



GERALDEVE

One Fitzroy, 6 Mortimer Street,
London W1T 3JJ
Tel. +44 (0)20 7493 3338
geraldeve.com

Regeneration and Planning
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Our Ref: LJW/NLR/TEY/U0019379

26 September 2022

Dear Sir or Madam

**Town and Country Planning Act (as amended)
Application for Full Planning Permission
Saffron House, 6-10 Kirby Street, London, EC1N 8TS**

On behalf of our client, BNP Paribas Depository Services (Jersey) Limited and BlackRock (Channel Islands) Limited as Trustees of the Saffron House Unit Trust ('the Applicant'), we write to submit an application for full planning permission in respect of the proposed development at Saffron House, 6-10 Kirby Street, London, EC1N 8TS.

The proposals comprise the refurbishment of the existing external fire escape staircase, including removal and replacement of existing ACM cladding and alterations to the rear escape stairwell, the installation of 1no. louvre and 1no. extract duct within the external stairwell, in addition to alterations to the ground floor façade to Saffron Hill. The existing cycle entrance / fire exit doors to Kirby Street are also proposed to be replaced.

Accordingly, planning permission is sought for the following development:

“Refurbishment of existing external fire escape staircase including replacement of cladding, installation of 1no. intake grille, 1no. extract duct and 1no. acoustic louvre and replacement screening. Replacement shopfront and glazing and creation of new entrance to Saffron Hill elevation, replacement doors and installation of louvred panel to Kirby Street elevation”.

Site and Surrounding Area

Saffron House is a large building in Class E Use which fronts both Kirby Street and Saffron Hill. The Kirby Street façade and the internal accommodation were refurbished through a series of works undertaken between 2016 and 2020. The Kirby Street elevation is of simple but smart contemporary design with a largely white render façade with black detailing to the fenestration and the ground floor. The Saffron Hill elevation is largely brick with a consistent elevation pattern. The ground floor is articulated by large shopfront-style glazing and grey detailing. The existing fire escape staircase is partially screen at ground floor level but is exposed on upper floor levels. The upper floors are also articulated by a series of set-back terraces providing outdoor amenity space for the office accommodation.

The immediate area comprises a mix of commercial used with some residential interspersed. Immediately to the south of the site is The One Tun public house, which is comprised of a pub and function rooms set over ground and first floor level with 8no. rooms located and second and third floor level. Saffron Hill runs parallel to the Farringdon Road and perpendicular to Greville Street.

The site is not listed but is located within the Hatton Garden Conservation Area. The Conservation Area Appraisal notes

that Saffron Hill suffered badly from war-time bomb damage, hence the irregularity of the architecture in terms of age, form and style and the lack of a distinct character. The narrow, gentle winding of Saffron Hill is considered an important reminder of medieval street pattern. The One Tun pub, located at 125 Saffron Hill, is identified as an unlisted building making a positive contribution to the character of the Hatton Gardens Conservation Area. The closest listed building is No. 25 and 27 Farringdon Road (Grade II).

In terms of planning policy designations, the site is located within the Central London Area and the Hatton Garden Area.

Planning History

This site's recent planning history relevant to these proposals is set out below.

On 10 April 2007 planning permission ref. 2007/0945/P was granted for **“Installation of canopy over main entrance to existing office building (Class B1)”**.

On 16 March 2009 planning permission ref. 2009/0301/P was granted for **“Change of use of lower ground and ground floor from office (Class B1) to an alternative use of either offices (Class B1) or non-residential institution (Class D1)”**.

Subsequently on 19 November 2015 planning permission ref. 2015/5707/P was granted for **“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”**. These interventions were designed by Ben Adams Architects, who have designed the proposals which are the subject of this planning application.

Planning permission ref. 2018/3928/P was then granted on 11 September 2018 for **“Installation of condenser units and associated external alterations to the front and rear fenestration”**.

A non-material amendment application (ref. 2019/2637/P was granted on 14 June 2019 for **“Non-material amendment to planning permission granted under ref 2018/3928/P dated 08/10/2018 (Installation of condenser units and associated external alterations to the front and rear fenestration) namely, relocation of two approved louvres on fourth and fifth floor to the south and north elevations at fourth floor level”**.

