



International House, 36-38 Cornhill, London, EC3V 3NG

# Planning Statement

19-20 Hatton Place EC1N 8RU

Hatton Garden Metals

May 2024

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## Summary of conclusions

1. This site is an existing three storey building located at 19-20 Hatton Place EC1N 8RU in commercial use. It is currently vacant. The neighbourhood is characterised by a mixture of uses that predominantly support the area's jewellery trade, and residential accommodation.
2. The applicant, Hatton Garden Metals, is a precious metals business located in Hatton Garden. It wishes to move to the premises to expand its operations. Given the nature of the business, it requires its public facing area to be secure and requires a second entrance to serve this need. An existing entrance was closed following an application made in 2008 which this application proposes to re-open. The council has since installed two on-street parking bays directly in front of the location of the new entrance which are proposed for removal as part of the application for safety, security and accessibility reasons. Internal alterations will also be undertaken, but these are not subject to planning.
3. This is an application for:

*Creation of a secondary access to the building for the public and for the deletion of two existing on-street parking bays.*
4. The site is located in the Hatton Garden Special Retail Area and in the Hatton Garden conservation area. It is not a listed building.
5. An officer pre-application response ref: 2023/5465/PRE, dated 28 March 2024 was received and is included at Appendix B. The officer response advises, in summary, that the proposal:
  - Is considered to help to protect the special retail function of Hatton Garden;
  - Has been discussed with colleagues in the transport and parking teams with feedback on removing the two bays confirming that the Council would be supportive of the removal of the bays if that were required;
  - In principle of the reinstatement of the door is supported;
  - would need to be a door designed in a sympathetic way to the host building. The building and street have a strong industrial character, which should be reflected in any proposal.
6. The key benefits of the scheme are:
  1. It restores an original opening in the façade of the building to provide a secondary means of access;
  2. It improves security at the site;
  3. It improves safety at the site;
  4. It promotes and protects the jewellery industry in Hatton Garden.
7. We consider the key issues in this application are:
  - The principle of development;
  - Design, access and heritage;
  - Security;

- Highways safety.
8. This statement demonstrates how the key issues meet the material policies in the Development Plan. It is consistent with officer pre-app advice and may be approved without delay.

## 1.0 Introduction

- 1.1 This statement supports a full planning application, made on behalf of Hatton Garden Metals. The site address is 19-20 Hatton Place EC1N 8RU. The local planning authority (“the LPA”) is London Borough of Camden.

### The applicant

- 1.2 Hatton Garden Metals Ltd, was established in 2007 and is a local business, presently trading at 11 St Cross Street, nearby to the site. The company is a family-owned gold and metals business strategically positioned in Hatton Garden. Its core operations revolve around delivering an exceptional gold and metals-selling service to both the public and trade customers, which include major retail establishments and pawnbrokers across the UK. It offers investment grade gold and other metals coins and bars available for purchase at its shop and through its online platform.
- 1.3 The business has grown successfully over the last 15 years and out-grown the current premises. Since it invites members of the public into its building, it requires a separate entrance for its customers and for its staff for safety and security.

### The proposal

- 1.4 The description of development is:

*Creation of a secondary access to the building for the public and for the deletion of two existing on-street parking bays.*

### The application

- 1.5 The application is supported by the following documents:
- Application forms, certificates and notices;
  - CIL form;
  - Site location plan;
  - Block plan;
  - Existing elevation and floor plans;
  - Proposed elevation and floor plans;
  - Door specification SP1155 Kingscross Bay Door;
  - Fire safety statement to meet London Plan policy D12;
  - This planning statement.
- 1.6 A Design and Access Statement is not required but the principles thereof are contained in this statement below.

