



**Regent's Park Road Hotel**

**155 – 157 Regent's Park Road, London, NW1 8BB**

**Planning Statement (Including Draft Heads of Terms)**

**Uchaux Ltd**

**July 2019**

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## **APPENDICES**

1. ROUNDHOUSE NOTE
2. CUSHMAN AND WAKEFIELD CAMDEN OFFICE MARKET LETTER

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## 1. INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Limited on behalf of Uchaux Ltd (the “Applicant”) in support of an application for the redevelopment of 155 - 157 Regent’s Park Road, London, NW1 8BB (the “Site”), within the London Borough of Camden (“LBC”).

1.2 The Proposed Development is as follows:

*“Redevelopment to provide a basement (2 levels), ground plus 7-storey building comprising a retail unit at ground, a hotel and single residential unit on the upper floors, with associated works.”*

1.3 It is proposed that the hotel will be linked and work in partnership with the Roundhouse. The Roundhouse is a well-established arts and culture venue located in Camden, in close proximity to the Site. It welcomes almost 500,000 people to a range of arts programming and music gigs as well as private and public commercial events. On top of this, it is also a charity providing support to marginalised 11 to 25 year olds in the community through creatives studios onsite and community collaborations with schools. This charity programme is set to increase and to support this, the Roundhouse will be expanding its footprint with a new building and include studio spaces for young creatives and co-working space to support young entrepreneurs in the creative industry.

1.4 The Roundhouse is supportive of plans for the building of a hotel in the Chalk Farm neighbourhood. It considers there are limited options for hotels in the area and a new hotel would support its activities. In terms of a partnership, the Roundhouse proposes to work with the hotel to create themed food and beverage packages to enhance the guest experience at both the hotel and Roundhouse and provide promotional ticket incentives for hotel staff and guests. It is also recognised that there is an opportunity to work with the hotel

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to support professional development programmes for young people. Please see supporting note from the Roundhouse at Appendix 1.

1.5 This Planning Statement is structured as follows:

- Section 2 - Site Context
- Section 3 – Planning History
- Section 4 – Pre-application Discussions and Public Consultation
- Section 5 – Application Proposals
- Section 6 – Planning Policy Framework
- Section 7 – Planning Assessment
- Section 8 – S106 Draft Heads of Terms
- Section 9 – Conclusions

1.6 In addition to this Planning Statement, the application is submitted with the following supporting documents:

- Application Form (Including Ownership certificates and notices);
- CIL Additional Information Form;
- Location Plan (Prepared by Piercy & Co.);
- Existing and Proposed Drawings (Prepared by Piercy & Co.);
- Design and Access Statement (Prepared by Piercy & Co.);
- (Built) Heritage, Townscape and Visual Impact Assessment (Prepared by Montagu Evans) ;

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- Noise and Vibration Report (Prepared by Cundall);
  - Basement Impact Assessment (Prepared by LBH Wembley Engineering);
  - Daylight and Sunlight Assessment (Prepared by Point 2 Surveyors);
  - Flood Risk Assessment and SuDs Strategy (Prepared by LBH Wembley Engineering);
  - Arboricultural Impact Assessment (Prepared by Landmark Trees);
  - Air Quality Assessment (Prepared by Cundall);
  - Energy and Sustainability Statement (Prepared by Cundall);
  - Transport Assessment (Prepared by WSP);
  - Framework Travel Plan (Prepared by WSP);
  - Delivery and Servicing Management Plan (Prepared by WSP);
  - Outline Construction Logistics Plan (including CMP proforma) (Prepared by WSP);
  - Waste Management Strategy (Prepared by WSP);
  - Health Impact Assessment (Prepared by Trium);
  - Crime Impact Assessment (Prepared by Cundall);
  - Economic Impact Assessment (Prepared by Volterra);
  - Employment and Skills Strategy (Prepared by Volterra);
  - Office Demand Letter (Prepared by Cushman & Wakefield);

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- Hotel Needs Assessment (Prepared by Whitebridge); and
  - Statement of Community Involvement (Prepared by Kanda).

1.7 This Planning Statement should be read in conjunction with the above documents.

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## **2. SITE CONTEXT**

### **The Application Site**

- 2.1. The Site comprises an existing four-storey building at the junction of Regents Park Road, Haverstock Hill and Adelaide Road. The existing building was developed in the early 1980s in a mock-Victorian style that references the Adelaide Tavern that was demolished as part of the redevelopment.
- 2.2. The building is understood to have been built at the same time as the ‘wing buildings’ at 5-13 Adelaide Road and 151 Regents Park Road adjacent to the Site. The Site does not include these adjacent ‘wing buildings’. Numbers 5-13 Adelaide Road comprise a three-storey building with retail at ground and residential above. The adjacent building at 151 Regents Park Road comprises a three-storey residential building which is detached from the Site. There is a rear yard behind the buildings which provides car parking spaces associated with the adjacent residential buildings.
- 2.3. The building fronts Haverstock Hill and is set back from the main road by an area of underutilised public realm comprising an existing tree, concrete seating and a public toilet. There is a dedicated bay for motorcycles, mainly used by motorcycles associated with the existing A5 unit at ground floor within the public realm.
- 2.4. The Site comprises a mix of uses including three commercial units comprising (A1, A3 and A5 Class Uses) at ground and lower ground floor with low quality office accommodation at first and second floors above and a single residential unit on the top floor.

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### **Site Designations**

- 2.5. The Site is located within the Chalk Farm Neighbourhood Centre. The Neighbourhood Centre is located adjacent to, but outside, the Camden Town Centre.

### **Surrounding Context**

- 2.6. The Site is not located within any Conservation Area but is in close proximity to the Primrose Hill, Eton and Regents Canal Conservation Area. The Site is located to the south of the Grade II Listed Chalk Farm Station at the corner of Adelaide Road and Haverstock Hill. The Site is located to the north of the Roundhouse Arts venue which is a Grade II\* Listed Building.
- 2.7. The surrounding area is characterised by a dense urban environment.

### **Public Transport Connections**

- 2.8. The Site is located adjacent to Chalk Farm Station providing access to the northern line and has a PTAL level of 6a (Excellent). The Site is well served by a number of regular bus routes to the surrounding areas.



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### **3. PLANNING HISTORY**

#### **The Site**

- 3.1. There have been a number of minor applications associated with the Site and its existing operations. The following applications (none of which have been implemented) are however of the most relevance to the proposals.
- 3.2. Prior Approval (ref. 2015/2926/P) was granted on 28th July 2015 for *“Change of use of 1st and 2nd floors from office use (Class B1) to provide 10 studio flats (Class C3)”*.
- 3.3. Prior Approval (ref.2014/3253/P) was granted on 3rd July 2014 for *“Change of use of 1st and 2nd floors from office use (Class B1) to provide 2 x 2-bed and 2x 3 -bed residential units (Class C3).”*

#### **Surrounding Planning History**

- 3.4. There have been a number of planning approvals for redevelopment in the surrounding area as identified below.

#### ***18-22 Haverstock Hill***

- 3.5. Planning Permission (ref. 2018/2179/P) was granted on 28<sup>th</sup> January 2019 for *“Demolition of existing buildings and ancillary structures (11 flats, A1 unit, A5 unit) and construction of a new building comprising ground plus basement and five upper floors for use as 29 no. dwellings (Class C3) and flexible Class A1/A2/A3/A4 together with cycle parking, landscaping, refuse and associated works.”* This development is not yet underway however the applicant is engaging with LBC to discharge conditions.

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### **5-17 Haverstock Hill**

- 3.6. Planning Permission (ref. 2016/3975/P) was granted on 2<sup>nd</sup> October 2018 for *“Demolition of existing building and erection of a part-six, part-seven storey development comprising 77 residential units (8 x studio, 18 x 1-Bed, 32 x 2-Bed and 19 x 3-Bed units) (Use Class C3) and retail (Use Class A1-A5) use at ground floor with associated cycle parking, amenity space, refuse and recycling store and associated works.”* This development is not yet underway.

### **4-8 Haverstock Hill (Marine Ices) & 45-47 Crogsland Road**

- 3.7. Planning Permission (ref. 2015/0487/P) was approved on 22<sup>nd</sup> December 2016 for *“Demolition of existing buildings, with retention of facade at 45-47 Crogsland Road and construction of a part 4/part 5 storey building with basement comprising flexible use of cinema (class D2) at basement and ground level with ancillary restaurant and bar (class A3/A4) at ground level or retail class (class A1 at basement and ground floor level and 19 residential dwellings (8 x 1 bed, 9 x 2 bed and 2 x 3 bed units) on upper floors with associated cycle parking, amenity space and refuse and recycling storage.”* This development is underway.

### **Roundhouse Theatre, Chalk Farm Road**

- 3.8. Planning Permission 2016/5761/L was granted on 16<sup>th</sup> August 2018 for *“The erection of a new building ranging from two to four storeys in height to accommodate new studios (Class D1) and offices (Class B1) within the service yard and the addition of a sixth storey to the existing 'container' office building for office accommodation (Class B1) together with installation of rail side storage containers and associated works within the service yard area.”* This development is not yet underway.