The Proposals

The proposals comprise the refurbishment of the existing external escape stair on Saffron Hill, including replacement of balustrade infill panels and repainting of the stairwell. The existing ACM cladding within the stair alcove will be replaced with new, high-quality cladding. Also within the stair alcove an air intake grille and an AHU grille are proposed. The escape stair will be screened from the street by a new metal screening with fire escape door.

The ground floor façade to Saffron Hill is to be refurbished to provide level access to the building within an enhanced glazed frontage. The existing render will be made good and the existing windows at upper ground and first floor level will be painted to match. To the Kirby Street façade, the existing cycle entrance will be replaced providing an enhanced, welcoming entrance point. New subtle lighting is also proposed to enhance wayfinding.

The Development Plan

The Statutory Development Plan for the purposes of this pre-application request comprises the National Planning Policy Framework (2021), the London Plan (2021), Camden's Local Plan (2017), Camden's Site Allocations Plan (2013). Further relevant guidance is set out in Camden's Supplementary Planning Documents.

Planning Considerations

Principle of Development

Following the Government's amendments to the Use Classes Order, which came into effect on 1 September 2020, existing lawful Class B1 (office) uses transitioned into the new Class E use. Having regard to this, the existing lawful use of the premises is now considered to be Class E use.

Camden Local Plan Policy E2 seeks to maintain and enhance the quantum and quality of employment floorspace within the

borough. The building has undergone incremental enhancements with the Kirby Street element most recently refurbished, including comprehensive improvements to the façade. The proposed works to enhance the external fire escape stairs and the ground floor façade to Saffron Hill will complete the external upgrades to the building. The refurbishment of the escape stairs is required to remove the ACM cladding and will ultimately improve building fire safety. The alterations to the ground floor level will provide a much needed upgrade to the building at street level on Saffron Hill. The proposed external works form part of a wider Category A internal refurbishment of the lower floors which will ensure the longevity of the building as attractive commercial floorspace.

Overall the proposals will deliver improvements to the office building, securing the long term future of the building and contributing to the enhancement of the quality of employment space within the borough.

Design and Heritage

Local Plan Policy D1 seeks to ensure high quality design in development, which respects local context, preserves or enhances the historic environment and heritage assets, is sustainable in design and construction, and incorporates high-quality landscaping. Policy D2 has regard to heritage assets and stipulates the Council will require that development within conservation areas to preserve, or where possible, enhance the character and appearance of the area.

Local Plan Policy D3 states that when determining applications for shopfront development, the Council will take into account the design, including details and materials, of the shopfront, the existing character, having regard to architectural and historic merit and design of the building and its shopfront, and the relationship between the shopfront and the upper floors of the building and surrounding properties, including between the shopfront and any forecourt or lightwell. The Council will also take into account the prevailing character of shopfronts in the vicinity, community safety, and accessibility. It is proposed to refurbish the external staircase and stair alcove. The existing ACM cladding, which clads each of the three elevations that surround the alcove must be removed. In order to facilitate its removal the staircase must be partly dismantled. The cladding will be replaced with non-combustible, high-quality cladding, ensuring the building's primary fire escape is safe. The existing staircase partially corresponds to balcony detailing on the upper floor levels of Saffron House, however it is never viewed in this context due to narrow, winding nature of Saffron Hill and the setback of the upper floor levels. The external staircase is therefore primarily viewed in the context of the ground to second floor level, which forms the primary façade of Saffron House on the eastern side of the building, and in the context of the adjacent One Tun pub, which, as identified in the Hatton Garden Conservation Area Audit, makes a positive contribution to the Conservation Area. Other buildings identified as making a positive contribution to the Conservation Area are 29-31 Saffron Hill and 32-38 Saffron Hill, both opposite, and 116-117 Saffron Hill, adjacent to the north.

