



NOVEMBER
2020

Planning Statement

19 Denmark Street, London, WC2H 8NE

Iceni Projects Limited on behalf of
Consolidated Development Ltd

November 2020

ICENI PROJECTS LIMITED
ON BEHALF OF
CONSOLIDATED
DEVELOPMENT LTD

Iceni Projects

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

Glasgow: Suite 2/1, The Mercantile Chambers, 53 Bothwell Street, Glasgow, G2 6TS

Manchester: That Space, 31-33 Princess Street, Manchester, M2 4EW

t: 020 3640 8508 | w: iceniprojects.com | e: mail@iceniprojects.com

linkedin: [linkedin.com/company/iceni-projects](https://www.linkedin.com/company/iceni-projects) | twitter: @iceniprojects

Planning Statement
19 DENMARK STREET, LONDON, WC2H 8NE

CONTENTS

1.	INTRODUCTION	1
2.	THE SITE AND SURROUNDING AREA	3
3.	THE PROPOSED DEVELOPMENT	5
4.	CONSULTATION	6
5.	PLANNING POLICY CONSIDERATIONS	9
6.	CONCLUSIONS	14

1. INTRODUCTION

1.1 This Planning Statement is submitted to the London Borough of Camden ('the Council') on behalf of Consolidated Developments Ltd ('the Applicant') in support of an application for full planning permission for the proposed development at 19 Denmark Street, London, WC2H 8NE ('the Site').

1.2 The application seeks full planning permission for:

“Rooftop extension to 19 Denmark Street and change of use providing a new 1x bed residential unit and reconfigured office floorspace.”

1.3 This Planning Statement has been prepared by Icen Projects Ltd and provides the planning case in support of the proposed development. It assesses the development in the context of relevant adopted and emerging planning policy and guidance at national, regional and local levels.

1.4 The Site lies immediately adjacent to and is within the same ownership as the wider St Giles Circus redevelopment site.

1.5 The planning application should be viewed in accordance with pre-application feedback (LPA Ref. 2018/1756/PRE) and a full planning application, which also comprised of changes to neighbouring Shaldon Mansions (LPA Ref. 2019/5473/NEW).

1.6 Following the receipt of pre-application feedback, and comments resulting in 19 Denmark Street withdrawing from application 2019/5473/NEW, the applicant has made a number of alterations to the proposed development. This application removes the link between the roof sections and establishes two separate zinc extensions resulting in a 1 x bed residential unit and a reconfigured office floorspace section.

The Submission

1.7 This Planning Statement should be read in conjunction with the other documents submitted in support of this planning application. These documents comprise:

- Planning Application Form and Certificate of Ownership, prepared by Icen Projects;
- Site Plan, Site Location Plan, Existing and Proposed Plans, Sections and Elevations, prepared by Ian Chalk Architects;
- Design and Access Statement prepared by Ian Chalk Architects;
- Daylight and Sunlight Assessment, prepared by Avison Young.

2. THE SITE AND SURROUNDING AREA

- 2.1 The application site encompasses 19 Denmark Street, London, WC2H 8NE, which is located within the Holborn and Covent Garden Ward of the London Borough of Camden (LB Camden).
- 2.2 The site is located on the corner of Denmark Street and Charing Cross Road, in close proximity to the junction with Tottenham Court Road and Oxford Street which lie to the north of the site.
- 2.3 No.19 Denmark Street is a 5 storey (plus basement) 1920's building. Dressed in Portland Stone with central steel bay windows on each of its upper floors. The building is in use as retail at ground and basement level (Use Class A1) and office floorspace above this (Use Class B1).
- 2.4 An existing central lightwell, adjacent to 19 Denmark Street, is shared with neighbouring properties at 18 Denmark Street and Shaldon Mansions. This lightwell allows natural light to reach all floors of the building down to basement level. At basement level the lightwell provides a paved yard space both providing light and amenity space to an existing studio unit.
- 2.5 The surrounding area is characterised by a mix of commercial and retail uses, with world famous shopping along Oxford Street and Tottenham Court Road 0.1 miles from the site, in addition to both residential and office uses. Denmark's Street's Tin Pan Alley is an important place for the UK music industry. Many specialist retailers locate here with a focus upon the sale and repair of musical instruments. Traditionally other music industry activities, including recording studios, artist management offices, music publishing houses and agents, being located on the upper floors.
- 2.6 As noted below the surrounding area is subject to wider development activity with the St Giles redevelopment due for completion in spring 2021.