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***100,100a and 100b Chalk Farm Road***

- 3.9. Planning Permission (ref. 2013/5403/P) was granted on 27th March 2015 for “Redevelopment of site to create a mixed-use development comprising 57 market flats (13x1beds, 28x2beds and 16x3beds), 6 affordable flats (3x3 bed social rented, 3x1 bed intermediate), new office, retail and restaurant units with associated works to highways and landscaping; following demolition of existing buildings and car park.” This development is not yet underway.

***Camden Goods Yard***

- 3.10. Planning Permission (ref. 2017/3847/P) was granted on 7<sup>th</sup> July 2017 for a major mixed-use development at Camden Goods Yard, including a range of buildings up to 14 storeys comprising a food store, petrol filling station, flexible retail/food & drink floorspace, office floorspace up to 573 homes, a community centre; together with new streets and squares, hard and soft landscaping and play space. This scheme is not yet progressed but will have a transformational effect on this part of Camden when underway.

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#### **4. PRE-APPLICATION DISCUSSIONS & CONSULTATION**

- 4.1. The applicant first engaged in pre-application discussions (email correspondence and a meeting) with LBC officers in May 2018. The proposals at that stage comprised a part 10 storey hotel building, with lower shoulders facing Adelaide Road (7 storey) and Regents Park Road (4 storey).
- 4.2. After this meeting, LBC presented the pre-application proposals to their internal major cases conference and provided the following feedback via email dated 25<sup>th</sup> May 2018:
- Loss of residential unit and office floorspace unacceptable.
  - A proportion of residential would need to be brought forward with a hotel.
  - Would expect to see a reduction in height – 6 to 7 storeys could be supported.
  - Need to look at traditional materials.
  - The developer should also be aware that major improvement works are planned for the junction outside Chalk Farm Road.
- 4.3. A formal pre-application advice letter was provided by LBC on 11<sup>th</sup> July 2018. It confirmed officers' continued concerns with respect to the single land use proposed, the loss of residential and offices and the scale of the proposal in both its immediate and emerging context.
- 4.4. The advice concluded that without reconsideration of the land use proposals to include self-contained housing there would be limited prospect of receiving officer support for redevelopment of the Site. Once an appropriate mix of use is agreed, there may be some scope for reviewing the mass and height, albeit within the significant townscape and heritage context.

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4.5. Following this meeting, the design team progressed with various options for the Site to present to officers and further heritage and townscape analysis was undertaken. A follow-up pre-application meeting took place in September 2018. A summary of the feedback received is set out below:

1. The option to redevelop the 'wing buildings' as a comprehensive redevelopment was queried by officers. The applicant confirmed that the buildings have long leases of over 125 years which mean that there is no prospect of bringing these buildings forward together.
2. Officer's queried the quality of the existing office floorspace. It was confirmed that the existing landlord uses part of the office for admin accommodation and the rest is on short term lets at low rents reflective of the low quality floorspace.
3. Officers noted that their priority land use is for residential across the Borough. It was noted that prior approval consent was granted for the change of use of the Site from office to 10 residential units which has not been implemented. There was no associated affordable housing offer. There is a specific concern with providing residential in this location due to the adjacency to the Roundhouse Arts venue and its associated operations.
4. The applicant has a signed agreement to be the official hotel provider for the Roundhouse due to the pressing need to provide accommodation nearby.
5. It was confirmed that the existing residential unit at fourth floor would need to be re-provided in redevelopment proposals.
6. Officers noted that the loss of office, re-provision of residential, provision of hotel outside a town centre and provision of residential would need to be addressed.

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- 4.6. Kanda Consulting was commissioned by the applicant to develop and implement an engagement strategy for the Site with community and political stakeholders in LBC. This engagement process undertaken is set out in the Statement of Community Involvement submitted in support of this planning application. This included two separate public consultation events.
  - 4.7. An initial public consultation event was held on 14<sup>th</sup> of May 2019 where 23 people attended. The general response was one of support for the Proposal.
  - 4.8. A further pre-application meeting took place in May 2019 following the positive initial public consultation exercise. Officers concluded that *“a hotel would be acceptable on site if the lost employment and housing floorspace are compensated for and the uplift in commercial matched by housing.”* It was noted that a PiL might be accepted against the uplift in commercial floorspace.
  - 4.9. A further public consultation event was held on 8<sup>th</sup> July 2019 and 27 people attended. This consultation suggested continued support for the principles of the development. Attendees demonstrated a general belief that they had helped shape the scheme.

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## 5. APPLICATION PROPOSALS

5.1. This application is for full planning permission comprising the redevelopment of the Site to provide a basement (2 levels), ground plus seven storey building comprising a 70-bedroom hotel and a single residential unit (2 bed 4 person) above. At ground floor, the proposals also comprise a replacement retail unit and ancillary food and beverage offer, and workspace associated with the hotel, along with refuse and servicing on Regent's Park Road. The proposals involve the demolition of the existing building on the Site and indicatively propose improvement works to the public realm to the front of the Site<sup>1</sup>.

5.2. The quantum of floorspace proposed is set out below:

Land Use	Proposed new floorspace (GIA)
Hotel (C1 Class Use)	1,846 sqm
Residential (C3 Class Use)	111 sqm
Retail (A1 Class Use)	59 sqm

5.3. The application seeks planning permission for:

*“Redevelopment to provide a basement (2 levels), ground plus 7-storey building comprising a retail unit at ground, a hotel and single residential unit on the upper floors, with associated works.”*

### **Hotel**

5.4. The proposals comprise a 70-key hotel with rooms accommodated at lower ground and first to seventh floors. The hotel will be the official hotel linked to the Roundhouse and will be a mid-price point, 4-star boutique hotel. The hotel rooms will follow the microhotel model with a high-quality fit out allowing

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<sup>1</sup> To be agreed with LBC through a s278 agreement as outside of the applicant's ownership and the application boundary.

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these to be provided at a mid-price point. The ground floor of the hotel will comprise a food and beverage offer as well as casual workspace which will be publicly accessible.

### **Residential**

- 5.5. The proposals comprise the re-provision of an existing residential unit at 8<sup>th</sup> floor. The unit proposed is a two-bedroom 4-person penthouse unit extending to 111 sqm GIA. Access to the residential unit will be from within the hotel, utilising the same lift and stair core, which will be carefully managed.
- 5.6. Private amenity space associated with the residential unit is proposed at 7<sup>th</sup> floor roof level which is accessed from the 8<sup>th</sup> floor via a staircase, which could be adapted for accessibility purposes. It totals 18.6 sqm, which exceeds the relevant amenity space standards.

### **Public realm works**

- 5.7. The proposals include enhancement and improvement work to the front of the Site on Haverstock Hill. This area is outside of the Site red line boundary and is outside of the applicant's ownership/control and therefore indicative proposals only are shown at this stage.
- 5.8. It is the applicant's intention to secure and fund the public realm works as part of the S106/s278 Agreement as set out within the draft Heads of Terms at Section 8 of this Statement.

### **Parking and Servicing**

- 5.9. The hotel is well served by public transport, therefore no car parking is proposed for the hotel. A single disabled car parking space is proposed in place of the existing motorcycle bay within the public realm (which is mainly used by



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motorcycles connected with the existing A5 unit and has been assessed as surplus to requirements). A secure, covered cycle store is proposed within the rear courtyard providing 5 long stay cycle bays for the hotel. 4 short stay cycle parking spaces will be provided alongside the front façade to be easily accessible for visitors.

- 5.10. The residential unit is proposed to be car-free, in accordance with the LBC and London policies on car-free development in accessible locations. A dedicated cycle store for the residential unit is proposed within 3 cycle spaces provided.