The window details at upper ground and first floor level will be painted dark grey, which will smarten the façade and is a contemporary approach commonly found within the Hatton Garden Conservation Area, and notably at the adjacent One Tun pub and at 29 Greville Street. The proposed alterations for the shopfront would see new fenestration inserted into existing openings, with one bay accommodating an additional door. The new windows are of high-quality double-glazed units, providing high levels of natural light into the office floorplate and improve the thermal performance of the building. The existing door to the northernmost end of the façade will be removed. A modest amount of demolition will facilitate the installation of an enlarged window which corresponds in height and width to the existing opening on the façade, therefore enhancing consistency and rhythm. The shopfront render will be refurbished and painted in dark grey which, overall, will deliver a high-quality, contemporary shopfront, which is sensitive to its historic context. The dark grey painted render will ensure that the relationship between the shopfront, the stair alcove, and surrounding buildings is strengthened, bringing the sense of a cohesive architectural approach to the southern end of Saffron Hill. The large format glazing and proposed lighting providing an active frontage and contribute to community safety.

On the Kirby Street side, the only proposed change is the replacement of the existing cycle access / fire exist door at ground floor level with an improved, glazed entrance door with louvered panel above.

Overall, the proposed development represents an improvement on the existing situation. The alterations to the ground floor façade will provide a contemporary shopfront which has a strengthened relationship with the upper floors of the primary façade on Saffron Hill, the fire escape stair alcove and detailing on the adjacent pub. The refurbished staircase further enhances this relationship and is a sensitive alteration which subtly enhances the contribution the building makes to the Hatton Garden Conservation Area through high quality materiality and finish. The replacement of the cladding is required to ensure the building's fire safety. The proposed development is therefore considered to accord with Camden Local Plan Policy D1, D2 and D3.

Amenity

Camden Local Plan Policy A1 seeks to protect the quality of life of occupiers and neighbours and states the Council will grant permission for development unless this would cause unacceptable harm to amenity. The Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected, having regard to visual privacy, outlook, daylight and sunlight, highways impacts, noise and vibration levels and impacts of construction.

Noise

The existing building is in commercial use and the prevailing contextual character of the site is predominantly commercial. It is acknowledged there are some sensitive receptors in the immediate vicinity, including the 8no. rooms accommodated above the One Tun pub. New internal equipment will be installed in the existing AHU room located at upper ground floor level. A new, louvred AHU intake and extraction is proposed within the stairwell to replace the existing. An Acoustic Assessment, prepared by Anderson Acoustic, is submitted in support of this planning application. The Acoustic Assessment identifies second and third floor of the One Tun public house, located at 125 Saffron Hill, as the nearest sensitive receptors and confirms that the proposed attenuation ensures that the projected plant noise is well below the noise emission limit.

Energy and Sustainability

A key driver for this external alterations and refurbishment scheme is to improve the energy performance and sustainability credentials of the building. The design team have sought incorporate a number of measures which will reduce the overall impact of the building. Twin and Earth have been advising the design team in respect of sustainability and have input into a Sustainable Design Statement which is included at Chapter 9 of the Design and Access Statement.

The Client brief was to take a refurbishment-first approach to ensure the life of the building for the long term within existing parameters, as opposed to seeking partial demolition or total redevelopment due the associated environmental and energy impacts. The proposed works will deliver an improved thermal performance via high performance glazing and replacement cladding to the stairwell. The proposals are targeting a BREEAM rating and are anticipating achieving an EPC 'A' rating.

Enclosures

The pre-application advice request comprises the following documents:

- Covering letter, prepared by Gerald Eve LLP
- Pre-application request form, prepared by Gerald Eve LLP;
- Site location plan, prepared by Ben Adams Architecture;
- Existing and Proposed Drawings, prepared by Ben Adams Architecture;
- Design and Access Statement, prepared by Ben Adams Architecture;
- Sustainable Design Statement (within DAS) prepared by Twin and Earth; and
- Acoustic Assessment, prepared by Anderson Acoustics.

This pre-application submission has been made via email. The pre-application advice fee of £266.20 will be made electronically.

We trust that the information submitted is sufficient to validate the application. Should you require anything further, please contact Natalie Rowland (0207 333 6220) or Tom Eyres (0207 333 6429).

Yours faithfully



Gerald Eve LLP