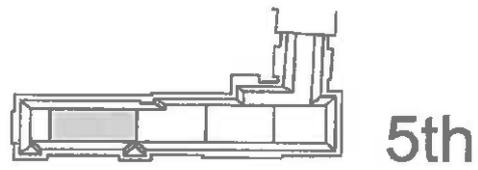
Option b)
Link redevelopment
as E&T facility



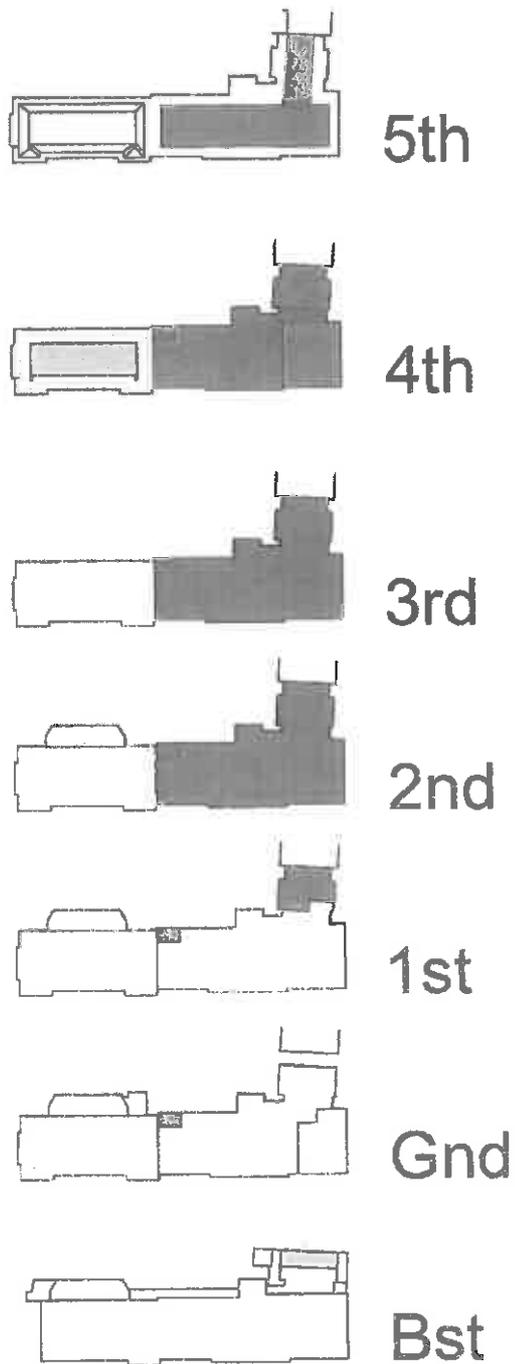
Option c)
 Extend up and over
 for auditorium and out
 to front and rear



Option d)
Extend above
Francis Taylor
Building



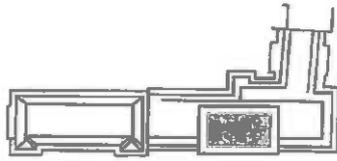
Option e)
Basement auditorium
and extend kitchens to
Church Court



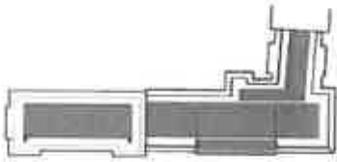
Option i)
 Additional brick
 storey at 4th and
 E&T in roof at 5th



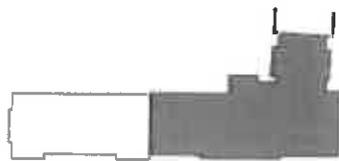
6th



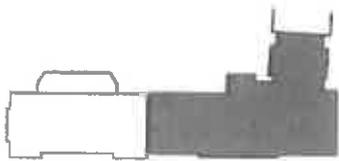
5th



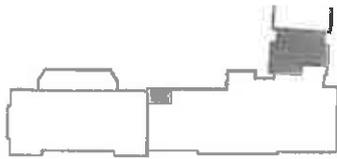
4th



3rd



2nd



1st



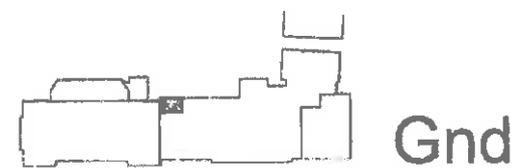
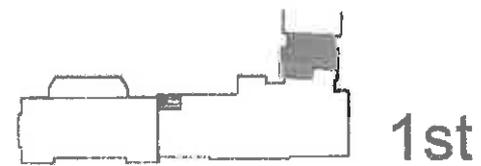
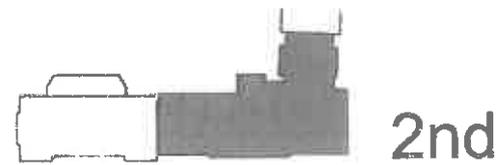
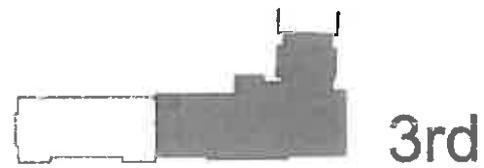
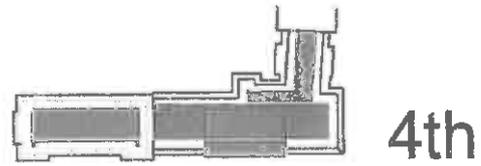
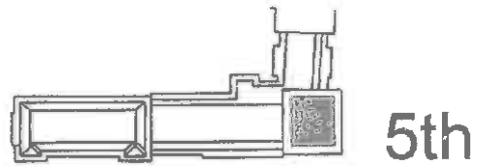
Gnd



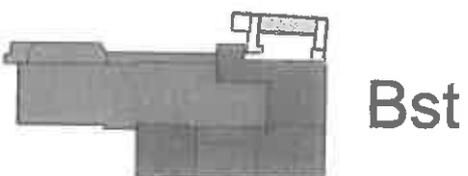
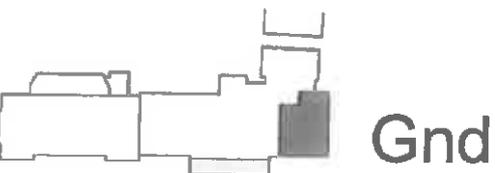
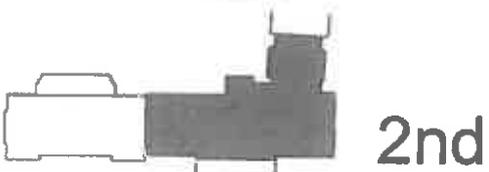
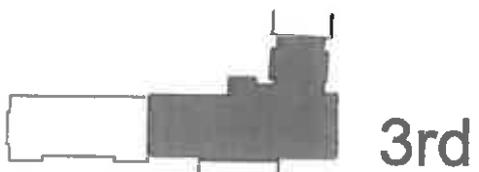
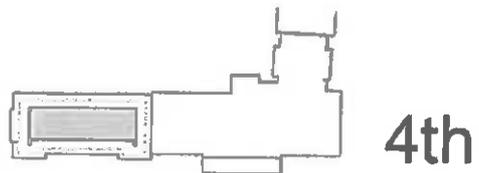
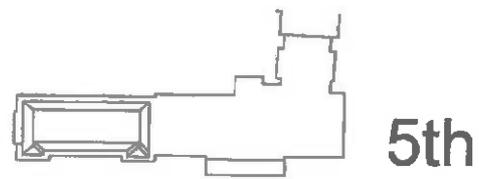
Bst

Option I)
Additional brick
storey at 4th and
central tower at 5th

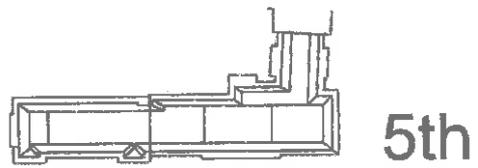
 6th



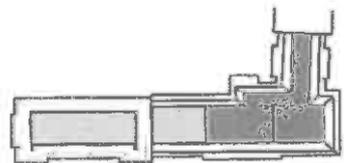
Option m)
Additional brick
storey and SE
clock tower at 5th



Option cc)
Extend out to
front and under
south terrace



5th



4th



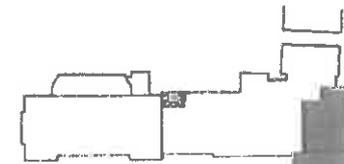
3rd



2nd



1st

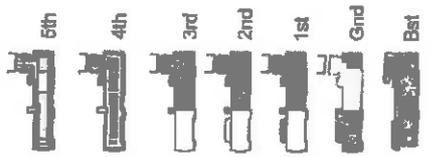


Gnd

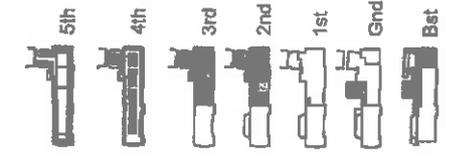


Bst

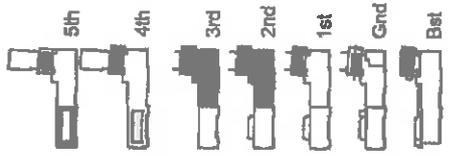
Option ee)
Extend out to
south terrace for
auditorium



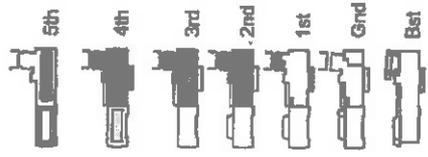
Planning



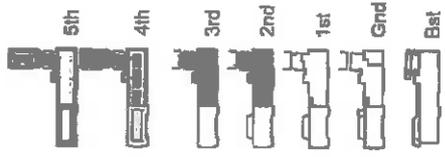
Option a)
Church Court
extension for E&T



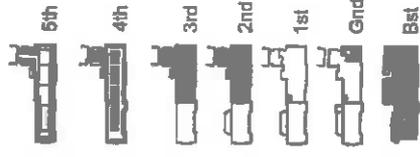
Option b)
Link redevelopment
as E&T facility



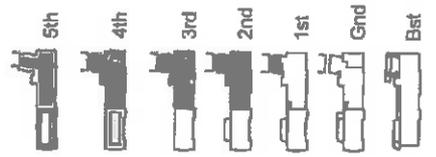
Option c)
Extend up and over
for auditorium and out
to front and rear



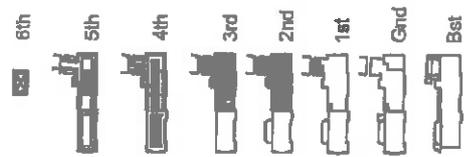
Option d)
Extend above
Francis Taylor
Building



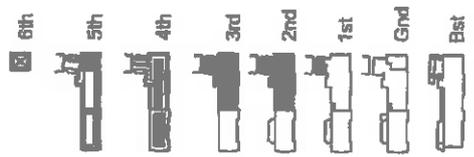
Option e)
Basement auditorium
and extend kitchens to
Church Court



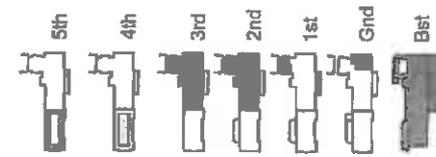
Option i)
Additional brick
storey at 4th and
E&T in roof at 5th



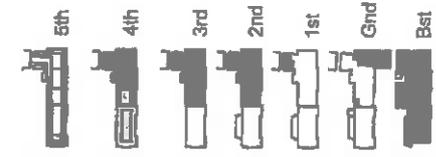
Option l)
Additional brick
storey at 4th and
central tower at 5th



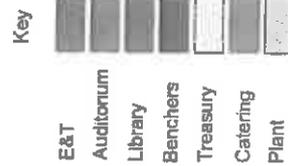
Option m)
Additional brick
storey and SE
clock tower at 6th



Option cc)
Extend out to
front and under
south terrace



Option ee)
Extend out to
south terrace for
auditorium



Appendix 3 – Listing

Inner Temple

Listed Buildings

Inner Temple The Master's House, Church Court – Grade II
Buttery at Inner Temple Hall, Crown Office Row – Grade II*
Gates with gate piers and steps, Crown Office Row – Grade II*
2 lamp standards outside Inner Temple Hall – Grade II
Inner Temple Gatehouse, Inner Temple Lane – Grade II*
Statue of John Hiccocks against rear wall of Nos. 30-32 Fleet Street – Grade II
Dr Johnson's Buildings, Nos. 1-3 Inner Temple Lane – Grade II
Temple Church, Inner Temple Lane – Grade I
No. 1 King's Bench Walk (east side) – Grade I
No. 2 King's Bench Walk (east side) – Grade I
No. 3 (North) King's Bench Walk (east side) – Grade II*
No. 3 King's Bench Walk (east side) – Grade I
No. 4 King's Bench Walk (east side) – Grade I
No. 5 King's Bench Walk (east side) – Grade I
No. 6 King's Bench Walk (east side) – Grade I
Gateway to Tudor Street, Kings Bench Walk – Grade II
No. 7 King's Bench Walk (east side) – Grade I
No. 8 King's Bench Walk (east side) – Grade II*
Nos. 9-11 King's Bench Walk (east side) – Grade II
Nos. 12 & 13 King's Bench Walk (east side) – Grade II
Paper Buildings, Nos. 1-4 King's Bench Walk (west side) – Grade II
Paper Buildings, No. 5 King's Bench Walk (west side) – Grade II
Lamp standard opposite No. 7 King's Bench Walk – Grade II
4 lamp standards at north end King's Bench Walk – Grade II
Nos. 1 & 2 Mitre Court Buildings – Grade II

Victoria Embankment 4 gate piers to Middle Temple Lane, Victoria Embankment – Grade II
5 gate piers to Inner Temple Lane, Victoria Embankment – Grade II

Scheduled Monuments

Inner Temple Hall Buttery

Additional Considerations

Inner Temple Garden and Middle Temple Garden are both designated, Grade II, and included in the English Heritage Register of Parks and Gardens of Special Historic Interest in England.

Appendix 4 – Architect's Quotes

Please find below a selection of quotes from leading architects that could be felt appropriate to this scheme and planning application

Beauty will result from the form and correspondence of the whole, with respect to the several parts, of the parts with regard to each other, and of these again to the whole; that the structure may appear an entire and complete body, wherein each member agrees with the other; and all are necessary to compose what you intend to form.

Andrea Palladio (1508-80)

Less is more.

Ludwig Mies van der Rohe (1886-1969)

Form follows form, not function.

Philip Johnson (1906-2005)

"Form follows profit" is the aesthetic principle of our times.

Richard Rogers (1933-)

A product often becomes more useful if the costs are lowered without harming the quality.

Charles Eames (1907-78)

Don't ever turn down a job because it's beneath you.

Julia Morgan (1872-1957)

The design of buildings in natural settings, whether urban or rural, must be responsive to the earth out of which they arise and the sky against which they are seen.

James Polshek (1930-)

You can put down a bad book; you can avoid listening to bad music, but cannot miss the ugly tower block opposite your house.

Renzo Piano (1937-)

You cannot simply put something new into a place. You have to absorb what you see around you, what exists on the land, and then use that knowledge along with contemporary thinking to interpret what you see.

Tadao Ando (1941-)

Space, space: architects always talk about space! But creating a space is not automatically doing architecture. With the same space, you can make a masterpiece or cause a disaster.