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## **6. PLANNING POLICY FRAMEWORK AND OVERVIEW**

- 6.1. This section provides a brief summary of the key planning policies relevant to the Site and its redevelopment.
- 6.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.3. In this instance, the Development Plan for the Borough comprises:
- The London Plan (March 2016); and
  - Camden Local Plan (2017).
- 6.4. The Development Plan is supported by the following Supplementary Planning Documents which are material considerations in the determination of planning applications: CPG 1 Design (updated March 2018); CPG 2 Housing (Updated March 2018); CPG 3 Sustainability (updated March 2018); CPG6 Amenity; CPG 7 Transport (September 2011); CPG 8 Planning obligation (Updated March 2018); CPG Employment sites and business premises; CPG Planning obligations (updated March 2018); CPG Town centres and retail.
- 6.5. The Revised National Planning Policy Framework (NPPF) was published in July 2018. The NPPF sets out the Government's economic, environmental and social planning policies.
- 6.6. At the heart of the NPPF is a presumption in favour of sustainable development, which should be applied to both the plan-making and decision-taking process. This means approving development proposals that accord with the development plan without delay, and where the development plan is absent, silent, or out-of-date, granting permission unless the adverse impacts

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of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

### **Emerging Planning Policy**

- 6.7. The Draft London Plan, Consolidated Suggested Changes Version was published in July 2019. It shows all of the Mayor's suggested changes following the Examination in Public (EiP) of the draft Plan earlier this year. It is a material consideration in the determination of this planning application and given its advanced stage significant weight should be attributed to this document.
- 6.8. It is scheduled to be adopted in late 2019.
- 6.9. The key relevant policies of the adopted and Emerging Development Plan are set out below:

#### **The London Plan (2016)**

- Policy 4.5 – London’s Visitor Infrastructure
- Policy 7.6 - Architecture

#### **The Draft London Plan (2019)**

- Policy E10 Visitor infrastructure
- Policy D1 London’s form and characteristics
- Policy D2 Delivering good design

#### **The Camden Local Plan (2017)**

- G1 Delivery and location of growth
- H2 Maximising the supply of self-contained housing from mixed-use schemes
- C5 Safety and security
- C6 Access for all
- E1 Economic development

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- E3 Tourism
  - TC4 Town centre uses
  - A1 Managing the impact of development
  - A2 Open space
  - A3 Biodiversity
  - A4 Noise and vibration
  - D1 Design
  - D2 Heritage
  - D3 Shopfronts
  - CC1 Climate change mitigation
  - CC2 Adapting to climate change
  - CC3 Water and flooding
  - CC4 Air quality
  - CC5 Waste
  - T1 Prioritising walking, cycling and public transport
  - T2 Parking and car-free development
  - T3 Transport infrastructure
  - T4 Sustainable movement of goods and materials

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## **7. ASSESSMENT OF THE PROPOSALS**

- 7.1. This section provides an overview of specific considerations in respect of the proposed development. It assesses the acceptability of the proposal against the planning policy context and other material considerations.

### **The Principle of Redevelopment**

- 7.2. The existing building dates back to the 1980s and is in need of significant internal refurbishment to bring it up to modern standards. Due to the age of the building and the low-quality accommodation that it provides, it is considered that it is more efficient to redevelop the building to optimise the Site.
- 7.3. The exterior of the building is not considered to comprise any architectural merit and is not listed or locally listed. The Site therefore provides an important opportunity to construct a high-quality building in this location.
- 7.4. Paragraph 117 of the NPPF confirms that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 7.5. Local Plan Policy G1 (Delivery and location of growth) states that LBC will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting development that makes the best use of the site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and other considerations relevant to the Site. It confirms that development that makes inefficient use of Camden's limited land will be resisted.

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- 7.6. The proposed Site is located in a prominent, highly-sustainable, position at the junction between Regents Park Road, Adelaide Road and Haverstock Hill and is in a generous setting, well set back from the junction by an area of public realm. As such the proposals which comprise a building of ground plus seven storeys which is of high quality design is considered to be appropriate in this context and is considered to optimise the use of the Site.
- 7.7. LBC through pre-application consultation have raised no issues in relation to the demolition and redevelopment of the Site, therefore it is considered that the acceptability of this is agreed in principle.

#### **Loss of Office Floorspace**

- 7.8. The existing building comprises 320 sqm of low quality office floorspace and is let on short term basis at a price point that reflects the quality of the space. The existing floorspace is not comparable to the standard of office accommodation elsewhere in the local area.
- 7.9. Nevertheless, Local Plan Policy E2 of the Local Plan seeks to protect premises that are suitable for continued business use (B class), in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the CAZ or local economy.
- 7.10. It is recognised that the proposals do not protect the existing B class floorspace on the site, but it is submitted that there are a number of material considerations which outweigh this.

#### *Employment generating space*

- 7.11. The purpose of Policy E2 is that *“The Council wants to encourage the development of a broad economic base in the borough to help meet the varied*

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*employment needs, skills and qualifications of Camden's workforce". In addition, Policy E2 expressly states that the intent is to protect "businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy".*

7.12. Local Plan Policy E1 (the Council's primary economic growth policy) directs new office development to growth areas, Central London, and the town centres: the Site is not located in any of these areas.

7.13. Policy E1 recognises the importance of non B-class employment generating uses, including retail, education, health, markets, leisure and tourism. This is backed up in the supporting text to the Local Plan which states at paragraph 5.33 that:

a. *"Camden's visitor economy provides around 16,500 jobs in the Borough, 10% of all tourism related employment in Inner London and is worth £566 million per annum". It is considered that these figures have increased since the Local Plan evidence base was produced in 2009.*

b. *"Jobs are provided by many types of uses within the borough, not just those based in offices or industrial premises. These include shops and markets, hotels and restaurants, leisure and tourism use, as well as knowledge-based sectors such as health and education".*

7.14. It is therefore clear that when read as a whole, the primary aspiration of Policies E1 and E2 is for economic growth which will benefit local residents and the local economy. Whilst the business floorspace will be lost from the Site, there will be an increase in employment generating floorspace by virtue of the hotel and retail development, which as per Policy E2 will support the local economy and provide employment to local residents.

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7.15. The Economic Impact Assessment (EIA) prepared by Volterra Partners confirms that the proposal is expected to support 35 full time equivalent (FTE) jobs, 10 more than the existing 25 FTE jobs, and the applicant has also committed to an Employment and Skills Strategy, prepared by Volterra Partners and to be agreed with LBC. This includes:

- Meeting the Construction Industry Training Board (CITB) benchmark regarding the number of construction roles advertised through local employment vehicles (King’s Cross Construction Skills Centre);
- The recruitment of one construction apprenticeship for every £3 million in build costs;
- Agreement to the Camden Local Procurement Code;
- Living Wage commitments; and
- Local employment targets.

7.16. It is also proposed that the ground floor hotel space will be publicly accessible and used by professionals and entrepreneurs as flexible workspace. This will be encouraged through the provision of tables and chairs, internet access and laptop charging points. This type of innovative floorspace is encouraged by paragraph 5.9 of the Council’s Local Plan.

7.17. The proposed Hotel will also bring other economic benefits to the local economy as set out in the EIA including:

- a. 55 jobs on-site over the 18-month demolition and construction phase.
- b. £130,000 construction work spend in the local economy.
- c. Workers at the proposal during operational stage are estimated to spend £25,000 in the local area each year.
- d. Guests staying at the Proposed Development’s hotel are estimated to spend a total of £3.2 million outside of the site annually.



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- e. After accounting for multiplier and displacement effects, alongside the induced employment from visitor expenditure, the Proposed Development is estimated to support circa 85 net additional jobs across London.
  - f. The Proposed Development would support a total of £1.8 million in annual GVA. It is expected that this would result in additional tax revenues of up to £735,000 each year.

#### *Loss of Office floorspace*

- 7.18. Cushman and Wakefield (see letter at Appendix 2) have assessed the Camden office market and confirm that there is currently an over-supply of office space in Camden against demand. In particular there is little demand for low quality office space. They conclude that the removal of the existing space on site from the market would have a very limited impact on the Camden office market dynamic and supply. The loss of the current office floorspace from the Site would therefore overall have a negligible impact on the local economy.
- 7.19. There is already significant office floorspace in the pipeline for Camden as part of large mixed use development proposed in the vicinity of the site, including at: Camden Goods Yard; 100 Chalk Farm Road and the Roundhouse. It is considered that these sites are better placed to provide new office floorspace.
- 7.20. As set out within Camden's Employment Sites and Business Premises CPG (March 2018), developments which result in the loss of office space will be required to provide a payment in lieu to overcome this. As noted, the proposals will result in the loss of office space, however this will be replaced by employment generating floorspace so there will be no net loss of jobs. However, as mentioned above in order to off-set the loss of the office floorspace, a payment in lieu (£500k) is also offered towards affordable workspace off-site which will contribute towards Camden's strategic objective

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of delivering 695,000sqm office floorspace during the plan period to 2031. It is intended that this funding will be aimed at an organisation that supports start-ups, small and medium-sized enterprises and training and apprenticeships.

7.21. A number of local initiatives have been considered to benefit from the contributions, including the Roundhouse and the social mobility projects run by One Housing Group at Arlington.

7.22. As set out earlier, the Roundhouse is not just an entertainment venue, it is also a charity providing support to marginalised 11 to 25 year olds in the community through creatives studios onsite and community collaborations with schools. This charity programme is set to increase and to support this, the Roundhouse will be expanding its footprint with a new building and include studio spaces for young creatives and co-working space to support young entrepreneurs in the creative industry. In these terms, there is clear opportunities through the proposed partnership to support professional development programmes for young people.

7.23. The applicant has also been in touch with David Leeves who runs the social mobility department for One Housing Group in Camden. The social mobility department provides all the 'non-housing' services which help the residents and families in One Housing Group's care achieve their full potential.