Planning Designations

- 2.7 In terms of planning policy designations, the site is located within the Central London Area, is a specialist retail area and contains a Primary Shopping Frontage. The site is also located within the Denmark Street Conservation Area. Whilst the buildings are not statutorily listed, they are identified as making a positive contribution to the character of the conservation area.
- 2.8 The site has excellent transport accessibility and is located within an area of PTAL rating 6b. Tottenham Court Road Station which has access to the London Underground Central and Northern Line is located 0.1 miles from the site, whilst Leicester Square Station with access to the London Underground Piccadilly Line is located 0.5 miles from the site. There are also numerous bus services

which stop along Charing Cross Road and New Oxford Street and Crossrail will serve Tottenham Court Road when it opens in 2022.

Planning History

- 2.9 A full review of the Council's planning history records has been undertaken and has not identified any recent and relevant planning applications for the site.
- 2.10 This application should be assessed in the context of the approved planning application at the St Giles Circus site (LPA Ref. 2012/6858/P) granted in March 2015 which is within the same ownership as this current planning application. The 2015 planning application approved the redevelopment of the large scale site surrounding the application site. The scheme proposed the erection of three new building at 4, 5 and 7 storeys in order to provide event gallery space, an urban gallery, restaurant floorspace, office floorspace, residential units, drinking establishments and a 14 bedroom hotel. Wider public realm improvements were approved as part of this application which feed into Denmark Street. This permission has been implemented and is due for completion in spring 2021.
- 2.11 19 Denmark Street was recently part of a submitted application, 2019/5473/NEW which encompassed neighbouring 18 Denmark Street and Shaldon Mansions. The application sought permission for *“Change of use and reconfiguration of the existing basement space below 18 Denmark Street and Shaldon Mansions to provide consolidated retail floorspace. Roof top extension to 19 Denmark Street to provide a new 1 x bed residential unit and the amalgamation of a studio and 1 x bed unit within Shaldon Mansions to provide a 3 x bed residential unit with associated external alterations.”* The proposed alterations to 19 Denmark Street were later withdrawn from this application following comments regarding the negative impacts of the glazed link between the roof extensions.

3. THE PROPOSED DEVELOPMENT

3.1 This section outlines the proposed development at the site. The proposed development is submitted under a detailed application for full planning permission.

3.2 The planning application seeks full planning permission for the following description of development:

“Rooftop extension to 19 Denmark Street and change of use providing a new 1x bed residential unit and reconfigured office floorspace.”

3.3 The over- arching objective of the proposals is to enhance the existing office space and provide priority residential use on the site. The proposals reconfigure to a smaller, but more high quality and useable office space while also providing one high quality residential unit.

3.4 The proposed development comprises the following alterations to the existing building:

19 Denmark Street

- Roof top extension and change of use to provide 1 x 1 bed residential unit (C3) and reconfigured office space (B1) with mezzanine.

3.5 Overall, the proposals would provide the following floor areas as compared to the existing situation in levels 4 and 5:

Use Class	Existing (GIA sqm)	Proposed GIA (sqm)
B1 Business	96.64	53.79
C3 Dwellinghouse	0	97.15
Total	96.64	150.94

4. CONSULTATION

4.1 During previous design development processes, the applicant engaged in pre-application discussions with Planning and Design Officers at the Council and submitted proposals for 19 Denmark Street within an application for a wider scheme.

