

**Saffron House, 6-10 Kirby Street &  
118-124 Saffron Street, EC1**  
Planning Application Supporting  
Statement

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118-124 Saffron Street, EC1**  
Planning Application Supporting  
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Appendices

**Appendix 1**  
Site Location Plan

**Appendix 2**  
Decision Notice for 10 St Mary Axe

# 1. Introduction

- 1.1. This statement has been prepared on behalf of Zurich Assurance Ltd to accompany a planning application to change the permitted use of the ground and lower ground floors of Saffron House, 6-10 Kirby Street and 118-124 Saffron Street, from B1 (office) to D1 and/or B1 (office/education) use. In preparing this statement, consideration has been given to the planning history of the site, adopted and emerging planning policy, and site constraints.
- 1.2. Section 2 provides a description of the site, surroundings and relevant planning history; section 3 outlines the key planning policy; section 4 considers the proposed widening of the use in the context of the policy and other material considerations; and section 5 sets out the conclusions.

## 2. Site and surrounding area

- 2.1. The site was redeveloped in 2000 and comprises a six storey property known as Saffron House, 6-10 Kirby Street and 118-124 Saffron Street. It is located in the Hatton Garden District of the London Borough of Camden. See site location plan at **Appendix 1**.
- 2.2. Saffron House benefits from planning permission to be used as office premises on all floors. Since construction in 2000, each floor of the building has been occupied for office purposes, although the ground and lower ground floors were last used for office purposes in June 2008 and since that time they have remained vacant.
- 2.3. The main pedestrian entrance to Saffron House is via Kirby Street, with the lower ground benefiting from additional access from Saffron Hill.
- 2.4. The site is in close walking distance of both Farringdon and Chancery Lane stations which provide both underground and mainline train services across London and further afield.
- 2.5. The properties in the area surrounding the site are of varied style and appearance and appear to be used for primarily office and other business purposes.

### Planning History

- 2.6. The most relevant planning history for the site relates to the application for its redevelopment, reference PSX0004584. The application premises are the result of the implementation of this permission.
- 2.7. Further relevant planning history for the site includes two successful applications for the change of use of parts of the former premises from B1 to D1. Permission reference 9300723 in 1993 approved a change of use from B1 to D1 for the second floor of 6-10 Kirby Street, and permission reference 9401563 in 1994 related to the change of use from B1 to D1 for part of the third floor of 6-10 Kirby Street. This planning history clearly demonstrates that there has been an historic acceptance of the appropriateness of D1 use within B1 buildings in the London Borough of Camden, and more specifically at this site.

### 3. Planning Policy

#### The Proposal

- 3.1. It is proposed to change the use of the ground and lower ground floors of Saffron House from B1 to D1 and/or B1 use. This widening of potential use would allow the currently vacant premises to be marketed on a wider spectrum.
- 3.2. There has already been some interest in the use of floorspace at the premises by a professional education facilities provider, although there has been no interest to use the floorspace for other office use to date.
- 3.3. The use of all or part of the floorspace on the ground and lower ground floors by a professional education provider would complement the predominant use of the premises, and the surrounding area, being the type of facility that is best located in close proximity to the businesses it supports. It would not undermine the purposes of protecting employment floorspace and could help to underpin the local facilities available to an office based professional service market.
- 3.4. The application proposes that a condition be imposed by the Council to ensure that upon cessation of any element of D1 use the floorspace would revert back to B1 use. Similar conditions have imposed on permissions granted elsewhere to provide the Councils with comfort that there would be no permanent loss of B1 floorspace and would therefore not conflict with objectives of protecting employment land. An example of such a permission is included at **Appendix 2** in the form of a recent decision issued by the City of London.
- 3.5. The development does not involve any external physical alterations to the building.

#### Key Planning Policy

- 3.6. The relevant planning policy for the site is contained within the Camden Replacement Unitary Development Plan, June 2006 and the London Plan (consolidated with alterations since 2004) 2008.