7.24. They provide employment support and training programmes; and support new business start-ups and 'social economy partners' based at Arlington, who support a wider work in tackling homelessness. They have a partner (Haptivate) on site as a start-up who are operating in the health and well-being field who provide free services to their residents to help build confidence, motivation and self-esteem, the 'soft skill set' needed to get people back into work and to live independently and successfully. Mr Leeves has suggested that

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funding from the planning application could support a number of initiatives in their social mobility department, including:

- Haptivate: supporting a new business start-up – business development & promotional activity, office/studio running costs, business rates etc - £50kpa (up to 5 years)
- Training programme: operated and delivered on-site by One Housing – for a dedicated co-ordinator and engagement work across Camden Homeless Pathway £37kpa
- Creative Space: Arts programme for Arlington / Pathway residents, additional tutor capacity, materials and exhibition resources - £25kpa
- Office apprenticeships: Business Administration position within the team - £25kpa

7.25. However ultimately, the benefactors of this contribution will be agreed with LBC during the determination of the planning application.

7.26. In conclusion, the proposed contribution towards affordable workspace in the Borough, together with the employment generating nature of the hotel, is considered to be a significant benefit compared to the existing provision. A significant financial contribution towards providing new higher quality, affordable employment floorspace in the Borough is considered to off-set any loss of existing low quality floorspace and would be a significant benefit to the scheme. It should also be noted that the applicant would be able to re-apply for prior approval to convert the space out of office use (either to residential space on a permanent basis or to retail or community space for a three-year period) which would also remove the Site from office use, but without the benefits proposed.

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## **Principle of the Proposed Hotel**

- 7.27. Policy 4.5 of the London Plan sets a target for 40,000 net additional hotel rooms by 2036 and the proposals will contribute to this aspiration. As identified within the draft London Plan, visitor numbers in London are expected to continue to increase and the proposals will contribute to a much-needed demand within Central London. The supporting text of draft London Plan Policy E10 estimates that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum. This is a significant increase from the existing hotel bedroom targets.
- 7.28. The Site is located in a Neighbourhood Centre, across the road from the Camden Town Major Town Centre boundary and in a highly accessible location in PTAL 6a opposite an underground station. It is therefore considered that the Site provides a good opportunity for hotel development. Officers at LBC acknowledged during pre-application discussions that a hotel could be acceptable on the Site, provided any loss in housing and office space is resolved through re-provision or payment in lieu.
- 7.29. In this instance, the existing residential unit is re-provided as part of the planning application and an offsite contribution to affordable workspace is offered to compensate for the loss of the existing office floorspace.
- 7.30. A Hotel Needs Assessment has been prepared by Whitebridge to support the planning application. This concludes that:
- London is one of the most visited cities in the world and is home to a wealth of world class attractions and events LBC is an established tourist location within London and home to many of the city's leading attractions.

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- Supply of existing hotels in LBC fell in 2017/18 and future growth currently looks limited, particularly in the Camden Town area of LBC.
  - The Site under consideration has many strengths owing to its strategic location between the tourist nodes of Hampstead and Camden Town, and the proposed concept as a 'micro' hotel means that it should fill a gap.
  - Within LBC, supply has fallen and future growth in supply is limited, and yet the Borough has strong appeal within sources of overnight serviced accommodation demand, especially within the Camden Town area, indicating that the strength of demand in the local area should be sufficient to absorb the project under consideration (an area in which there are few such concepts/units in the immediate vicinity).
  - At a more micro level, we have been aware that the Roundhouse is keen to see a quality, good value hotel in its vicinity, as visitors to the events venue often struggle to find suitable overnight hotel accommodation in the vicinity. With further plans to improve Roundhouse and extend its facilities and range of support services for young, aspiring, entertainment entrepreneurs, the need for an appropriate hotel nearby will be even greater.
  - Thus, the proposed hotel will not only meet the needs of leisure visitors generally to the area, but it will also underpin and support the social and nurturing goals of Roundhouse and the Roundhouse Trust within LBC and beyond.

7.31. The EIA prepared by Volterra Partners also acknowledges the need for hotel development. It confirms that:

- London is one of the world leading destinations for both leisure and business visitors, ranking 2nd in the world by the Mastercard 2018

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Global Destination Cities Index for the total number of international visitors.

- In 2017, 19.8 million international overnight visitors stayed a total of 114 million nights in the city. The number of visits to London has grown by 71% between 2002 and 2017 whilst the number of nights stayed has also increased by over 50%.
- Spending by international visitors in London is a significant contributor to the regional and national economy, with international visitor spending totalling £14bn in 2017. Remarkably, the level of expenditure has increased by 134% over the same 15-year period. This suggests that London's international visitors are visiting more often, for longer, and spending much more than they were in 2002.
- London also attracts a significant number of domestic visitors. In 2017 domestic visitors accounted for 20% of all visitor nights spent in London, as well as 16% of all visitor expenditure.
- In total the direct expenditure from domestic and international overnight visitors to London in 2017 stood at £16bn, equating to 4% of the total output for the region.
- GLA Economics forecasts that the total number of nights stayed in London by visitors will increase by 58 million over the period 2015-2041, corresponding to a total increase of 42% and an average annual increase of over 2 million nights stayed in the city
- The 42% increase in visitor demand forecast over the period 2015-2041 by GLA Economics is predicted to require a net additional 58,140 serviced accommodation rooms across London to meet this demand. This requirement for additional hotel rooms corresponds to an average net completion rate of 2,236 rooms annually across the region.
- There is a strong argument to be made that in order to maintain the positive economic benefits that tourism and business visitors bring to

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London, growth in the accommodation supply is required to prevent the region losing competitiveness.

- In Camden, GLA Economics forecast that over the period 2015-2041, LBC will require net additional 1,595 serviced bedrooms to meet hotel demand.
- In recent years hotel supply growth for LBC has fallen behind that of other London boroughs.
- The Proposed Development will help to address the increasing need for hotel bedrooms in London, and in LBC. The location is ideal for hotel development, as the site is easily reached by public transport, which is reflected in its PTAL rating of 6a. This is in line with the requirements for tourism development set out in the LBC Local Plan, where Policy E3 states that visitor accommodation should be easily reached by public transport. Furthermore, the hotel is located next to the Roundhouse, a large entertainment venue which currently requires a nearby hotel to support it; this is in line with the Local Plan, which states that LBC will consider tourism development where it would have a local or specialist focus.
- Evidence that the supply of hotels within the immediate area is limited is given in the table below, which outlines the number of existing hotels within a 1km radius of the site. As the table shows, there are 4 hotels in operation within 1km of the site, comprising 291 rooms, which is equivalent to just 1.6% of LBC's total 2015 serviced accommodation supply. As this represents a small proportion of LBC's total supply, it suggests there is a relative absence of hotels in the immediate vicinity of the Proposed Development. The creation of a hotel in this location will therefore not only meet demand for future hotels across the whole of LBC, but also ensure the relocation of hotel provision within the borough, resulting in a more balanced concentration of hotel bedrooms.

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- 7.32. Draft London Plan Policy E10 (Visitor infrastructure) sets out that London’s visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors. The Roundhouse is a renowned attraction, and a hotel connected to it would enhance the visitor experience.
- 7.33. Local Plan Policy E3 recognises the importance of the visitor economy across the Borough. The policy identifies that tourism development outside of the specified areas including Camden Town Centre should be considered where it would have a local or specialist focus. As noted above, the proposed hotel is linked to the Roundhouse which is a locally important facility and will therefore have a local and specialist focus in line with the aspirations of the policy. The proposed hotel is therefore supported in this location in line with the aspirations of Policy E3.
- 7.34. As noted above, the financial contribution towards local employment in the area coupled with the employment benefits associated with the new hotel will significantly outweigh any perceived loss of office floorspace on site and is a material consideration in the assessment of this application.

#### **Proposed residential unit**

- 7.35. A single residential unit is proposed at eighth floor level to replace the existing residential unit. The replacement unit can be successfully accommodated with its own private entrance at top floor.
- 7.36. As such there will be no loss of residential units on Site. The minor loss of residential floorspace would be offset through the Payment in lieu towards the Council’s affordable housing fund (see below).



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- 7.37. The residential unit will be of high-quality design, and will meet all relevant standards. It will be provided with 18.6 sqm of private amenity space and 3 dedicated secure long-term cycle parking bays in line with policy requirements.

### **Residential or Mixed-Use Policy Assessment**

#### *Residential use*

- 7.38. It is acknowledged that the Council's preferred use for the redevelopment of the Site is as residential, and that this is the priority land use within the Borough.
- 7.39. As demonstrated in the planning history, the option of changing the use of the building to residential has already been explored under the permitted development route. This scheme would have delivered 10 units and would have been entirely exempt from affordable housing contributions (both in terms of on-site provision and any in-lieu contribution).
- 7.40. However, there are various challenges with the location of the Site adjacent to the Roundhouse venue and event space and it is not considered that further residential accommodation in the immediate vicinity would be appropriate due to the inevitable amenity issues this creates. On this basis, it is considered any additional quantum of residential accommodation is not considered practical or desirable as part of this scheme.
- 7.41. In any event, it is not considered that residential use is viable for the Site, as has been demonstrated through the stalling of various planning permissions within the surrounding area such as Marine Ices at 4-8 Haverstock Hill & 45-47 Crogsland Road. If a residential-led use was to be revisited for the Site, and a full application made, the only feasible viable scheme could deliver 7- 9 large

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high-end residential units which would not be at a price point for local people and would not include any affordable housing units.

