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12/07/2019

Dear Samir,

Re application ref. 2019/1646/P

Thank you for letting us know about the revised plans for proposed redevelopment of 53 & 55 Monmouth Street / 2 & 3 Ching Court.

We note that the plans for three 1-bedroom flat-level units are revised to be for two 2-bedroom 3-level units. We acknowledge that this helps to retain more fabric of the listed buildings, by eliminating the need for a 'knock-through' of an old supporting wall between two distinct buildings. However, the revision is unfortunately not sufficient to make the application acceptable in any other ways.

Our comments as an objection to 2019/1646/P therefore still stand as stated in our email of 29/04/19. They relate, in particular to:

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 character of Ching Court, an award-winning development within the Seven Dials Estate conservation area. It is made up of 18 listed buildings including these two – and, importantly, its character is defined by its mix of uses.

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We would like to make some further comments in relation to this application.

It is accepted by all parties that this application would be refused outright if it had been made on its own. Knowing this, the applicant has used the device of a 'land use swap' to attempt to soften the overall impact. It would be concerning to see such a device succeed where neither part of the swap is beneficial to its individual context.

We believe that there are many grounds for refusal of consent, and appeal to you to use these to rebut this application. Besides Camden's own policies that cover some of the points of objection enumerated above, other policy considerations include:

### The Seven Dials Estate Conservation Area Appraisal and Management Strategy document

- The special character of the Conservation Area is found in the range and mix of building types and uses and the street layout. The character is not dominated by one particular period or style of building but rather it is their combination that is of special interest. (Page 11)
- Forming the centre is the Seven Dials Pillar Sundial, seen from each entrance to the Dials. The character surrounding the column is derived from the street layout, the scale of buildings, plot sizes and the uses. .... There is an intimate atmosphere added to by the small incidental spaces found at junctions and in courtyards. This area includes many new developments which complement the historic architecture of Covent Garden; The Comyn Ching Triangle; the Thomas Neal conversion of warehouses at Shorts Garden/Earlham Street incorporates a complex of shops/cafes with offices and residential on the upper floors; Mathews Yard on Shorts Gardens is a mixed use development of residential, shops and workshops by the GLC, Nottingham House adapted into retail and residential. These are successful because of their design, in particular their scale, height and materials but in addition the uses are appropriate. (Page 15)

### The London Plan

- Residential development proposals should not lead to a loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices and/or alternative provision is made for the provision of net additional office space near the development". [Draft London Plan 2019, SD5 – Part H]

The current land use swap proposals in Seven Dials do, as you know, lead to the loss of about one and a half floors of viable small office space in one of the Monmouth Street buildings. This loss goes directly against the draft London Plan which is a document that merits consideration and is shortly to be published in its final form.

The London Plan 2016 that it is about to replace already states that:

- In the Central Activities Zone (CAZ), the differential in office and residential land values has led to concern over the loss of office space to housing ... sustained loss of generally more affordable existing stock could erode the Zone's strategic offer as a competitive, nationally important office location. (4.17A)

And its CAZ SPG states that:

- In response to concerns about the loss of office stock to residential in CAZ, London Plan Policy 4.3Bd requires residential proposals in CAZ which would otherwise result in the loss of office space to make a proportionate contribution to the provision of new office space within, or nearby, the development. (1.3.8)

The proposed land use swap involves the loss of just such "more affordable" existing office stock and its replacement with a lesser square footage of more expensive, high grade office.

### Loss of family and disabled accommodation

The proposed land use swap involves the loss of a disabled-accessible generously-sized 3-bedroom family flat at 20 Shorts Gardens. The revised plans would replace this with quite cramped 2-bedroom maisonettes each over 3 floors with a narrow staircase.

Sadly, we are all too aware that 1 and 2 bedroom flats are rarely now acquired by families wishing to live in the area as their main home for a long period of time. In Seven Dials the vast majority of 1 and 2

bedroom flats are 'town pads' and/or short lets, and we would expect these new maisonettes to be no different.

It puzzles us that application 2019/1294/P states that 20 Shorts Gardens is a 2-bedroom flat. It is clear from the plans that there are 3 bedrooms.

The previous tenant, who was asked to leave to facilitate this development and now lives nearby, did use the 3<sup>rd</sup> bedroom as an office for a while but has told us that he was asked by the applicant's agent not to do so and to return its use to a bedroom.

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We hope that you will be able to refuse consent given the volume of local objections and the policy considerations.

However, if consent were granted for change of use of 53 Monmouth Street then there is an important feature that would need to be added to the design, in the form of a blanked-off door at the rear of 2 & 3 Ching Court.

This would need to be designed to match the existing doors at 4 and 5 Ching Court. Its function would be to mitigate some of the disturbance and security issues associated with the application, by:

- a) reducing the size of the recess used for antisocial behaviour and drug crime, and
- b) creating a small corridor to allow access to 53 Monmouth Street from 55 Monmouth Street without opening one outside door and re-entering through another, making noise in Ching Court at night when every sound echoes.

The gates of Ching Court have always been closed after 6pm and all weekend to prevent access for reasons of security and disturbance. These protections are written into the covenants of the buildings that surround the space and the rules that apply to users. Since only offices are accessed from the courtyard, the need for access outside these hours is minimal. This development would change that and cause unnecessary problems without the addition of the blanked-off door.

Yours sincerely,

Elizabeth Bax  
Chair, Planning Subcommittee.

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