4.2 The pre-application put forward the following proposal for 19 Denmark Street:

- Roof top extension to provide 1 x 1 bed residential unit (C3) with external terrace at 5th floor.

4.3 Pre-application feedback was provided by Sofie Fieldsend, Planning Officer at the Council on 12th July 2018 (LPA Ref: 2018/1756/PRE). The feedback noted the following with regards to the proposed development:

Land use

- The provision of a 1 bed unit at 19 Denmark Street is acceptable in principle.

Design and Heritage

- It is acknowledged that Denmark Street has a variety of forms of roof extensions which are more diverse than the range of its building ages and styles. This includes the mansard addition recently approved at 4 Denmark Street (LPA Ref. 2012/6858/P) but which has a more traditional design to that proposed with a sloping roof extending from the front elevation.
- The principle of a modern style extension above the existing roof storey to 19 Denmark Street could be acceptable in principle but in current form would not be supported.
- The appearance of the roof extension from the east toward the 'bookend' gable and chimney of the mansion block is an important consideration which would be obscured by the front eave forming the proposed roof extension. The proposed front eave would project and express heavily with a deep profile and strong shadow. The proposed roof extension would also block views of the 'grand and contrasting' scale of the mansion block in these views and remove the change in scale on the corner of the street. This is most apparent in views from the ends of Denmark Street and from St Giles High Street near the Grade I listed St Giles Church. Therefore, the proposal roof extension would better integrate if its angle were reduced.

- The use of timber would be acceptable with slate or rolled metal proposed for cladding. It is suggested that rolled metal may be more in-keeping.
- The rear of the proposed roof extension is unlikely to be seen in views from the North on Charing Cross Road / Tottenham Court Road, Oxford Street/New Oxford Street and the Centrepoint plaza. However, it is advised that the same considerations be made in respect of the form, materiality and integration of the northernmost proposed pavilion with the existing roofscape and the townscape of the rear of Denmark Street.

Amenity

- The proposed roof extension to number 19 Denmark Street creates a number of amenity issues both to the existing residential units below in 18 Denmark Street and those within Shaldon Mansions which have windows facing the lightwell in addition to future occupiers of the unit.
- The proposal adds an additional storey to the building and further encloses the lightwell. No daylight and sunlight report has been provided.
- The proposed terrace facing onto the lightwell is considered to create issues of overlooking and loss of privacy into the flats and the future occupiers of the flat. Obscure glazing to the lightwell plus the introduction of screening would not be supported.
- Given the separation distance to the property across the road, the principle of a front terrace would be acceptable subject to sensitive design.

- **Transport**

- Two cycle parking spaces would be required per new dwelling and the retail unit extension should provide 1 cycle parking space.
- Highways officers have determined that a CMP is not required.
- A car-free development is supported and would be secured by s106 legal agreement.

4.4 Following the pre-application discussions, amendments were made to the proposed development and were incorporated into part of a full planning application (LPA Ref. 2019/5473/NEW):

- The roof addition to 19 Denmark Street was revised to take into account the Council's feedback. The proposals put forward two zinc clad mansard roof extensions which provide more refined proportions mirroring that of 4 Denmark Street. Within the proposal the roof, flanked on the east by an extended brickwork gable, closely followed the pitch of the roof and allowed the existing character of the brickwork gables as viewed from St Giles to be retained. The proposed terrace adjacent to the lightwell was revised to incorporate angled fins along the front of the terrace to address overlooking concerns, whilst continuing to allow light to filter into the lightwell.
- A full Daylight and Sunlight Report accompanied the application.

4.5 The following feedback was received from the Council resulting in the withdrawal of proposals for 19 Denmark Street from the planning application:

- The link providing access to the two parts of the proposed roof extensions result in a negative impact to the adjacent lightwell in the form of reduced daylight and a sense of enclosure which effects the site and neighbouring properties.
- The proposals would result in neighbouring property Shaldon Mansions to be overlooked from the proposed glazing and windows.

