

Planning and Heritage Statement

84 Hatton Garden, London EC1N 8JR

Iceni Projects Limited on behalf of
84 Hatton Garden Ltd

March 2016

Iceni ref. 16/007

ICENI PROJECTS LIMITED
ON BEHALF OF 84 HATTON
GARDEN LTD

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1. INTRODUCTION

- 1.1 This Planning Statement is submitted, on behalf of 84 Hatton Garden Limited ('the Applicant'), in support of an application under Section 73 of the Town and Country Planning Act 1990 (as amended).
- 1.2 The application seeks consent to vary the 'approved plans' condition (Condition 2) on planning permission decision notice 2015/1925/P, which was granted on 3 December 2015, subject to S106 agreement. This scheme is referred to as the 'original' planning consent throughout the rest of this statement.
- 1.3 Condition 2 states:

The development hereby permitted shall be carried out in accordance with the following approved plans: Site Location Plan HTG LP 001; E101; EX 101; EXD 101; PL 101 Rev A; PL102; PL 103; PL 104; PL 105; PLX 01; PLX 02; PLXD 03; PL04; PLXD 03; PLXD 04; S 101; SX 001; SXD 001; Design and Access Statement by Works Architecture dated 27th March 2015; Planning and Heritage Statement by Icen Projects dated March 2015; Construction Management Plan; Structural Engineering Report by Chris Brown Structural Engineering Ltd dated March 2015; Transport Assessment by TPA dated March 2015; Energy Report by Price & Myers dated 27th March 2015; Code for Sustainable Homes Pre-assessment by Price & Myers dated 27th March 2015; Daylight/sunlight Report by Right of Light Consulting dated 3rd March 2015 Acoustic Report by Conabeare Acoustics dated 26th March 2015.

Reason: For the avoidance of doubt and in the interest of proper planning.

- 1.4 As such, the description of development for this minor material amendment application is

'Variation of Condition 2 of planning permission 2015/1902/PP (dated 2 December 2015) for the "Erection of 3 to 8 storey plus basement building comprising retail unit (Class A1) at ground floor level, jewellery workshop (Class B1c) at lower ground floor level, and serviced apartments (Class C1) above, following demolition of upper floors (1st -5th) of existing building." :- to allow minor material changes within Class C1 from serviced apartment to hotel and associated minor external alterations to the facades of the building'

- 1.5 This application is being submitted on behalf of the new owners and the minor amendments proposed would allow them to operate their bespoke hotel offer.
- 1.6 The application is submitted following pre-application discussions with the London Borough of Camden ('LBC' or 'the Council') officers.

1.7 The purpose of this statement is to demonstrate that the proposed minor amendments are of a scale and/or nature that would result in a development which is not substantially different from the one which has been approved.

1.8 The statement is structured as follows:

- Section 2 describes the application site and its surroundings;
- Section 3 outlines the planning history and lawful use of the site;
- Section 4 describes the consented development and minor material amendment proposals;
- Section 5 identifies the planning policies relevant to the determination of the application;
- Sections 7-11 identify the key planning considerations raised by the proposed minor material amendments; and
- Section 12 concludes that planning permission should be granted.

1.9 Appendices to this statement comprise:

Supporting Documents

1.10 The extent of the supporting information required for this planning application was discussed and agreed with the Council in its role as Local Planning Authority (LPA) prior to the submission of the planning application. For full list see **Appendix 1**.

2. SITE AND SURROUNDINGS

- 2.1 This section describes the application site, its policy designations/allocation and the surrounding area. This section has been included to provide context and does not differ from the Planning Statement prepared for the original application.

The application site

- 2.2 At present, the site comprises an unlisted commercial building on the west side of Hatton Garden with five storeys above ground floor, plus a basement. The building contains one occupied retail unit (Class A1) at ground floor and the rest of the building is vacant jewellery workshops/ancillary office space (Class B1c). The site is 202 sq m.
- 2.3 The site benefits from an 'Excellent' Public Transport Accessibility Level rating of 6b. The nearest station is Farringdon, less than 5 minutes' walk to the east of the site, whilst the nearest bus stops are also located to the east, on Farringdon Road.
- 2.4 The existing lawful planning use of the site is office/jewellery workshop (Use Class B1c) and retail (Class A1) at ground floor level. However only ground floor of the building is occupied and is currently in use. Given the site's long term vacancy the building has fallen into a poor state of repair and is in need to significant capital investment to bring it up to standard.
- 2.5 The site is considered to make a neutral contribution to the conservation area. The Hatton Garden Conservation Area Statement does not identify the building as making either a positive or a negative contribution to the character and appearance of the conservation area.

