

13-15 Bonny Street, London NW1 9PE

Planning Statement

October 2023

Turley

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Client

The Arch Company Properties Limited

Our Reference

THEL3169

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1. Introduction

- 1.1 This Planning Statement ('Statement') has been prepared on behalf of The Arch Company Properties Limited (hereafter: 'the Applicant', 'Arch Co') in support of an application for Full Planning Permission and Listed Building Consent for the ground and first floors of 13 & 15 Bonny Street, Camden Town, London NW1 9PE (hereafter referred to as 'the site' as a collective).
- 1.2 The description of development for this application is therefore as follows:
- 1.3 *"Full Planning Permission and Listed Building Consent for minor internal and external works to the ground and first floors of 13 & 15 Bonny Street, including repairing existing windows, repairing and repointing brickwork, rationalising internal layout to meet current building regulations"*
- 1.4 The development proposal seeks consent for the following:
- Repairing of the windows at No.15 Bonny Street at ground floor level to match those of No.13 Bonny Street.
 - Rationalising of the internal layout to meet modern standards of living through demolition of deteriorated partition walls and staircase and internal remodelling.
 - Preservation of deteriorating period mouldings, fireplaces and details through utilising suspended ceiling (at first floor level), plaster board, repairs and replicating where required.
- 1.5 This Statement sets out why the Council should grant consent for planning permission and Listed Building Consent for the proposed development.
- 1.6 This application for full planning permission and Listed Building Consent is supported by a suite of technical documents and drawings that are referred to throughout this Statement. The full list of submission material is as follows:
- Application Form and Ownership Certificates, prepared by Turley
 - CIL Form, prepared by Turley
 - Planning Statement (this document), prepared by Turley
 - Fire Safety Strategy Statement, prepared by Prime Construction Consultants Ltd
 - Sustainability Statement, prepared by Prime Building Consultants Ltd
 - Built Heritage Statement, prepared by RPS
 - Technical Appraisal (Scope of Works) for 13 Bonny Street, prepared by Prime Building Consultants Ltd

- Technical Appraisal (Scope of Works) for 15 Bonny Street, prepared by Prime Building Consultants Ltd
- Existing Plans, prepared by Prime Building Consultants Ltd
- Existing Elevation and Sections, prepared by Prime Building Consultants Ltd
- Location Plan, prepared by Prime Building Consultants Ltd
- Proposed Plans, prepared by Prime Building Consultants Ltd
- Proposed Elevation and Sections, prepared by Prime Building Consultants Ltd
- Demolition Plans, prepared by Prime Building Consultants Ltd
- Proposed Plumbing Layout, prepared by Prime Building Consultants Ltd
- Proposed Mechanical Layout, prepared by Prime Building Consultants Ltd
- Proposed Ceiling Plans, prepared by Prime Building Consultants Ltd
- Demolition Elevation and Sections, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.01 LOBBY, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.02 HALLWAY, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.03 HALLWAY, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.04 ROOM, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.05 FRONT RECEPTION SHEET 1 OF 2, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL- G.05 FRONT RECEPTION SHEET 2 OF 2, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.06 BOILER ROOM, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.07 KITCHEN, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.08 LOBBY, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.09 HALL, prepared by Prime Building Consultants Ltd

- Existing Internal Elevation OFL-G.10 HALL, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.11 KITCHEN, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL-G.12 FRONT RECEPTION SHEET 1 OF 2, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation OFL- G.12 FRONT RECEPTION SHEET 2 OF 2, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.01 HALL, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.02 BEDROOM, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.03 BEDROOM SHEET 1 OF 2, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.03 BEDROOM SHEET 2 OF 2, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.04 HALL SHEET 1 OF 2, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.04 HALL SHEET 2 OF 2, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.05 BEDROOM, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.06 BEDROOM, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.07 BEDROOM SHEET 1 OF 2, prepared by Prime Building Consultants Ltd
- Existing Internal Elevation 1FL-F.07 BEDROOM SHEET 2 OF 2, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.01 LOBBY, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.02 KITCHEN SHEET 1 OF 2, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.02 KITCHEN SHEET 2 OF 2, prepared by Prime Building Consultants Ltd