4.6 Following a withdrawal of the proposed works to 19 Denmark Street contained within application LPA Ref. 2019/5473/NEW, the following amendments have been made:

- The link between the two sections of the proposed roof extension has been removed which significantly reduces the negative impacts on the adjacent lightwell noted by the Council in previous discussions. This has led to the proposal now adopting a residential duplex to the rear of the site and reconfigured office space to the front.
- In response to the Council's comments that previous proposals overlook Shaldon Mansions, window openings have been orientated away from the effected neighbouring properties allowing natural light into the development and access to favourable views.
- A new Daylight and Sunlight report has been provided as part of this application which concludes that the new proposal is justifiable in the context of the dense urban environment within which the building sits.

5. PLANNING POLICY CONSIDERATIONS

Planning Policy Framework

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan

- 5.2 The statutory development plan for the proposed development consists of the London Plan (2016), together with the Camden's Local Plan (2017).
- 5.3 The Revised National Planning Policy Framework (NPPF) was published on 19 February 2019 and sets out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.
- 5.4 Additionally, the Intend to Publish London Plan is considered to be a material consideration due to its advanced stage.
- 5.5 An assessment of the key planning considerations in relation to the proposed development against the relevant adopted planning policies is set out below.

Principle of Development

- 5.6 This application seeks the addition of a 1 bed high quality new residential unit (Use Class C3) at 19 Denmark Street and the reconfiguration of office space with associated change of use (Use Class B1). While the B1 use floorspace is reduced compared to existing parameters, the proposal represents a significant improvement in the quality of B1 space and therefore its usability.

Residential – C3 Use

- 5.7 Local Plan Policy H1 seeks to maximise the housing supply in the borough of Camden, specifically through the encouragement of the development of self-contained housing. The addition of a residential unit within an extension to 19 Denmark Street contributes towards this policy with a additional self contained, high quality, 1 bed residential flat.
- 5.8 Local Plan Policy H4 seeks to maximise the supply of affordable housing in the borough by requiring a contribution from all developments providing one or additional homes where the addition equals 100sqm GIA or greater. The policy states that in developments with capacity of 10 dwellings and less, a payment-in-lieu as form of contribution is acceptable, which is calculated through a 'sliding
-

scale'. The policy also states that the council will take into consideration the context of the development, including the site and area and the viability of contribution. The proposals for 19 Denmark Street include additional residential area totalling 97.15sqm, which is under the 100sqm provision calculated for affordable housing contribution in Local Plan Policy H4. Therefore, the proposals featured in this calculation are not applicable to making a contribution towards the associated provision.

Office – B1 Use

- 5.9 Local Plan Policy E2 seeks to protect the provision of employment spaces within the borough. While this proposed scheme sees a small loss of B1 floorspace, the reconfiguration presents a more usable space with associated mezzanine, that would be suitable for a small / start-up business within an economically thriving area. 19 Denmark Street also has the benefit of the floors below the proposed development remaining in B1 use, significantly contributing to the overall office use of the site.

Design and Heritage

- 5.10 Paragraph 130 of the NPPF (2019) states that permission should be refused for development of poor design that fails to take the opportunities for improving the character and quality of an area and the way it functions. Paragraph 131 of the NPPF (2019) states that in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.
- 5.11 Good design is a central objective to the London Plan (2016). London Plan Policy 7.4 requires new development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. In addition to this, Policy 7.6 states that buildings should make a positive contribution to a coherent public realm and streetscape, and should incorporate the highest quality materials and design appropriate to their context. Emerging Policy D6 of the Draft New London Plan (2017) also sets out that development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Policy 7.8 of the London Plan (2016) states that development affecting heritage assets and their settings should conserve their significance through sensitive design in terms of form, scale, materials and architectural detail.
- 5.12 At a local level, LB Camden will seek to ensure high quality design in development. Local Plan Policy D1 requires any proposal to respect local context and character and preserve and enhance the historic environment and heritage assets in line with Local Plan Policy D2. The Council requires extensions to consider the character, setting, context and the form and scale of neighbouring buildings; the quality of materials to be used; and the character and proportions of the existing building.