## 2.0 Site and area description

- 2.1 The site address is 19-20 Hatton Place EC1N 8RU. The site area is approximately 117 sqm. The building is currently vacant.
- 2.2 The building is a three storey commercial building located in Hatton Garden. The neighbourhood is characterised by a mixture of uses that predominantly support the area's jewellery trade, and residential accommodation. The site is located on a back street and bounded by its neighbours on the west and south. The north and east facades of the building face on to Hatton Place, a public highway.
- 2.3 The site has a 6b level of public transport accessibility, which is the highest level.
- 2.4 The site is located in Flood Zone 1 (least risk). It is located in the Hatton Garden conservation area. It is not a listed building.
- 2.5 Existing neighbouring land uses include commercial uses related to the Hatton Garden precious metals and jewellery trades. Buildings in the area range from three to four storeys. There is no soft landscaping due to the urban nature of the area. there are no existing boundary treatments except party walls shared with neighbouring buildings. The front of the building faces directly on to Hatton Place.
- 2.6 Existing highway markings include two marked on-street parking bays. The site is located in a controlled parking zones (CPZ).

### 3.0 Legislation and guidance

- 3.1 To the extent that development plan policies are material to an application for planning permission the decisions for applications must be taken in accordance with the development plan, unless there are material considerations that indicate otherwise (section 38(6) of the Planning and Compulsory Purchase Act 2004).

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the local planning authority that requires that special attention be given to preserving or enhancing the character or appearance of a conservation area.

#### National Planning Policy Framework

- 3.2 The National Planning Policy Framework (NPPF) was last published in December 2023. It sets out the Government's planning policies for England and how these are expected to be applied. The NPPF stresses the importance of having a planning system that is genuinely plan-led (paragraph 15).
- 3.3 Decisions should apply a presumption in favour of sustainable development and that means approving development proposals that accord with an up to date development plan without delay (paragraph 11).
- 3.4 With regard to design, paragraph 124 states that "The creation of high quality buildings and places is fundamental to what the planning and development process should achieve". Paragraph 127 sets out criteria which new developments are expected to meet.
- 3.5 With regard to heritage, paragraph 189 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 193 states that great weight should be given to the conservation of heritage assets.
- 3.6 Paragraphs 195 and 196 set out the required approach towards decision-taking where proposals will lead to harm to heritage assets.
- 3.7 On building a strong and competitive economy, paragraph 80 states "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future".
- 3.8 On ensuring the vitality of town centres, paragraph 85 states "Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation".

#### Planning practice guidance

- 3.9 The Planning Practice Guidance (NPPG) highlights that good design is an integral part of sustainable development. New proposals should reflect this requirement for good design (as set out in national, regional and local policy) while local planning authorities are advised to give

great weight to outstanding or innovative designs that help to raise the standard of design more generally in the area. The guidance further outlines that good design seeks to create places, buildings and spaces which work well for everyone and, most importantly, adapt to the needs of future generations



## 4.0 Development plan policy

4.1 The documents that form the development plan for the area are:

- The London Plan (2021)
- The Camden Local Plan (2017)
- The Camden Policies Map (2017)

### London Plan (2021)

4.2 The following London Plan policies we consider relevant and the proposal responds positively to the requirements:

- Policy SD4 The Central Activities Zone (CAZ);
- Policy D4 Delivering good design;
- Policy D5 Inclusive design;
- Policy D11 Safety, security and resilience to emergency;
- Policy HC1 Heritage conservation and growth;
- Policy T2 Healthy Streets.

### The Camden Local Plan (2017)

4.3 The following policies we consider relevant and the proposal responds positively to the requirements:

- Policy E1 Economic development;
- Policy E2 Employment premises and sites;
- Policy TC2 Camden's centres and other shopping areas;
- Policy TC1 Quantity and location of retail development;
- Policy D1 Design;
- Policy D2 Heritage;
- Policy C5 Safety and security;
- Policy C6 Access for all;
- Policy T1 Prioritising walking, cycling and public transport;
- Policy T2 Parking and car-free development.

### Supplementary Planning Guidance

- Access for All - Camden Planning Guidance (CPG) 2019;
- Design CPG 2021;
- Employment Sites & Business Premises CPG 2021;
- Town Centres and Retail CPG 2021;
- Transport CPG 2021.