- Proposed Internal Elevation OFL-G.03 BATHROOM, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.04 UTILITY ROOM, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.05 LOBBY, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.06 WC, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.07 KITCHEN DINING SHEET 1 OF 2, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.07 KITCHEN DINING SHEET 2 OF 2, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.08 CUP'D, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.09 BEROOM, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.09 BEROOM DEMO, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation OFL-G.10 EN-SUITE, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.01 HALL, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.02 BEDROOM, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.03 EN-SUITE, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.04 BEDROOM, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.05 HALL, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.06 BEDROOM SHEET 1 OF 2, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.06 BEDROOM SHEET 2 OF 2, prepared by Prime Building Consultants Ltd

- Proposed Internal Elevation 1FL-F.07 EN-SUITE, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.08 BEDROOM 1 OF 2, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.08 BEDROOM 2 OF 2, prepared by Prime Building Consultants Ltd
- Proposed Internal Elevation 1FL-F.09 EN-SUITE, prepared by Prime Building Consultants Ltd
- Typical Secondary Glazing Detail, prepared by Prime Building Consultants Ltd
- Typical 4 Panel Door Detail, prepared by Prime Building Consultants Ltd

1.7 The Planning Statement is structured in the following way:

- Chapter 2 – Site and Surrounding
- Chapter 3 – Planning Background
- Chapter 4 – Development Proposals
- Chapter 5 – Planning Policy Context
- Chapter 6 – Planning Considerations
- Chapter 7 – Summary and Conclusions

1.8 This Statement should be read alongside all documents submitted for approval (i.e. the set of plans and drawings and any documents specifically required through the use of conditions) or in support of this application.

2. Site and Surrounding

- 2.1 The site falls within the jurisdiction of London Borough of Camden ('LB Camden') which is the Local Planning Authority ('LPA').
- 2.2 The site consists of two, 19th century, two-storey single aspect, terraced residential units. Both buildings have three stories – this planning application and listed building consent applied only to the ground and first floor, which are currently vacant and have deteriorated significantly over the years due its vacant state.
- 2.3 The site falls into the Jeffreys Street Conservation Area (hereafter 'JSCA'), located within Sub Area One of the JCSA, which was first designated in 1985, with Sub Area Two being added on as an extension in 2002.
- 2.4 The site forms part of the Grade II Listed Camden Road Station (List Entry Number 1244154), which is made up of Camden Road Station, nos. 13-23 Bonny Street and 223 Royal College Street.
- 2.5 The total existing floorspace is approx. 210.6sqm (GIA) and is broken down as follows:
 - 13 Bonny Street – 111.1sqm
 - 15 Bonny Street – 99.5sqm
- 2.6 The site is located on a largely residential street, bounded by residential properties to the east, south and west, and is in close proximity to high street commercial uses found on Camden Road to the east. To the north, the site backs onto Camden Road Station's viaduct, which currently forms part of TfL's Overground network and the Grade II listed Camden Road Station.
- 2.7 The site is accessible via the following access points:
 - To the east, main road Camden Road allows for pedestrian and cycle access to Bonny Street.
 - To the west, Camden Street allows for vehicular (as well as pedestrian and cycle) access to Bonny Street.
 - To the north-west, Prowse Place allows for pedestrian and cycle access to Bonny Street.



Figure 1: Site and Surrounding Area (Approx. site boundary added in red by Turley, Source: Google Maps)

2.8 In terms of the surrounds, the site is also immediately adjacent to Regents Canal Conservation Area to the south and Camden Broadway Conservation Area to the east. in close proximity to a number of listed buildings:

- 2-8 Bonny Street (even) and attached railings
- Sainsbury's Supermarkets Ltd. 17-21 Camden Road
- 1-12 Grand Union Walk, Kentish Town Road
- 162-168 Camden Street (even) and attached railings
- 8, 9 and 10 Ivor Street
- 157 and 159 St Pancras Way and attached railings
- 1-6 Greenwood Almshouses, 15 Rousden Street
- 25-28 Randolph Street
- North Road Bridge over the Grand Union Canal

2.9 In addition, the site is approx. 60m west and 80m east of Camden Road and Camden Street, respectively. Both of which are main roads containing retail and commercial uses, and are also main transport links within the area.