- 7.42. It is therefore considered that the contribution that the hotel will make to the local economy, together with contributions towards affordable workspace and affordable housing are significantly greater benefits to the Borough than the provision of market residential units on site and any affordable housing contribution that they may attract (subject to viability).

*Mixed use*

- 7.43. Local Plan Policy H2 sets out that *“In all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development. In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floorspace of more than 200sqm (GIA), we will require 50% of all additional floorspace to be self-contained housing”*. In the Central London Area and named town centres, self-contained homes are required for new development. It should be emphasised that the Site sits outside of the Central London Area and the named town centres and therefore self-contained homes are encouraged as part of a mix of uses rather than required under the policy.

- 7.44. The carefully designed development comprises a hotel led scheme on a site which is relatively small and physically constrained by adjacent buildings. As such there are limited opportunities to deliver a commercially viable hotel building which has a lower quantum of floorspace. Due to the operational requirements of the proposed hotel, the price point of the rooms and the economies of scales, the number of rooms cannot be reduced below 70 keys. It is therefore not possible to provide an uplift in residential floorspace.

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7.45. The Site would not be able to accommodate an acceptable level of residential amenity space directly fronting the main road and as such the floorspace proposed would not be able to provide a high quality residential environment for future residents. Moreover, the physical requirements needed to accommodate separate residential accommodation would also erode the ability to fit the proposed hotel rooms in.

7.46. As identified, the Site is not within a location within which a housing contribution will be required, however it is acknowledged that residential accommodation is the priority land use across the Borough and is encouraged on all sites. On the basis that the Site cannot accommodate further residential on-site and the applicant does not own any suitable Sites within the local area, a without prejudice payment in lieu is offered towards the Council's Affordable Housing fund, based on the amounts which would be payable as in lieu contributions for a nine-unit residential scheme and for a scheme within the Town Centre. This will be secured under the S106 Agreement as set out below.

#### **Retail units**

7.47. The existing retail units at ground floor comprise a restaurant (A3 Class use), a fast food take away unit (A5 Class use) and a retail unit (A1 Class use). A single existing retail unit (A1 Class use) will be re-provided with frontage on Adelaide Road. The hotel will provide a food and beverage offer at ground floor and therefore the proposals will maintain an active frontage onto Haverstock Hill within the neighbourhood centre. There will be no loss of vitality and viability of the centre as a result of the proposed hotel use and the proposals seek to enhance the public realm to the front of the building which will encourage the use of this space.

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## Design

- 7.48. Paragraph 124 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.49. Local Plan Policy D1 seeks to secure high quality design in development which – inter alia – respects local context and character; is inclusive and accessible to all and preserves strategic and local views.
- 7.50. The proposed Site is located in a prominent, highly-sustainable position at the junction between Regent’s Park Road, Adelaide Road and Haverstock Hill and is in a generous setting, well set back from the junction by an area of public realm. As such the proposals which comprise a building of ground plus seven storeys which is of high quality design is considered to be appropriate in this context and is considered to optimise the use of the Site.
- 7.51. The Design and Access Statement (DAS) states that Piercy & Company have put great care into the design of the building reflecting the rich architectural history in Camden and the emerging present-day character.
- 7.52. The DAS confirms:

*“The appearance of the building is developed from a deep understanding of Camden and its historic and present day architectural character. The Site is a prominent corner site with significant public open space in front of the primary facade. As is the case with many of Camden’s finest buildings, our proposals are expressive of the building’s function. The fenestration pattern is reflective from the functional*

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*arrangement of hotel rooms and their corresponding size, in an efficient and logical layout.*

*The predominant base material is brick with arched window openings with gauged voussoirs defining the window head. A simple window frame and panel sits within the opening. Where there is no functional requirement for a glazed opening the panel is solid brick, within a similar arched opening. Where the building articulates the staircase in the rear facade, the brickwork has no further external expression or architectural detail. The only variations to the fenestration strategy are where the brick panels become 'hit and miss' such that ventilation can be provided to the communal hallways of the building. Window opening sizes vary only to express a change in function behind the facade line, such as the larger accessible rooms to the fifth floor or an increase in height to reflect the more generous nature of the public areas of the ground floor.*

*Many of Camden's corner buildings are however more aesthetically expressive and flamboyant. In subtle acknowledgment of this, our proposals stagger the colour of brickwork with darker bricks towards the base of the building and lighter brickwork to the top.*

*The colour of the brick voussoirs remains lighter and consistent throughout the facade therefore being more expressive at the lower levels of the building. The mortar course also remains consistent and therefore prominent at lower levels, adding secondary levels of visual interest and intrigue at a human scale. The lower southern block provides a private amenity space for the residential unit. This is accessed from the apartment via an external spiral staircase. This*

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*approach is expressive of the functional need but to access but also provides visual interest higher up the building.*

*The building embodies a simple elegance, that is expressive of its function but with a layering of further detail suitable to the prominence of buildings position and townscape sitting.*

7.53. In conclusion, it is considered that:

- When considering the Site's accessibility and emerging architectural context, the Site benefits from a significant amount of potential to create a marker building. It is considered that the simple elegant design of the proposal will provide a quiet prominence to the building, reflecting its corner junction position.
- The height of the proposals is appropriate for its corner junction position and is in keeping with the scale of development in the area.
- The Proposals will have beneficial impacts on local views and will not have a detrimental impact on protected views and heritage assets.

7.54. Further details on the appropriateness of the scale and design of the proposal are set out in the next section.

#### **Heritage and Townscape.**

7.55. Paragraph 197 of the NPPF states that in weighing applications which directly or indirectly affect non-designated heritage assets a balanced judgement will be required having regard to the harm or loss and the significance of the asset.

7.56. Policy 7.8 of the London Plan and Policies D1 and HC1 of the Draft New London Plan require new development to respect, enhance, and utilise the heritage assets and architectural features that contribute to the local character.

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7.57. The planning application is supported by a Heritage, Townscape and Visual Impact Assessment (HTVIA) prepared by Montagu Evans. The HTVIA provides an assessment of the impact of the Proposed Development on heritage, townscape and visual receptors.

7.58. The HTVIA provides the following assessment:

1. Effect on the Roundhouse: In relation to the listed Roundhouse a degree of harm has been identified which is, in the terms of national policy, less than substantial. Such harm is capable of being acceptable on the balance of planning benefits, including heritage and urban design benefits. The harm identified arises from the slight occlusion which the proposals cause in views of the round roof of the Roundhouse in views south down Haverstock Hill. When ascertaining the degree of harm, which is essential for the balancing exercise, the following matters are considered relevant:
  - i. The redevelopment of the site on any reasonable scale would occlude that view, even, at say 5/6 floors overall.
  - ii. The building being replaced is a poor-quality piece of architecture in the setting of the listed building, a pastiche of early C19 architecture of the mid-1980s.
  - iii. The views north past the Roundhouse are actually enhanced by a building of distinction, raising the architectural quality in the setting of the building through a design that draws on the legacy of historical architecture which inspired the Roundhouse (see the DAS).
2. Effect on Chalk Farm Underground Station: LBC have identified that the effect on the view of the station from the south as an important consideration (in their pre-application response of 11 July 2018). View 8 reproduced in Section 9 illustrates this effect. The proposal would be

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visible on the skyline but would not occlude the station in view 8. Given its existing setting, the proposals will not reduce the prominence or distract from the listed building but would aid the legibility of the station in townscape terms. In view 7 from Havistock Hill to the north, the Application Building already appears in the backdrop of the listed station and is an architecturally undistinguished neighbour. It is considered that the proposed building would be an architecturally distinguished neighbour, and a marked improvement on the existing building on the site. Overall, given the high architectural quality of the Proposed Development, the Proposed Development would preserve the special interest of the listed station.

3. Appropriateness of scale and design: The Site is an appropriate location for a taller building for the following reasons:
- i. The Site is located outside but immediately adjacent to Camden Town Centre, which is a Major centre in the London Plan hierarchy. Chalk Farm underground station is also located outside Camden Town Centre. The Site is within the Chalk Farm Neighbourhood Town Centre. London Plan Policy 2.15 states that town centres, including neighbourhood centres, are the main foci outside the Central Activities Zone for intensification.
  - ii. The Site is located on a prominent street corner, adjacent to an
  - iii. underground station, where a landmark building would aid legibility and signal the location of the station. This has been an important junction for at least 260 years and there was historically a hotel on this Site.
  - iv. The Site is outside a conservation area and is of relatively ordinary townscape quality aside from the listed buildings nearby.



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- v. There is a widening of the public realm on the street frontage, and there is potential to enhance this as part of the application, which would bring associated townscape benefits.
  - vi. The convergence of streets creates an event or moment in the townscape, which together with having a generous spatial character, can accommodate a tall building.

The Site lies at the confluence of three townscape areas, again reinforcing its townscape importance.

