

**Morgan, Jackson**

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**From:** Richard Snowdon [REDACTED]  
**Sent:** 30 May 2024 08:53  
**To:** Planning Policy Consultations  
**Cc:** McNicol, Rob; Andrews, Gudrun; Nancollas, Tom  
**Subject:** Draft City Plan 2040 - Regulation 19 public consultation response  
**Attachments:** 20240529 - Reg 19 representation to City Plan 2040.pdf

**Categories:** CONFIRMED

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

This representation relates to the draft City Plan 2040, and in particular Policy TP1: The Temple, and is written for, and on behalf of, the Honourable Society of the Inner Temple.

We would be grateful if receipt could be acknowledged, please.

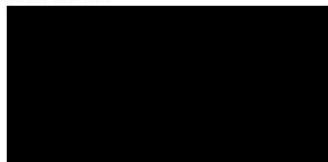
Yours faithfully,

Richard Snowdon



Richard Snowdon FRICS

ADDRESS



Director of Properties & Surveyo



ONLINE

[innertemple.org.uk](http://innertemple.org.uk)

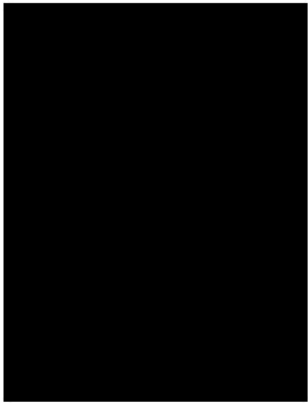
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29 May 2024

To: [planningpolicyconsultations@cityoflondon.gov.uk](mailto:planningpolicyconsultations@cityoflondon.gov.uk)

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Dear Sirs,

**Draft City Plan 2040 – Regulation 19 public consultation – Policy TP1: The Temple  
Consultation response on behalf of the Honourable Society of the Inner Temple**

We write in response to the Reg 19 public consultation on the draft City Plan 2040, and in particular Policy TP1: The Temple. We strongly support Policy TP1: The Temple but seek one change to the policy text and one change to the supporting text.

The Temple is a unique environment serving the needs of the legal profession, with a character and a sense of place which is not only unique, but which also contributes to the wider character of the City. As the Temples Conservation Area Character Summary says, the Temple “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”, where “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”.

In terms of its functioning, the Inn is located close to the main courts of England and Wales – including the Royal Courts of Justice and the Old Bailey – and at the heart of ‘legal London’, near to the Law Society and many solicitors’ firms. The Temple is at the heart physically of the legal services industry which contributes so much to the City and the country. It is a key part of the legal character which comprises an element of the City’s vision for the Fleet Street and Ludgate area – a “centre for judicial and related business” as draft policy S22 puts it.

The Temple is a key part of the specialist legal cluster recognised in the London Plan, which identifies the additional benefits from specialist activities and services being agglomerated in a single cluster. The London Plan also explains that a “supportive policy approach” is required for such specialist clusters, in order to enable them to flourish and achieve their economic potential.



The core functions of the Inn are as a provider of chambers (office space) from which barristers and their clerks work, as an education and training provider for both aspiring and qualified barristers, as a provider of common and collegiate facilities for barristers and students, such as the library, meeting and lecture rooms, dining facilities, car parking, and the like – and of course the Inner Temple garden and the Temple Church. It is the provision in one place of both chambers and the related common facilities, and the activities which take place in them, which give the Inn the strong collegiate atmosphere.

At its heart, the Inn is and always has been an education and training organisation for aspiring and qualified barristers. The education and training function of the Inn has increased recently with the completion of Project Pegasus, the essence of which was to provide a new, modern education and training centre for the Bar. This has allowed the Inns of Court College of Advocacy to teach its Bar course at the Inner Temple. Now, in addition to all the education and training activity the Inn has undertaken for its student and qualified members in recent years, around 150 Bar students from all the Inns of Court – and from all over the world – come to the Inner Temple to study on the ICCA Bar course.

Overall, we share a similar vision for the role of the Inn as part of the Justice Quarter of the City, especially in light of the proposed City of London Law Courts and the Salisbury Square development.