Jean Nouvel (1945-)

Never talk to a client about architecture. Talk to him about his children. That is simply good politics. He will not understand what you have to say about architecture most of the time. Most of the time the client never knows what he wants.

Ludwig Mies van der Rohe (1886-1969)

I don't know why people hire architects and then tell them what to do.

Frank Gehry (1929-)

Sometimes one is constrained to do things against reason in order to obey the will of the lord who ordered the building to be built.

Philibert de l'Orme (ca. 1514-70)

Very often the opinion of the clients must be disregarded in their own interest.

John H. Johansen (1906-)

I have never been embarrassed to state what might be self-evident, so it will come as no surprise to suggest that the pencil and computer are, if left to their own devices, equally dumb and only as good as the person driving them.

Norman Foster (1935-)

Old-style architects did as much as they could control. Their own hand was always involved in their work; responsibility wasn't delegated to anyone else. Once work is delegated and not followed through by the original hand, it's not architecture anymore. It's something else.

John Hejduk (1929-2000)

I always consider a building as part of the whole, a piece which creates a collective performance, which is the city.

Christian de Portzamparc (1944-)

Any work of architecture which does not express serenity is a mistake.

Luis Barragan (1902-86)

Appendix 5 – Inspiration

Figure 5.1 – 142 Park Street, South Melbourne



Figure 5.2 – Kukje Galley, Seoul

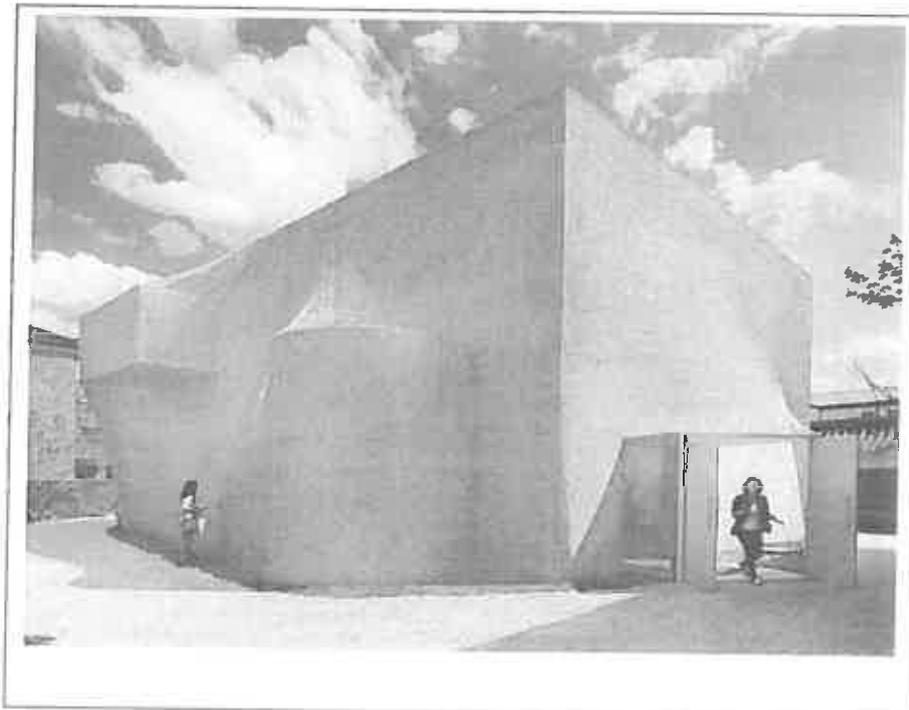