#### The London Plan

- 3.7. The London Plan acknowledges that although *'many solutions are too specific and detailed to be included in a strategic plan and their delivery is not the responsibility of the Mayor'*, Policy 3A.15 states that:

*'UDP policies should assess the need for social infrastructure and community facilities in their area...Policies should seek to ensure that appropriate facilities are provided within easy reach by walking and public transport of the population that use them'.*

- 3.8. Policy 3A.21 specifically considers education facilities, stating:

*'UDP policies should reflect the demands for pre-school, school and community learning facilities...and should ensure adequate provision in partnership with the local education authority, local strategic partnership and users'.*

- 3.9. With Policy 3A.22 dealing specifically with higher/further education provision, stating:

*'The Mayor will and boroughs should work with the LDA and the higher*

and further education sectors to ensure that the needs of the education sectors are addressed in Sub-Regional Development Frameworks and in UDPs. This will include:

- promoting policies aimed at supporting and maintaining London's international reputation as a centre of excellence in higher education,
- taking account of the future development needs of the sector, including the provision of new facilities and potential for expansion of existing provision
- recognising the particular requirements of Higher Education Institutions for key locations with good public transport access, and having regard to their sub-regional and regional sphere of operation,
- recognising the distinctive locational and access needs of Further Education establishments,
- supporting the provision of student accommodation'.

3.10. Supporting paragraphs 3.94-5 expand further on the policy stating:

*'Higher education in London provides an unparalleled choice of undergraduate and postgraduate degree programmes, continuing professional development and advanced research. It is also a major employer and attracts major international companies able to benefit from the universities' research reputation...*

*... Access to further education is important for the large proportion of Londoners who do not go into higher education. It plays a key role in skills development and life long learning'.*

#### **Camden Replacement UDP**

3.11. Strategic Policy S13 states the Council's objectives towards economic activity are that:

*'The Council will seek to meet local and strategic economic needs by encouraging the development of a range of businesses to match the needs, skills and qualifications of the workforce, and securing and retaining a choice of sites suitable for a range of office, industry and warehousing activities, including provision for small and traditional businesses'.*

3.12. Strategic Policy S15 considers community uses, which includes the provision of education facilities, and states:

*'The Council will seek to secure and protect a range of land and buildings which meet existing and future needs for community uses and that are accessible to the communities they serve'.*

3.13. The Plan sets out the Council's strong commitment towards sustainable development and the creation of sustainable communities, stating at paragraph 1.8 that:

*'The vision of Camden's Community Strategy is for Camden's communities to thrive and grow and take care of the environment for themselves and for future generations. To achieve this, the vision calls for a strong local economy with local businesses employing skilled local people. In land use terms with which this Plan is concerned, the Community Strategy therefore requires that both community and business needs be adequately met'.*

3.14. Policy SD3 goes on to state:

*'The Council will seek a mix of uses in development, including a contribution to the supply of housing, and will not grant planning permission for development that reduces the amount of floorspace in secondary uses, unless it considers that particular characteristics of the proposal, site or area would make development of housing or a mix of uses inappropriate ... In considering the mix of uses and the appropriate contribution to the supply of housing, the Council will have regard to:*

- a) the character, diversity and vitality of the surrounding area;*
- b) the suitability of the site for mixed use development;*
- c) the need and potential for continuation of an existing use;*
- d) whether the floorspace increase is needed for an existing user;*
- e) the need for an active street frontage and natural surveillance; and*
- f) any over-dominance of a single use in the area, and the impact of the balance of uses proposed on the area's character, diversity and vitality'.*

- 3.15. Paragraph 1.20 indicates that the Council would seeks to optimise the use of previously developed land and vacant and underused buildings and would seek development that secures a distribution of land uses and reduces the need to travel. With paragraph 1.21 going on to state that:

*'the incorporation of mixed use into established areas and individual developments can reduce the need for travel between homes, services and jobs. Housing and other secondary uses can enhance the character of the area, and increase safety and security by providing activity and natural surveillance throughout the day and evening, particularly on street frontages. The Council assesses mixed-use schemes in terms of the "primary" use, which is the largest land-use by gross floorspace, and "secondary" uses, which are all uses with smaller gross floorspaces'.*

- 3.16. Paragraph 1.22 further expands this approach, stating:

*'Secondary uses that may be sought include shops, community facilities, open space and workshops (light industry)'.*

- 3.17. With paragraph 1.24 stating:

*'In addition, the Council particularly seeks the introduction of secondary uses where there is a predominance of a single non-residential use, such as offices'.*

- 3.18. Paragraph 1.27 states:

*'The need for secondary uses and the precise mix and proportion appropriate will vary in different locations and will be a matter for negotiation, bearing in mind existing uses on the site and in the area, as well as the area's character, diversity and vitality. The consideration of these factors will include the predominant land use in the area, the scale of premises, buildings and blocks, the variety of different uses, vacancy levels and levels of street activity at different times of the day. Proposals should not involve the loss of uses that are needed in the area or protected by other UDP policies, unless the criteria for release of land set out in those policies are satisfied'.*

- 3.19. Policy E2 indicates a general presumption in favour of the retention of existing business uses in the Borough, advising that:

*'The Council will not grant planning permission for development that involves the loss of a business use on a site where there is potential for that use to continue. The Council will consider:*

- a) whether the site is in or adjacent to the Industry Area;*
- b) the size of the site and whether it could potentially provide for servicing by large vehicles;*
- c) whether the site is particularly suitable for small firms;*
- d) the accessibility of the site by public transport and by service vehicles;*
- e) the relationship of the site to nearby land uses;*
- f) the demand, supply and variety of sites that are suitable for employment uses, firstly in that particular use class, and secondly in business use in general; and*
- g) the retention of design features that enable flexible use, including use for light industry as part of schemes for the redevelopment or alteration of industrial premises for B1 purposes.*

*Where the Council considers that the site does not have potential for continuation of the existing business use, preference will be given to maintaining the site in an alternative business use, with a higher priority to retention of flexible space for B8 or B1 light industry than to provision of B1(a) offices. When a site is not suitable for continuation of any business use other than B1(a) offices, as an exception to the general approach, the Council may allow a change to other uses. In such cases, the Council will seek a change to permanent residential uses (in particular affordable housing), or community facilities'.*

- 3.20. The reasoned justification for Policy E2 is set out in the Plan, with paragraph 7.17 indicating that the need to retain business sites will be balanced against availability. It is also acknowledged in paragraph 7.22 that the Borough has a large, and in some cases surplus, stock of office accommodation and as such, as an exception to the general approach of Policy E2, proposals for other uses may be considered appropriate if they involve the provision of community uses, such as an extension to educational facilities.

- 3.21. Policy C1 relates specifically to the provision of community uses, including education facilities, and states:

*'A) The Council will grant planning permission for the development of community uses in suitable locations. Facilities with a local catchment should be located close to, and/or be easily accessible to, the community that they serve. Facilities likely to attract large numbers of people should be located where they are easily reached by public transport and should be fully accessible to people with disabilities...*

*C) The Council will grant planning permission for the development of education uses in line with policy C1A, provided that travel demand associated with the development would not harm the transport system. The Council will seek to ensure that, where appropriate, educational facilities are made available for public use outside of term time or opening hours'.*



- 3.22. Paragraph 8.8 expands on Policy C1 by advising that the Council will welcome new facilities that will not have a harmful effect on local amenity, the environment and transport, encouraging such uses in locations where they are easily accessible by public transport.
- 3.23. Paragraph 8.9 goes on further to acknowledge it is difficult to accommodate community uses within the Borough because of competition from other uses and in order to overcome this concern it advocates the inclusion of suitable accommodation in mixed-use schemes, particularly in locations that are easily reached by public transport or on foot.
- 3.24. Paragraph 8.16 acknowledges that educational opportunities are necessary and good quality sites and buildings for educational use are needed to meet the needs of the Borough's population. It goes on to state:

*'The Camden Community Strategy identifies access to education as an important issue for increasing employment and developing the Borough's economy. Therefore, proposals that are aimed at meeting skills shortages in Camden will be encouraged'.*

- 3.25. With Paragraph 8.18 stating:

*'The Council will support the future growth in the University, its Colleges, and other educational institutions in a way that is sensitive to its surroundings and maintains the amenity of existing residential communities in Central London'.*

## 4. Consideration of Planning Issues

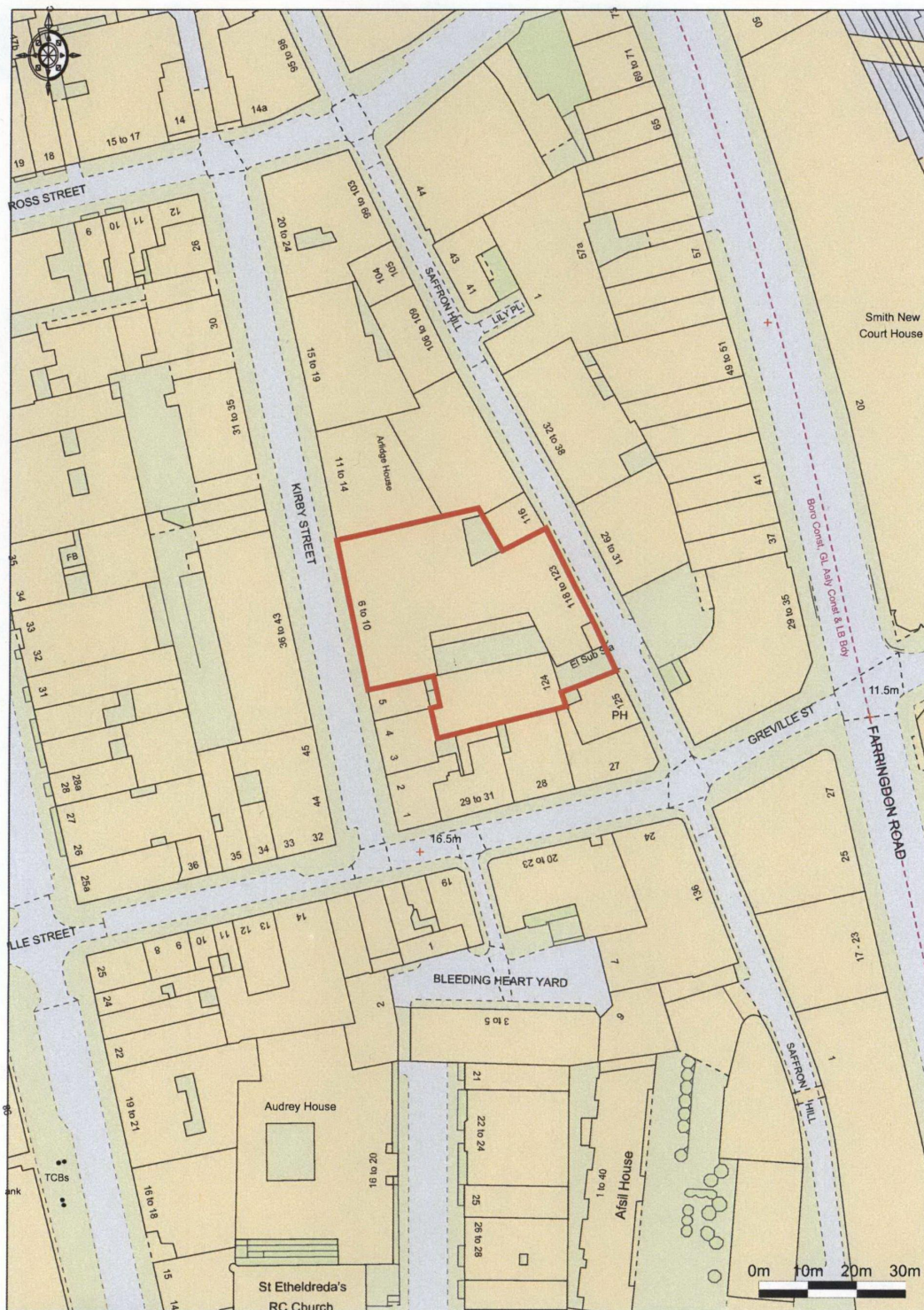
- 4.1. As set out in the previous section, the GLA and Camden Council's objectives towards securing sustainable communities, retaining existing business floorspace, and enhancing educational facilities have been acknowledged.
- 4.2. The London Plan confirms that education use is a major employer and the UDP similarly acknowledges that the Camden Community Strategy identifies access to education as an important issue for increasing employment opportunities and developing the Borough's economy.
- 4.3. This application seeks to widen the use of existing business floorspace, however, it does not propose the comprehensive change of use of the business accommodation within the building, merely a minority portion of the floorspace, akin to the provision of a 'secondary use' within a mixed use development (as referred to in Policy SD3 and the supporting text of the UDP).
- 4.4. Saffron House would remain primarily in employment use and use of the floorspace on the lower ground and ground floors for education purposes would not undermine the Council's policy objectives or the ability to prevent the comprehensive loss of the floorspace from business use. Similarly, a condition to require the reversion back to B1 use upon cessation of the D1 use would ensure no permanent loss of employment floorspace.