- 2.10 Regents Canal lies approx. 60m south of the site, which is a (Metropolitan) Site of Importance for Nature Conservation.
- 2.11 The site is in a highly accessible location, benefitting from a Public Transport Accessibility Level ("PTAL") rating of 6b (the highest rating).
- 2.12 The site is served by several bus routes, and is adjacent to Camden Road Station (Overground lines Richmond – Stratford and Clapham - Stratford), with the station entrance located on the corner of Bonny Street and Camden Road. Camden Town Station (Northern line) is located approx. 350m south-west of the site.
- 2.13 The site is located within Flood Zone 1 (low probability of flooding).

Planning Background

Site Planning History

- 2.14 A review of the LB Camden's planning history records shows no recent applications in relation to the site.
- 2.15 Although no recent application for either full planning permission or listed building consent have been made, it is important to note that a pre-application enquiry and process was entered into back in April / May 2020 albeit no formal response was received. In addition, the pre-application request for was a slightly different proposal which did include external and internal alterations but also included an intensification of the residential use from the two current townhouses to 4no. flats.
- 2.16 Meeting notes from this meeting touched on the following:
- Both properties are in poor condition and works must be applied for [to LB Camden] for both to bring them back into an acceptable condition and able to be occupied as the use they were intended for
 - Removal of any doorways or rearrangement of any windows would be considered contentious by LB Camden
 - Any opportunities to repair or enhance the existing elevations are recommended in order to have a positive contribution to the heritage
 - In relation to the internal works, any listed building consent application should include a full scope of works and ensure plans are providing anything concerning plaster work, flooring, mouldings etc
 - LB Camden confirmed that the conversion from 2no. townhouses to 4no. flats would be resisted
 - In terms of the internal layout, LB Camden confirmed that the existing arrangement is inefficient with a lot of space being lost to circulation areas. Officers confirmed that intervention to listed buildings in terms of internal layout rearrangement can be seen as acceptable as long as they are sensitively considered and meet current building regulations

3. Development Proposals

- 3.1 Full planning permission and Listed Building Consent is sought for the following development:
- 3.2 *“Full Planning Permission and Listed Building Consent for minor internal and external works to the ground and first floors of 13 & 15 Bonny Street, including repairing existing windows, repairing and repointing brickwork, rationalising internal layout to meet current building regulations”*
- 3.3 To elaborate on the previous – the development proposal seeks planning permission and listed building consent for the following:
- Repairing of the windows at No.15 Bonny Street at ground floor level to match those of No.13 Bonny Street.
 - Removing the bars from the main front doors on both properties and making good the doors.
 - In order to ensure 15 Bonny Street is adequately ventilated 4no. air bricks are proposed to the front elevation.
 - A new boiler flue on 15 Bonny Street is proposed on the front elevation to match that of both 13 Bonny Street and 17-19 Bonny Street (show on drawing Proposed Elevation and Sections (ref: 014.2429-007_P4))
 - Rationalising of the internal layout to meet modern standards of living through demolition of deteriorated partition walls and internal remodelling.
 - New staircases in each property is proposed to match the existing, which includes design of the balustrades, rail and newel post.
 - Preservation of deteriorating period mouldings, fireplaces, and details through utilising suspended ceiling (at 1FL), plaster board, repairs and replicating where required (all like for like).
- 3.4 The current condition of the building is not suited for modern living and has deteriorated in previous ownership to the stage where it is not fit for use. Through internal remodelling, and modern standards of living and fire safety, the proposal seeks to bring the vacant properties No.13 and No.15 Bonny Street back into residential use and to secure these 19th century properties for the purpose they were intended for.
- 3.5 Restoration of external features and renovation of the windows will improve upon the current state of the external façade facing Bonny Street. Through repairing the windows and replacing the central window to match that of No.13 Bonny Street, the elevation will read as one.
- 3.6 Further detail can be found in the accompanying Design and Access Statement as well as the Built Heritage Statement.

4. Planning Policy Context

- 4.1 A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are statutory Development Plans which seek to guide the decision making process. Section 38(6) of The Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Development Plan

- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that planning applications be determined in accordance with the Development Plan unless other material considerations indicate otherwise. The adopted Development Plan for the site comprises:

- The London Plan (2021);
- Camden Local Plan (2017); and
- Camden Local Plan Policies Map (2017).