- 5.13 The site is located within the Denmark Street Conservation Area. Whilst the buildings are not statutorily listed, the buildings are identified as making a positive contribution to the character of the conservation area and therefore have both architectural interest and townscape quality.

19 Denmark Street

- 5.14 The application proposes two separate two storey roof extensions to the property, and no longer connected via a glazed link as proposed in the previous planning and pre-application submissions. The new space will result in the addition of a residential dwelling within 19 Denmark Street, while also reconfiguring existing poor quality office space to provide a more useable area suitable for modern office occupiers. The existing roof, of which this proposal wishes to expand upon, is currently varied in height but with a flat finish across. It is currently accessed from a stair well central to the roof.
- 5.15 As noted in the original pre application comments, Denmark Street has a varied selection of roof forms. The most notable and successful additions comprise of roof extensions that have a shallow pitch, such as that of 4 Denmark Street (LPA Ref. 2012/6858/P) which allows for transition between taller and shorter neighbouring properties. It was noted during the pre-application stage that any modern form of extension should be sympathetic to the current roofline of Denmark Street.
- 5.16 The proposed roof extensions have developed in form since the original pre application stage. With the removal of the glazed link which was proposed to connect the two extensions from the front of the site to the rear, the impact on the adjacent lightwell has been reduced, as has the impact on the sense of enclosure and outlook..
- 5.17 The proposals have significantly reduced in pitch since the original pre application stage and have taken into consideration the application of 4 Denmark Street which has allowed for sympathetic roofline additions, appreciating the historic importance of Denmark Street. At the pre application stage it was noted that the current brickwork gables to the east of the site would be obscured by the original scheme that proposed a much higher roofline. With a reduced pitch and the current proposals following neighbouring rooflines, the gables remain in view from St Giles.
- 5.18 This application should be acknowledged for its careful consideration to the comments from both previous pre application and planning application stages in regards to design. The roof pitch and line now sympathetically coincide with adjoining properties, preserving views of brick gables and allowing for a smooth transition in height between properties, as shown approved and built out at 4 Denmark Street. The design has also developed to acknowledge the existing lightwell, in order to reduce the impact on existing neighbouring properties facing into the lightwell.

Residential Quality

- 5.19 LB Camden Local Plan Policy H6 notes that the Council expects all self-contained homes to meet the national described space standards.
- 5.20 The size of the homes within the proposed development comply or exceed the relevant space standards as set out in the nationally described space standards as demonstrated within the following table.

Unit	Unit Type	Technical Housing Standards	Proposed (Sqm)
No. 19 Denmark Street	1 bed 2 persons	50	97.15

- 5.21 The LB Camden Interim Housing Guidance (2018) also notes that all new homes should have access to some form of private outdoor amenity space, such as balconies or terraces. The proposed residential unit has access to private amenity space in the form of a balcony on the proposed new 5th floor.
- 5.22 Additionally, the unit has been designed with regard to the both Camden Planning Guidance and the Mayor's Housing SPG, with the residential accommodation receiving good levels of daylight and sunlight, natural ventilation and outlook, and good floor to ceiling heights.. This is achieved through a proposed rooflight serving the residential unit and two new gable windows serving both units on the east elevation.
- 5.23 The proposed development has been designed to deliver a high-quality residential environment and analysis of the quality of the residential accommodation is included in the supporting Design and Access Statement prepared by Ian Chalk Architects.

Amenity

- 5.24 Local Plan Policy A1 and Camden CPG1 Design seeks to ensure that the amenity of neighbours is protected, including visual privacy, outlook, sunlight, daylight and overshadowing.
- 5.25 Pre-application feedback noted concerns with regards to the original proposed roof extension, specifically the loss of daylight and sunlight to the existing residential units with windows facing the adjacent lightwell. It was noted that the additional storey to the building would further enclose the

lightwell and without a daylight and sunlight report it was considered that the loss of daylight and sunlight to these units would result in poor amenity. This has resulted in the removal of the terrace and glazed link, to minimise the impact on the light well as well as reducing any impact on outlook and sense of enclosure for those properties facing into the light well. The removal of the glazed link and the provision of a balcony which does not overlook neighbouring properties addresses any previous concerns around visual privacy..

