
4 Wild Court, London, WC2B 4AU

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1.0 Introduction

- 1.1 This planning statement is submitted by CB Richard Ellis on behalf of Kensington School of Business and Kensington College in support of the full planning application and application for a Non Material Amendment at 4 Wild Court (hereafter referred to as 'the subject site' or 'the site').
- 1.2 The building is not considered suitable for modern flexible education space. The current educational occupiers of the building will relocate to a suitable building in Russell Square, within the Borough of Camden.
- 1.3 It is upon this basis that planning permission (ref. 2010/2282/P) was approved on the 2nd September 2010 for the Change of use of education institute (Class D1), offices (Class B1) and ancillary cafe to provide 86 self contained units for student accommodation in association with the London School of Economics.
- 1.4 The client wishes to undertake some amendments and minor additions to the extant planning permission above that will enhance the accommodation offer and increase the number of student accommodation units by 12 additional units to a total of 98 units.
- 1.5 On the basis that the principle of the change of use has been established by the extant planning permission, the amendments and minor additions are intended to be dealt with through the submission of the following two applications:
 - The submitted full planning application relates to the provision of a new mansard roof on the 7th floor to provide additional floorspace (351m² GEA), to form 12 student accommodation units (Class C2- Residential Institutions) which will replace the existing crèche building structure on the roof.
 - The submitted application for a Non Material Amendment relates to minor internal alterations that improve the internal lighting levels to the approved room layouts under planning permission (ref. 2010/2282/P).
- 1.6 The proposed scheme has been informally discussed with Stuart Minty - East Area Team Manager prior to submission in order to identify possible concerns. As a result of this pre-application discussion the scheme is considered to be submitted in a positive manner.
- 1.7 This planning statement produced by CB Richard Ellis is submitted in conjunction with the following documents:
 - Planning Application Forms, prepared by CB Richard Ellis;
 - Various architectural plans (layouts, elevations, sections), prepared by Chaplin Farrant Wiltshire Ltd;
 - Design and Access Statements, prepared by Chaplin Farrant Wiltshire Ltd;
 - Addendum Sunlight & Daylight Report, prepared by Gordon Ingram Associates ;and
 - Illustrative Photomontages, prepared by m3fx.

2.0 Site and Surroundings

- 2.1 The following provides a detailed description of the existing site and its surroundings.

SITE

- 2.2 The site comprises of an 8 storey building located on Wild Court. Wild Court is a small side street off Kingsway, which is a no through route for vehicles. Please see site location plan in Appendix A.
- 2.3 The building is currently in D1 (Non-residential institution) use and is occupied by the Kensington School of Business/Kensington College of Business (KCB) with an internal café area and an area of vacant B1 office space at 1st floor level.
- 2.4 The main entrance to the site is from Wild Court. There is a secondary entrance in Wild Court leading to a Courtyard area and refuse storage area, not used for general access. This secondary entrance also serves as access for people in wheel chairs.
- 2.5 The site lies partly in the Seven Dials Conservation Area and partly in the Kingsway Conservation Area. The building opposite the site is the Grade II listed building known as the "Kodak House, No. 63 Kingsway" and the building to the west of the site, but not adjoining, is the Grade II* Listed Building known as the 'Freemasons Hall, Great Queen Street'.

SURROUNDINGS

- 2.6 Kingsway is a mixed use area of predominantly office uses above shops, bars and restaurants, though there is an increased proportion of residential and hotel use off the many side streets and between roads running parallel and perpendicular to Kingsway. There is a large supermarket, pharmacies and health centres all within close proximity. The area has many theatres including, The Aldwych, The Strand, The Lyceum, The Duchess and the Theatre Royal.
- 2.7 The site is bounded on three sides by the surrounding buildings. The rear of No.67 Kingsway, to the east, backs onto the Courtyard of the site, the Kingsway Hall Hotel to the North and the Connaught Rooms to the west. The Middle Yard creates a gap to the rear of the site between Kingsway Hall Hotel and Connaught Rooms.
- 2.8 The site is in very close proximity to the London School of Economics campus (a 2 minute walk). The new London School of Economics building is located on the opposite side of Kingsway (corner of Sardinia Street) in Camden.
- 2.9 The character of the surrounding buildings is mixed in terms of use, appearance, materials used, scale and fenestration.