Figure 5.3 – Trevox Apartments, Naucalpan, Mexico

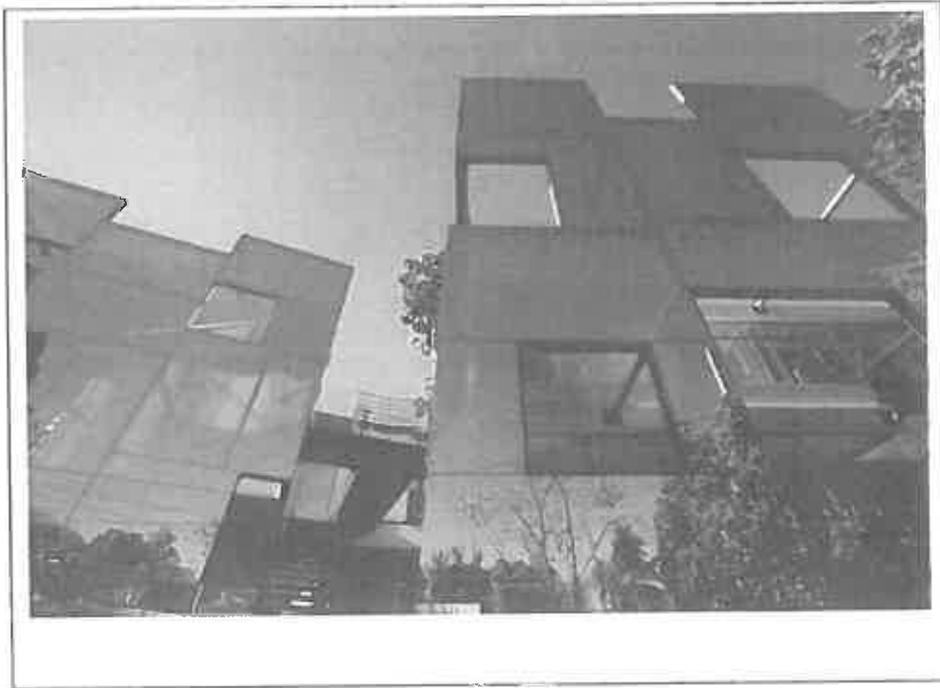


Figure 5.4 – Frog Queen, Graz, Austria

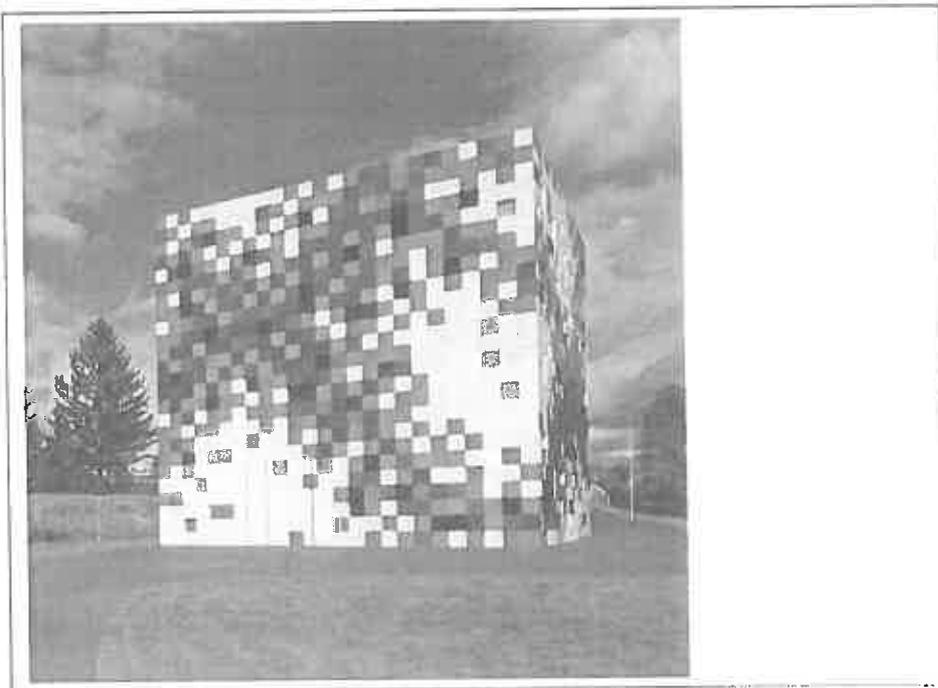


Figure 5.5 – Glass Pavilion at the Tolodo Museum of Art

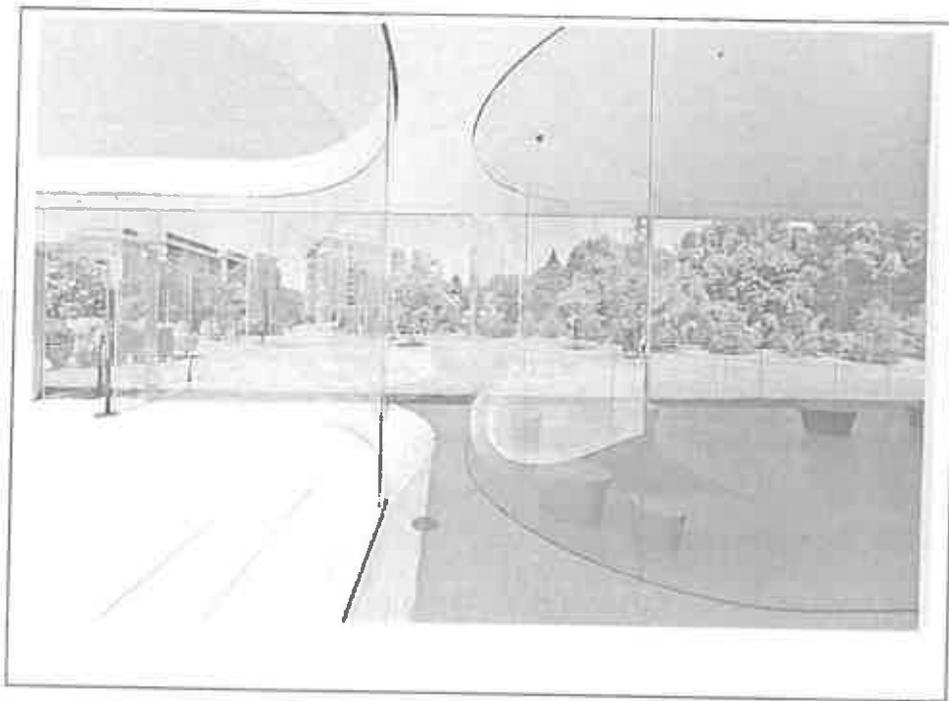


Figure 5.6 – Drive – Façade of multi-storey car park, Skopje, Macedonia

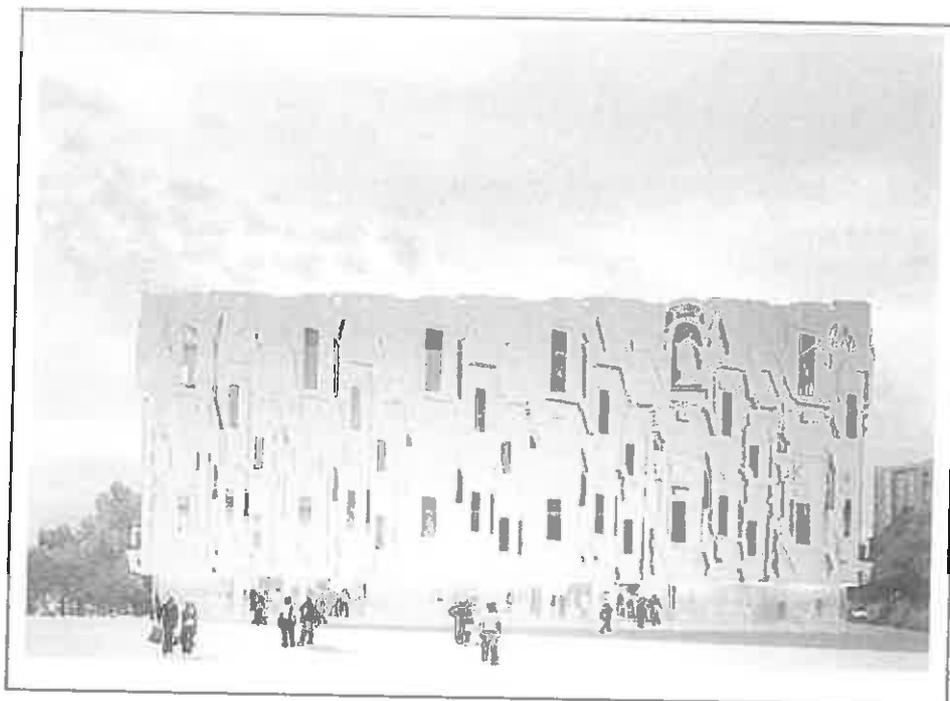


Figure 5.7 – 55 Treehotel, Harads, Sweden

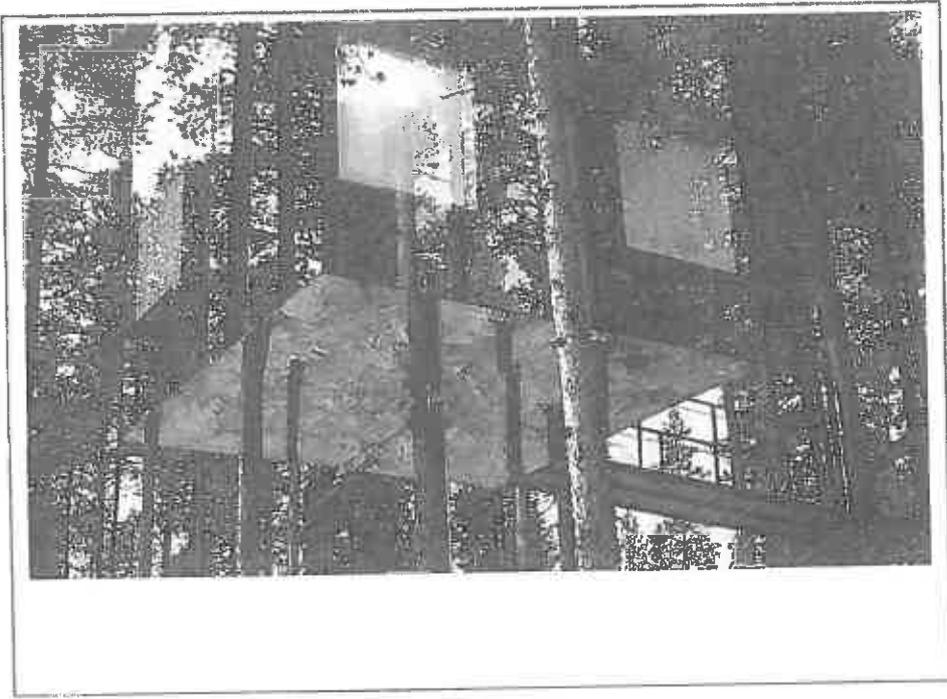


Figure 5.8 – Treehouse, London

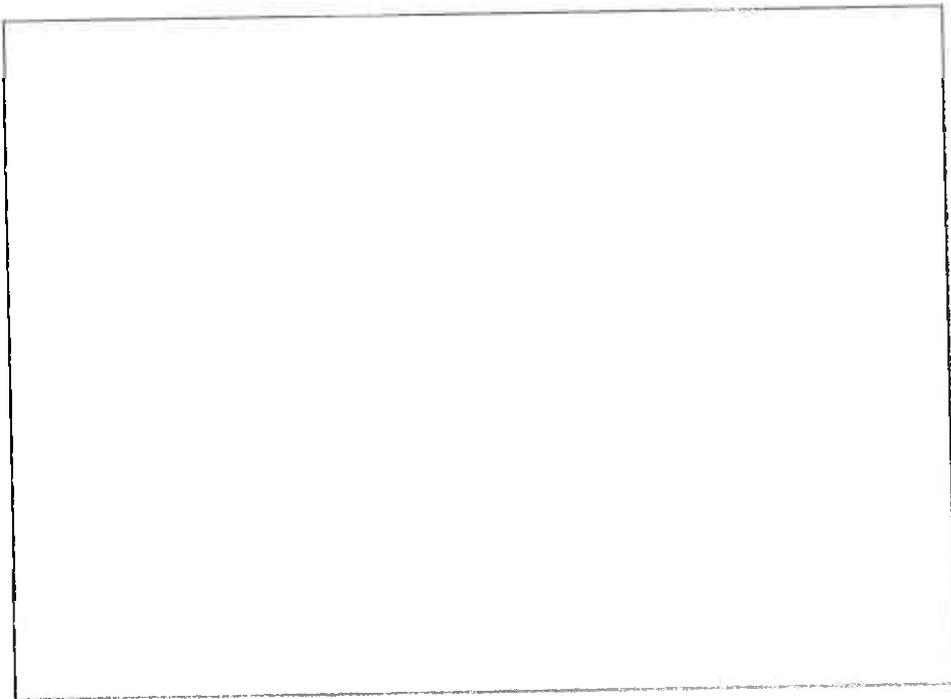


Figure 5.9 – Italian Pavilion, Milan

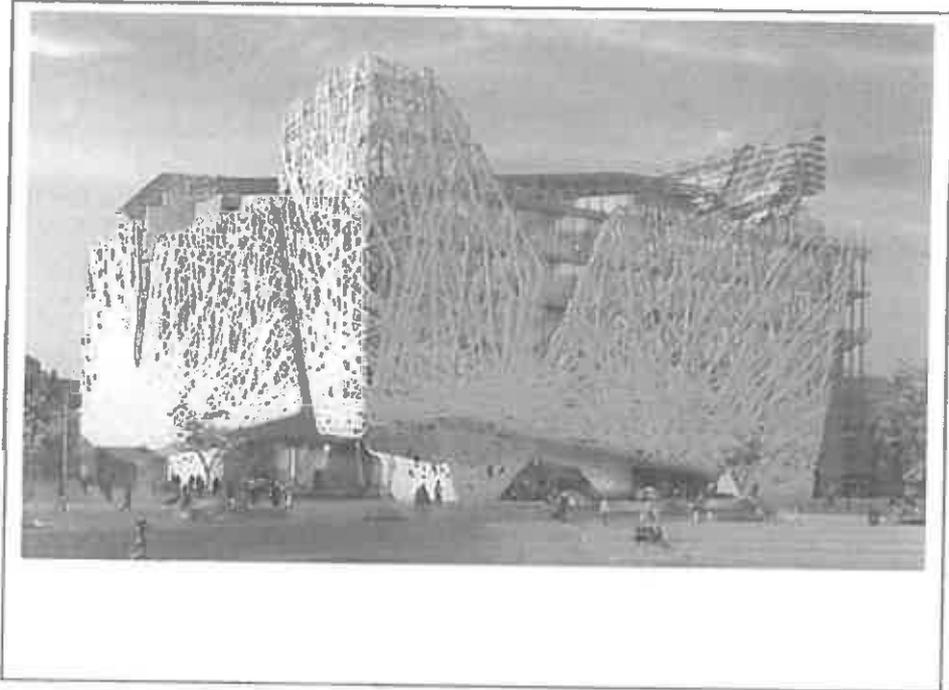


Figure 5.10 – 3D Print Canal House

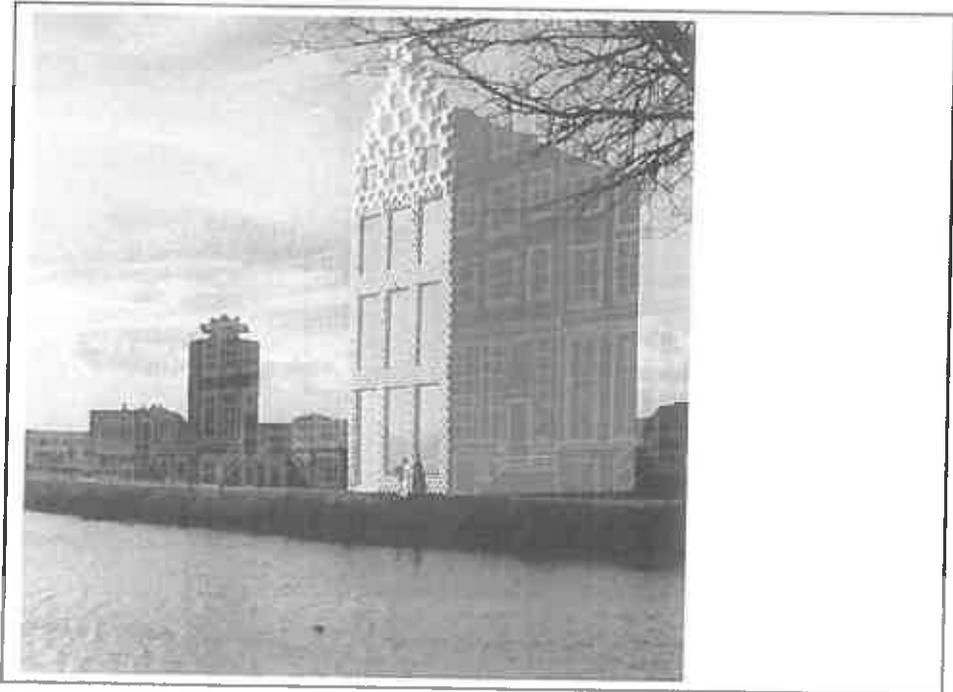


Figure 5.11 – Braintree Town Hall, America – Meyer and Meyer Architects

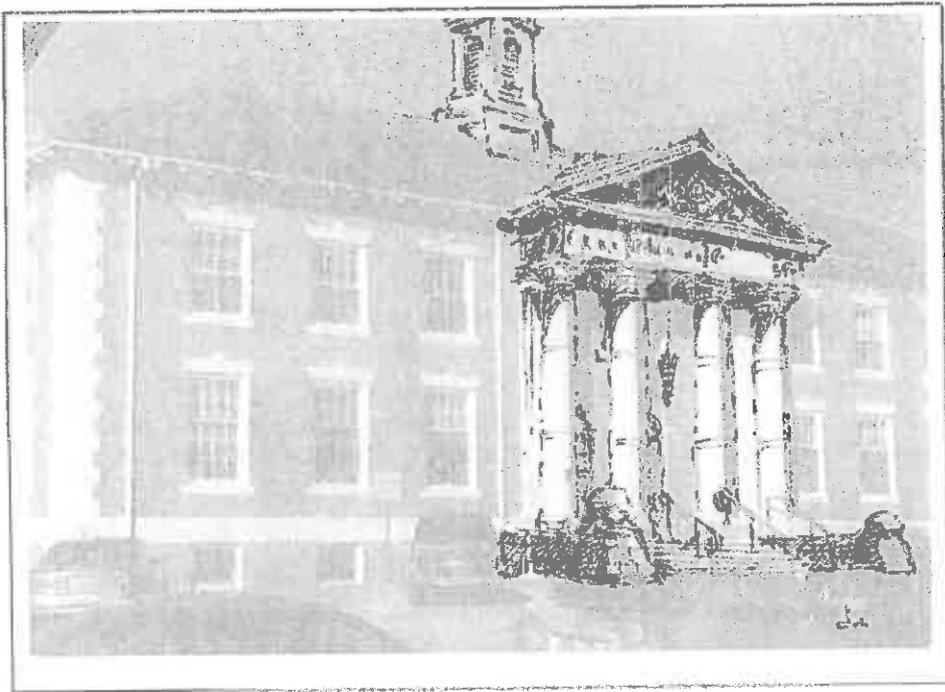


Figure 5.12 – Nottingham Museum of Contemporary Art



Figure 5.13 – Osterley Park House

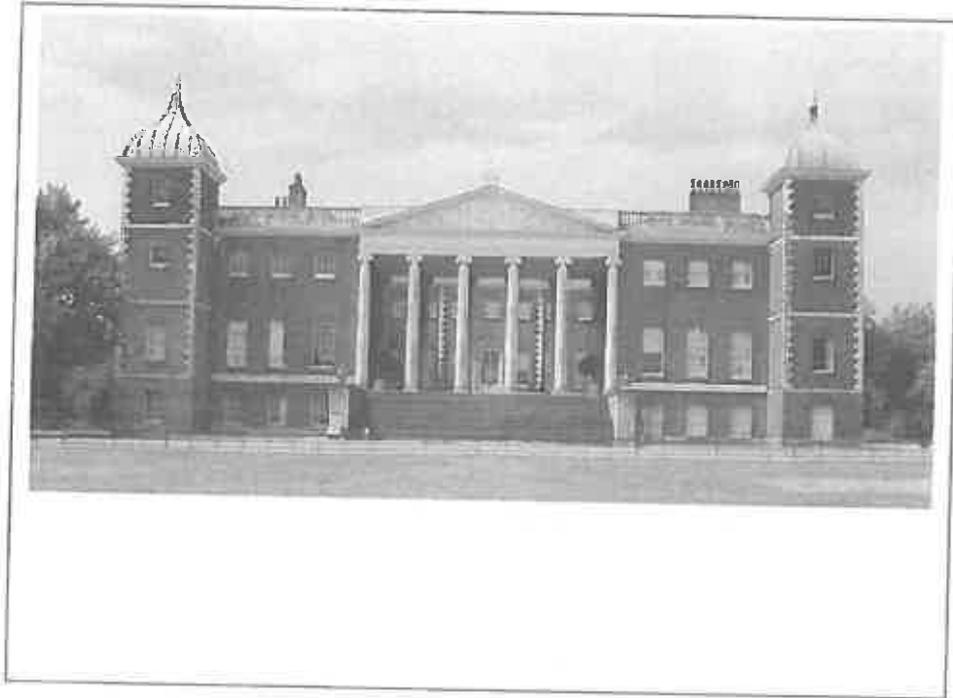


Figure 5.14 – Queen Anne Mansion

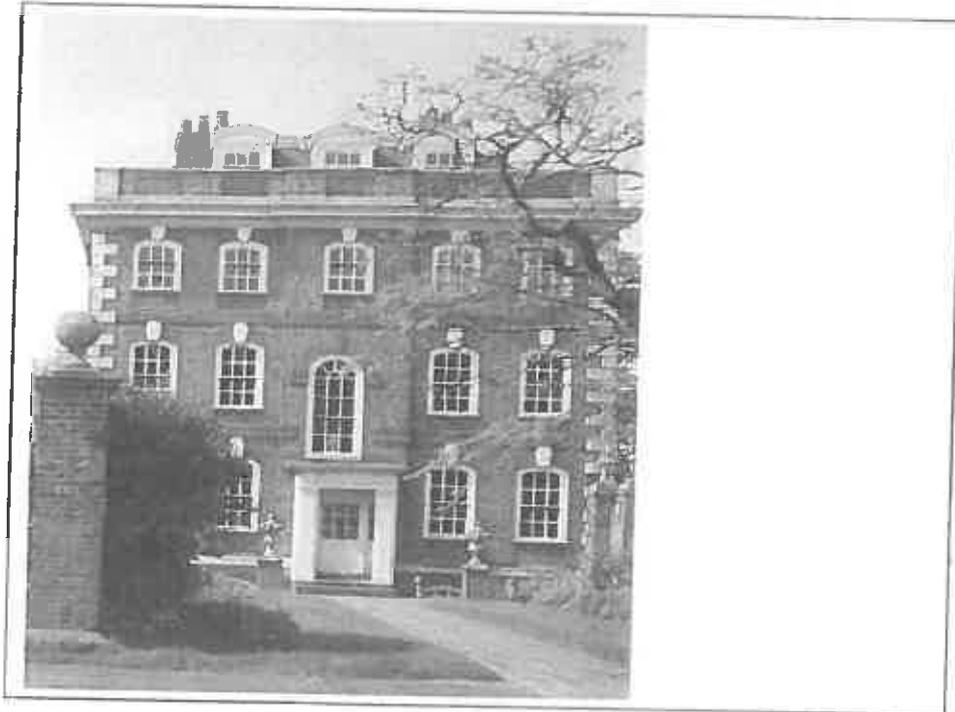


Figure 5.15 – Queen Anne – Wilmslow Hall



Figure 5.16 – Harcourt Buildings – Dormers small relative to tall mansard and no larger than upper windows



Figure 5.17 – Middle Temple Library with pediment/crest and roof with eaves. NB: No dormers

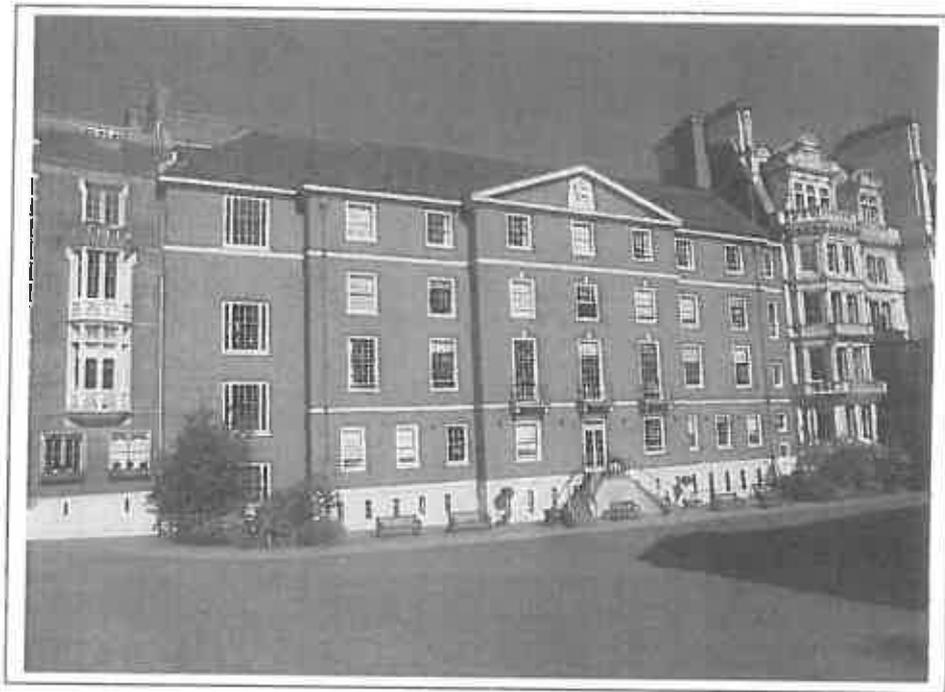


Figure 5.18 – Middle Temple – Chambers- Pediment with crest. NB: No dormers



Figure 5.19 – View of Treasury Building from the Embankment with Fetter Lane building looming behind. Increase in height of building with pitched roof, tower, spire and/or copula would be desirable