- 5.26 A Daylight and Sunlight Report as prepared by Avison Young accompanies this planning application.. The report concludes that there is a negligible effect upon neighbouring property Shaldon Mansions due to the dense urban context of the area and the low levels of light that currently reach the properties in question.
- 5.27 It is therefore considered that there will be no material detrimental impact in terms of amenity on the surrounding occupiers.

Transport and Servicing

- 5.28 Local Plan Policy T1 requires development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan and the design requirements as outline in CPG7, notably secure and step free.
- 5.29 Ian Chalk Architects have undertaken a study to determine possible locations for step free cycle storage in accordance with London Plan and LB Camden minimum standards and design guidance.
- 5.30 The proposed units are located at upper floor level (levels 4 & 5), accessed via stairs and therefore will require either lift access or an alternative solution at ground floor. As there is no lift in the building and there is not space to incorporate one without severely compromising the existing floorplates any cycle storage space will need to be located at ground floor level. The ground floor of 19 Denmark Street is currently occupied by a separate retail unit and as such would not be practical for cycle space provision to be provided here, particularly as the site forms part of the protected shopping frontage.
- 5.31 The site sits within the wider St Giles Circus redevelopment site which is providing a number of short-stay cycle spaces within the wider public realm which will aid towards provision of cycle spaces within the immediate area. It is proposed that the required cycle parking be provided as part of this wider cycle provision and the Applicant is willing to discuss alternative solutions within the wider St Giles Circus redevelopment area as required.

Vehicular Transport

- 5.32 Local Plan Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. The Applicant is willing to enter into a S106 legal agreement to secure a car-free development on site.

Refuse

- 5.33 Refuse and servicing is to continue as per the existing arrangement on site for both residential dwellings, office use and the existing retail unit.

6. CONCLUSIONS

- 6.1 This Planning Statement has been prepared on behalf Consolidated Developments Ltd in support of an application for full planning permission for development at 19 Denmark Street, London, WC2H 8NE.
- 6.2 The site, which is adjacent to the St Giles Circus redevelopment site and within the Denmark Street Conservation Area, currently consists of retail space at ground floor level with upper floors in use as office space.
- 6.3 The planning application is submitted following the receipt of pre-application advice (LPA Ref. 2018/1756/PRE) and a subsequent planning application (LPA Ref. 2019/5473/NEW) as part of a wider scheme encompassing 18 Denmark Street and Shaldon Mansions. Following the receipt of pre-application feedback and application comments from the Council, the Applicant has made a number of significant alterations to the proposed scheme which respond to the Council's comments and advice.
- 6.4 This planning application seeks full planning permission and associated change of use for a roof-top extension to 19 Denmark Street to provide a new 1 x bed residential unit and reconfiguration of office floorspace.
- 6.5 The proposal puts forward sensitive alterations to the existing building, reflective of the wider regeneration area, in addition to the buildings position within the Denmark Street Conservation Area. The proposal seeks to increase the residential offering at 19 Denmark Street, while improving the quality of office space. The scheme will provide an improved reconfiguration of office space and 1 x high quality residential 1 bed unit.
- 6.6 The proposed development will optimise the development potential of this highly accessible site by incorporating high-quality and sensitive roof level additions, whilst respecting the relationship to the adjacent lightwell. The scheme also seeks to remove roof level alterations which are out of keeping with the host building, thereby both preserving and enhancing the wider conservation area and following the precedent of other roof extensions within the vicinity of Denmark Street, namely 4 Denmark Street.
- 6.7 Overall, the proposed scheme is considered to constitute a sustainable development that complies with the relevant planning policies of the development plan and will deliver a significant number of planning benefits.