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6th July 2017

Dear Charles

Town & Country Planning Act 1990

4 Wild Court and 75 Kingsway, London, WC2B 4AU (2017/1611/P)

Whilst it would now appear that most matters are sorted in connection with the above application, leading to a positive recommendation at the early July Committee, we have now spoken with Rob Farnsworth and clarify our client's position in relation to the emerging draft Local Plan *Policy H2* - due to be adopted by the Full Council on 26th June, replacing the LDF Policy DP1.

As such, the draft Local Plan has significant weight in the consideration of this planning application and will most likely be fully adopted by the time the application is presented to Committee in July.

Additional Floor Area

Firstly, we note that there has been some confusion regarding the floor areas and provide a floor area schedule below, and accompanying plans showing the extent of measurement, as defined in RICS Code of Measuring Practice 6th Edition.

Floor Area Schedule:

FLOOR	EXISTING		PROPOSED	
	GIA (sqm)	GEA (sqm)	GIA (sqm)	GEA (sqm)
Basement Level	39	63	39	63
Sub-Basement Level	51	66	0	0
Lower Ground Floor	451	532	464	544
Upper Ground Floor	534	615	543	628
Mezzanine Floor	68	89	42	54
First Floor	462	541	473	554
Second Floor	397	459	407	472
Third Floor	405	458	415	471
Fourth Floor	408	459	417	473
Fifth Floor	377	421	388	435
Sixth Floor	344	382	342	372
Seventh Floor	100	125	267	296
Eighth Floor	0	0	112	130
TOTAL	3636	4210	3909	4492

The total 'additional' floorspace created by the proposal is **273 sqm (GIA)**. As this is just above the minimum policy threshold it requires appropriate consideration against the emerging Local Plan Policy H2 for the provision of self-contained housing, and this is addressed below.

Overall, the proposed GIA to GEA sq m ratio as set out in the schedule above is lower than the usual expected average ratio (circa. 20%) in part due to the additional floor area comprising the external panoramic lifts having an efficient GIA to GEA ratio due to thin glazing. The new roof extensions at Seventh and Eighth floor have a more proportionate and expected GIA/GEA ratio

We also enclose screenshots from the relevant section drawing (dwg no. 646-GS03-P1) to demonstrate the removal of the existing floor slab at Sub-basement level as this space has become redundant, with new 'full' floor slabs provided at Lower ground level and Ground floor level. At Mezzanine floor level, the floor slab is which accounts for a higher exiting floor area than that proposed. We note and are happy for the inclusion of a condition dealing with this element of the scheme if required.

Policy H2 - Maximising the supply of self-contained housing from mixed use schemes

The additional floorspace arising from the proposal is 273 sqm (GIA). As such, we have considered the criteria contained in the emerging draft Local Plan *Policy H2 – Maximising the supply of self-contained housing from mixed use schemes*, and provide justification below as to why the provision of on-site self-contained housing in association with the hotel development is not appropriate or practical in this instance.

- The proposed development delivers a new hotel to assist with meeting existing and future business and visitor demand within this central location. The applicant is a hotel operator whose modus operandi is converting existing buildings to alternative hotel use via a change of use, with additional extensions as required. They are a successful hotel operator and not a residential developer and their product does not lend itself, or involve comprehensive new build hotel, or indeed mixed-use development.
- The existing building subject to the change of use to hotel has entire site coverage apart from a small service courtyard/lightwell, with a two storey extension proposed to the roof to provide additional hotel accommodation.
- Due to the narrowness of Wild Court and the internal lightwell the internal lighting levels will not support residential use below the 5th floor. Hotel (and student) use is not subject to such tight strictures under the HMSO Sunlight and Daylight guidance. As such, to accommodate 137 sqm GIA of self-contained housing, would require residential provision on the new 8th floor and part provision on new 7th floor.
- In pure commercial terms, there is simply no financial or business sense in the hotel operator building out the proposed 8th floor as they would not only 'lose' the proposed 6 hotel rooms to residential but also have to lose a further 4 rooms on the 7th floor. With resultant amenity and management issues associated with mixed hotel/residential floor, it would therefore be more sensible for the hotelier to simply build out the 7th floor at 167sqm – providing the full 14 rooms, without the incumbent requirement to address the mixed use policy.
- The inclusion of independent residential use on the upper floors would also:-
 - normally be expected to have separate access at street level with a dedicated lobby and lift. Due to the Council's design comments over the extent of the 8th floor extension (pulled back from Wild Court/Kingsway), the associated ground floor access (lobby) and dedicate lift would need to extend deep into the Wild Court building, reducing the overall meaningful hotel and residential space;
 - The only other alternative means of accessing the upper floors for residential, would require unsatisfactory shared use of the service yard or entrance foyer/reception, lifts and fire escapes with the main hotel.

- The relatively small quantum of self-contained housing would be smaller than the identified 137 sqm GIA, as this currently takes no account of any associated ground floor lobby areas, stair, lift space and fire escape areas that would be dedicated or apportioned to the alternative residential use.
- It is assumed that any independent residential accommodation would need to cover the related service charges and, because of the need for dedicated or shared stairs, lifts and lobby/circulation and additional management/security costs - would be disproportionately high.
- The location of residential accommodation on the 8th floor and part 7th floor atop of the hotel would obviously mix commercial and residential users – especially if reliant upon shared lobby areas and lifts. The 24 hour operational activity of the hotel would not be compatible with residential use in either a 'stacked' or 'blended' configuration between floors. On this basis, the proposal would not provide appropriate levels of amenity for the residents or make the most efficient use of land.

On the basis of the above arguments we feel that there is no merit in seeking or applying Policy H2 to this proposed hotel scheme and look forward to receiving confirmation from the Council on this point over the coming week. As mentioned, the applicant is still more than agreeable to support appropriate payments dealing with public realm improvements or other mitigation such as transportation.

However, please do not hesitate to call me should you require any further clarification or information.

Yours faithfully

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