- 4.5. A professional educational use would be well suited to sit alongside the business floorspace within Saffron House and the surrounding area, and there is a distinct synergy between business uses and this type of education use. Such uses are also employment generators in their own right, with the education operations requiring teaching professionals and administrative support, normally employing a largely skilled but also unskilled workforce.
- 4.6. Although the proposal does not include the provision of workshop space for the jewellery industry as sought by the UDP, it does not undermine the general policy objectives of the Plan.
- 4.7. The application premises were developed in 2000 following the Council's approval of the redevelopment of a site previously used for employment and educational purposes. The Council's aspirations for securing mixed use developments as a means by which to help underpin the creation of sustainable communities has evolved since the time the permission to redevelop the site was granted. As such, although policy may not have supported a mixed use development of the site in 2000 (should the current mix of uses have been proposed), a mixed use redevelopment which included a community use such as the provision of an education facility in this location would not be contrary to the current policy regime.
- 4.8. As noted in Section 2 of this report, the site previously benefited from approval to use office floorspace for educational purposes and as such the principle of such a use in this location has previously been established.
- 4.9. The ground and lower ground floors of Saffron House have only been vacant since June 2008 but since that time there has been no interest in occupation of the floorspace for office purposes. There has, however, been interest expressed to use the floorspace for professional education purposes. Although not having been marketed for a two year period, the proposals would not undermine the Council's objectives in respect of protecting the local jewellery industry and would conform with the Council's general policy provisions relating to the change of use of business floorspace to a community facility and the creation of sustainable mixed use developments.