3.0 Planning History

- 3.1 The following section details the relevant planning history at the subject site. To research the appropriate planning records, a review of the Council's online planning application register has been undertaken.
- 3.2 Planning permission (ref. 2010/2282/P) was approved on the 2nd September 2010 for the Change of use of education institute (Class D1), offices (Class B1) and ancillary cafe to provide 86 self contained units for student accommodation in association with the London School of Economics.
- 3.3 Planning permission (2005/3159/P) was approved on the 4th October 2005 for the erection of glazed canopy to enclose internal courtyard and railings to ramp and restoration of a window opening to east elevation. This permission has not been implemented.
- 3.4 Planning permission (ref. 2005/1737/P) was refused on the 11th July 2005 for alterations to front elevation to enlarge windows at ground floor level and alterations to side courtyard to include new canopy and openings.
- 3.5 In January 2002 a Certificate of Lawfulness for existing use was part granted/part refused for class A3 use in the basement and the use of the upper floors as offices and educational and leisure space. The use as independent café and independent use of the theatre were refused. The council accepted that the A3 use was ancillary to the use of the rest of the building as educational/office space.

4.0 Proposed Development

- 4.1 The principle of the change of use for student accommodation has been established by planning permission (ref. 2010/2282/P) approved on the 2nd September 2010 for the Change of use of education institute (Class D1), offices (Class B1) and ancillary cafe to provide 86 self contained units for student accommodation in association with the London School of Economics.
- 4.2 The client wishes to undertake some amendments and minor additions to the extant planning permission above that will enhance the accommodation offer and increase the number of student accommodation units by 13 additional units to a total of 99 units. The proposals are explained in detail in the Design And Access Statements prepared by Chaplin Farrant Wiltshire Ltd.
- 4.3 On the basis that the principle of the change of use has been established by the extant planning permission, the amendments and minor additions are intended to be dealt with through the submission of the following two applications:

Full planning application

- 4.4 *The submitted full planning application relates to the provision of a new mansard roof on the 7th floor to provide additional floorspace (351m² GEA), to form 12 student accommodation units (Class C2- Residential Institutions) which will replace the existing crèche building structure on the roof.*
- 4.5 The 12 additional units are to be built on the flat roofs of the existing building. On the upper roof area it is proposed to replace the existing roof buildings and remove the full height solid metal fence that enclosed the external play area. On the lower roof level to the North West of the Court Yard a new room will be built on top of the an existing flat roof at fifth floor level. The accommodation will be for the sole use of post graduate students of the London School of Economics.
- 4.6 Whilst the proposed Seventh Floor Plan (AP 150) shows 11 units of student accommodation, the full planning application relates to 12 units as the roof structure of one of the rooms proposed in the existing stairwell area will external to the building, and thus visible within the Conservation Area. On this basis, it was considered pertinent to include this within the full planning application, rather than the Non Material amendment application which relates solely to other internal works.
- 4.7 The proposal is to extend the existing mansard roof up by one storey to enclose the new floor, the pitch, line and material of the mansard roof facing the street will be to match the existing. The dormer windows of the existing floor will also be replicated on the new floor level, with the new windows to be visually similar to the existing but double-glazed.
- 4.8 Each unit of student accommodation will comprise bedroom/living space and a private WC, shower room and cooking facilities. If this proposal is built out it will be done in-conjunction with the implementation of the separate planning application for student accommodation in the lower floors, as per the previous consent 2010/2282/P or similar. The students occupying the hall will have communal access to the facilities in the building below which will include;
- launderette,
 - computer Room/Library/Common Room
 - secured bike store,

