

Muthoora, Leela

From: Spencer Copping [REDACTED]
Sent: 02 October 2014 08:45
To: Planning; RSCDevelopmentControl
Subject: Applications regarding 64 Lincoln's Inn Fields - LPA Ref: 2013/7434/P & 2013/7457/L
Attachments: Further Comments regarding 2013_7434 and 2013_7457 64 Lincolns Inn fields.pdf
Importance: High

Dear Committee Clerk

Applications regarding 64 Lincoln's Inn Fields - LPA Ref: 2013/7434/P & 2013/7457/L

I refer to the above. Please find attached our further comments prepared on behalf of Farrer & Co.

I can confirm that we request the attached comments be forwarded to members of the Development Control Committee.

While writing I can confirm that we are not requesting to speak at the meeting.

I would be grateful if you could confirm receipt of this email and attachment and confirm that it has been received at the correct email address.

Kind Regards

Spencer Copping



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**Further comments regarding application 2013/7434/P & 2013/7457/L
Application regarding site at 64 Lincoln's Inn Fields, London, WC2A 3JX**

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Objection on behalf of Farrer & Co, the occupiers of 65 & 66 Lincoln's Inn Fields

I am writing on behalf of Farrer & Co following receipt of the Case Officers report to committee and having reviewed the revised application drawings submitted by the applicant.

There are three main considerations:

- Loss of employment floorspace
- The Design and Heritage implications of the development
- The impact of the proposal on adjoining occupiers

The proposal, even in its marginally amended form, fails on each of the above points as set out below:

Loss of employment floorspace

The Case Officers report takes a lenient approach towards the assessment of the applicants Marketing evidence and sets a dangerous precedent for the change of use of other important buildings within Lincoln's Inn Fields. It is also important to note that the Council were encouraged by English Heritage in their correspondence dated 20th January 2014 to carefully examine the marketing information supplied to justify the change of use.

It is clear from the evidence that the pre application submission for a change of use was submitted shortly after the acquisition of the building. Hence, it is not clear whether the necessary investment has been made to make the building attractive to future B1 employers. A great deal has been made regarding modern occupiers, SME or business start ups not finding the building acceptable, however there is a great deal of interest from existing legal practices within the Square.

The Design and Heritage implications of the development

The Case Officer report also states that English Heritage accept the principle of the development which is not strictly apparent when reading their evidence. While they welcomed the desire to bring this vacant building into use they raised concerns regarding the change of use owing to the marketing information submitted and also stated the following regarding the changes proposed to the building:

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“...English Heritage does not agree with all the findings in the statement of significance, namely in relation to the rear of the building. While this part of the building has been altered previously, the rear building line that defines the historic envelope of the building is still apparent and in our opinion is a significant feature worthy of retention. It is particularly important relation to the plan form, which is still recognisable, most notably with the location of the historic staircase set against the rear wall. The rear façade, the line of which is shared by the neighbouring grade II star listed building at 65 Lincoln's Inn Fields, contributes to the attractive appearance of the group of historic buildings including 66-67 Lincoln's Inn Fields. These buildings all show signs of their historic development at the rear and are visible in private views, which in our opinion contributes to the special interest of the listed buildings and to the character and appearance of this part of the Bloomsbury Conservation Area.”

In addition, English Heritage concluded the benefits proposed are of limited public value and in the case of the proposed double glazed windows at the rear would have a negative impact on the historic and architectural significance of the building. We requested that the Case Officer consult English Heritage on the amended drawings but he declined to do so. We say that the amendments made do not go far enough to overcome the concerns raised by English Heritage.

There has been little evidence submitted to confirm that the building could not be converted to a single dwelling. As highlighted in our original correspondence this was deemed acceptable by the applicant in converting the former Gucci headquarters at 4 Grafton Street in Westminster. At the very least this would require less internal and external alterations and would negate the need for the glazed unit to the rear of the site.

The above points are echoed by Mark Sanderson of the Heritage Advisory acting on behalf of Farrer & Co.

In addition, to the above it is also noted that the sizes of the studio flats fall well below the accepted standards and are therefore detrimental to the amenity of future occupiers. This issue alone is symptomatic of the overdevelopment of the site.

The impact of the proposal on adjoining occupiers

The principle amendment made to the rear of the proposal sees the removal of the central extension to the rear of the building. While this is noted as an improvement it does not go far enough to allay the concerns regarding neighbour amenity.

The change of use proposed also gives rise to issues with the future upgrading of plant to the rear of 65 & 66 Lincoln's Inn Fields which may be prejudiced by a change of use next door to residential use.

In summary the proposal fails to preserve or enhance the character and appearance of the area, avoid harm to the special interest of the building or avoid harm to the setting of a listed building. The proposal fails to comply with National Guidance contained within the NPPF or Development Plan.