## 5.0 Relevant planning decisions

5.1 Relevant on-site planning decisions are:

Reference	Description	Decision	Date
2008/2391/P	Alterations to the existing building including the replacement of windows and doors, installation of canopy over main entrance and ramp access, replacement of roof lantern, installation of 3 x condenser units and lift overrun at roof level with acoustic screen enclosure.	Granted	04-06-2008
2007/5644/P	Change of use from jewellers show room and workshop (sui generis) to office use (Class B1); replacement of existing windows, doors and roof lantern; and installation of three air conditioning units at roof level.	Refused	10-03-2008
26843/R	Renewal of permission dated 29th November 1973 (Reg.No.17458 (R)) for construction of an additional (3rd) floor for light industrial use.	Conditional	22-07-1978

5.2 No relevant off-site planning decisions are identified.

## 6.0 Other material considerations

- 6.1 An officer pre-application response ref: 2023/5465/PRE, dated 28 March 2024 was received and is included at Appendix B.
- 6.2 The officer response advises that the proposal:
- Is considered to help to protect the special retail function of Hatton Garden;
  - Has been discussed with colleagues in the transport and parking teams with feedback on removing the two bays confirming that the Council would be supportive of the removal of the bays if that were required;
  - In principle of the reinstatement of the door is supported;
  - would need to be a door designed in a sympathetic way to the host building. The building and street have a strong industrial character, which should be reflected in any proposal.

## 7.0 Key issues and considerations

7.0.1 We consider the key issues in this application are:

- The principle of development;
- Design, access and heritage;
- Security;
- Highways safety.

### 7.1 The principle of development

- 7.1.1 The site is located in the London Plan Central Activities Zone (CAZ) and Policy SD4 seeks to promote and enhance the unique concentration and diversity of cultural, arts, entertainment, night- time economy and tourism functions in London. It directs LPAs to define boundaries for Special Policy Areas, where there are valued specialist clusters of uses or functions identified as having particular significance to London’s unique identity, economic function or cultural heritage. Examples include Hatton Garden for jewellery.
- 7.1.2 Camden Policy E1 Economic development seeks to create the conditions for economic benefits and harnessing the benefits for local residents and businesses. Specifically part g(iv) seeks to achieve this by promoting and protecting the jewellery industry in Hatton Garden.
- 7.1.3 Camden Policy E2 Employment premises and sites will encourage and protect sites that support the CAZ or the local economy. It seeks to secure and retain premises suitable for use as jewellery workshops and related uses in Hatton Garden.
- 7.1.4 Camden Policy TC2 Camden’s centres and other shopping areas designates Hatton Garden as a Specialist Retail Area. Policy TC1 Quantity and location of retail development states that the Council will promote the following distribution of retail and other town centre uses.
- 7.1.5 The proposal will support the CAZ and the Special Retail Area of Hatton Garden. We find the proposal meets London Plan policy SD4 and Camden Local Plan policies E1, E2, TC1 and TC2.

### 7.2 Design, access and heritage

- 7.2.1 London Plan Policy D5 on inclusive design requires developments to achieve the highest standards of accessible and inclusive design, including to be convenient and welcoming with no disabling barriers, be able to be entered, used and exited safely, easily and with dignity.
- 7.2.2 London Plan Policy HC1 Heritage conservation and growth states that development affecting heritage assets should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.
- 7.2.3 Camden Local Plan Policy D1 Design seeks to secure high quality design in development. It requires development to respect local context and character and that it preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage. It seeks details and materials that are of high quality and complement the local character, that development integrates well with the surrounding streets and open spaces, that it is inclusive and accessible for all and that it is secure and designed to minimise crime and antisocial

behaviour.