7.59. The HTVIA states that the proposed building is an accomplished design in high quality materials that will meet the GLA and Camden's local policies on design, including London Plan Policy 7.4 and 7.6 and Camden policy D1 and chapter 12 of the NPPF.

7.60. It further advises that with the exception of the harmful effect identified on the listed Roundhouse from Havistock Hill, no other harmful heritage effects from the proposed development are identified. With respect to the effect on the Roundhouse, the harmful effect would be limited to the views from Havistock Hill, would be less than substantial and very limited for the reasons set out earlier, not least because the design of the replacement will be a significant improvement on the existing, uninspiring building.

7.61. The HTVIA recognise that any harm to a designated heritage asset is of great weight in the planning balance, however limited it may be. However it is considered the public benefits of the scheme (discussed later in this section) should outweigh the low level of harm as required by paragraph 196 of the NPPF.

7.62. It concludes by confirming that the proposed development is therefore consistent with London Plan policy 7.8, Camden policy D2 and chapter 16 of the NPPF. In granting planning permission for the proposals LBC would be

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discharging their statutory duty with respect to section 66(1) of the Planning (Listed Buildings and Conservation Area) Act 1990.

### **Amenity considerations**

- 7.63. Local Plan Policy A1 advises that LBC will seek to protect the quality of life of occupiers and neighbours. They will grant permission for development unless this causes unacceptable harm to amenity.
- 7.64. Local Plan Policy TC4 (Town centre uses) is applied to proposals for town centre uses whether they are inside or outside of a centre. The Site sits outside of Camden Town Centre but within Chalk Farm Neighbourhood Centre. Hotels are considered to be 'town centre uses' and regard should be had to any harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. The policy notes that any potential harm to amenity or the local area can be mitigated by planning conditions and obligations.
- 7.65. Given the Site's location within the neighbourhood centre, proximity to the Roundhouse Arts venue, and location opposite Chalk Farm Station, the Site is considered to be an entirely appropriate and accessible location for a new hotel linked to the Roundhouse. The proposed hotel use will be carefully managed and operated and is not considered to have a detrimental impact upon neighbouring residential amenity. It is expected that an Operational Management Plan would be secured by Planning Condition.

### **Crime**

- 7.66. In line with Local Plan Policy C5, the planning application is supported by a Crime Impact Assessment (CIA). The purpose of the CIA is to ensure that crime, disorder and the fear of crime on the development are considered at the planning stage, to safeguard the provision of appropriate security features into

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the scheme from the start of the design process and complement other key design considerations.

- 7.67. The CIA proposes that the aim is to implement a pragmatic and practical level of security, without detrimentally affecting day to day business operations. The development will follow the key principles of Secured by Design (SBD) for physical security of the building.
- 7.68. In order for the development to provide a secure environment, it will follow the principles of the Crime Prevention Through Environment Design (CPTED) framework in order to incorporate crime precautions within design of the built environment, aiming to reduce the opportunity to commit crime.

### **Health and Wellbeing**

- 7.69. Local Plan Policy C1 states that LBC will improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. It confirms that LBC will require:
- a. development to positively contribute to creating high quality, active, safe and accessible places; and
  - b. proposals for major development schemes to include a Health Impact Assessment (HIA).
- 7.70. In these terms a HIA has been prepared to support the planning application. In line with the HUDU Rapid HIA matrix, the HIA assess the proposal against 11 health determinants including: housing quality and design; crime education and climate change. It concludes that a number of measures have been developed as part of the proposal to promote health and wellbeing which include: implementation of the Residential Travel Plan to promote sustainable travel for the residents of the Proposed Development; complementary First-

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Aid training of security operatives on-site during the construction works; implementation of a construction logistics plan and a Construction and environmental management plan to reduce adverse health risks from demolition and construction activities.

### **Noise and Air Quality**

7.71. In terms of noise and air quality, the Local Plan advises as follows:

- Policy A4 confirms that LBC will seek to ensure that noise and vibration is controlled and managed. It advises that development should have regard to Camden's Noise and Vibration Thresholds and states that LBC will not grant planning permission for:
  - a. development likely to generate unacceptable noise and vibration impacts; or
  - b. development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.
- Policy CC4 advises that LBC will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough. It confirms that Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution.

7.72. In these terms, the planning application is supported by both a Noise and Vibration Impact Assessment and an Air Quality Assessment.

7.73. The Noise and Vibration Impact Assessment, which includes baseline background noise surveys, concludes that that the site is suitable for residential / hotel development taking into account the threshold set by LBC

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provided the proposed mitigation measures are implemented. This can be secured via condition.

- 7.74. The Air Quality Assessment overall concludes that with the provision of appropriate mitigation measures, construction activities and operation impacts will have no significant effects on local air quality. Therefore the proposals are compliant with the requirements of the relevant Supplementary Planning Guidance and new draft London Plan.

### **Daylight and Sunlight**

- 7.75. The planning application is supported by a Daylight and Sunlight Report prepared by Point 2 Surveyors.

- 7.76. The report advises that:

- a. The proposed scheme has been carefully designed having regard to the existing surrounding residential properties in terms of daylight and sunlight amenity.
- b. 18/18A Haverstock Hill, 4-8 Haverstock Hill, 210 Regents Park Road and Bridge House all experience fully BRE compliant changes in daylight and sunlight as a result of the development.
- c. 9 Adelaide Road experiences some changes in daylight which exceed default BRE Guidance however, in most cases, the rooms are dual aspect thus the overall impact is ameliorated by non-site facing windows; this is confirmed by the NSL analysis.
- d. Overall the proposed scheme demonstrates compliance with current BRE Guidance, and in our opinion relates well with the surrounding residential context.

- 7.77. Point 2 Surveyors conclude that they fully support this planning application in terms of daylight and sunlight amenity.

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### **Accessibility**

7.78. The planning application is supported by an Access Statement. This confirms that the proposal has been designed by the project team with inclusive access in mind, and has taken into account relevant policy, regulations and good practice.

7.79. It confirms that:

- a. In line with Local Plan Policy C6, provision of the highest practicable standards of accessible and inclusive design will be incorporated into the building and the site to ensure that it can be used safely, easily and with dignity by all.
- b. The residential unit will meet Building Regulations M4 (3) standard.
- c. Seven of the hotel rooms will be wheelchair accessible in accordance with the British Standards which equates to 10% of the total provision in accordance with draft London Plan Policy E10.
- d. Evacuation lifts are provided in line with draft London Plan Policy D3.

### **Public Realm Improvements**

7.80. In order to improve the public realm around the Site (outside of the site boundary), an illustrative design has been developed. This design is shown in the Design and Access statement and proposes a raised tree planting bed and public seating to the perimeter. The applicant will work with LBC to finalise the design and pay a contribution to deliver it, to the benefit of the proposed hotel and wider area.

7.81. An Arboricultural Impact Assessment (AIA) has been prepared to support the planning application and assesses the impact of the development on the

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adjacent cherry tree within the public realm. The cherry tree is mature and of a moderate quality, however it is not protected by a TPO or Conservation Area.

- 7.82. The AIA concludes that although the scheme is not reliant on the removal of the tree, it would be the preferred option. This is because whilst there would be a moderate level impact on the wider area over the short term if the tree were to be removed, the inappropriate long-term position of the tree next to the existing building means that the proposed replacement planting would provide an entirely more sustainable tree resource that has the potential to offer significantly more amenity. The retention/removal of the tree will need to be discussed during the planning application.

### **Basement**

- 7.83. The proposals comprise the provision of an extension to the existing single basement to provide hotel and retail accommodation at lower ground floor and a second basement to accommodate mechanical plant and back of house areas.
- 7.84. Local Plan Policy A5 (Basements) sets out that it should be demonstrated that basement proposals will not cause harm to neighbouring properties; the structural, ground or water conditions of the area; the character and amenity of the area; the architectural character of the building and the significance of heritage assets.
- 7.85. It is noted within Policy A5 that generally no more than one storey of basement will be accepted but that exceptions to this apply for large comprehensively planned sites. Camden's CPG on Basements defines 'large comprehensively planned sites' as new major development for example schemes which comprise 1,000 sqm of additional non-residential floorspace. It is therefore

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considered that the principle of the provision of a double basement is acceptable in this instance.

- 7.86. A Basement Impact Assessment has been undertaken to support the planning application. The report commences with a desk top study and characterisation of the Site, whereby consideration is given to identifying the potential hydrogeological, hydrological and stability impacts associated with the proposed development. The next stage is the findings of an intrusive ground investigation are reported and a ground model is developed. Followed this, an outline construction methodology is put forward and the potential impacts of the proposed scheme considered.
- 7.87. The report concludes that the assessment has demonstrated that no adverse residual or cumulative stability, hydrological or hydrogeological impacts are expected to either neighbouring structures or the wider environment as a result of the proposed development.