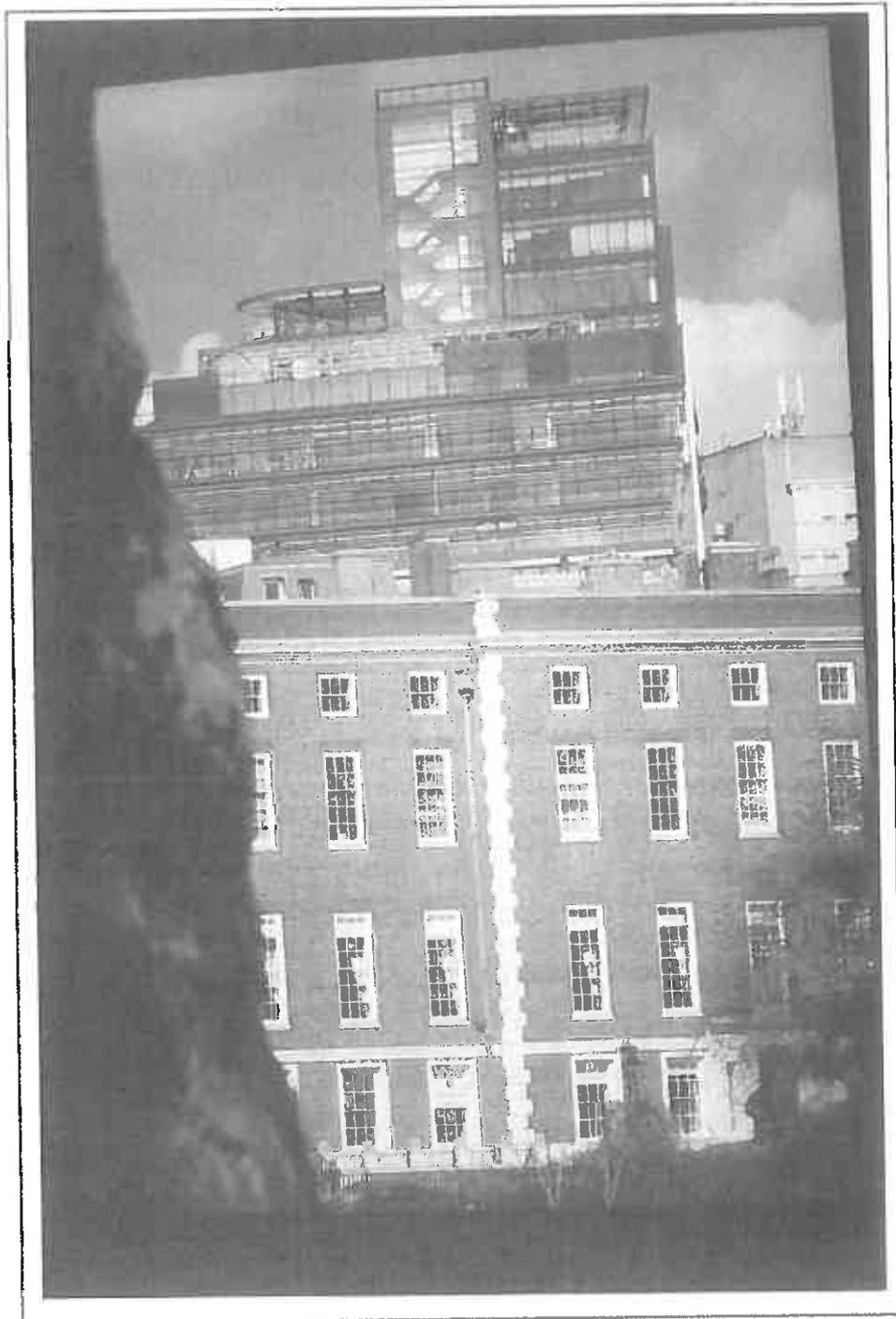


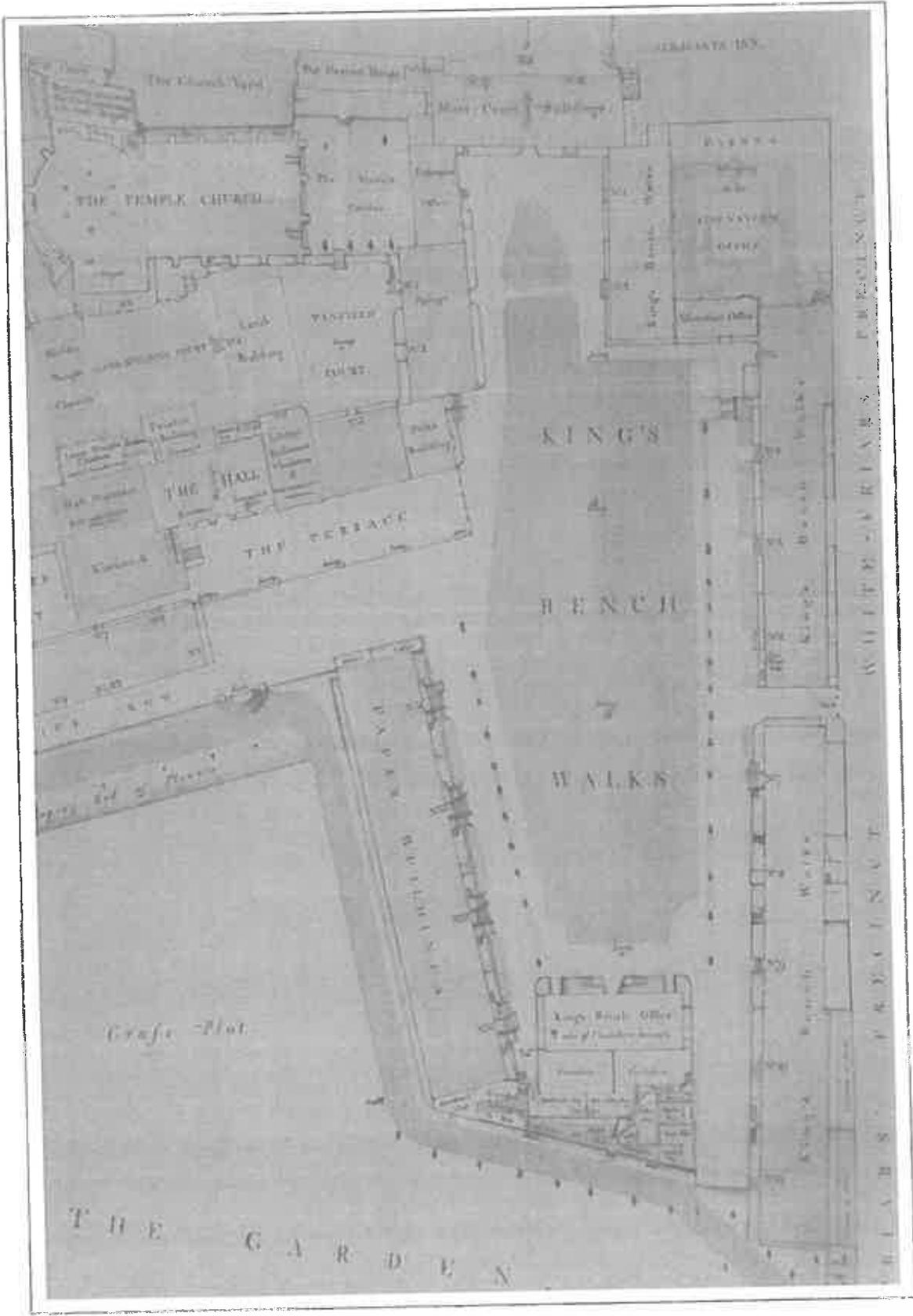
Figure 5.20 – Inner Temple Garden – High Border – Potential underground E&T suite with access/view to garden and link to main building and kitchens for servicing



Figure 5.21 – Former Lamb Building in Church Court



Figure 5.22 – Inner Temple Plan – 1820 showing Lamb Building in Church Court and King's Bench Office to south of current car park



Michael Sutcliffe Dipl Arch (UCL) RIBA Chartered Architect

Comments on KM Heritage Supplemental Heritage Statement

The general guidance on the preparation of Heritage Statements requires that they should be a balanced evidence based assessment of the potential impacts of a proposed development and should not express personal views on the proposed works.

This Supplement does contain numerous statements which do not observe this guidance and should be given no weight by the LPA when considering the Application.

Two typical examples: - (pages 25 and 29)

P25

Fig. 11 and 12

Caption

"a less distinguished and coherent outcome of the bolder, livelier and more unified scheme originally proposed"

This is an attempt to compare the 1948 scheme (the Hall faced in stone with a balcony) and in my view is not factual but a pointless personal opinion.

P 29 Fig. 14:

Caption

Rooftop view westwards towards the hipped roof of the Hall from the flat roof of the Library. The only flat roof in the Temple, it gives an incomplete, unadorned character to the Library, and jars with its pitched neighbours.

"The only flat roof in the Temple"

This is not correct; Kings Bench Walk was reconstructed in 1949 with the flat roof over the Rear (eastern) portion finished in asphalt.

"incomplete, unadorned character to the Library",

This has been rectified by affixing various pipes and devices above the copper sheeting presumably as a part of the installation of comfort cooling some years ago.

At one time architects, as a profession had an unwritten undertaking not to make critical comments on their fellow professionals, dead or alive. It must now be acceptable practice for former conservation officers and their researchers when writing Heritage Statements to use terms which attempt to minimize the professional work architects. Sir Edward Maufe is not exempt from this practice in the heading to P. 44

"NB No biographical information on Sir Edward Maufe is presented here since his actual input on the Temple Treasury Office, Library and Hall seems minor at best. Certainly they are not mentioned in his autobiographical catalogue The works of Sir Edward Maufe, R.A (Guildford House Gallery,1973) nor his obituary of Worthington."

Sir Edward Maufe was a Consultant, plain and simple, to refer to his input as **minor at best** is of no assistance in considering this Planning Application.

P.46 includes some further personal views expressed in a more derogatory manner and are not a balanced evidence based assessment, for example with terms such as ;- *minor figure... Nothing is known of his birth/death dates... Nothing is known of his birth/death dates and although he was etc*

T.W. Sutcliffe, fl. 1955-60 T.W. Sutcliffe is extremely hard to document, and seems to have been a minor figure within the post-war architectural scene. Nothing is known of his birth/death dates nor indeed basic biographical facts, although he was elected as Associate member of the RIBA in 1922, entered Worthington's Manchester-based practice as an assistant in 1924, and joined Sir Hubert as his 'Associate and Manager for the Temple Office in 1953'. Sutcliffe's first mention in connection with a published work is in 1952,

If it is of any relevance, TWS born 7 April 1896 Died May 1976 Aged 80.

I give below a brief outline of his professional career;-

My father became a member of the RIBA in 1922 and joined the long established Manchester architects Thomas Worthington & Sons on 3rd March 1924. He worked first for Sir Percy W , (JHW being Professor at RCA until 1928) on the East Lancashire Memorial Masonic Temple and Grammar School in Manchester, then later for JHW on Libraries, Laboratories and Dental Hospital at Manchester University, Oxford College Libraries¹, Hospital projects in the North West and from February 1944 onwards on War Damage repair works at the Inner Temple . He then completed work with Sir Hubert at Manchester Royal Infirmary , Theatres and Laboratories, prior to moving to London in 1949 to set up the office under the style of

Sir Hubert Worthington ARA Architect: TW Sutcliffe ARIBA Associate at 13 Kings Bench Walk on the September Quarter Day in 1949. JH Hayes moved from Manchester to London in later in 1949. In addition to the Inner Temple other projects in the London Office included rebuilding at Westminster School restoration of the Busby Library , College Building and Armoury Classrooms, laboratories at Imperial College, New Hall for the Brewers' Company in London Wall², Merchant Taylor's Hall, Offices for Hawker Aircraft at Kingston (in association with Norman+ Dawbarn) and as consultants on Maidenhead Town Hall , (North + Partners Architects) and a boarding house at Aldenham School.

¹ The Builder May 9th 1941 p449 "Architecture at the Royal Academy " "Mr J Hubert Worthington's New Library at New College Oxford which Mr TW Sutcliffe has drawn very beautifully , as an architect should"

² The Times October 17th 1960 "Designed by Sir Hubert Worthington RA and Mr TW Sutcliffe " caption

He completed the repair and alteration to form the Rectors Lodgings in the 1889 Norman Shaw house at Queens Gate for Imperial and after Sir Hubert's death in 1963 completed the boarding house at Roedean in 1964. He moved his office to The Charterhouse in 1966 and from there carried out several projects for the Brewers Company at Dame Alice Owens Schools in Islington and later advised on the new Dame Alice Owens school being built by Hertfordshire County Council in the SEAC system at Potters Bar. Alterations to 44 Portland Place for the Royal Aeronautical Society He received a Civic Trust Heritage Year Award for the alteration and extension of Beeston's Almshouses at Peckham for the Girdlers Company in 1975.

Throughout his career he collaborated with his colleague and fellow architect at Thos. Worthington & Sons, TA Collins, first in the early 1930's on the Manchester Society of Architects Panel for Design of Small Houses; (other members being Prof. R A Cordingley, Taylor & Young, Rhodes & Walker) and in 1937 submitted a competition entry for the Welwyn Garden City UDC. TA Collins left Manchester to become County Architect of Cumberland and later of Leicestershire where TWS later assisted on him on the new County Offices c 1970.

He carried out smaller domestic projects such as alterations to the House and Studio of the sculptor Cecil Thomas in Brompton Road; alterations to a house at Turville near Henley and a new private house in Norfolk. At the same time maintained close contact with the Worthington Family after Sir Hubert's death; he carried out alterations for Lady Worthington at her Sloane Street flat, also for her daughter at her house in Chelsea in 1974.

P46

The practice in 1924 was not Worthington's Manchester based practice but Thomas Worthington and Sons Architects .Manchester. The office was located close to the University and Manchester Royal Infirmary at 178 Oxford Road (Opposite the UCP Tripe Shop) The partners were Percy Scott W and his half brother John Hubert W. Shirley Worthington later became a partner, undertaking much work at Leicester University.

Appendix B P48

Caption

Lady Worthington was JOAN not Jean; a pity even this is incorrect

What factual reference can be provided to justify whether the Hall dormers match the Library dormers in your researches?

I note the 1948 design of the Hall has no dormers; this may not be a helpful comment when much of the discussion on this Application appears to centre around dormer windows ,their shape and size.

P-49 caption

What importance or relevance has a semi circular stair tower on a *preliminary 1948 scheme* to do with a Heritage Statement in support of this Application?

Michael Sutcliffe May 2017

Sehmi, Amrith

From: PLN - Comments
Sent: 22 May 2017 19:00
To: PLN - Comments
Subject: Comments for Planning Application 17/00077/FULMAJ

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

Comments were submitted at 6:59 PM on 22 May 2017 from Mr Alan Birbeck.

Application Summary

Address: Inner Temple Treasury Building The Terrace Crown Office
Row London EC4Y 7HL

Proposal: Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking. |cr| |cr| Supplementary information supporting the application has been submitted by the applicants. The additional documents comprise; |cr| |cr| 1. Project History and the Consideration of Alternatives |cr| 2. Supplementary Planning Information: Design Approach |cr| 3. Bar Educational Training & the Role of the Inns of Court |cr| 4. Supplemental Heritage Statement |cr| |cr| These additional reports are now available to view online.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Alan Birbeck
Email:
Address: Drystone Chambers 35 Bedford Row London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: 22/05/17 Submission re: The Inner Temple Library

Dear Sir or Madam

I write further to your letter of 11/05/17 as regards to the further application received and proposals impacting on the Inner Temple Library.

I write as a concerned frequent library user. I understand the need for development and progress in the current climate. However losing space in the library would be a considerable detriment for the Inns main knowledge resource and its users. The Inner Temple library provides superb legal knowledge resources which are invaluable to barristers and benchers.

1. Quality of the physical venue

Further to other submissions to the previous application I reiterate the quality of the physical venue.