- courtyard,
- recycling/refuse point
- canteen
- secure storage

Non Material Amendment Application

- 4.9 *The submitted application for a Non Material Amendment relates to internal alterations to provide 1 additional student accommodation unit and minor internal revisions that improve the internal lighting levels to the approved room layouts under planning permission (ref. 2010/2282/P).*
- 4.10 The changes to this scheme are highlighted below, along with the notes of the changes made to this scheme to address the council's previous concerns.
- 4.11 The main changes to the application are;
- Increase in number of student rooms from 86 to 98.
 - Revised Daylight and Sunlight reports demonstrating compliance with Council requirements.
 - All windows are to be non-obscured and clear glazing to optimise outlook. The new windows will be like for like otherwise as what was existing. The original glazing will be stored for possible reuse in other buildings.
 - Details of window to window relationships between the application site and the adjoining buildings including uses and glazing type.
 - Details of student occupancy of the rooms to understand how long they stay in the rooms.
 - The future occupiers of the rooms will be made aware of and offered reductions in rent for rooms with a comparatively reduced outlook and/or daylight and sunlight result.
 - All bedrooms now contain kitchenettes as preferred by the LSE, with communal spaces provided including an enlarged canteen on the lower ground floor.
 - The applicant is happy to accept a S106 that restricts the use of the accommodation as halls of residence for the sole use of the LSE.

Basement, Ground and First floor

- 4.12 The Council expressed concerns with the lower ground, ground, mezzanine and first floor student rooms in terms of sunlight and daylight and outlook. Extensive discussions took place and have shaped the outcome of this scheme.
- 4.13 There are no student rooms on the lower ground floor which is now used as communal space and facilities for the students.
- 4.14 The Council had particular concerns with the courtyard facing rooms on the ground, mezzanine and first floors in terms of outlook, daylight and sunlight. The mezzanine floor is no longer proposed and the student rooms to the lower ground floor facing the courtyard have been removed.
- 4.15 The disabled rooms on each floor facing the middle yard have been revised to allow for a better layout, allow a good outlook and reasonable levels of daylight and sunlight.

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- 4.16 The canteen will encourage students to spend more time socially out of their rooms and enhances the amenity of the building.

5.0 Planning Policy Context

- 5.1 Planning policy at regional and local level is guided and informed by central government policy, which is also a material consideration when considering planning applications.
- The key regional and local level policies considered relevant to both these applications is provided below. Further analysis of the proposed development in relation to Planning Policy is provided in the Design and Access Statement by Chaplin Farrant Wiltshire Ltd.

Principle of Use

- 5.2 The principle of the change of use for student accommodation has been established by planning permission (ref. 2010/2282/P) approved on the 2nd September 2010 for the Change of use of education institute (Class D1), offices (Class B1) and ancillary cafe to provide 86 self contained units for student accommodation in association with the London School of Economics.
- 5.3 This application is to increase the number of students rooms available in on the site which is within very close proximity of their place of study, the London School of Economics campus (a 2 minute walk). The new London School of Economics building is located on the opposite side of Kingsway (corner of Sardinia Street) in the Borough of Camden.
- 5.4 In light of and adequate replacement facility is being provided in Russell Square, within the Borough of Camden, and supporting marketing evidence submitted in relation to the above extant planning permission, it is considered that the principle of the proposals for an 'intensification' of the use are in accordance with Policy C2 (Protecting community uses) and Policy E2 (Retention of existing business uses).

Proposed Additional Student Accommodation

- 5.5 The planning application proposes 12 additional student accommodation units in the form of a new mansard roof on the 7th floor, which will replace the existing crèche building structure on the roof. The application for a Non Material Amendment relates to minor internal alterations.
- 5.6 As per the extant planning permission, the student units will be arranged as self-contained bedsits each with its own internal kitchenette and WC/shower room facility. Adopted LDF Policy DP9 relates to student housing and the size of the proposed units is considered to provide an adequate level of amenity, in addition to the common room, gym and shared laundry facilities.
- 5.7 Adopted LDF Policy DP9 specifies that development should include a mix of unit types. As per the extant planning permission, all the additional units are proposed to be self contained, as the accommodation is intended for use by post graduate students only, who have a preference for self contained accommodation. Other types of accommodation are offered by LSE at other halls of residence, and it is upon this basis that the proposal is considered acceptable with policy.

Conservation Area & Urban Design

- 5.8 As demonstrated by the illustrative Photomontages, prepared by m3fx, the addition of a further floor of accommodation on the 7th floor of the building will not have any detrimental impact upon the surrounding streetscape, and will preserve the character and appearance of the Conservation Areas.
- 5.9 The proposal on the upper roof involves the removal of an un-attractive full height solid metal fence that currently surrounds the roof area, this barrier previously allow the space to

be used as part of a crèche/nursery. The other roof buildings at this level are not in keeping with the building as a whole.