#### **Transport, Servicing and Waste**

- 7.88. In line with Policy T1, the proposal seeks to prioritise sustainable modes of transport to the Site, comprising walking, cycling and public transport. As set out in the accompanying Transport Assessment, the Site is in a highly sustainable location with easy pedestrian and cycle access to local amenities, as well as Chalk Farm underground station and location bus stops adjacent for trips further afield. In addition, a framework Travel Plan is submitted with the planning application which sets out a number of objectives to encourage sustainable travel patterns.
- 7.89. In accordance with Policy T2, it is proposed that the development will be car-free. As set out in the Transport Assessment, one blue badge parking space will be provided on-street to service the hotel. The existing motorcycle bay



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could be converted to provide this single blue badge parking space subject to agreement with LBC, as it is on land outside of the site boundary. It should also be noted that the existing motorcycle parking is being used by takeaway riders with the associated pizza restaurant which will not be retained and therefore reduce the requirement for the motorcycle bay. There are other motorcycle bays located in close proximity of the Site which appear to have capacity and could accommodate any need.

7.90. Cycle parking provision is proposed in line with the New Draft London Plan standards, as follows:

- Long-stay cycle parking will be provided in a secure location in the rear courtyard to the north of the site:
  - A total of 5 cycle parking spaces will be provided for the hotel cycle store including one DDA compliant cycle parking space.
  - A total of 3 cycle parking spaces will be provided for the residential unit including one DDA compliant cycle parking space.
- A total of 4 short stay cycle parking spaces will be provided to the south of the site.

7.91. In terms of servicing and deliveries, the planning application is supported by a Delivery and Servicing Plan (DSP). Its purpose is to identify where loading and unloading activity will occur and facilitate the safe and efficient use of areas for servicing. It is drafted in accordance with guidance provided within the Transport for London (TfL) document 'Management Freight Effectively: Delivery and Servicing Plans' and will remain a live document that will evolve over time to ensure that objectives are met in the most appropriate manner. It is intended that it will complement the objectives of the Travel Plan through the implementation of sustainable delivery initiatives.

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7.92. It proposes that servicing and refuse collection will be undertaken on Regents Park Road to the west of the Site, as per the existing scenario. A total of 7 two-way servicing trips are forecast per day which will be consolidated where possible and a management system will be put in place to determine slots for each delivery. The servicing and refuse management will be monitored and reviewed regularly to ensure it is as efficient as possible.

7.93. In terms of waste, the application is supported by both a Waste Management Strategy and a Construction Logistics Plan (including Construction Management Plan proforma).

7.94. The Waste Management strategy considers the potential impacts that may arise from waste generated during the operational phase of the development and seeks to lessen the overall impact of waste generation through the recycling of materials. It proposes a strategy as follows which meets the requirements of relevant waste policy and follow applicable guidance:

1. Residential Waste:

- The residential unit will incorporate sufficient internal waste storage containers to promote the separation of recyclable materials at source.
- The resident will be provided with a dedicated waste storage area at ground floor level, which contains sufficient number of refuse, recycling and food waste containers.
- The residents will be responsible for transporting wastes from their apartment directly to the waste store area at ground floor level, and for separating their recyclables into the appropriate containers.
- The residential waste will be collected by LBC's appointed waste management contractor.

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2. Hotel Waste:

- The hotel will be provided with a waste storage area at ground floor level which will have sufficient bins to store two days' waste.
- The hotel operator's staff will be responsible for transporting their waste from the point of generation to the waste storage area.
- The hotel operator will appointment a licenced waste management contractor who will park on Regents Park Road and will collect (and return) the bins directly from the waste storage area.

3. Retail Waste:

- The retail tenant will provide their own internal waste storage area as part of their fit out.
- The retail tenant will be responsible for appointing their own waste management contractor who will collect the waste directly from the waste storage area.
- The retail tenant will not be permitted to present their waste on street for collection.

7.95. In terms of waste during construction, the CLP/CMP sets out the strategy in order to demonstrate that construction materials can be delivered and waste removed in a safe, efficient and environmentally friendly way.

**Energy and Sustainability**

7.96. Local Plan Policy CC1 confirms that LBC will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. It confirms that they will:

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- a. promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;
  - b. require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;
  - c. ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;
  - d. support and encourage sensitive energy efficiency improvements to existing buildings;
  - e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
  - f. expect all developments to optimise resource efficiency.

7.97. The planning application is supported by an Energy and Sustainability Statement, prepared in line with the GLA's Energy Assessment Guidance 2018. It confirms that overall the development achieves a 63% reduction in carbon emissions and follows the following strategy in line with the energy hierarchy:

- 'Be Lean': Passive and energy efficiency measures including:
  - The envelope of all buildings will be designed to perform significantly better than the Building Regulation standards with low U-values, G-values, thermal bridging equal to or better than regulations standards and low design air leakage rates; and
  - Energy efficient services employed in the development include high efficacy LED lighting coupled with occupancy and daylight controls to significantly reduce the lighting energy use.
- In accordance with the 'Be Clean' step, the feasibility of connecting to an existing or proposed district network has been investigated for the

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site. The London Heat Map indicates that there are no existing or planned heat networks within a feasible connection distance of the development, therefore no connection is proposed. Furthermore, CHP is not considered appropriate for this development due to the air quality issues it will create in the residential area.

- Following the final 'Be Green' step of the energy hierarchy, heat pumps are the preferred choice for providing thermal energy to the development.

7.98. In addition to the above, a preliminary BREEAM assessment has also been undertaken for the development indicating that an "Excellent" rating is able to be achieved under BREEAM New Construction 2014, thus complying with the London Borough of Camden planning policy.

#### **Flood Risk and Drainage**

7.99. Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. It confirms that LBC will require development to:

- a. incorporate water efficiency measures;
- b. avoid harm to the water environment and improve water quality;
- c. consider the impact of development in areas at risk of flooding (including drainage);
- d. incorporate flood resilient measures in areas prone to flooding;
- e. utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
- f. not locate vulnerable development in flood-prone areas

7.100. Although the Site lies within Flood Zone 1 and is less than 1 ha in area, it is within a critical drainage area (CDA) and therefore a Flood Risk Assessment (FRA) is required. Furthermore, policy seeks the utilisation of SUDS where

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feasible. In these terms, the planning application is supported by a FRA and SUDS Statement.

7.101. The FRA assesses the potential effect of the new development on surface water runoff, in addition to assessing the Site's vulnerability to flooding from out sources including groundwater and overland runoff, rivers and the sea. Following this, the statement provides advice on mitigation measure and whether the site is suitable for redevelopment.

7.102. The FRA confirms that:

- The risk of flooding from various sources has been assessment and the overall risk of flooding is considered to be low.
- The volume of surface water run-off likely to be generated from the development is not expected to change, given that there will be no increase in impermeable area and this can be further reduced and managed through introduction of SUDS feature in the design of the proposal.

7.103. The SUDS proposed include:

- In order to limit the discharge rate to the combined sewer serving the site, attenuation storage is to be included as a SuDS element;
- The option to include a blue roof on the Site has been considered as part of the proposals.
- Alternatively, a proportion of the roof may be considered for green roof areas which is expected to provide similar attenuation storage as the blue roof.
- The option has been explored for the introduction of pervious paving to the rear of the Site.

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## Summary of Public Benefits

7.104. The Proposed Development would give rise to a series of significant public planning benefits, which would weigh positively in favour of the scheme. Having regard to the three dimensions of sustainable development, as defined in the NPPF, the benefits associated with the proposal include:

### 1. Economic:

- The provision of a new hotel meeting both LBC and London demand;
- The provision of new jobs both during construction and operation:
  - Construction: 55 jobs over 18 months
  - Operation: 35 FTE jobs
- Increased economic spend in the area through:
  - Construction workers: £130,000 during construction.
  - Operational workers: £25,000 each year.
  - Hotel guests: £3.2 million outside of the site annually.
- Employment and training initiatives as set out in the Employment and Training Strategy; and
- S106 and CIL contributions towards local infrastructure.

### 2. Social:

- Provision of a replacement residential unit which exceeds the Mayor of London's housing standards, has its own private amenity space and is wheelchair accessible/adaptable;

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- Provide an affordable housing contribution to support the affordable housing need in LBC;
  - Provide an affordable workspace contribution to replace the low-quality office space on site and support the affordable workspace initiatives in LBC; and
  - Partner with and support the Roundhouse in both its commercial and charity function in the local area.

### 3. Environmental:

- Make effective use of previously developed land;
- Utilise placemaking principles and well-designed architecture to enhance the character, appearance and townscape setting of this part of Chalk Farm by delivering a high quality new building;
- Address security concerns by utilising Secured by Design principles, including active frontages and well-lit spaces to deter crime and antisocial behaviour;
- Encourage sustainable transport choices and to minimise reliance on travel by the private car;
- Construct energy-efficient and sustainable buildings (including efficient building fabric and renewable energy technologies) that would minimise carbon dioxide emissions and the potential contribution to climate change resulting from the proposal; and
- Provide the opportunity for qualitative improvements to the immediate public realm.