2. Quality of the physical resources.

The library stocks a unique unrivalled collection often of material which is not and will never be available online such including historic and current versions a diverse range of law texts, case reports, command papers and overseas collections etc. I myself have in the last two weeks for example accessed books from 1865, 1915, 1958, 1959 and 1985 by amongst others Bagehot, Anson, Dicey, Jennings, Hart & Honore. I have also accessed current practice texts such as Blackstone's Criminal Practice and the journals section both older editions and current editions.

I note excluding Blackstone's Criminal Practice and modern era journals none of these books or resources are available online. I also note outside of Oxford and Cambridge very few of the other texts would be available. I note from the 2013 library survey to the question 'What are your reasons for visiting the Inner Temple Library 68% of those surveyed (545 users for this question) used the hard copy resources

The crucial aspect is that these are books readily accessible not stored in an archive. There is also the good fortune when researching to be able to see a full range of texts some of which may not be known to the reader or easily searchable.

3. Usage

It is estimated around 150 persons use the library daily. This varies depending on the day of the week, time of day and time of the year. However my experience is frequently each room will be occupied particularly in the afternoons and early evening. I note for example the 2013 survey during a three week period drew 795 responses. This is fair indication of usage.

4. Quality of online resources

The online resources provided by the Inner Temple are second to none. They are well structured and helpfully signposted for those new to the resources. The current awareness section is excellent.

However as was emphasised by the Strategic Review of October 2015 there was a strongly expressed preference by users for hard copy (printed) resource. An example would be any practitioner text. The flow of the text online remains problematic. The capacity to take notes and engage with a chapter of a practitioner text is considerably diminished by not being able to physically move around the resource.

New editions of practitioner texts vary from at the lower end £190 to at the higher end £500. Looseleafs can even more.

5. Quality of the study space

The library also provides an excellent quiet place to work. It provides for BPTC students, pupils and members of bar a chance of resources and peace in which to work. I have used all four of the Inns libraries and by far Inner is the most accessible and high quality space.

5. Quality of the staff

The staffs at all the Inns libraries are helpful and knowledgeable but Inners staff are outstanding. The diverse range of resources required by any legal practitioner requires access to knowledgeable information specialists. The staff can handle queries from the vagaries of Hansard and Royal Commissions to using the online databases.

6. Impact on publicly funded and sole practitioners and BAME groups

The impact of shrinking the available space will be significant on publicly funded and sole practitioners. The impact will also be considerable on BAME groups. The 2013 survey and current experience indicate in times of austerity all chambers are cutting their physical and online resources this is particularly so for small chambers and publicly funded chambers. The statistics are clear that BAME groups are more likely to operate from smaller chambers and thus more likely to suffer the impact.

Further to all the above the 2013 Library User group survey pointed to all of the above qualities and more from large numbers of Inner Temple library users.

It would be a great shame if this resource were diminished in size. The current space is ideal and is in my view the Inns greatest asset.

If I can be of any further assistance please do not hesitate to contact me.

Thanks

Alan Birbeck

TELEPHONE: 020 7353 8415
FACSIMILE: 020 7353 7622
DX: LDE 402

Website: www.ftb.eu.com

FRANCIS TAYLOR BUILDING
INNER TEMPLE
LONDON EC4Y 7BY

24 May 2017

Bhakti Depala
Case Officer
Department of Built Environment
City of London
Guildhall
PO Box 270
LONDON EC2P 2EJ

Dear Mr Depala

Planning Application 17/00077/FULMAJ by Inner Temple

I have had the opportunity of reading the supplementary papers submitted by the Inn in this matter.

Others will have made further detailed representations to you pointing out the continued failure of the Inn to demonstrate need to offset the loss of the undesignated heritage asset.

In this short representation I wish to make one simple point. I consider the Library to be an outstanding undesignated heritage asset. This is not apparent from looking at the building from the outside. Nor can its quality be assessed by looking at pictures, although they help to give some idea of it. To make a proper assessment it is necessary to see the building. I am confident that the officer who comes to write the Report to members will have seen it. However I want to urge that **the Report itself recommends that members visit the Library**. Only if you see it, do you fully appreciate the strength of the objectors' argument as to the heritage value of the library.

I am sending this by e mail, but I shall put a hard copy in the post.

Yours sincerely



Philip Petchey

Planning Application 17/00077/FULMAJ

Second Further Representation by Richard Humphreys QC in response to 4 supplementary documents submitted on behalf of the Inner Temple

Background to this Further Representation

1. The application was formally registered on 2nd February.
2. I made written representations on 17th February, emailed to the Inn on the same date¹. In response the applicant Inn lodged 3 documents which were uploaded onto the City of London Corporation's ("the City") website on Tuesday 28th February. I submitted a representation in respect of these documents on Friday 3rd March.
3. I note, in passing, that the views I expressed have since been independently shared by, amongst many others, 5 past Treasurers of the Inner Temple, 2 past Masters of the Inner Temple Library and the Library Users Group, by very distinguished judges and academics, by Benchers of the Inn who, in some instances, were practising when the Library opened in 1958, as well as practising barristers and students. Save Britain's Heritage and The 20th Century Society have also objected. (Some 49 "public comments" on the website are of objection, compared to 28 in support.)
4. By email dated 13th April to Mr Snowdon, the Inn's Director of Properties, the City's planning officers requested the applicant to attend a meeting, stating:

¹ These were uploaded onto the City of London Corporation's website on 28th February.

“In the process of considering the application a number of issues have emerged which *require further consideration and clarification*. ...

- The relevance of the library use and interior to the significance of the non-designated heritage asset (Treasury Building) / designated heritage asset (Temples CA);
- The materiality of the impact of the internal works on the non-designated heritage asset (Treasury Building) / designated heritage asset (Temples CA);
- What weight should be given to the benefits of the proposals;
- If weight is to be given, should evidence of the benefits (and the need for them) be provided and should the provision of any such benefits (eg the proposed legal education use) be secured by condition or covenant;
- An extension of time for the application;
- Possible Planning and Transportation Committee dates.”

5. That meeting was held on 4th May. According to an email sent by Mr Snowdon to the City’s planning officers on 15th May, the “opening point” made by the Inn at that meeting was that the Inn would provide the information requested

“without prejudice to our primary stance that the consideration of the interior of the building is not a material consideration, and that the interior works are a consequence of the application, but were not being specifically applied for.”

6. This point is addressed below: in summary, interior works are applied for in the description of the application and are shown in the submitted plans. As the applicant’s advisers should be aware, the plans show how external works directly affect the interior of the Library. The consideration of the interior plainly is a material consideration.
7. On 11th May, almost a month after the identification of the issues by the City, (which replicate points already raised by me in February 2017) 4 further supplementary documents, submitted by the applicant Inn, were uploaded by the City.
8. Objectors were invited by the City’s planning officers to respond to these supplementary documents by 25th May.
9. On 15th May Mr Snowdon sent a further email to the City’s planning officers:

“I have just been made aware of a very recent decision of the Court of Appeal which, I think, is helpful to this case, and your deliberations, and we thought it helpful for you to be aware of it.

The case is: R (Khodari) v. RBKC [2017] EWCA Civ 333.

Of particular relevance are paras 20-21, in which Lewison LJ accepted that the loss of internal features in a non-listed building was capable of

being a material consideration, but went on to say that, since there was no need for planning permission, it is difficult to see how that loss could be given any significant weight.”

10. This case is addressed below but in summary the Court of Appeal confirms my previous representations that loss of, or harm to, the interior of a non-designated heritage asset can indeed be a material planning consideration. As also submitted in my representations as long ago as 3rd March, which submission has not been contradicted: “it would be fanciful to suggest ... that the Inn would ever carry out the proposed interior works to the Library alone”. This clearly distinguishes the present planning application from the facts of the case before the Court of Appeal, there is no suggestion that the Court of Appeal considered that substantial weight could not be given to an interior (such as the Inner Temple Library) where, if the development proposed were not permitted, that interior would not otherwise be lost or harmed. This important point should, with respect and in fairness, have been acknowledged and drawn to the City's attention.

Introduction

11. This Further Representation responds to the 4 supplementary documents, analyses the court decision in more detail and provides a summary at pages 34-37 below, but first addresses the “opening point” raised for the first time by the Inn at its meeting with the City's planning officers on 4th May, namely:

“the consideration of the interior of the building is not a material consideration, and that the interior works are a consequence of the application, but were not being specifically applied for”

The scope of the planning application: external and internal works

12. The City's website describes the application as:

“Extension and refurbishment in association with an education and training facility and office use (sui generis) of the Treasury Building, works comprising; i) Mansard roof extension at fourth floor, with new dormer windows on front, rear, west and east elevation and a glazed rooflight; ii) Installation of a rooftop plant area; iii) Reconstruction of the hall roof resulting in an increased ridge height; iv) Insertion of dormer windows in the hall roof; v) Extension at the north east corner to create a new lift shaft; vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall; vii) Creation of new chimney stacks and associated internal and external alterations and cycle parking.” (emphasis added)

13. The planning application form, submitted by the Inn, also expressly (section 3) seeks planning permission for “Associated internal alterations”.

14. The plans submitted as part of the application clearly show proposed changes to the interior of the Library.

15. Moreover, there are external works proposed as part of the development for which planning permission is sought which also directly affect the interior of the existing Library: *for example:*

- (i) the Proposed Second Floor Plan (Draw No. 231-P1012-RevP1), by comparison with the Existing Second Floor Plan (Draw No. 2031-E1012-RevP1) shows that an existing window in the Library which presently overlooks Church Court and a section of external wall would be removed to allow access to the proposed new 10 person lifts (part of the works set out in v. in the planning application description above - "The extension at the north east corner to create a new lift shaft");
- (ii) In addition on the Proposed Second Floor Plan an existing window in Library Room B overlooking Church Court would be removed and replaced by a brick wall;
- (iii) similarly, the Proposed Third Floor Plan (Draw No. 231-P1013-RevP1), by comparison with the Existing Third Floor Plan (Draw No. 231-E1013-RevP1) shows the proposed removal of an existing window in the Library which presently overlooks Church Court as well as the removal of a (larger) section of external wall to allow access to the proposed new 10 person lifts (part of the works set out in v. in the planning application description above - "The extension at the north east corner to create a new lift shaft");
- (iv) In addition on the Proposed Third Floor Plan an existing window above Library Room B would be removed and replaced by a brick wall;

- (v) the Proposed Third Floor Plan (Draw No. 231-P1013-RevP1), by comparison with the Existing Third Floor Plan (Draw No. 231-E1013-RevP1) also shows that part of the north-western corner wall of the library would be removed to create an access to the proposed new fire escape stair (part of the works set out in vi. in the planning application description above – “vi) A new brick clad escape stair on the north side between the Treasury Building and the Hall”).

16. Thus the premise of the applicant Inn’s claim – that interior works are not part of the application – is factually incorrect, whether by reference to the description of development and/or to the submitted plans.

17. Moreover, even if (which is *not* the case) the proposed development were only for external alterations) plainly the consequences of a grant of planning permission are a highly relevant material planning consideration as a matter of law (and common sense) where, but for that grant, those consequences (proposed loss/harm to the Library) would never occur.

The interior of the Library is a heritage asset and should be given substantial weight

18. The further and/or consequential claim that the consideration of the interior of the Library cannot be a material consideration is incorrect in law. This is now confirmed by the recent decision of the Court of Appeal in R (on the application of Khodari) v. Royal Borough of Kensington and Chelsea. Reliance on that case by the applicant Inn is, with respect misplaced.

19. As to the facts, that case concerned 2 separate grants of planning permission

- (i) for the conversion of 31 Egerton Gardens from 5 flats to 8 - as the court noted, "the approved conversion consists of internal works only";
- (ii) for the reconfiguration of 31 Egerton Gardens from 5 flats in their existing form to 5 flats of different sizes – but as the court noted, "one of the curiosities about the second application was that the development concerned did not require planning permission. ... Nevertheless RKBC considered the application."

20. The facts were thus very different from the present application. Moreover, the interior was noted as "no longer surviv[ing] in anything like its original state". The case officer considered that the heritage significance of the building in that case was its external appearance, which would not change. The effect on the interior was, however, in any event fully considered by the relevant committee.

21. The first (and presently only relevant) ground of challenge was that

"RKBC had failed to have regard to the fact that 31 Egerton Gardens either was or should have been identified as an undesignated heritage asset, and failed to take into account the fact that the development would destroy important interior features of the building."

22. The challenge failed on its facts.

23. The Court held, in a judgment given orally immediately after argument, that, whilst the Council had not explicitly considered whether the building should be formally identified as a non-designated heritage asset, the Council had in substance considered the interior; and that whether a building had the requisite "degree of significance" to satisfy the definition of "heritage asset" was a value judgment, not a question of law.

24. The court accepted that

"the loss of internal features [of a non-designated heritage asset] is indeed capable of being a material consideration even though those features could be removed without the need for planning permission where that loss is an integral part of development that does require planning permission."

25. The Court also said, "As far as the second application [internal reconfiguration only of 5 flats] is concerned, since there was no need for planning permission, it is difficult to see how the loss of internal features could have been given any significant weight if, indeed, that loss was capable of amounting to a material consideration."

26. As submitted in my representations as long ago as 3rd March, which submission has not been contradicted: "it would be fanciful to suggest ... that the Inn would ever carry out the proposed interior works to the Library alone".

27. This *clearly* distinguishes the present planning application from the facts of the case before the Court of Appeal. There is of course no suggestion that the Court of Appeal considered that substantial weight could not be given to an

interior (such as the Inner Temple Library) where, if the development proposed were not permitted, there is no prospect otherwise that that interior would be lost or harmed.

28. This important point should, with respect and in fairness, have been acknowledged and drawn to the City's attention.

29. As regards the present application, in summary:

- (i) the Court's ruling that the loss of, or harm to, the interior of a non-designated heritage asset can indeed be a material planning consideration confirms my original representation.
- (ii) loss/harm to the interior here is an integral part of development that does require planning permission: see paragraphs 12-16 above.
- (iii) it is not contended that the loss/harm to the Library would ever occur if planning permission for the proposed development were refused.
- (iv) substantial weight can and should therefore be given to the significance of the interior.
- (v) the significance of, and the scale of impact on, the interior of the Library as a heritage asset should have been addressed by the applicant Inn in the documents submitted when the application was lodged. (The applicant Inn now accepts that the interior should be identified as a heritage asset.²)

² In my original representations, I submitted at paragraph 6 that "the Library itself (i.e. its rooms and gallery) should be regarded by the City of London Corporation ("City of London") as a 'non-designated heritage asset'. [as defined in the Glossary to the NPPF] The Library is

30. Again, since it is only if permission is granted for the development proposed that the loss of the gallery etc would occur, the consequence of granting planning permission is therefore *highly relevant*.

Supplemental Heritage Statement (KMH)

31. Reading this further statement brings to mind the somewhat startling introduction to KM Heritage's 2015 report, entitled "Inner Temple Treasury Office, Library and Hall - A representation regarding a proposal to add the building to the statutory list" which was submitted to Historic England in December 2015, having been commissioned after an application to list the whole of the above had been made.³

"The purpose of the report is to explain why the building should not be added to the list of buildings of special architectural and historic interest."