- 5.10 A smaller roof extension with a single room in it is to be built on the existing roof at level 5, two floors below the new roof level, and to the North West of the internal court yard. This building will have a mansard roof and dormer window to match the existing court yard roof, the rear wall would be an extension of the existing wall.
- 5.11 The external appearance of the additional floors would be in character with the existing building, having a mansard roof forming the facade the new story in a material to match the existing. The dormer windows of the existing top floor will also be replicated on the new floor, with the new windows to be visually similar to the existing but double-glazed. The existing chimney features and parapet walls would also be continued up.
- 5.12 The appearance of the double height mansard roof would be in character with the local area, this is a feature that can be seen on several buildings in The Kingsway.
- 5.13 This proposed accommodation does not increase the height of the building, but falls within the walled communal area on the roof, currently occupied by the crèche building. Given the set back illustrated in the section drawing and the general narrow nature of the street, combined with the mansard roof being a relatively light weight addition to the roof, it is considered that the proposal will result in a visual improvement (albeit views are limited) to the building and surrounding over the existing crèche building.
- 5.14 The Non Material Amendment application modifies the internal layout of the building. There are no external changes proposed to the Wild Court elevation and thus are considered to not to harm the character and appearance of the Conservation Areas.
- 5.15 The three Universities and their existing Halls of residence are part of the character of the area. Therefore it is considered that the proposal does not harm the character and appearance of the Conservation Area.
- 5.16 The proposals are therefore considered in accordance with Policies B1 - General design principles, B3 - Alterations and extensions and B7 - Conservation areas.

Affordable Housing

- 5.17 The Councils Unitary Development Plan makes it clear that the council do not expect the provision of affordable housing in association with halls of residence.
- 5.18 The applicant will agree to appropriate conditions in relation to the proposed hall of residence if the council are minded to approve the proposal.

Privacy & Outlook

- 5.19 In terms of outlook and privacy it is considered that the proposals provide a satisfactory level of privacy and outlook. The Design and Access Statement provides a section that was used in the previous successful application to demonstrate that the halls of residences windows do not look directly into those of the adjoining building, the Connaught Rooms. The additional floor would have no detrimental effect on the privacy of neighbouring buildings.
- 5.20 The windows to the Connaught rooms are obscured as previously accepted and the angles of view from the new windows of the additional storey to 4 Wild Court do not allow significant overlooking.

- 5.21 The windows in the court yard from the lower ground to the 5th floor face the adjacent building 67-71 Kingsway. The section clearly demonstrates that these windows do not directly line up with those of the halls of residence.
- 5.22 The windows of 67-71 Kingsway relate to fire corridors and toilet facilities. Requirements by Building Regulations require adequate fire escape routes that due to the arrangement of the building in relation to its surroundings results in them being located in the elevation that faces 4 Wild Court. Therefore the uses of these rooms are required to remain as emergency escape routes and not habitable or regularly used rooms.
- 5.23 A number of the windows to 67-71 Kingsway are obscured, restricting views between the buildings.
- 5.24 The level of privacy between the buildings was considered to be acceptable by the Council in the previous application number 2010/2282/P. The windows to the additional floor represent no further loss of privacy.
- 5.25 The dormer window from the additional lower level room looks down the length of the courtyard, it is above other existing windows with the same orientation. These existing windows are in a communal staircase within 4 Wild Court and the new window is not expected to reduce privacy levels.

