

2 January 2023

Dear Ms Meynell

Re: Planning Application 2022/3772/P (and related application)

We write to object to and to raise further concerns about the proposed change of use of the first-floor premises at 28 Church Row, London NW3 6UP from Office to Residential (E to C3).

We have read and agree with the contents of the responses already submitted and posted on the Camden webpage relevant to the present application (Application No: 2022/3772/P) being (at the time of writing) from

- David Milne
- Erika and Maurits Dolmans
- Esther Fitzgerald and
- Professors Nicola Lacey and David Soskice

We do not intend to duplicate the points made by those respondents and intend to raise further, *i.e.*, additional, concerns.

Our concerns relate both to the consultation process and the substantive merits of the proposal. The Application should be refused on either or both grounds.

Process concern: the consultation process is flawed

The Application refers to and relies on a number of drawings, identified as Drawings (Plans) 05/1111/201-204 (204_A).

The only drawings available on the website as part of the Application are:

- 05/1087/PLAN/201_A – Site Location Plan
- 05/1111/PLAN 203_A – Existing and Proposed Floor Plans
- 05/1111/PLAN/205 – Existing and Proposed Section A-A

On any view, Drawings 202 and 204 (204_A) have not been provided as part of the public consultation. It is, thus, impossible fully to understand the nature of the proposal. The incomplete provision of material expressly incorporated in and relied on as part of the proposal must mean that the Application, in its present form, is irremediably flawed.

The process concern does not stand alone. The Application should be refused on substantive grounds to which we now turn.

Substantive grounds of objection

The proposed arrangements cannot be achieved as described for (at least) 4 reasons which relate to:

- Plumbing and drainage
- Ventilation (proposed kitchen and bathroom)
- Water usage
- Parking

(i) Plumbing and drainage:

The Application would involve the proposed works being connected to the existing drainage system: *“Internal drainage connections from tea point and WC with basin. Drawing 05/1111/PLAN/204_A”*.

As already noted, “Plan/204_A” has not been included in the application as uplifted to the relevant web page. That makes it difficult (but not impossible) to comment on this aspect of the proposal.

From Drawing 05/1111/PLAN/203_A (Existing and Proposed Floor Plans), the existing plumbing and drainage meet the needs of the small office kitchen in the middle of the property and the office WC at the SE back of the premises. That WC is unchanged between the Existing and Proposed Plans.

Under the proposal, a new kitchen will be located at the NW corner of the premises with a sink between the two windows overlooking Church Row. It is completely unapparent how water will be fed to a sink in that proposed location, nor how waste sink water will be voided.

(It is also entirely unapparent where a water tank sufficient to meet the daily average usage needs (600-750 litres/day, taking average consumption for a family of 4 or 5 – see below) will be located, nor where the hot water/central heating boiler will be installed.)

(ii) Ventilation

At present, the back toilet, presumably, has adequate ventilation. As that will be unchanged (comparing the Existing and Proposed Plans), it is also presumed that it will be sufficient simply to carry over those present ventilation arrangements. The present kitchen – referred to in the Application as a “*tea point*” – presumably requires little, if any, ventilation.

The proposal would create both a new bathroom in the middle of the premises and a new kitchen at the front. It is – again – completely unapparent as to how suitable ventilation will (or even could) be installed in either location. Take the kitchen by way of example: a cooker hood cannot vent vertically – internal venting would mean going through the flats on the second and third floors; external venting would mean cutting into the exterior wall facing Church Row. Neither is feasible. (Here, it should also be noted that the Application has confirmed that there would be no works to the exterior of the building.)

(iii) Water usage

The Application states that the expected internal residential water usage would be 105 litres per person per day (pppd).

In 2021, the average domestic pppd water usage in England and Wales was 152 litres: see, <https://www.statista.com/statistics/1211708/liters-per-day-per-person-water-usage-united-kingdom-uk/>.

i.e., the average water usage pppd is, broadly, 50% more than the expected usage set out in the proposal. No explanation is put forward for such a disparity. The proposal is unrealistic and infeasibly low. The failure properly to estimate the pppd water usage will have a knock-on effect: the proposal would need a sufficiently-sized water tank (as noted above).

(iv) Parking

Item 5 of the Design Statement (transportation and highways) says:

"The building currently does not have any parking allowance and due to the location residents would not need to be reliant upon car ownership."

The first half of that sentence is accurate: the building has no parking allowance. As most people use public transport to commute to work, that lack does not impinge on the usability of the premises as offices. That does not hold good for residential premises.

The projected cost of works is "up to £2 million", which takes no account of the present value of the premises. The proposal, therefore, contemplates a value of well over £2 million on completion (with a commensurate open market rental value). As the premises presently provide workspace for 6, it must also be contemplated that a family with 2/3 children would occupy the apartment on completion. (Any fewer occupants on completion would be a disproportionately low return for the loss of 6 workspaces.). The overwhelming probability must be that a family with 2/3 children would need 1+ cars. It is fanciful to assert that the likely residents "*would not need to be reliant upon car ownership*". They plainly would.

Those 4 specific substantive concerns are sufficient to demonstrate that the proposal has simply not to have been thought-through.

Those specific substantive grounds of objection are not alone.

Other concerns

(i) Work period

The Application states that the works involved in the proposal would start "2023-02" and end "2023-04". It is unclear whether "02" and "04" refer to months or quarters. As the costs of works has been estimated at "up to £2 million", the latter would seem more likely. (A monthly spend of up to £1 million would seem excessive even in these inflationary times.) The point should be clarified: there is a significant difference between a two-month, and a six-month, work period.

(ii) Listed building status

The Design Statement asserts that the Grade 2* listing of 28 Church Row "refers only to its exterior". Listings adhere to the property, not to specific attributes of the property. Further, the need for listed building consent must have been well-known to the agents acting for the applicant: see, previous involvement with planning matters at 28 Church Row: see, esp., Planning Application 2008/3932/L.

(iii) Returning/bringing back to residential use

On the authority of Historic England, 28 Church Row has comprised offices since the end of the 19th century; <https://historicengland.org.uk/images-books/photos/item/IOE01/13942/26>.

The assertion in the Design Statement that “*the proposal is to return the first floor back to its original residential use*” must be read in light of that information from Historic England.

The proposal would not return the first floor back to its original residential use.

When built in c. 1720, 28 Church Row was not originally laid out as apartments. It could only have been exclusively residential at some time before the late C19 (see above). As such, it would have been one property. It is a well-known fact that Georgian and Victorian kitchens were in the basement. They were not located in the NW corner of the first floor. It is, therefore, quite misleading for the proposal to speak of “returning the first floor back to its original residential use”.

Conclusion

The Consultation process is flawed.

Even had that not been so, the Application is objectionable for the substantive reasons set out above (whether considered individually or cumulatively).

The objections to the Application are compounded by the other concerns explained above.

The Application should be refused.

Sincerely,
Michael Patchett-Joyce and Marika Cobbold