32. Some of the quotations from the sources – articles, books etc – quoted in my representations are now (finally) included by KMH. KMH omit to refer⁴, however, to the articles (and photograph) in The Times (including an article by its architectural correspondent; and also omits to mention Pevsner's reference to "the double-height galleried rooms" in the Library.

a place (and part of a building) which has a degree of significance meriting consideration in the planning decision because of its heritage interest." See the supporting analysis of the Court of Appeal at paragraphs 8, 9, 11 and 14 of the judgment in Khodari.

³ By a person unknown.

⁴ Paragraphs 3.6-3.7.

33. It is very noticeable that there is still no acknowledgment that the Country Life article, in praise of the Library, was written by none other than Mark Girouard, future Slade Professor of Fine Art (and Fellow of the Society of Antiquaries of London).
34. His initials appear quite clearly at the end of the article. No explanation is given by KMH as to why reference to Mr Girouard is still omitted.⁵ Reference, without more, is now made to Christopher Hussey. Whilst he was Architectural Editor before he became Editor, it is understood that he in fact ceased to be editor in 1940 (i.e. 18 years before Mr Girouard's article).
35. The failure to address this issue appears to suggest an unwillingness to admit an important omission. If so, there is a real danger that objectivity and impartiality of view will be compromised.
36. Nor do KMH engage with paragraphs 6-9 of my further representations of 3rd March which refute the claimed absence of comment from the architectural press and the suggestion that appraisals have been "lukewarm". KMH now largely focus⁶ in this respect on comments on the external architecture of the Inn's buildings, not on the interior of the Library itself.

⁵ See KMH Supplementary Heritage Statement at paragraph 2.26.

⁶ Paragraphs 3.7, 3.8-3.10.

37. Having considered it appropriate originally, in representations to Historic England, to disparage the executive architect, T.W. Sutcliffe, as a “nonentity in post-war British architecture”, he is now acknowledged instead as a “minor figure”.

38. I note that Mr Michael Sutcliffe, his son and also an architect, has now provided⁷ the City with far more information than KMH include in their supplementary statement. Sir Hubert Worthington himself said that “the main credit for the Library ... is *rightly* given to Mr Sutcliffe.”⁸ This was genuine, not faint, praise.

39. KMH now concede that the interior of the Library is “clearly attractive in terms of its spatial qualities and decoration”.⁹

40. Whilst they refer¹⁰ to “equal or more splendid” architect-designed shelving, furniture and fittings; they have to acknowledge¹¹, albeit only in an earlier section of the Statement, Dr Geoffrey Tyack F.S.A.’s description of the Library as:

⁷ Submission uploaded by the City on 23rd May.

⁸ See paragraph 2.14.

⁹ Paragraph 3.11.

¹⁰ *Ibid.*

¹¹ Paragraph 3.7.

“Ingeniously divided into bays by beautifully crafted oak bookcases, with galleries above”.

41. Nor do KMH refer to the consultation responses of either The Twentieth Century Society or of Save Britain’s Heritage.

42. The Twentieth Century Society’s response is of especial importance:

“The library is comprised of a symmetrical series of rooms, the largest at the centre, all with original oak panelling, polished mahogany floors, brass candelabras and moulded plaster ceilings. A series of interlinked upper galleries with detailed carved balustrades allow light to flood through the space. The effect of measured opulence within an open, light-filled space was much admired at the time of the library’s opening with Country Life describing the library as “carefully planned” and “dignified but never pretentious or pompous”. ...

...

The impact of these works would be not only to entirely alter the measured proportions of the space, truncating the original plan and greatly reducing the amount of light and space, but would also involve the loss of a great deal of fine interior fabric; oak panelling and architraves, the moulded plaster ceiling and the brass candelabras whose dramatic drop currently serves to punctuate the grand, open nature of the space.

The Library at the Inner Temple Treasury Building represents one of the most sensitive reconstructions in the capital; a dignified neo-Georgian interior, which possesses a lightness of touch and which despite its historicist style, embodies the prevailing trends of the 1950s – use of light wood, a consideration of progression through space, and an abundance of natural light. The high level of craftsmanship and quality of materials imbue the library **[with] a sense of continuity with the areas important past**, and are particularly noteworthy given the date of construction so soon after the war when materials were scarce and expensive.

...

The Twentieth Century Society considers that the proposals would greatly undermine the grandeur of the space through the demolition of original fabric, the reduction of space and the loss of light. We consider that these proposals will cause **substantial harm to a non-designated heritage asset**, and we therefore object to the application and recommend refusal."

43. KMH note that Historic England, although (subject to the outstanding review) taking the view that the Library should not be listed, readily acknowledge the Library as a "successful space", "with good quality fixtures and fittings", and its "lighting, spatial and ambient qualities", and the "high regard in which it is held by its users".

44. KMH, again¹², neither acknowledge nor depart from the applicant Inn's architects' (HBA) assessment that the interior has "special character and architectural quality";¹³ but simply conclude that the interior is not of "outstanding quality".¹⁴ So the difference is between special character and quality and outstanding quality.

45. Outstanding quality is not of course the test for whether the interior of the Library should be considered as a heritage asset (non-designated).

46. KMH subsequently acknowledge¹⁵ that a less arduous test applies than for listing and they agree that the test is set out in NPPF paragraph 135. They then¹⁶, entirely inconsistently, revert to concluding that "we do not believe that the interior of the Library is of exceptional quality". With respect, such muddled thinking again suggests that little reliance can be placed on KMH's views.

47. Moreover, at paragraph 5.6 KMH then purport to weigh the benefits of the scheme. That exercise, with respect, is not for KMH. KMH are meant to

¹² See paragraph 11 of my Further Representations of 3rd March.

¹³ At paragraph 5.2 KMH refer to the Secretary of State's conclusion, subject to review, that it does not special architectural or historic interest.

¹⁴ Paragraph 4.12.

¹⁵ Paragraph 5.2.

¹⁶ Paragraph 5.7.

assess the scale of the harm or loss and its effect on the significance of the heritage asset. This KMH fail to do.

48. Despite the fact that Girouard, Pevsner, Tyack and The Twentieth Century Society (above) draw specific attention to the gallery, the significance of the loss of the gallery is not assessed by KMH.

49. Despite the Twentieth Century Society's view that:

"The impact of these works would be not only to entirely alter the measured proportions of the space, truncating the original plan and greatly reducing the amount of light and space, but would also involve the loss of a great deal of fine interior fabric; oak panelling and architraves, the moulded plaster ceiling and the brass candelabras whose dramatic drop currently serves to punctuate the grand, open nature of the space.

The Library at the Inner Temple Treasury Building represents **one of the most sensitive reconstructions in the capital**

The high level of craftsmanship and quality of materials imbue the library a sense of continuity with the areas important past, and are particularly noteworthy given the date of construction so soon after the war when materials were scarce and expensive.

... the proposals would greatly undermine the grandeur of the space through the demolition of original fabric, the reduction of space and the

loss of light. We consider that these proposals will cause substantial harm to a non-designated heritage asset”

KMH make no proper assessment of the impact of the proposals.

50. Again, despite Historic England’s acknowledgment of the “successful space”, the Library’s “lighting, spatial and ambient qualities”, the impact on these are not assessed.

51. All that is said is that, “without occupying the upper level of the Library, the proposed scheme would either not be possible, or would require the upward extension of the building.” That is not an assessment of significance or of the scale of harm or loss.

52. Thus the applicant Inn’s case, on this important issue, lacks essential analysis after 3 attempts¹⁷.

53. KMH’s statement moreover ignores, as just one *example*, Scheme 1, which was informally favourably received by the City’s planning officers in 2014.¹⁸ This would provide a lecture theatre for 99, as well as 10 training rooms (which could be made the presently proposed 8 larger rooms¹⁹), a business

¹⁷ Heritage statement, Response to Mr Humphreys’ Representation, Supplementary Heritage Statement.

¹⁸ See the layout understood to have been presented at paragraph 69 below.

¹⁹ BET Statement, unnumbered page 3.

centre, external terrace overlooking the Gardens and Thames, foyer/waiting area, café, kitchen, lavatories etc *without affecting the gallery floor*.

54. For completeness, in respect of KMH's statement:

- contrary to paragraph 2.18, it is understood that it was not in fact necessary to alter any of the Library panelling to permit the installation of a 'comfort cooling' system.
- contrary to paragraph 4.3, and as already made clear in my representations in February²⁰, the Library is for use by members of all four Inns of Court and for researchers who would like to have access to printed material not available elsewhere.

Contribution of the interior to the Conservation Area

55. KMH finally, and remarkably, in a single sentence separately opine that the interior does not make "its own specific contribution to the conservation area".

56. Nowhere do KMH acknowledge that:

- (1) the interior contributes to the character of the Conservation Area:
 - (a) the design and layout of the Library, including the gallery, which was influenced by late 17th and early 18th century libraries, reflect the insistence of the Inn on "recreating the qualities which made the place

²⁰ Paragraph 12.

special”²¹ and reflect the character of the buildings, garden and spaces seen in the views out of the Library windows;

- the loss of the gallery and the resultant continuous, very long (somewhat oppressive) run of rooms under a single height ceiling, lacking proportion, would not preserve the character of the Conservation Area.

(b) a grand, spacious, beautiful library is an important element in what is expected of a collegiate society. As the Temples Conservation Area Character Summary states: “The area is more than an outstanding collection of buildings of historic importance. It is a subtle combination of buildings and spaces with a character and environmental quality that is reminiscent of the collegiate atmosphere of Oxford and Cambridge.”

- Again, the significant harm to, and partial loss of the library would not preserve the character of the Conservation Area.

(2) The interior contributes also to the appearance of the Conservation

Area:

²¹ Conservation Bulletin (2007) written by Philip Davies, Planning and Development Director (South), English Heritage: “Political Landscapes – Governing and Defending the Land - The post-war decades saw unprecedented investment in public building. But how much of that legacy will survive into the 22nd century? – Post-war place making”.

- (a) when seen from the exterior, including the registered listed garden, especially the chandeliers²²; by the large numbers of people entitled or permitted so to do;
- (b) HBA themselves acknowledge in their Supplementary Information: Design Approach²³ that
- “in the evening the building has warm lighting levels. The Inn strives ... to preserve this key characteristic. The lighting combines with the timber paneling and suspended light fittings within to create an inviting ambience, which makes a contribution to the atmosphere of the Conservation Area.”
- (c) As Mark Girouard noted in his article in Country Life: “The long line of brass candelabra that hang at regular intervals along the centre of the ceiling [in the Library] is one of the pleasantest features of the main rooms.”
- The chandeliers will be lost and the education and training facility will be brightly lit, affecting that inviting ambience and the Conservation Area of which it forms a central part.

²² The chandeliers, noted by Country Life et al, are similar to those to be found at the Grade II listed Norman Shaw house at 170 Queens Gate (with which T.W. Sutcliffe is associated.)

²³ Section 2.0 Existing Attributes.

57. The City's Conservation Area Advisory Committee ("CAAC") have clarified that their comments on the application relate only to the exterior physical changes proposed and that the significant alterations to the interior of the building are not, in their view, within the Committee's remit.

58. Whilst I respectfully disagree with their understanding of their remit, it is important of course to note the limits of that remit (as perceived by them): the CAAC has not considered the interior.

59. As a matter of law, in my view (and as referred to in my original representations²⁴ and further representations²⁵), the interior of a building in a Conservation Area is capable of contributing to the character and appearance of the Conservation Area, so that harm to the interior is capable of causing harm to that character and appearance. If the City has any doubt on this point, legal advice should of course be sought.

Design Approach Statement (HBA)

60. I have referred above to the fact HBA's Supplementary Statement now acknowledges that the existing lighting "combines with the timber paneling and suspended light fittings within to create an inviting ambience, which makes a contribution to the atmosphere of the Conservation Area."

²⁴ 17th February - paragraphs 52-55.

²⁵ 3rd March – paragraph 32.

61. Rather beyond, with respect, one may think, their remit and area of expertise, HBA suggest²⁶, however, that the Library is “now being greatly underused compared to its former days”.

62. The Library is well used: this is confirmed by the Inn’s own evidence. The Inn’s Annual Library Review 2016 (already submitted with the representation of Mr Nicholas Asprey, which I note none of the Supplementary Statements address) states:

“an electronic monitor at the library entrance counts people entering and leaving the Library, including staff: totals for each day are halved to compensate (as far as possible) for the fact that most people would be counted twice. The average daily total in 2016, after this adjustment, was 209.”

As Mr Asprey goes on to say:

“After making allowance for staff footfall and for users entering and leaving more than once it is likely that over 150 people use the Library every day at present.”

63. Moreover, as was observed in the Country Life article in 1958, the Library has a variety of workable space and tables of different sizes – with plenty of

²⁶ Section 2.0.

different areas where one can, when necessary, spread out numerous volumes of the law reports and statutes for research, or work on papers without being overlooked or 'cheek by jowl' with another researcher. They are indeed, as noted by Girouard, "**supremely workable-in rooms**".

64. Further, a recent survey, launched on 20th April 2017, is being undertaken by the Inn to establish:

"what demand there might be, particularly among publicly funded practitioners, for serviced space within the Inn, providing:

- Quiet rooms for study;
- need for quiet space;
- Communal facilities such as photocopying, high bandwidth Wi-Fi and wireless connection to printers etc;
- ...
- Cloakroom facilities.

The Inner Temple would seek to merely cover the costs of this provision, and would aim to provide a fully inclusive tariff for daily, half-daily and hourly hire on a room by room basis. Indicative costings [the Inn] have in mind are:

- £350 + VAT per day
- £200 + VAT per half day (4 hours)
- £75 + VAT per hour

..."

65. It is, to put it mildly, ironic, that the Inn should be recognising the need/demand for quiet rooms for study and the need for quiet space for the publicly-funded Bar²⁷, whilst at the same time proposing the loss of such space in the Library (where such study space in the Library and wi-fi access is also free of charge). Unsurprisingly, the proposed costings are also likely to be considered to be unattractive.

66. For completeness there appear to be a number of errors in the HBA Statement:

- There would be 85 working places in the remaining Library (i.e. the second floor of the building) not 91²⁸ (compared to the existing 97 on the second and third floors of the present Library). All of the other Inn libraries would have more working places.
- the present window blinds in the Library are in fact all the same. They only hang at different heights when they are adjusted to do so by the readers.
- whilst not an error as such, the drawings of the library rooms in the HBA Statement do not indicate the room heights (2.85m for rooms C and D and 2.45m for rooms E and F).

²⁷ "For 43 per cent [of the self-employed Bar], over half of their work is publicly funded (and therefore heavily affected by any changes to availability of public funding). In criminal practice [the main practice area for one in three barristers], the majority of barristers report that 90 per cent of their work is publicly funded": The Bar Council/Bar Standards Board "Barristers' Working Lives, Biennial Survey of the Bar" (2011).

²⁸ Section 4.0.

- The stated reduction in shelving capacity - 13% - may well be understated because no account appears to have been made for the reduction too in shelf heights;
- whilst the current legal collection is presently available on open access on two adjoining floors, in future the collection will be split between the second floor, the basement and a separate building;
- additional shelving space would still be required.

Consideration of Alternatives Supplementary Information

67. The points made in my original representation have not been properly addressed.

68. As previously mentioned, the Inn has existing buildings which have not been considered.

- a. Sets of chambers from time to time decide to relocate outside the Inn (there is no requirement that barristers must practice from within an Inn of Court); or leases come to an end (there is no right to renew a business tenancy where redevelopment is proposed).
- b. It is not suggested (nor could it be when a score or more of millions of pounds are proposed to be expended on the proposed scheme) that it

would not be viable for the Inn to lose the rental income from a set of chambers occupying an existing building.

