

Planning Services
London Borough of Camden
2nd Floor,
5 Pancras Square
London
N1C 4AG

By Planning Portal

10 August 2018

let.002.VC.EQ.00030354

Dear Sir/Madam

SAFFRON HOUSE, KIRBY STREET, LONDON, EC1N – NEW CONDENSERS AND EXTERNAL ALTERATIONS AT FOURTH AND FIFTH FLOORS

PLANNING PORTAL REF. PP-07195165

On behalf of Zurich Assurance Limited c/o Columbia Threadneedle Property Investments, the owners of the above property, we submit a planning application for:

“Installation of condenser units and associated external alterations to elevations”

This application is accompanied by the following documents:

- A completed planning application form and ownership certificates;
- Completed CIL Form;
- Noise Report, prepared by KP Acoustics;
- A package of application drawings, prepared by Morgan Lovell, including:
 - Location Plan (drawing ref. ML2918-G-800 rev. B);
 - Ground to Fifth Existing Rear Elevation (drawing ref. ML2918-G-5-902);
 - Fourth and Fifth Existing Side Elevation (C) (drawing rev. ML2918-4-5-904 rev. B);
 - Fourth and Fifth Existing Side Elevation (D) (drawing ref. ML2918-4-5-906 rev. A);
 - Ground to Fifth Existing Kirby Street Elevation (drawing ref. ML2918-G-5-909 rev. A);
 - Fourth Existing Rear Terrace Area (drawing ref. ML2918-4-700 rev. A);
 - Fourth Floor Proposed Mechanical Screening Lift Off Panels (drawing ref. ML2918-4-610 rev. C);
 - Fourth Floor Proposed Mechanical Plant Compound (drawing ref. ML2918-4-701 rev. C);

- Ground to Fifth Proposed Rear Elevation (drawing ref. ML2918-G-5-903 rev. C);
 - Fourth and Fifth Proposed Side Elevation (C) (drawing ref. ML2918-4-5-905 rev. B);
 - Fourth and Fifth Proposed Side Elevation (D) (drawing ref. ML2918-4-5-907 rev. A);
 - Lower Ground to Fifth Floor Saffron Hill Sight Line Section (drawing ref. ML2918-LG-5-908); and
 - Ground to Fifth Proposed Kirby Street Elevation (drawing ref. ML2918-G-5-910 rev. C).
- Drawing Schedule and Issue Sheet, prepared by Morgan Lovell;
 - Technical Submission Front Sheet; and
 - Details of the Proposed Condensers.

The application fee of £924 has been paid via planning portal.

The Site and Surroundings

The building, which recently underwent internal and external improvements, is currently in use by a number of office tenants and consists of basement, ground and four upper floors. The ground floor entrance is within the centre of the building fronting Kirby Street and includes a canopy over the front with a “Saffron House” sign sitting above the canopy. These works have been undertaken in relation to planning permission ref. 2015/5707/P.

The first and second floor levels have been brought slightly forward, to sit flush with the ground floor, in accordance with planning permission ref. 2015/5707/P. The fourth and fifth floors are set back from the lower floors with only the barrel roof line visible from street view.

The main pedestrian entrance to Saffron House is via Kirby Street, with the lower ground benefiting from additional access from Saffron Hill. 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. The site has a PTAL rating of 6b which is considered excellent.

The properties along Kirby Street vary in style and appearance and are predominantly used for offices on ground floor levels with a mix of office and residential uses on upper floors. Directly opposite the site is student accommodation from ground floor to third floor.

Relevant Planning History

Planning permission was granted on 26 February 2016 (LPA ref. 2015/5707/P) for the “external alterations to the existing offices (Class B1) including infilling the external front balconies at first and second floor level, enlargement of the window openings at third floor level, relocation of the ground floor front entrance, and

installation of new ground floor canopy”.

The works in relation to this permission have been completed.

Planning Policy

National Planning Policy Framework

The proposed development must be considered against the new National Planning Policy Framework (NPPF), (July 2018). The Framework sets out the Government’s position with regard to national planning policy.