- 4.3 A review of the Camden Plan Policies Map shows that the site is subject to the following designations:

- Jeffreys Street Conservation Area
- Grade II Listed Building (Camden Road Station)
- Flood Zone 1

London Plan (2021)

- 4.4 Policy HC1 (Heritage Conservation and Growth) states that proposals affecting heritage assets and their settings should seek to conserve their significance, by being sympathetic to the asset's significance and appreciation within their surroundings.
- 4.5 Policy D3 (Optimising site capacity through the design-led approach) states that development proposals should be of high quality, with architecture that pays attention to detail and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through the use of appropriate construction methods and attractive, robust materials which weather and mature well.

Camden Local Plan (2017)

- 4.6 Policy D1 (Design) states that the Council will seek to secure high-quality design in development. It adds that proposals for new development will be required to, inter alia, respect local context and character; preserve or enhance the historic environment and heritage assets in accordance with Policy D2; and comprise details and materials that are of high quality and complement the local character.

- 4.7 Policy D2 (Heritage) states that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, and locally listed heritage assets.

Other Material Considerations

National Planning Policy Framework (2023)

- 4.8 The National Planning Policy Framework (updated 2023) is a material consideration in the determination of planning applications.
- 4.9 Whilst the NPPF does not change the statutory status of the Development Plan as the starting point in decision making, the NPPF constitutes the Government’s view of what sustainable development means in practice for the planning system.
- 4.10 The Government’s objective in publishing the framework is to secure a significant culture change in the way planning applications are determined, with a clear presumption in favour of sustainable development, with LPAs proactively driving and supporting sustainable economic development to deliver the homes, business and industrial units, and infrastructure the country needs.
- 4.11 At the heart of the NPPF and wider Government guidance is the presumption in favour of sustainable development which is considered to represent a ‘golden thread’ that runs through both plan-making and decision-taking.
- 4.12 Paragraph 202 of the NPPF states that:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

National Planning Practice Guidance (PPG) (2021)

- 4.13 The PPG supplements those overarching objectives of the NPPF. Those elements of the PPG that are considered most pertinent in the determination of this planning application relate to enhancing and conserving the heritage asset and the importance of good design.
- 4.14 Historic Environment PPG (Paragraph: 015 Reference ID: 18a-015-20190723) states that:

“If there is only one viable use [of a site], that use is the optimum use.”

- 4.15 Historic Environment PPG (Paragraph: 016 Reference ID: 18a-016-20190723) states that:

“Where a heritage asset is capable of having a use, then securing its optimum viable use should be taken into account in assessing the public benefits of a proposed development.”

Supplementary Planning Guidance (SPGs) and Documents (SPDs)

4.16 In addition to the Development Plan, the following planning policy and guidance are important material considerations:

- Jeffrey's Street Conservation Area Statement (2003) and
- Camden Design Camden Planning Guidance ('CPG') (2021).

5. Planning Assessment

Principle of Development (External and Internal Alterations)

