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London Borough of Camden
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Our Ref: LJW/NLR/TEY/U0019379

1 February 2023

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 placement of the existing fourth floor chiller enclosure like-for-like. Within the enclosure, the existing chiller would be removed and replaced with a new unit. In addition, 2no. VRF units will be provided within the acoustically louvred enclosure.

Accordingly, planning permission is sought for the following development:

"Replacement plant at fourth floor level within replaced louvred plant enclosure".

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 on 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"**.

Planning permission (ref. 2022/4287/P) was granted on 21 December 2022 for **"Refurbishment of existing external fire escape staircase including replacement of cladding; installation of 1 intake grille, 1 extract duct and 1 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 associated with cycle store to Kirby Street elevation"**.

The Proposals

The proposals comprise the replacement of the existing chiller with a new unit, in addition to the installation of 2no. VRF units at fourth floor level. The existing enclosure will be replaced like-for-like with the addition of new doors will be located on the south elevation to aid maintenance.

The material of new enclosure will match the existing. There will be no change to the footprint, height or scale of the enclosure.

There are no other works proposed a part of this application.

The Development Plan

The Statutory Development Plan for the purposes of this planning 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

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. Planning permission ref. 2022/4287/P, granted on 21 December 2022, consented further works to the escape stairs and the ground floor elevation to Saffron Hill. The proposed works to

upgrade the fourth floor plant and enclosure 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.

The new plant enclosure has been designed to match existing and therefore following its installation there will be no perceivable difference apart from the additional doors located on the south elevation. The additional doors are required to aid maintenance of the plant units contained within.

The proposals are of quality design and would preserve the character and appearance of the conservation area. The proposed development is therefore considered to accord with Camden Local Plan Policy D1 and D2

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, the student accommodation building located at 36-43 Kirby Street, which is approximately 16m from the enclosure.

Within the replaced louvred enclosure, the existing chiller will be removed and replaced with 3no. separate smaller units that will more efficiently provide the same function. A Technical Memo has been prepared by Anderson Acoustics in support of this planning application. The Memo confirms that the existing chiller (model Carrier 30GS-290) has a published sound power level of 104dB_{Lw}.

The proposed equipment yield a combined sound power level of 94 dB L_w when fully operational, which is 10dB below the maximum existing noise level.

The Memo concludes that, on the basis that the replacement louvres are of a similar performance or better than the existing, the replacement plant will produce a lower sound output than the existing chiller and enclosure. The proposals are therefore considered acceptable and to accord with Camden Local Plan Policy A1.

Energy and Sustainability

The existing single chiller is to be replaced by several smaller units allowing for each tenant to have greater control over their heating and cooling. This will improve the environmental performance of the chiller system throughout the building whilst allowing for increased future flexibility through easier replacement or disassembly of parts.

The new units will be more efficient than the existing: the refrigerant within the existing chillers (R134a) has a global warming potential (GWP) of 1430, whilst the proposed chiller refrigerant (R454b) will have a GWP of 467, denoting a marked reduction.

Enclosures

The planning application advice request comprises the following documents:

- Covering letter, prepared by Gerald Eve LLP
- Completed Planning Application Form, prepared by Gerald Eve LLP;
- Site location plan, prepared by Ben Adams Architecture;
- Existing and Proposed Drawings, prepared by Ben Adams Architecture;
- Design, Access and Sustainability Statement, prepared by Ben Adams Architecture; and
- Acoustic Technical Memo, prepared by Anderson Acoustics.

This planning application has been made via the Planning Portal. The application fee of £56.20 (including Planning Portal servicing fee) 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