7.105. In addition, it is also important to note that the team at Uchaux has a strong track record in terms of project delivery and the project is a fully funded scheme, ensuring its deliverability. It is considered the development of this important Site in Chalk Farm will be the Catalyst for other consented development in the area progressing.



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7.106. It is submitted that the public benefits to be provided by the scheme clearly outweigh the less than substantial harm identified to the setting of the Roundhouse.

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## **8. PLANNING OBLIGATIONS & SECTION 106**

8.1. Regulation 122 of the Community Infrastructure Levy Regulations (2010) states that planning obligations may only constitute a reason for granting planning permission for the Development if the obligation is:

- necessary to make the Development acceptable in planning terms;
- directly related to the Development; and
- fairly and reasonably related in scale and kind to the development.

8.2. The above tests are set out in paragraph 56 of the NPPF. Paragraph 54 sets out that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

8.3. Paragraph 55 states that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the Development to be permitted.

8.4. London Plan Policy 8.2: 'Planning Obligations' states development proposals should address strategic as well as local priorities in planning obligations. Affordable housing, Crossrail and other public transport improvements should be given the highest importance. Importance should also be given to climate change, learning and skills, health facilities and services, childcare provisions and the provisions of small shops.

8.5. London Plan Policy 8.3: 'Community Infrastructure Levy' (CIL) refers to the Mayor bringing forward a draft charging schedule to enable CIL to fund strategically important infrastructure, focussing on Crossrail. The Mayor has

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brought forward a CIL charging schedule, which was formally adopted on 1 April 2012. In addition, the London Borough of Camden adopted a charging schedule effective from 1<sup>st</sup> April 2012.

8.6. The London Borough of Camden adopted their Developer Contributions Guidance in March 2019. The contributions will be provided in accordance with this Guidance.

8.7. Having regard to the priorities set out in Regulation 122 and the regulations and guidance set out above, it is expected that the conditions and obligations will broadly cover the following Heads of Terms (HoTs):

- Affordable workspace contribution of £500,000, which is equivalent to 320 sqm (existing office accommodation) of affordable workspace for 10 years. It is intended that this contribution could support several initiatives locally, including the Roundhouse and One Housing Group's 'social economy partners' at Arlington. This can be agreed with LBC through the application process.
- Mixed use policy Affordable Housing contribution of £1 million, calculated as follows:
  - £447,500 calculated on the basis of 50% of the uplift in floorspace (circa 500 sqm) in line with the notional requirements of Policy H2 as set out in Interim Housing CPG (March 2019);
  - £530,000 calculated on the basis of a notional additional 8 residential units on the Site of 125sqm each using the affording housing calculation as set out in Interim Housing CPG (March 2019); and
  - £22,500 to off-set the loss of 35sqm of residential floorspace in the top-floor flat.

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- Employment and Skills Strategy:
    - Meeting the Construction Industry Training Board (CITB) benchmark regarding the number of construction roles advertised through local employment vehicles (King's Cross Construction Skills Centre);
    - The recruitment of one construction apprenticeship for every £3 million in build costs;
    - Agreement to the Camden Local Procurement Code;
    - Living Wage commitments; and
    - Local employment targets.
  
  - The delivery of public realm works.
  
  - The provision of a car-free residential unit.

8.8. The Draft Heads of Terms are provided without prejudice.

8.9. The scheme will be liable to Community Infrastructure Levies for both the Mayor of London and the London Borough of Camden.

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## 9. CONCLUSIONS

9.1. This Planning Statement has been prepared to accompany a full planning application for the following:

*“Redevelopment to provide a basement (2 levels), ground plus 7-storey building comprising a retail unit at ground, a hotel and single residential unit on the upper floors, with associated works.”*

9.2. The Planning Statement has assessed the proposals against the provisions of the NPPF, London Plan, LBC Development Plan and supplementary planning guidance. It is considered that the proposal generally accords with the relevant local, regional and national policies and delivers significant benefits as discussed in section 7. In particular:

- The delivery of a high quality mixed use development enhancing the character, appearance and townscape setting of Chalk Farm;
- The delivery of an energy-efficient and sustainable building, which makes the best use of previously developed land;
- The provision of a new hotel meeting both LBC and London demand;
- The replacement of a residential unit, ensuring no loss of homes from the Site;
- The provision of an opportunity for qualitative improvements to the immediate public realm;
- The provision of significant new jobs both directly and indirectly during construction and operational phase;
- Increased economic spend in the area (hotel guests to spend £3.2m outside of the Site annually);
- The provision of an affordable housing contribution to support the affordable housing need in LBC;

- 
- The provision of an affordable workspace contribution to replace the low-quality office space on site and support the affordable workspace initiatives in LBC;
  - Partner with and support the Roundhouse in both its commercial and charity function in the local area;
  - Employment and training initiatives as set out in the Employment and Training Strategy; and
  - S106 and CIL contributions towards local infrastructure.

9.3. It is clear from the preceding sections that the proposal represents a sustainable form of development for which there is a “presumption in favour” as set out in national, regional and local planning policies. The Development would deliver an exemplary, sustainable and economically viable development which would have many regenerative and economic benefits for the site and immediate surrounding area.

9.4. In summary, the redevelopment of the site and proposed hotel scheme would deliver significant benefits in the form of employment generation in both the construction and occupation phases of the scheme and economic spend on the local economy. The proposals represent an important opportunity to support the Roundhouse charity scheme in providing flexible office floorspace for the creative arts. There is also an important link between the new hotel as a destination associated with the Roundhouse arts venue. Furthermore, the proposals will deliver a high-quality building which optimises the use of the site and offers improvement to the townscape. Although some harm is identified to the listed Roundhouse, this is considered less than substantial and the benefits to the scheme, not least in terms of the design of the replacement building, outweigh this harm.

# Appendix 1

Regent's Park Road Hotel  
Sponsorship of the Roundhouse  
*Planning Application Narrative - July 2019*



The Roundhouse is a well-established and beloved iconic arts and culture venue located in Camden. Each year, it welcomes almost 500,000 people to a range of arts programming and music gigs as well as private and public commercial events. Aside from its commercial business, the Roundhouse is, foremost, a charity reaching 6,000<sup>1</sup> of the most marginalised 11-25 year olds in our community through our young creatives' studios onsite and through our community collaborations with schools, PRU's, community groups and associations. In the coming 3-5 years, it is expected that demand for the Roundhouse programmes and projects for young people will increase to 10,000. To support this increased growth, the Roundhouse will be expanding its footprint with a new building and include studio spaces for young creatives and co-working space to support young entrepreneurs in the creative industry.

The Roundhouse is supportive of plans for the building of a hotel in the Chalk Farm neighbourhood. Currently there are limited options for brand hotels in this area so a new hotel would support the demand by thousands of annual Roundhouse visitors as well as visiting artists, production and technical teams associated with Roundhouse programming. Additionally, each year the Roundhouse is rented for over 100 commercial and private events including high profile award ceremonies, product launches and national and international conferences, the guests and organisers of which, would be well-served by a local hotel. We would also work with the hotel to create themed food and beverage packages to enhance the guest experience at both the hotel and Roundhouse and provide promotional ticket incentives for hotel staff and guests.

Beyond the commercial value of the hotel to the Roundhouse, we see excellent opportunities to work together to support our professional development programmes for young people. We would look to involve skilled hotel staff in business related workshops, industry talks and mentorships as well as hotel internships for young people to help them gain professional experience and support their pathway to employment.

A new hotel in the area would also have a very positive economic impact on the wider community and add value to the surrounding businesses and residences. There would be an increased spend at local shops, bars, restaurants, venues and attractions such as the Roundhouse and Camden Market. The presence of a hotel conveniently located opposite Chalk Farm tube station would also increase pedestrian traffic adding to the energy, vibrancy and safety of the neighbourhood while providing some relief for an overly congested Camden Town tube station.

The Roundhouse plays a vital role in the Camden community and it only makes sense that we collaborate with local companies and organisations. We therefore welcome the development of a hotel near the Roundhouse look forward to the value it will bring to our community.

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<sup>1</sup> Year 2018/19



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*by email only*

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19<sup>th</sup> July 2019

Dear Kate,

### **RH45 – CAMDEN OFFICE MARKET**

The Application Site (155 – 157 Regents Park Road) is located in the north west of Camden. This part of Camden is not a recognised office market and as a result there is little demand for office floorspace in this area.

Across Camden as a whole, in past months office stock has remained at around 59,000 sq ft, of which 15,100 sq ft is Newly Built Grade A space and 44,100 sq ft is second hand space.

Year to date take up currently stands at 13,201 sq ft, and there are currently no units under offer within Camden, so this figure is not expected to increase over the next Quarter. As a result it appears there is an over-supply in Camden against demand.

Based on the above market analysis, in our opinion there would be little demand for a low quality 3,500 sq ft office unit in this part of Camden, and the potential removal of it from the market would have a very limited impact on the Camden office market dynamic and supply.

Yours sincerely,



**Phil Gibb**  
Associate Director  
Cushman & Wakefield Debenham Tie Leung Limited