- c. In the not too distant past the Inn decided to redevelop the Niblett Hall (post war it was first used by the Inn as its dining hall, subsequently it was used as a students' hall, then more recently redeveloped for new Chambers). The use of the Inn's estate therefore changes from time to time and over time.
- d. The Middle Temple has premises very close to the Inn's Hall (e.g. Cloisters); there is no evidence that Middle Temple has refused to consider a land exchange (after the war the Inns' Charters were amended to allow rationalisation of their respective estates); or refused to consider a sharing or joint provision of education and training facilities for both (adjacent) Inns.

69. The Royal Courts of Justice is only approximately 150 yards from the Inn's Treasury Building and has a vast number of courts (including tiered courts – a real, not “mock courtroom configuration”²⁹); not all of which courts are used, even during the day. It is not suggested that the possibility of hiring these has been explored and rejected by the Ministry of Justice. (The proximity to the Inn, its dining hall and library, with or without the facilities available pursuant, for example, to Scheme 1 would of course maintain the collegiality referred to

²⁹ Consideration of Alternatives Statement, unnumbered page 3.

in the Supplementary Statement concerning Bar Educational Training and the Role of the Inns of Court ("the BET Statement").³⁰⁾

70. Given the inevitable harm that would be caused by the proposed scheme to the Library as a heritage asset, the failure to consider alternatives properly necessarily undermines the weight that can be given to the benefits which, it is asserted, cannot otherwise be delivered.

71. The Statement also sets out reasons why the Inn is not now pursuing its Scheme 1. As already noted, that scheme was informally favourably received by the City's planning officers in 2014. It would provide a lecture theatre for 99, as well as training rooms, a business centre, external terrace overlooking the Gardens and Thames, foyer/waiting area, café, kitchen, lavatories etc *without affecting the gallery floor.*

72. Firstly I set out a copy of the floor plan of Scheme 1 as, it is believed, it was submitted to the City's officers in 2014, at page 38 below.

73. On a minor point, it will be seen that 10 smaller training rooms were then proposed, not 7 as stated in the Statement (8 larger rooms are now proposed).

74. Provision of 99 seats is shown in the lecture theatre. There is no mandated requirement for 120 seats. Although Mr Snowdon³¹ refers to the figure of 120 having been formulated in 2010, the fact that the Inn put forward Scheme 1 in

³⁰ Unnumbered page 4.

³¹ Unnumbered page 1 of Statement.

2014 with 99 seats shows that there is no 'magic' in the figure of 120. The BET Statement refers³², indeed, only to "up to" 120.

75. The Statement acknowledges that raked (i.e. tiered) seating would give an "optimal viewing experience" but does not, nor could, suggest that a level floor would not give a satisfactory viewing experience. The BET Statement is at pains to emphasise the excellent audio-visual facilities which new facilities such as Scheme 1 would have.³³

76. Moots (including rounds of the National Mooting Competition) take place presently in commodious surroundings in the Inn's Hall (which would be situated below, as also are other existing function rooms which are used for training and lectures on a regular basis.)

77. The essence of the format of a moot or of a mock trial is that the participants stand up when speaking and thus can be seen by those who remain seated.

78. Moreover, the BET Statement now admits³⁴ that "the majority of training for the Bar is conducted in ... smaller groups Smaller rooms ... lend themselves to 'learning by doing' and the practise of skills, such as advocacy, in smaller groups." The renowned and respected Hampel method of advocacy training, adopted by the Inner Temple for many years, is also based on small groups.

³² Unnumbered page 2.

³³ Unnumbered page 4.

³⁴ Unnumbered page 3.

79. The fact that the Royal College of Surgeons may be used by specialist bar associations may stem from the very commercial rates presently sought by the Inn. (In the same way, most students do not have lunch in hall because, even with some subsidy, it is too expensive; the same goes for members of the publicly funded Bar.) The use of the Hall or of the Parliament Chamber would otherwise be greater, in my view: after all, the Inn has considerable space and ambience, excellent catering and facilities.

80. It is considered that rather too much is made of the difficulties – previously not considered difficulties – and not enough of the opportunities that Scheme 1 for example would give for *both* providing new, high quality educational accommodation *and* not harming the Library. Again, given the inevitable harm that would be caused by the proposed scheme to the Library as a heritage asset, the failure to consider alternatives properly necessarily undermines the weight that can be given to the benefits which, it is asserted, cannot otherwise be delivered.

81. For completeness:

- “the majority of members voted in favour of the application design”³⁵
 - more accurately, the majority (if slender) of Benchers voted in favour.³⁶
- “the reliance by the Bar has largely switched from attendance at a Library for research purposes to online research” – no reference is

³⁵ Unnumbered page 3.

³⁶ See paragraph 1 of my original representation.

made to Mr Asprey's submission which includes evidence taken from library surveys on the continued use of hard copy, as well as referring to the report of the Inn's own strategic review group (2015):

- "The printed page is not dead, nor will it ever be in our lifetimes, to judge by the responses to our consultation. So there is a powerful case for preserving the remarkable physical collections of the Inn's Library"
 - "we do not believe it [the construction of an auditorium in the Treasury Building] should be done at the cost of reducing the library service, which is rightly valued by members of the Inn".
- "the application preserves an excellent law Library"³⁷ – I have already referred to the consequential need, if the proposed scheme is implemented, to split up the collection into different locations; which will also make legal research more difficult and time consuming.
- "opportunity for attendees to the centre to take their lunch in Hall"³⁸
- I have already referred to the deterrent of cost (even with subsidy); there is also the practical problem as to the inadequacy of space in

³⁷ Unnumbered page 3.

³⁸ Unnumbered page 4.

the hall for all attendees to be accommodated in addition to the barristers who already lunch there.

82. Finally, I note that no mention is made of attendance at the Inn's exhibition for the project and comments received.

Bar Educational Training Statement

83. This Statement confirms that Lincoln's Inn are currently constructing an education facility including a lecture theatre (and extending their library); that Middle Temple have converted a part (on the third of three floors) of their Library (which is not of comparative aesthetic merit) (and with training rooms, not a lecture theatre); Gray's Inn already have a lecture theatre/educational facility (presently being used to deliver the BPTC by the Law School at City University). It is not stated, however, that for example Scheme 1 would not provide sufficient training facilities or that the conversion of existing buildings within the Inner Temple and/or Middle Temple could not. The conversion of nearby buildings would also maintain the collegiality referred to in the Supplementary Statement.

84. At paragraph 4 above³⁹ I noted that the City required *further consideration and clarification* be given to (among others):

- *“What weight should be given to the benefits of the proposals*

³⁹ 4th bullet point.

- *If weight is to be given, should evidence of the benefits (and the need for them) be provided and should the provision of any such benefits (eg the proposed legal education use) be secured by condition or covenant;”*

85. The BET Statement now discloses⁴⁰ for the first time that a detailed business plan is still being drawn up and that the Inns have not yet committed to providing a new Bar Professional Training Course nor received even in principle validation from the Bar Standards Board to provide the course. It is thus plainly premature (at best) to place weight on the asserted benefits of the proposal.

86. It is noted that no business case to support the viability/sustainability of the proposed development for which planning permission is sought has been provided: if the BPTC is not provided by the Inns (whether because the Inns do not pursue it or because the BSB decline to validate its provision by the Inns, no indication is given as to what purpose the space created will sought to be put (commercial conferences?) and as to the viability/sustainability of such uses. It appears that following the meeting, no draft planning condition or draft s.106 covenant has been tabled by the Inn to ensure that the space will be used for legal education. That speaks volumes.

87. The foregoing entirely bears out the very real concerns expressed previously that if planning permission is granted the claimed benefits (asserted to justify

⁴⁰ Unnumbered page 2.

the grant) cannot and/or would not materialise; yet the irreversible harm to the Library would have occurred.

Conclusion

- the Court of Appeal's ruling in Khodari that the loss of, or harm to, the interior of a non-designated heritage asset can indeed be a material planning consideration confirms my original representation.
- loss/harm to the interior here is an integral part of development that does require planning permission: interior works are applied for in the description of the application and are shown in the submitted plans; the plans show how the proposed external works would directly affect the interior of the Library.
- Importantly, as noted in my representation in March, it is not contended by the Inn that the loss/harm to the Library would ever occur if planning permission for the proposed development were refused.
- substantial weight can and should therefore be given to the significance of the interior.
- the loss/harm to the interior plainly is a highly material consideration where, but for the grant of permission, the harm would not otherwise arise.
- the proposed development would clearly result in significant harm to the Library, which (and on this there is common ground) has the

requisite degree of heritage interest⁴¹ to be considered as a heritage asset.

- the loss of the entire gallery floor (and other rooms on the main floor), the reduced ceiling height etc constitutes harm and loss of a significant scale, significantly affecting the special character and architectural quality (again common ground) of the Library.
- as The Twentieth Century Society has responded:

“The library is comprised of a symmetrical series of rooms, the largest at the centre, all with **original oak panelling, polished mahogany floors, brass candelabras and moulded plaster ceilings**. A series of **interlinked upper galleries with detailed carved balustrades allow light to flood through the space**. The effect of measured opulence within an open, light-filled space was much admired at the time of the library’s opening with Country Life describing the library as “carefully planned” and “dignified but never pretentious or pompous”. ...

...

The impact of these works would be not only to **entirely alter the measured proportions of the space, truncating the original plan and greatly reducing the amount of light and space, but would also involve the loss of a great deal of fine interior fabric; oak panelling and architraves, the moulded plaster ceiling and the**

⁴¹ See paragraph 30 of my original Representations.

brass candelabras whose dramatic drop currently serves to punctuate the grand, open nature of the space.

The Library at the Inner Temple Treasury Building represents one of the most sensitive reconstructions in the capital; a dignified neo-Georgian interior, which possesses a lightness of touch and which despite its historicist style, embodies the prevailing trends of the 1950s – use of light wood, a consideration of progression through space, and an abundance of natural light. The high level of craftsmanship and quality of materials imbue the library [with] a sense of continuity with the areas important past, and are particularly noteworthy given the date of construction so soon after the war when materials were scarce and expensive.

...

The Twentieth Century Society considers that the proposals would greatly undermine the grandeur of the space through the demolition of original fabric, the reduction of space and the loss of light. We consider that these proposals will cause **substantial harm to a non-designated heritage asset**, and we therefore object to the application and recommend refusal.”

- it is at the very least premature to give any weight to the now claimed benefit – the Inn has not even decided whether to seek validation of its proposed BPTC course and has yet to complete a business plan.

There is no certainty (nor even an 'in principle' approval) that the BSB would validate the proposed provision of the BPTC.

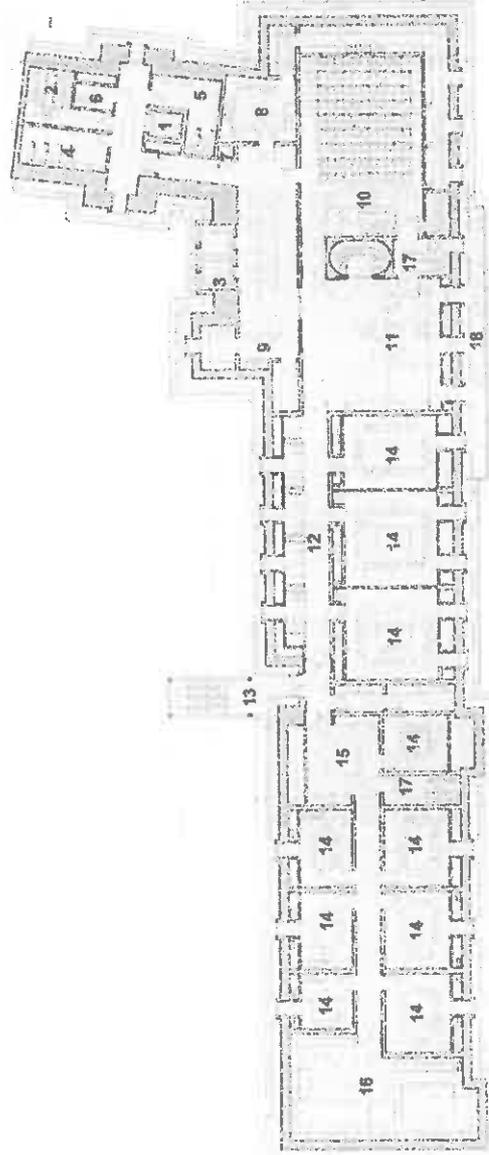
- The locational need asserted is thus also undermined; moreover, there are other possibilities which exist which have not been considered/demonstrated not to be realistic: existing buildings in Inner and Middle Temple, Royal Courts of Justice, Scheme 1 (or similar) which could meet the locational need.
- The use of the space, absent BPTC provision, is not explained and no covenant or condition is suggested to ensure its use for the provision of legal education and training.
- It cannot therefore be concluded that the benefits outweigh the significant harm to the interior of the Library.
- I have also previously referred to the harm to the character and appearance of the Conservation Area not only by reason of the harm to the interior of the Library but also in respect of the design of the dormer windows, the effect on the setting of the Temple Church and the inevitable harm to the listed Garden for the lengthy duration of the proposed construction period.
- It is respectfully submitted that the application be refused.

25th May 2017

Richard Humphreys QC

Scheme 1 - Proposed Fourth Floor Layout

Scheme 1 - Proposed Fourth Floor Layout



Key		Scope of works	
1	Existing lift extended to 4 th floor	13	Escape stair
2	Escape stair	14	Training room
3	Direct lifts from ground level	15	Foyer / waiting area
4	Female WCs	16	Plant room
5	Male WCs	17	Furniture store
6	Disabled WC	18	Terrace
7	Cleaner's cupboard		
8	Kitchen		
9	Reception and cloakroom		
10	Lecture theatre		
11	Café		
12	Business centre		

From: Robert McCracken QC
To: PLN - Comments
Cc: "N ASPREY"; Richard Humphreys; Philip Petchey
Subject: 17/00077/FULMAJ
Date: 25 May 2017 10:58:17

I am writing to comment further on the application by the Honourable Society of the Inner Temple for works to the Treasury and Library building in view of the recently submitted material.

I endorse but see no need to repeat the comments made by Richard Humphreys QC, Philip Petchey, Nicolas Asprey and David Vaughan CBE, QC.

I note that a private meeting has taken place between the representatives of the applicants and City officers. Fairness requires that a similar opportunity should be given to objectors before the officers' report is drafted. The applicant can appeal against an adverse decision; objectors cannot. Where heritage is at stake, the opportunity for objectors at this stage to influence officers should be as great as for promoters, and if anything, greater.

Robert McCracken QC
Francis Taylor Building
Temple EC4Y 7BY

Robert McCracken QC

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Francis Taylor Building
Inner Temple
London EC4Y 7BY

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David Vaughan CBE QC
50 Oxford Gardens
London W10 5UN

Nicholas Asprey Esq
14 Queen Anne's Gardens
London W4 1TU

Ms Bhakti Depala
Case Officer
Department of the Built Environment
City of London
Guildhall
PO Box 270
London EC2P 2EJ

25 May 2017

Dear Chairman,

Planning Application 17/00077/FULLMAJ by Inner Temple

This letter contains our response to the supplementary papers submitted by the Inn and published on the City's website on 10 May. We will adopt the same expressions in this letter as we used in our first submission published on 10 March.