- 7.2.4 Camden Local Plan Policy C6 Access for all seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. It expects development to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.
- 7.2.5 Camden Local Plan Policy D2 Heritage seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas. The Council requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.
- 7.2.6 Existing site photos are enclosed at Appendix A. These show the frontage of the building and two occupied car parking spaces in front of the façade.
- 7.2.7 The proposal comprises the reinstatement of a door that was approved for removal under ref: 2008/2391/P on 3 October 2008. The historic plans are enclosed for information at Appendix C.
- 7.2.8 The proposed design of the new door is guided by security principles and is consistent with, and compliments, the local context and character of other businesses in the Hatton Garden area.
- 7.2.9 The pre-app response advises how building and street have a strong industrial character. The proposed door has been selected to reflect this.
- 7.2.10 The door is proposed to be accessible for all, with no disabling barriers, be able to be entered, used and exited safely, easily and with dignity by all.
- 7.2.11 The site is located within the Hatton Garden conservation area. As such, the proposals must be assessed with regard to it preserving, or enhancing the significance of the heritage asset. We consider that the context of the proposed new door, being on a back street in Hatton Garden, it will have an impact that it *de minimus* on the significance of the heritage asset. The design is contiguous with the character and appearance of other doors in the conservation area that are required to be secure. Having identified the heritage asset, its significance, and considered the likely impacts, we consider the proposal preserves or enhances the character and appearance of the area, in accordance with heritage policies and the NPPF.
- 7.2.12 The site photos at Appendix A show evidence of anti-social behaviour, where people are apparently using parked cars for cover whilst going to the toilet in the street, with human waste and toilet tissues present. The proposal removing the two existing car parking bays would, therefore, also remove the opportunity for using vehicle cover for these actions, likely to improve the appearance and cleanliness of the area.
- 7.2.13 The proposal will reflect the existing character and appearance of the area and the Hatton Garden conservation area. it will provide access for all with no disabling barriers. We find the proposal meets London Plan policies D5 and HC1 and Camden Local Plan policies D1, D2, and C6.

### 7.3 Security

- 7.3.1 London Plan Policy D11 Safety, security and resilience to emergency seeks to maintain a safe and secure environment and reduce the fear of crime. It expects development to include measures to design out crime.
- 7.3.2 Camden Local Plan Policy C5 Safety and security requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn.
- 7.3.3 The proposed door will help to deliver a secure environment for the business and reduce the fear of crime. It incorporates design principles which contribute to community safety and security. We there, consider the proposal meets London Plan policy D11 and Camden Local Plan C5.

### 7.4 Highways safety

- 7.4.1 London Plan Policy T2 Healthy streets requires development proposals to reduce the dominance of vehicles on London's streets whether stationary or moving, and connect to local walking and cycling networks as well as public transport.
- 7.4.2 Camden Local Plan Policy T1 Prioritising walking, cycling and public transport states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 7.4.3 Camden Local Plan Policy T2 Parking and car-free development states that the Council will limit the availability of parking to disabled spaces and/ or essential operational or servicing needs and require all new developments in the borough to be car-free.
- 7.4.4 The proposal includes the removal of two on-street parking bays that are located directly in front of the location for the proposed reinstatement of the former door (see historic plans in Appendix C). Details are included on the parking bay plan. For security reasons, both parking spaces would need to be deleted.
- 7.4.5 The development will help to reduce the dominance of vehicles on London's streets and will help promote sustainable transport by prioritising walking, cycling and public transport. The pre-app response confirms the parking operations teams support in removal of the two bays if that were required.
- 7.4.6 We find the proposal accords with London Plan Policy T2 and Camden Local Plan Policies T1 and T2.

## 8.0 Conclusions

- 8.1 This statement demonstrates that the proposal is in accordance with the material policies in the development plan. It is made consistent with the advice provided via a pre-application request, which forms a material considerations there are to justify an approval.
- 8.2 The key benefits of the scheme are:
1. It restores an original opening in the façade of the building to provide a secondary means of access;
  2. It improves security at the site;
  3. It improves safety at the site;
  4. It promotes and protects the jewellery industry in Hatton Garden.
- 8.3 Since the application has been found in accordance with the Local Plan and material considerations and has strong policy support, we encourage the local planning authority to approve the proposals without delay