
From: [REDACTED]
Sent: 29 April 2019 01:00
To: Benmbarek, Samir
Cc: Planning
Subject: Covent Garden Community Association comments on application ref. 2019/1646/P

Categories: CASES

Dear Mr. Benmbarek,

Please find below our full comments in relation to this application. As before, they should be categorised as 'Object and Notify of Committee Date', please.

Regards,

[REDACTED]
Planning Subcommittee chair



[REDACTED]

Comments on application ref. 2019/1646/P to knock together two small office buildings for conversion into three 1-bedroom dwellings at 2 & 3 Ching Court (frontages on 53 & 55 Monmouth Street)

Covent Garden Community Association (CGCA) objects to both this planning application and the related listed buildings application ref. 2019/1710/L for these two buildings on the grounds of:

1. Loss of residential amenity in relation to overlooking and disturbance.
2. Loss of residential, commercial and public amenity in relation to security.
3. Loss of interesting and affordable offices for small businesses in the West End of London.
4. Damage to the fabric and character of two listed buildings with parts dating from Stuart times.
5. Damage to the character of Ching Court, an award-winning development made up of 18 listed buildings including these two.

Issues relating to planning consent overlap somewhat with those relating to listed building consent.

At the outset it is important to understand the reason for these applications. The applicant, Shaftesbury, owns many of the buildings around Ching Court, and others around the Seven Dials area. The company is open about its commercial strategy being to shift uses around in their estate, to meet higher investment

returns as the property market shifts. However, this can be very destabilising to the long-term residential community and to the small business community too.

At present the market situation is as follows:

- a. rental prices on small, unmodernised offices are under pressure, and higher returns can be made in the residential private rental market;
- b. rental prices on larger 'family' flats are less than the same square footage split into little flats or converted and modernised as open-plan offices.

So the applicant wishes to turn two small offices with staircases on Monmouth Street into 1 bedroom flats, and to 'swap' them by turning a 3 bedroom flat on Shorts Gardens with lift access into a modern office (the latter being the subject of two separate applications, 2019/1709/L and 2019/1294/P).

The community of long-term residents depends upon people being able to put down roots and build their lives around a situation that they commit to when they move in. It is of paramount importance that this situation is not changed so much that they find life difficult or, at worst, feel that they must leave. A neighbourhood like Seven Dials is particularly sensitive because everyone is operating in such cramped spaces.

We do not believe that the increased financial return projected for Shaftesbury by this exercise justifies the wide-ranging loss of amenity to people in nearby properties, the loss of affordable offices, damage to important listed buildings, and the damage to the character of this unique post-modern mixed-use development.

1. Loss of residential amenity in relation to overlooking and disturbance.

Ching Court has been so successful as an urban redevelopment because the mix of uses co-exist in a complimentary way, even though people are living and working in such close proximity.

a) Overlooking

The angle of the buildings in relation to one another means that dwellings cannot see into each other's windows at the back. Only the offices can see directly into the dwellings, and vice versa. So in the evening and at weekends residents are able to have some privacy at the back. They rely on this since, at the front, overlooking during the day, night and weekends is already less than 9 metres across both Shelton Street and Mercer Street.

Change of use of 2 and 3 Ching Court would result in the new dwellings overlooking existing ones at the back, and vice versa. The distance is as little as 7.2 metres between windows, and 6 metres between the two closest points on each building including balconies. In total the new dwellings would overlook, and be overlooked by, 18 dwellings to varying degrees.

The distances involved are similar to those involved in 2013/7894/P nearby (Grape Street), where consent was refused due to loss of privacy. And in that case only privacy at the front of dwellings was compromised.

Camden's CPG on Amenity continues to protect the amenity of residents against developments where overlooking is less than 18 metres away, such as in this case. This is also consistent with the most recent

London Plan which continues to seek to protect against development which causes unacceptable harm to privacy, as we believe this would.

b) Disturbance

Ching Court is a hard space, characterised by beautiful dressed stone surfaces surrounded by buildings of 4 to 6 storeys in height. This makes it difficult from a noise perspective because sound is reflected from these surfaces and is amplified. We often refer to this as the 'canyon effect' in the tall narrow streets around Seven Dials, and the same applies to Ching Court - except that it is worse because of the lack of any ambient noise.

Ching Court is very quiet at night and at weekends, so any sound from people's windows, for example, causes a noise peak which can wake people up. Residential use inevitably leads to more noise at night and at weekends than office use, so these proposals would increase disturbance.