At the heart of the NPPF is a presumption in favour of sustainable development. For decision taking, this means approving development proposals that accord with the development plan without delay.

The NPPF also sets out a number of core planning principles which underpin plan making and decision taking. These include an emphasis that planning should proactively drive and support sustainable economic development.

Section 12 provides guidance on good design. Paragraph 127 requires development to be sympathetic to local character and history and establish or maintain a strong sense of place, using the arrangement of the streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit. In addition, the policy requires developments to be visually attractive.

London Plan

The London Plan was originally adopted in 2011, with early alterations made in order to ensure that it complied with the NPPF in 2012. Further alterations were adopted in 2015 and 2016. The policies that are relevant to this application are set out below:

- Policy 4.2 Offices encourages the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility.
- Policy 7.4 Local Character seeks to improve an area’s visual or physical connection with natural features with regard to form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.
- Policy 7.6 Architecture ensures that architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape by incorporating highest quality materials and design appropriate to its context.
- Policy 7.8 Heritage Assets and Archaeology seeks to sustain and enhance conservation area’s significance and utilise their positive role in place shaping.

The draft London Plan (December 2017) is currently out for consultation.

Local Planning Policy

The London Borough of Camden Local Development Framework comprises the Camden Local Plan (July 2017). The relevant policies relating to this application are set out below.

- Policy D1 requires development to be of the highest architectural and urban design quality which improves the function, appearance, and character of the area through respecting local context and character and conserves or enhances the historic environment and heritage assets.
- Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.
- Policy A1 seeks to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.
- Policy A4 seeks to ensure that noise and vibration is controlled and managed and will only grant planning permission where plant and machinery can be operated without causing harm to amenity.

Supplementary Planning Guidance and Documents

In addition, consideration has been given to the following supplementary planning documents:

- Camden Planning Guidance 1: Design; and
- Camden Planning Guidance 6: Amenity.

Site Designations

The site falls within an "Archaeological Priority Area", Hatton Garden Conservation Area and the Central London Area.

The Proposal

The current tenants on the fourth and fifth floors are to vacate the premises early 2019, therefore, it is a good opportunity to refurbish these two floors for new tenants to occupy which will also conform with the most recent refurbishment that occurred under planning permission ref. 2015/5707/P. As part of the wider internal refurbishment of these two floors, the air conditioning operations are to be upgraded requiring the installation of new condensers to improve the air flow within these floors. Therefore, the proposal includes the following:

- Installation of two condenser units, including acoustic screening, at the existing fourth floor terrace;
- Replacement of the existing single door to provide a new double door at fourth

floor level to allow for access to the existing chiller; and

- Replacement of two window panels on fourth and fifth floors on elevation D to provide louvers.

Key Considerations

Economic Development

The fourth and fifth floors of the existing office building will become vacant in March 2019. To ensure the future vitality of the existing office building, improvements to these floors are required. Internal improvements will be carried out as well as improvements to the existing air conditioning system.

The proposed condensers are required to be installed to improve the operational function of these floors. The existing air conditioning system is unable to cope with the upgrades to the fourth and fifth floors and therefore, their own separate system is required.

The replacement of the windows for louvres are required to ensure that the air flow functions appropriately within these floors.

The external proposals, coupled with the internal alterations (that do not require planning permission) are being made to deliver a better quality of offices that will attract tenants which will ensure the premises can continue as a business use. The upgrading of the office building fully accords with Policy 4.2 of the London Plan and Policy E2 of Camden Local Plan and should be seen as positively supporting economic growth in this area.

Design

The proposed external alterations would be in-keeping with the character of the Conservation Area and host building and, therefore, conform with planning policy.

The proposal for the condensers at fourth floor will be located on the existing terrace. The terrace is accessed by the existing stairwell. The terrace will only be used for the purposes of any maintenance of the condensers and no access will be allowed for the tenants of the office building.

The units are located to the southern part of the existing office building (front onto Saffron Hill). They are in the most appropriate location to limit views from street level and the neighbouring residential units, thus preserving the character of the conservation area. The condenser units will include a decorative screening on the eastern side of the units to obscure the views further.