First, we ask that in Policy TP1, in the phrase “improvements to the accessibility of buildings”, after the word “accessibility”, the phrase “and energy efficiency” is inserted.

Whilst it is obvious that improvements to the buildings in the Temple will be required for accessibility purposes in the future, it is also plain that energy efficiency improvements will be required. Such improvements are likely to include replacement windows, secondary glazing, insulation, photovoltaic panels, and more sustainable forms of heating. Upgrading the energy and environmental performance of the historic buildings in the Inn is important for our occupiers but also in the wider public interest. If these improvements are not provided for the Inn’s buildings – which would essentially be the same whatever use the buildings were in – they will become increasingly unattractive to any occupier.

In this context, especially with changes in the post-covid office market in central London, there is a real chance of some barristers’ chambers seeking to move out of the Inn in the coming years, if the buildings cannot be brought up to acceptable standards in terms of both accessibility and energy and environmental performance. This would erode the traditional functioning and character of the Inn, and – by dispersing barristers more widely into the central London or into virtual-only barristers’ chambers – also erode the role that the Inn can play as the focus of a centre for judicial and related business in the Fleet Street and Ludgate area.



Beyond the content of Policy TP1, the Inn would be keen to work with the Corporation's officers, and Historic England, to develop a design code and a heritage partnership agreement in order to cover short to medium term changes required to deliver accessibility and energy and environmental efficiency improvements.

**Secondly**, we also ask that in the supporting text to Policy TP1, in paragraph 14.1.2, the following is added at the end of the paragraph: "Some changes of use, and physical developments, will be required to support the functions of the Inns and to provide modern facilities for barristers and students, including those normally based out of the Temple."

The kind of changes of use and physical developments which we envisage might be needed in the future are facilities for student barristers studying in the Temple (eg a common room and refreshments), conference rooms available to all barristers for client meetings and video hearings, and facilities for barristers based out of London but visiting to attend court in London (eg serviced office type space for barristers without rooms in the Temple, and more overnight accommodation, including self-catering apartments).

This is because, without such facilities being provided in the future, but in light of changing working practices for the Bar, the Inn will struggle to maintain the critical mass necessary to continue the Inn's role as the heart of the established legal cluster focussed on the Temple. Maintaining the traditional functioning and character of the Inn, and continuing the use of the buildings in line with the history of the Inn, will require changes of this sort.

Many of the Inn's members are based and practice primarily out of London, but need to come to London for hearings at, for example, the Royal Courts of Justice, the Supreme Court, the Old Bailey or other central London Crown Courts, and, in the future, at the new City of London Law Courts. The Inn could do more to service the needs of these barristers, for example with short-let serviced office space and self-catering residential accommodation. This would of course strengthen the land use links between the Inn and the Fleet Street and Ludgate area, including activity on Fleet Street as well as the Salisbury Square development and the Justice Quarter more widely.

In order to maintain the traditional functioning and character of the Inn – as a community of barristers and students, with a collegiate character and atmosphere, including a mix of workspaces, residential and communal facilities – some changes in planning terms will be required. If such changes are approached positively, the Temple, as part of the City's Justice Quarter, should not only be able to survive but also thrive.

We consider that this would fall within the ambit of the policy text in TP1, because developments of this sort will be required in the plan period in order to support the functions of the Inner Temple as a place of education and training and provider of common and collegiate facilities for barristers and students, as set out in the text of Policy TP1. Nonetheless, we consider that it would be helpful to have this principle recognised in the City Plan expressly. This is because, as and when applications are made, the focus can be on how best to do this, without needing to re-visit the principle that some development of this sort will be required in the plan period in order to meet the objective of Policy TP1.

Finally, whilst writing, we also wish to record our support for the recognition in Strategic Policy S22 of the role of the Fleet Street and Ludgate area as a centre for judicial and related business, and the policy objective of supporting and enhancing through the City Plan the important and varied legal functions of the established legal cluster focussed on the Temple (para 14.7.1).

Yours faithfully,

A large black rectangular redaction box covering the signature area of the letter.

**Richard Honey KC**  
Planning Lead on the Estates Committee for  
The Honourable Society of the Inner Temple