Disturbance would be even greater if people were actually to come into the courtyard at night, which they do not currently do except in an emergency as none of the existing dwellings have entrances there. But 2 and 3 Ching Court do have entrances there, and no means is offered by the applicant to prevent new residents from going in and out at the back at any hour of the night. Indeed, the proposals as designed would require at least some footfall into the courtyard for people accessing 53 Monmouth Street (2 Ching Court) via 55 Monmouth Street, and it would not be reasonable to expect new residents not to go as they pleased at any hour.

2. Loss of residential, commercial and public amenity in relation to security.

Security is a major concern for residents across Covent Garden. The Seven Dials and St. Giles areas are particularly badly hit, with the constant presence of gangs on the streets in relation to drug crime, knife crime and theft. The applicant's own security team has a log book jam-packed every day with incidents. And you will be aware of recent planning applications to install more effective security features in and around Ching Court itself.

It is critical for residents around Ching Court that they have a secure situation at the back of their properties. Any requirement for access via the gates of Ching Court at night would compromise this greatly. The application states that there would be no need for residential occupiers of 2 and 3 Ching Court to use the gates at night, but, as mentioned above, no means of prevention have been offered by the applicant.

The proposals would compromise security during the day as well, because the office uses ensure footfall while the courtyard is open to the public and this enables the space to be 'self-policing'. A reduction in offices would lead to a reduction in footfall. The local police Safer Neighbourhood Team based at Holborn is fully aware of the issues in relation to Ching Court and has written in support of this point.

3. Loss of interesting and affordable offices for small businesses in the West End of London.

53 and 55 Monmouth Street have been used as offices and/or workshops for a long time, and solely as offices since the Farrell redevelopment in the early 1980's.

With some upgrading in terms of wireless connectivity, and a little superficial refurbishment, we see no reason why they should not continue to provide attractive, unique office spaces for smaller businesses long into the future.

It is true that access is only via staircases, but this is the case for many small offices in older buildings in the West End. They tend to attract lower rents, which makes them ideal for smaller, earlier stage businesses that want a foothold in central London and their own front door rather than just shared space in an impersonal 'WeWork' complex.

Each of these little buildings has the capacity for about 10 desks. But because of their staircases they are quite flexible, and each building has been occupied successfully by a single company and at other times by several companies on different floors in the past.

The applicant accepts that the project would lead to a net loss of 34 square metres of office space, which is enough for several desks. But in fact it would lead to the loss of 177 square metres of 'affordable' office space because, although the proposed swap would put 143 square metres of office space in its place at 20 Shorts Gardens, that new space would be much higher grade and more expensive.

4. Damage to fabric and character of two listed buildings dating from Stuart times.

Seven Dials was laid out by Thomas Neale in the early 1690's. It is well known as the only quarter of London remaining from late Stuart England. The layout of the central streets, and some of the original buildings remain. Many buildings were rebuilt, partially rebuilt, or re-faced in the 18th and early 19th centuries. 53 & 55 Monmouth Street are important examples of buildings replaced in the 18th century on the 17th century model. They should be left intact, not knocked together to create a modern, lateral layout.

When the Comyn Ching Triangle was redeveloped in the early 1980's by Terry Farrell, some of the buildings had already been modified or badly damaged, but some could be left as they had been laid out in the 17th and 18th centuries. 53 & 55 are the only two such on the Monmouth Street side and we believe that they should be left as examples for future generations. Also, number 55 has a rare surviving 17th century panelled interior and stairs.

5. Damage to the character of Ching Court, an award-winning redevelopment made up of 18 listed buildings including these two.

The redevelopment of the Comyn Ching Triangle in the early 1980's was hailed as a triumph of early post-modern design and urban mixed-use development within a conservation area. The mix of uses is key to its character.

The location of the mixes was chosen deliberately. That is why the whole works so well, and still attracts so much interest from architects and social historians. All along the Monmouth Street side of the Triangle is offices from 1st floor level upwards. All along the other sides is residential from 1st floor upwards. Retail is at ground floor level. If the use of 2 & 3 Ching Court, or any other buildings along the Monmouth Street side, were changed from office to residential then the balance would be ruined.

All buildings that have elevations overlooking Ching Court were listed in 2016, or previously listed and had updates / additions in 2017. (Sadly, one building on the outer South corner had been subject to strip-out by the applicant the previous year, and not enough survived for listing. But this does not overlook Ching

Court). The intention was to preserve everything about the compilation, fabric, design and character of Ching Court. We believe that this would be seriously damaged by any modifications to the buildings or changes of use, such as those proposed in these applications.

We ask you to refuse this application.

We believe that it would also be helpful to have a clear statement of policy by Camden as the Local Planning Authority in relation to the Comyn Ching Triangle, so that its special character can be preserved to resist more applications of this type.

ENDS