Sunlight and Daylight

- 5.26 The extant planning permission (2010/2282/P) was accepted after issues with Daylight and sunlight overlooking and privacy between the buildings and to the student rooms were resolved.
- 5.27 New daylight calculations have been provided in the form of an Addendum Daylight & Sunlight Report in support of this application, dated 29/11/2010.
- 5.28 The previously accepted arrangement of rooms is largely the same in this new application, with the area of one of previously public stair cases having been replaced with student rooms, and the introduction of a further floor of accommodation on the 7th floor of the building.
- 5.29 With the combined assessment by Right of Light Consultants and Gordon Ingram Associates it can be shown that all of the student accommodation rooms in the design comply with the minimum requirements for daylight set out in BS 8206-2:2008.
- 5.30 The additional rooms located on the Upper Ground Floor, First Floor have been tested and their compliance demonstrated in the Addendum Daylight & Sunlight Report prepared by Gordon Ingram Associates.
- 5.31 The addition of a further floor of accommodation on the 7th floor with the continued sloped back of the mansard roof of the building will not have any detrimental impact upon the daylight levels within the rooms at located on the lower floors. This is because the proposed accommodation does not increase the height of the building, but falls within the walled communal area extent, presently occupying the 7th floor. This means that no additional obstruction is imposed on the daylight entering the courtyard.
- 5.32 The small infill proposed on the 6th floor will not be visible from any of the windows located at the lower floors. This is because the infill is set back from the current 5th floor edge overlooking the courtyard. Hence the presence of such infill and its relatively small impact on daylight will not be felt until further up the light-well where rooms show levels of ADF much in excess of the required minimum and can sustain an impact far beyond the one caused by the additional massing proposed.

- 5.33 For these reasons and based upon the results previously achieved there the assessment of the 7th floor accommodation and the 6th floor infill is redundant, as these room undoubtedly enjoy the highest levels of daylight achievable in the proposed scheme.

Energy Statement

- 5.34 An Energy Statement was submitted with the extant the consented application 2010/2282/P. By proposing the same energy efficient and production as for that scheme the proposal provides very similar sustainable benefits.
- 5.35 The Energy Statement appraised sustainable and renewable energy for the proposed development. This has been prepared in context with Appendix D of the Mayor's publication "Sustainable Design and Construction –The London Plan Supplementary Planning Guidance".
- 5.36 When complete the proposal would achieve a reduction in CO2 emissions which is in accordance with Policy SD9 – Resources and Energy of Camden Council's UDP. When compared to the baseline case, the application of energy efficiency features and efficient supply of energy results in a reduction of CO2 by approximately 43%.
- 5.37 Enhanced energy efficient features, over and above current Part L of the Building Regulations will be incorporated into the final design. These key features include;
- improved thermal performance of the building fabric,
 - improved window performance;
 - reduced air in leakage;
 - low power heat recovery ventilation system,
 - automatic heating controls,
 - controlled efficient lighting and
 - AAA rated domestic appliances.
- 5.38 Efficient sources to meet power, heating and hot water requirements will include Mini Combined Heat and Power/ Condensing boilers that are coupled to a large capacity thermal store.

Transport

- 5.39 Cycle parking for 58 bicycles has been included in the scheme. This exceeds the Councils provision of 1 space per two student units. Individually securable, the cycle spaces will be located in a sheltered and close circuit television protected area, within the basement.
- 5.40 This extant planning application was accompanied by a Transport Statement that takes into account of trip generation of the proposal. It concludes that;

"this scheme will not increase transport pressure in any form in the area. The proposals represent a potential reduction in public transport use of nearly ten times that of the existing use. The close proximity of this hall of residence to the college, at which the students will be studying, means that all of the residents will be within a 2 min work of their main every day trip destination. This vastly reduces transport pressure where the existing college currently has students commuting to Wild Court daily from outside as well as within London. In providing cycle spaces and encouraging use of more sustainable forms of transport, primarily walking and cycling, the applicant will ensure that this scheme makes a significant

improvement to sustainability of this location; and to the health and well being of its residents.

5.41 Thus it is considered that the proposal will reduce and not increase transport trips in the locality.

6.0 Conclusions

- 6.1 The principle of use of the building for student accommodation has been established by the extant permission. This Planning Supporting Statement has set out a description of the site and its surroundings, assessed the relevant planning history, and reviewed the relevant planning policy framework.
- 6.2 This Planning Supporting Statement confirms that the proposals for 12 additional student accommodation units in the form of a new mansard roof and minor internal alterations are appropriate and maximise the opportunities available to provide high quality student accommodation in a sustainable manner in the form of re-use of an existing building in this location.
- 6.3 The addition of a further floor of accommodation and the internal works relating to an intensification of use will not have any detrimental impact upon the surrounding streetscape, and will preserve the character and appearance of the Conservation Areas. The proposals will not have a detrimental impact on the amenity, of surrounding properties by virtue of there being no privacy and overlooking issues.
- 6.4 In summary, in light of the extant planning permission and the clear merits of these proposals, we trust that the Council and its statutory consultees will support these applications and grant planning permission.