In view of the supplementary papers submitted by the Inn we wish to draw attention to the very strong objections to the Inn's scheme that have been submitted by many eminent judges, practising lawyers and academic lawyers and institutions. We fully support and endorse their objections and wish to draw particular attention to the following:

- (1) The representation of Sir Stephen Sedley and the paper appended to his representation and submitted to Historic England by the four most recent Masters of the Library, namely Sir Michael Morland, Lord Sumption, Sir Stephen Sedley and Lord Justice Beatson, especially paragraphs 18-19 of that paper where they carefully and fairly evaluate the historical and architectural worth of the Library;
- (2) The representation of Save Britain's Heritage in its entirety. This drew attention to the failure of the Inn to describe the significance of the Library as a heritage asset as required by the NPPF. We suggest that the attempt by KM Heritage in their Supplemental Heritage Statement to downgrade the architectural significance of the Library should be construed in the light of that serious error. We note that Save Britain's Heritage describe the Inn's plans on their website as "brutal and insensitive";
- (3) The representation of Philip Petchey on behalf of the Library Users Group in its entirety. This reflects the views of many of those who use the Library and its resources, a point to which we refer more fully below;
- (4) The representation of the Twentieth Century Society in its entirety. This correctly describes the Library as "one of the most sensitive post-war reconstructions in the capital".
- (5) The representation of Guy Tritton that draws attention to the very high degree of opposition to this proposal among ordinary members of the Inn and other users of the Library who have not been consulted by the Inn and whose interests in the Library and its resources are being ignored or overridden by the Inn. More than 1,500 signatories signed his petition opposing the Inn's scheme many of whom added trenchant comments of their own.

The Legal Issue

The Inn contends that the interior works to the building are a consequence of the planning application but not a subject of that application and that such works are therefore not material to decide whether to grant planning permission. This is said to follow from the judgment of Lewison L.J. in *R (Khodari) v RBKC* [2017] EWCA Civ 333. It is a startling proposition and in our view misconceived.

We consider the legal position to be clear, and as follows: that internal alterations do not by themselves constitute 'development' for planning purposes, but in a case where planning permission is required for any reason such alterations may be a material consideration in deciding whether permission should be granted or refused. This is what Lewison L.J. said at paragraph 21 of his judgment.

In the present case the Inn needs planning permission because the project involves altering the exterior of the building in several respects. The consequential alteration of the interior of the Library – the loss of the galleries, the loss and/or alteration of the bookshelves, the panelling etc. – are relevant to the planning decision because (i) those features have great intrinsic value in themselves and (ii) their loss or alteration will have a severe detrimental impact on what remains of the Library.

Since the Inn would not even contemplate harming the Library if planning permission for the present scheme is refused the harm to the interior that would be caused by the Inn's scheme *must* be material and should be given considerable weight. Khodari does not suggest otherwise in such circumstances.

The Heritage Statement

We suggest that KM Heritage's statement has limited relevance to the planning application. It appears to relate to the application for the Treasury Building to be listed as a building of special architectural or historic interest, which raises different and specific issues.

The Library is a heritage asset and entitled to special treatment under planning law and policies. It is an architectural masterpiece regardless of whether it satisfies the very specific requirements for inclusion in a national list. Its elegance and beauty and its quiet and congenial ambience speak for themselves and are highly valued by all those who use it or come to see it. The Inn's scheme would destroy many of the features that give it such distinction.

One of its exquisite features is the galleries and the feeling of space and extra light that they impart to the interior. The galleries are mentioned specifically in Pevsner, edited by Simon Bradley, at page 350. It is to be regretted that KM Heritage fail to mention this in paragraph 3.11 of their statement, or indeed in paragraphs 3.6 or 3.7 of that statement.

The galleries also afford the best vantage point from which to view the interior of the Library both during the daytime and in the evening when the light from the chandeliers enhances the colour and warmth of the oak paneling and the bookshelves and furniture. The light from the chandeliers (which would disappear under the Inn's scheme) is also a warm and comforting sight for those walking through the Temple in the evenings.

KM Heritage purport to downgrade the Library by comparing it in paragraph 3.11 to Holborn Public Library. This comparison is false and, we suggest, meaningless in the context of this application. Each library was designed for its own purpose. The issue in each case is not the purpose of the design but the skill and beauty with which that purpose has been achieved. Each library is a masterpiece in its own context.

We also draw attention to the Library's unique setting. Whether viewed from the galleries or the main rooms, the Library looks out directly onto Church Court and the historic Temple Church to the north, onto the Inner Temple Garden to the south, which is also bordered by Harcourt Buildings and Paper Buildings, and beyond the Garden to the river, and onto ancient Crown Office Row to the east. There can be few libraries anywhere that can match this beautiful and historic setting.

KM Heritage set out Historic England's Advice Report. We disagree with much of that Report and it was not prepared for this planning application anyway. However it says this: "*The lighting, spatial and ambient qualities of the Library are acknowledged, as is the high regard in which it is held by its users, but the provision of a suitable, well-lit environment for quiet study is the purpose of all libraries, and is not a feature of greater distinction in this case*". With respect, the question is not whether the Inn's library is unusual but how it has been realized.

Anyone who has experience of working in different libraries will know that some are more successful than others in creating a congenial, well-lit environment for quiet study. Indeed the libraries of all four Inns of Court differ markedly when judged by this standard. We consider that the Library is wholly exceptional in this respect and we doubt if it has been bettered anywhere.

As the Library is a heritage asset the Inn must show that its scheme will produce planning gain which outweighs the harm. It has comprehensively failed to do this. We respectfully urge members of the planning committee to visit the Library and view it for themselves to experience the force of what we are saying.

Project History and the Consideration of Alternatives

In this paper the Director of Properties has made this statement:

"Whilst the aesthetic merit of the Library is undoubted, and the joinery of good quality, the level of Library visitor use has reduced significantly since it was built in the 1950s. Today, whilst some books are still physically required by some practitioners, as they may not be available via online resources, the reliance by the Bar has largely switched from attendance at a Library for research purposes to online research, where an internet connection and the appropriate subscription is the only requirement for access."

This does not meet any of the points raised in our first letter. We ask you to refer again to the section of that letter headed 'The Use of the Library'. In the context of this debate it is wholly inadequate merely to assert, as the Director does, that *'the reliance by the Bar has largely switched from attendance at a Library for research purposes to online research....'*

First, although the number of people working in the Library at any one time has diminished since the Library was built in the 1950s it remains a vital resource for most working lawyers from time to time. Although many working lawyers have access to their own online resources they still need to use the Library to access its vast resources that are not online. Ready accessibility to those resources is still as important today as ever.

By 'ready accessibility' we mean open access to the books on the shelves for those who need to use them. The scheme envisages that a vast number of books would be removed to the basement of the Treasury Building and that many more books would be moved to other parts of the Inn's estate as yet unspecified. This is totally unacceptable.

As any lawyer will know from experience, a reference in one book can lead to references in another book or books. If the books were spread around the Inn's estate this alone would severely diminish the Library as a place for research and study. It is no answer that the more frequently used volumes will be retained in the main rooms. Access to the more recondite volumes is often the reason for visiting the Library.

Secondly, there are many working lawyers, especially (but not exclusively) publicly funded lawyers, who do not have access to online resources, often because of the cost; and *most* working lawyers do not have access to *all* online databases. Access to all the databases in the Library is free of charge, save only for photocopying charges. Such access remains a vital resource for a large number of users.

The Director states that the proposal *"preserves an excellent law Library and provides a suitable environment for the training of the Inn's members throughout their careers"*. It does not, for the reasons we have stated.

Educational Training & the Role of the Inns of Courts

It seems to us clear that the proposal will lead to harm – substantial harm – to an important heritage asset (albeit not designated). This being the case, the Inn needs to show need that outweighs that harm.

The Inn has not demonstrated any need for the scheme. The only reason for destroying the Library is the Inn's desire to construct a *tiered* auditorium. This is unnecessary and could not compensate for the partial destruction of the Library. **A different scheme could achieve an auditorium above the Library without the harm caused by the present scheme.**

Even now there is no business plan. Each of the Inns has its own space needs and resources but there has until now been a woeful lack of planning between the Inns. It could hardly be sensible for the Inn to go it alone regardless of what the other Inns are proposing.

The Inn still does not know if it can deliver the BPTC training at lower cost or to a higher standard than the colleges of law. The suggestion that the training will be provided by 'eminent practitioners' seems unlikely to say the least. There is no suggestion that such practitioners have been consulted let alone signed up.

We are told that Lincoln's Inn are constructing a facility to deliver the training, that Middle Temple have converted part of their library into space from which to deliver the training and that Gray's Inn already have the facility formerly used by the ICSL. The Inn, it is implied, is the only Inn without such a facility, although we have been providing the same advocacy training as has been provided by all the Inns for many years.

It is true that Lincoln's Inn is building an auditorium. It is also *extending* its library. By contrast, the Inn's scheme will *reduce* the number of reader places in the Library to 85 and not 91 as stated in KM Heritage's paper. Absurdly, having regard to the grandiosity of this scheme, the Library will have the lowest number of reader places of all four of the Inns' libraries.

Middle Temple did not convert part of their library into space from which to deliver the BPTC training as is suggested. Their library is on three floors. They converted some small rooms on the top floor from which to provide the advocacy training that all four Inns currently provide. They do not have and are not planning to build an auditorium.

Gray's Inn's facility is currently occupied by City University who use it to run training sessions. We understand that City University have a long lease on that building. It was purpose built originally for the ICSL and has a lecture theatre but if it does not become available Gray's Inn will be in the same position as ourselves.

What is clear is that there are numerous and diverse possibilities but the Inns have not yet put their heads together to find the best solution in the interests of everyone, and one that does not involve the partial destruction of the Library.

The authors of this paper are scraping the barrel to justify their scheme. They imply that the Treasury Building does not lend itself well to the preservation of collegiality or the creation of a community of practitioners. By way of example they say that 'anyone working in the Library has to leave the building at one end, walk the length of the outside of the building and enter Hall at the other end'. However this is not a consequence of the configuration of the building but of the way it is used.

After entering through the front door it is possible to access all the Treasury offices on the ground floor, to take a lift or walk up two short flights of stairs to the Benchers' rooms on the first floor, to walk from there to the Hall or (if they have not already taken the lift on the ground floor) to take the lift to the Library. The reason why these routes are not available to everyone at present is that they are reserved for the Benchers. This practice could be changed at any time. There is no need to reconfigure the building.

The authors say that many of the specialist bar associations no longer meet or train in the Inns but prefer such venues as the Royal College of Surgeons. This statement is meaningless unless we are told the reasons. It is no surprise that the Surgeons' lecture hall is used by the CBA. The Royal College is almost adjacent to Lincoln's Inn and most chancery chambers are located in that Inn.

The authors say it is "vital" that training takes place "within the weave of the Inn(s)". They suggest that trainees "will also benefit from the collegiality within the Inn by taking their lunch with practitioners, with further opportunities for interrelationship and learning". It is unlikely that students will be able to afford lunch in the Inn. If they can they will surely sit together. That is human nature. We emphasise that a different scheme could achieve the key elements of the training facilities elsewhere within the Inn without the harm caused by the present scheme.

Conclusion

We suggest that the Inn has failed to make out its case for causing so much damage to the Library in the manner envisaged in the scheme. The planning application should be refused.

We think it important that Committee members come and see for themselves the interior of the Library before making a decision.

Mr David Vaughan CBE QC

Mr Nicholas Asprey

SCHEDULE

Extracts from the Online User Surveys

The best evidence regarding the use of the Library is contained in the user surveys carried out in 2013 and referred to in our first letter published on the website on 10 March. The summary of the online responses alone runs to 43 pages. We set out below a sample of those responses:

- (1) Question 5 of the survey asked: "To what extent is your need for hard copy legal information met by your own resources or the resources provided by your chambers/employer/BPTC provider?" There were 739 responses (93.0%) to this question.

Only 83 responses (11.2%) said they found everything they need within their own/chambers'/employer's/BPTC provider's resources; 364 responses (49.3%) stated that those resources were sufficient for the *majority* of their legal research needs; and 292 responses (39.5%) said that they *regularly* had to use additional resources.

Comments explaining the responses were collected together by the Librarian. The following are just a few examples: "A chambers library is not able to be totally self sufficient as the needs are too high and diverse"; "Almost nothing up to date in Chambers"; "I like the quiet atmosphere of the library as I share my room with a junior who takes pupils"; "Being in the United States except for limited time to attend BPP in London I depend on various sources"; "Books are ridiculously expensive for junior juniors, especially those of us in Crime"; "but the rising cost of online resources is becoming a worry"; "But we do not keep important historic versions of key texts and legislation for which I rely entirely upon the library – along with commentary going beyond leading text books"; "Chambers has steadily cut back on hard copy resources".

- (2) Question 6 of the survey asked: "To what extent is your need for online information met by your own electronic resources or the electronic resources provided by your chambers/employer/BPTC provider?" There were 738 responses (92.8%) to this question.

Only 150 responses (20.3%) said they found everything they need within their chambers'/employer's/BPTC provider's resources; 402 responses (54.5%) stated that those resources were sufficient for the *majority* of their legal research needs; and 186 responses (25.2%) said they *regularly* had to use additional resources.

Typical comments explaining the responses were: "Chambers do not have a subscription to Westlaw or Lexis Nexis (etc) and I can't afford one by myself so for anything beyond that on BAILII I need the Inn libraries"; "Chambers does not have subscriptions to Lexis/Westlaw etc"; "Chambers subscription does not cover all databases"; "E-Library access is too expensive for my criminal chambers"; "Go to Inner Library regularly"; "have to pay for/source everything myself"; "I do not have access to westlaw/lexisNexis or other electronic legal resources".

- (3) Question 7 of the survey asked: "In instances where your own/chambers/employer's/BPTC provider's resources are insufficient, which materials do you need to consult elsewhere?" There were 721 responses (90.7) to this question. Some users ticked more than one box.

Only 59 (or 8.2%) of these responses stated that the question was not applicable to them; 441 (61.2%) of the responses mentioned "current textbooks"; 440 (61.0%) mentioned "law reports"; 416 (57.7%) mentioned "journals"; 279 (38.7%) mentioned "loose leaf works"; 248 (34.4%) mentioned "non UK material"; 205 (28.4%) mentioned "databases"; 201 (27.9%) mentioned "old editions of textbooks"; 194 (26.9%) mentioned "Hansard/Bills"; 182 (25.2%) mentioned "statutes/SIs"; 152 (21.1%) mentioned "encyclopaedias"; 106 (14.7%) mentioned "other parliamentary papers"; 51 (7.1%) mentioned "directories"; 41 (5.7%) mentioned "others", as specified.

- (4) Question 16 of the survey asked: "What are your reasons for visiting the Inner Temple Library?" There were 545 responses (68.6%) to this question. Some users ticked more than one box.

Of these responses, 394 (or 72.3%) identified "research for case or opinion"; 375 responses (68.8%) said "to use one of the hard copy resources listed below"; 303 responses (55.6%) said "to copy specific material"; 283 responses (51.9%) mentioned "quiet or convenient place to work"; 203 responses mentioned "research for book, article or lecture"; 199 responses (36.5%) said "to use subscription databases"; 176 responses (32.3%) said "to use the expertise of the law librarians for legal enquiries"; and 25 responses (4.6%) specified other reasons.