- 4.10. The proposals would require no external physical works and as such would have no direct impact on the character or appearance of the conservation area.
- 4.11. In terms of traffic generation, the site is well located for pedestrian access to residential areas, as well as being in close proximity to rail stations serving both the underground and overground (thameslink) rail services. The vehicular traffic to the site would be limited to delivery vehicles and these would be no greater in number than would be associated with the use of the premises for office purposes. There are currently no parking spaces provided at the site and the application does not propose to change this.

## 5. Conclusions

- 5.1. In conclusion, as set out above, the proposed change of use of the floorspace would not be detrimental to the Council's policy objectives and would introduce an appropriate mix of uses into the Saffron House property.
- 5.2. The proposals would not result in the permanent loss of B1 floorspace and it is requested by the applicant that the Council impose a condition requiring the floorspace to revert to B1 use upon the cessation of any D1 use.
- 5.3. The proposals will not detrimentally impact on the Council's objectives for protecting the jewellery industry in the Hatton Garden district. They do not propose the wholesale redevelopment of Saffron House and only seek to widen and mix the existing permitted use.
- 5.4. If implemented, permission to allow for D1 use on the ground and lower ground floors of the premises would lead to the provision of a professional education facility that would help to underpin the services available to the local professional employment/office market in the area. There is a distinct synergy between such uses and professional education operations are always more successful when provided in close proximity to their target market.





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**Project**  
Saffron House, Kirby Street, EC1

**Title**  
Site Location Plan

**Client**  
Zurich Assurance Limited

**LPA** London Borough  
of Camden

**Date:** December 2008  
**Project No:** 003055  
**Drawing No:** 003055/001  
**Drawn by:** KN  
**Scale:** 1:1,250



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**KEY**

— Site Location

**Department of Planning & Transportation**  
Peter Wynne Rees  
The City Planning Officer



Indigo Planning  
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Email  
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Your ref  
Our ref 08/00982/FULL

**Case Officer**  
Michael Blamires

Date 11 December 2008

### **Town and Country Planning Act 1990**

### **PLANNING PERMISSION FOR DEVELOPMENT (CONDITIONAL)**

The Common Council of the City of London hereby permits the development referred to in the schedule below in accordance with the plans submitted and subject to the conditions set out therein. Your attention is drawn to the Statement of Applicant's Rights enclosed.

#### **SCHEDULE**

**APPLICATION NUMBER: 08/00982/FULL**

**Location: Fitzwilliam House 10 St Mary Axe London EC3A 8BS**

**Proposal: Change of use of the lower ground and part ground floors to Class D1/B1 use and on cessation of the use or uses revert to office use Class B1**

#### **REASON FOR APPROVAL**

The decision to grant this planning permission has been taken having regard to the policies in the City of London Unitary Development Plan 2002 set out below, the London Plan, which forms part of the Development Plan for the City of London, and to all relevant material considerations:

ECON4 - Change of use from offices  
COM2 - Provision of community facilities  
ECON1 - To encourage office development

The Local Planning Authority concludes that the development is generally in accordance with the Development Plan. This is only intended as a summary of the reasons for granting planning permission. For further details on the reasons for this decision please see the application report by

City of London PO Box 270, Guildhall, London EC2P 2EJ  
Switchboard 020 7606 3030  
[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

[www.cityoflondon.gov.uk/plans](http://www.cityoflondon.gov.uk/plans)

contacting the Department of Planning and Transportation on 020 7332 1710 or by visiting the Department's home page on the City of London's web site.

#### CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 On the cessation of the use or uses hereby permitted, the use shall revert to office (Class B1)  
REASON: To ensure the following policy of the Unitary Development Plan 2002 is not prejudiced: ECON 1.

#### INFORMATIVES

- 1 The Plans and Particulars accompanying this application are:  
15722-LPG, 15722-LPLG, 212014/SLP1

A handwritten signature in black ink, appearing to read 'Peter Wynne Rees', with a small circular mark to its left.

Peter Wynne Rees  
The City Planning Officer  
Date of issue: 11 December 2008

**STATEMENT OF APPLICANT'S RIGHTS ARISING FROM THE REFUSAL OF  
PLANNING PERMISSION OR ON THE GRANT OF PERMISSION SUBJECT TO  
CONDITIONS**

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under Section 78 of the Town and Country Planning Act 1990.
- If you want to appeal, then you must do so within six months of the date of this notice, using a form which you can get from the Planning Inspectorate, Customer Support Unit, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN (Tel: 0117 372 6372) or downloaded from their website on [www.planning-inspectorate.gov.uk](http://www.planning-inspectorate.gov.uk).
- The Secretary of State can allow a longer period for giving notice of appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they have imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

**Purchase Notices**

- If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has or would be permitted. In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.