Drawing ref. ML2918-LG-5-908 shows the site line section of what will be seen from street view. The section shows that the location of the condensers will be located within a discreet position and will not impact street-level views.

The proposal includes the total replacement of four window panels within the fourth

and fifth elevation and the replacement of the existing single door with access to the condenser units to a double door access. These works will take place on the set-back fourth and fifth floor levels where there are limited views from the street level and will be well screened by the height of the neighbouring properties (as shown on drawing ref. ML2918-LG-5-908).

Accordingly, the proposed works will preserve the character and appearance of the surrounding conservation area including the buildings along Kirby Street due to their discreet location. They, therefore, accord with Local Plan Policies D1 and D2, as well as national and regional policies.

Amenity

Appendix 3 of the Local Plan sets out the noise levels requirements for applications. KP Acoustics have prepared a Noise Report which has assessed the noise levels of the two condensers at the fourth floor in relation to the requirements set out within the Local Plan.

The report states that “in order to control noise emissions from the air conditioning units to meet the noise emissions criterion, louvered screens should be installed between the units and the road Saffron Hill”. The report confirms that the recommended screening will ensure appropriate noise mitigation during the full 24hr period the condenser units will be in operation. Drawing ref. ML2918-4-701 rev C shows the proposed acoustic screening to meet these recommendations, providing appropriate noise mitigation to the condenser units.

The proposal therefore accords with Local Plan Policy A1 and A2, as well as national and regional policies.

Heritage Statement

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas. This includes the consideration of the setting of conservation areas.

Saffron House is within the designated heritage asset of the Hatton Garden Conservation Area. The Hatton Garden Conservation Area Statement (August 1999) sets out the development of the area. A summary of this has been provided below.

Hatton Garden derives its name from Sir Christopher Hatton. In the 1680s the area was a district where the smiths associated with Goldsmiths Hall lived and worked. By the mid-17th century, the existing gardens within the area were replaced by a planned grid of housing. The streets of this area were laid out on an intersecting grid pattern, from North to South and East to West. Kirby Street was named after the Hatton Manor of Kirby in Northamptonshire. Today, Hatton Garden is London's jewellery quarter and the centre of the UK diamond trade. The area is also home to a diverse range of media and creative businesses.

Saffron House has not been recognised as a designated heritage asset and the building is not listed, even though it is within the Conservation Area.

The key elements of the proposed amendments and their associated impacts on the significance of the above heritage assets are summarised in the table below.

Proposed development	Nature of impact	Impact on significance
Replacement of the windows on fourth and fifth elevations to louvres	The windows are not original and are of no historical value to the conservation area. The replacement of the windows to louvres on the fourth and fifth floor would not be seen from street view.	Neutral impact on the appearance of the building and its contribution to the conservation area.
Installation of condenser units on fourth floor with decorative screening and acoustic screening	<p>The property is not identified in the Conservation Area Statement as a location where roof/terrace alterations are restricted.</p> <p>The proposed units would project 1.8m from terrace level and would be well screened by a decorative screening, as shown on the submitted plans.</p> <p>From street level, the condensers would not be seen as shown on the submitted drawings.</p>	Neutral impact on the appearance of the building and its contribution to the conservation area.

The proposed alterations, as above, would improve the functioning of the building and improve its longevity and conservation into the future. The amendments are largely minor and would not cause any material harm to the heritage value of Saffron House itself, or its contribution to the Hatton Garden Conservation Area.

Conclusion

The proposals are part of a wider refurbishment of the fourth and fifth floors of the existing offices and will provide enhanced office provision for the borough. The external changes are modest but effective in updating these floors whilst



preserving the character of the Hatton Garden Conservation Area. The proposals will have no adverse impacts on the amenity of the area.

Having taken all material considerations into account, the current proposals are in accordance with the relevant guidance in the NPPF and the London Plan along with the relevant Local Plan policies.

We look forward to receiving confirmation that the application has been validated. If you require further information, please contact me or my colleagues at Indigo Planning.

Yours faithfully

A handwritten signature in black ink that reads "V. Chase". The signature is written in a cursive, flowing style.

Victoria Chase

Enc: As listed above