- 5.1 The proposals seek Listed Building Consent and full planning permission for a range of internal and external alterations which will bring back into use these currently vacant and degrading residential properties. All the works proposed are sensitive to the listed features and the surrounding heritage whilst also ensuring they are compliant with up-to-date building regulation standards and fire safety standards.
- 5.2 In line with London Plan Policy HC1 and Local Plan Policy D2, this proposal seeks to restore external features and renovate the windows with careful consideration the significance of the site, therefore enhancing the building as a heritage asset. Furthermore, through remodelling the interior to bring it to modern standards of living and fire safety, this proposal aims to bring an otherwise vacant site back into residential use, as originally intended.
- 5.3 The proposed external works are designed with the intention of preserving the character and significance of the site. New or replacement features will be like for like in materiality, such as the windows, security bars and the plinth of no. 13. New external features, such as the new boiler flue on no. 15, are rationalised through their design, which aims to replicate that of no. 13, thus reinstating the rhythm of the terrace. The addition of four air bricks on the front elevation of no. 15 are done in order to ensure adequate ventilation, in turn enhancing the liveability of the property, all in line with London Plan Policy D3 and Local Plan Policy D1.
- 5.4 The design also considers the importance of the site as a heritage asset and listed building – the proposal looks to preserve original features, namely period mouldings, fireplaces and details, via the utilisation of the first floor suspended ceiling, plaster board, repairs, and (where required) replicas, all like for like. The staircases will be replaced, but the design aims to match the existing, in terms of the balustrades, rail and newel post. This proposal will enhance the site as a Listed Building and a heritage asset through external changes, and will bring it back to its original use via internal changes, thus on a wider scale preserving the character and appearance of the conservation area.
- 5.5 Changes to the internal structure are justified and done in a way that optimises the preservation of internal historical features whilst bringing them to a standard in which the properties themselves will be able to be used as residential units. It is considered that the harm done by the external works to the significance of the heritage assets in question is less than substantial.
- 5.6 Considering both the internal and external works, this proposal is in line with London Policy HC1(C) and Local Plan Policy D2, as this proposal strongly considers the need to preserve the character of the site, seen in its design.
- 5.7 The proposal will allow the site to be reactivated to its intended residential use whilst having high regard to the importance of maintaining its townhouse character – this proposal does not have the purpose of allowing conversion of the site into multiple

residential units. Taking the previous into account, this option can be considered as *likely to cause the least harm to the significance of the listed building*.

- 5.8 Furthermore, restoring the site to residential use is a both a public benefit and a benefit for the JSCA which should not be overlooked.

Sustainability

- 5.9 Local Plan para. 7.62 states that *proposals that reduce the energy consumption of listed buildings will be welcomed provided that they do not cause harm to the special architectural and historic interest of the building or group*.
- 5.10 Para. 10.7 of Camden Planning Guidance: Energy Efficiency and Adaptation (2021) encourages development to consider active cooling via features such as natural and passive ventilation. Similarly for energy efficiency, para. 8.23 of the same CPG encourages minor interventions to heritage assets which do not have a significant impact on its importance, such as provision of flue dampers and draught-sealing doors and windows.
- 5.11 Although this proposal does not propose any new floorspace nor an intensification of use it has reviewed how to make a betterment to its energy efficiency. For example, fabric improvements have been made to improve energy efficiency of the site, such as integration of features mentioned in examples in the previous paragraph, and a high efficiency heating system has been specified.
- 5.12 More details on said installations can be found in the Design and Access Statement and the Sustainability Statement.

Fire Safety

- 5.13 The proposals are supported by a Fire Safety Strategy Statement which are produced in accordance with London Policy D12 (A), which requires all development proposals to achieve the highest standards of fire safety for all buildings users.
- 5.14 Subsequently, the proposals are considered to fully accord with London Plan Policy D12 (Part A) in this regard.
- 5.15 Please see the accompanying Fire Strategy for further detail.

6. Summary and Conclusions

- 6.1 This planning application seeks full planning permission and Listed Building Consent for the following development:

"Full Planning Permission and Listed Building Consent for minor internal and external works to the ground and first floors of 13 & 15 Bonny Street, including repairing existing windows, repairing and repointing brickwork, rationalising internal layout to meet current building regulations."

- 6.2 This Planning Statement has demonstrated how the proposals have been developed in consideration of the planning and surrounding context and are considered to be in accordance with the National Planning Policy, London Plan Camden Local Plan and other relevant documents relevant to the Conservation Area and the Grade II Listed Building in question.
- 6.3 The proposed external works will restore the deteriorating condition of the site, thus strengthening its significance as a heritage asset and a Grade II listed building. The proposed internal works will bring the site to modern standards of living and fire safety, allowing for the reactivation of the site's intended residential use.
- 6.4 The alterations of the site's original features will be carried out respectfully, with works designed to minimise impact on the site's significance as a heritage asset.
- 6.5 The main case for this application is to bring the site back into use through design that is highly considerate of the site's value as a heritage asset. This application does not look to change the use of the site, nor does it look to intensify its original use by creating multiple residential units within each.
- 6.6 In summary, the proposals for the site are considered to be in accordance with PPG and the planning policies of the NPPF, London Plan, Camden Local Plan and other relevant documents, and we therefore respectfully request that planning permission and Listed Building Consent is granted.

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