The surrounding area

- 2.6 Hatton Garden is characterised by a mix of uses, with commercial, jewellery retail and workshop uses, together with residential and commercial uses on the upper floors of buildings. Leather Lane to the immediate west of the site also has a vibrant character.
- 2.7 The height of buildings along Hatton Garden ranges from three storeys over ground to eight and ten storeys over ground as Hatton Garden approaches High Holborn.
- 2.8 Historically the centre of the jewellery trade in London, the uses in Hatton Garden still reflect this function, with limited workshop spaces for production and retail units dedicated to the sale of jewellery.

- 2.9 In terms of built form, the immediate neighbours of the site in question are predominantly buildings constructed in the late 20th Century, with a mix of late 19th and post war buildings opposite.
- 2.10 North of the site, at no. 77 (which runs up to Cross Street), is a recent development comprised of ground floor plus six storeys above of all commercial space. As part of this development, a provision of jewellery workshop space was included in an adjacent building.
- 2.11 Immediately south of the site, numbers 85, 85 and 87 Hatton Garden are all of late 20th century construction, with 85 and 86 comprising ground floor café and ground floor retail uses at ground floor respectively. The upper floors of 85 and 86 also comprise commercial space, with four and five stories above ground respectively. 87 Hatton Garden comprises a ground floor jewellery workshop but differs from 85 and 86 in the composition of the upper floors, with six storeys of residential space above.
- 2.12 This mix of uses is reflected along Hatton Garden, with some properties offering upper storeys of residential and other offering jewellery workshop space. While there is still a significant of jewellery retail, there are also increasing numbers of cafes, other retail and commercial uses.
- 2.13 The character and appearance of the conservation area is discussed in more detail at Section 11.

Policy designations/allocations

- 2.14 The site is affected by the following Development Plan designations/allocations:
- Core Central Activities Zone (CAZ).
 - Hatton Garden Conservation Area.
 - Hatton Garden Area.
 - Designated View 2A.1 Parliament Hill summit to St Paul's Cathedral - Right Lateral Assessment Area.
 - Archaeology Priority Area.
 - Central London Area.

3. PLANNING HISTORY

- 3.1 This section summarises the site's planning history and relevant planning decisions.
- 3.2 The site is currently being used as a jewellery retail (Class A1) unit at ground floor, and the remainder of the building was formerly used as offices/ jewellery workshop space (Class B1c).
- 3.3 The key decision in relation to this application is for the original consent granted on 3 December 2015. There are no other planning decisions of relevance.
- 3.4 A full schedule of planning history is provided at **Appendix 2**.

4. THE PROPOSED DEVELOPMENT

4.1 This section sets out the minor material amendments that are being proposed to the original scheme.

4.2 This Section 73 application seeks permission to:

- Change the scheme from serviced apartments to a hotel, all within the same Class C1 use.
- Front and rear façade – minor fenestration pattern altered to allow for new internal layout.
- Roof level extension – minor infill to penthouse.
- Relocation of emergency escape to neighbour's roof.
- Rear façade – new glazed link to rear added at first floor level.
- Rear building – massing reduced and moved away from neighbouring windows, roof level dropped by one storey.
- Rear lightwell revised to allow for new layouts.
- Given the nature of the Class C1 operation waste and recycling would be stored centrally in the basement rather than in individual rooms.
- Increased cycle parking would be provided in the basement.

4.3 The 31 bed hotel would be operated by maximum of 5 employees on site. The total number employed by the company would be 10 (i.e. finance and bookings). The main roles on site would be front of house, waiting staff and cleaning; serving the hotel bedrooms and the communal breakfast room at basement level.

4.4 Overall, the proposed scheme comprises an uplift of floorspace of 147 sq m GIA from the original scheme. Table 4.1 shows the existing and proposed floor areas for each use.

Table 4.1 Land use summary

Use	Existing GIA sq m	Proposed GIA sq m
Jewellery workshop (Class B1c)	0	64
Hotel (Class C1)	0	941
Jewellery workshop / offices (Class B1)	767	0
Total	767	1005

4.5 It should be noted that the following elements of the scheme would remain as consented:

- Class A1 retail space at ground floor level;
- Class B1c space at lower ground level;
- The scheme would remain car-free; and
- Materials and detail.

5. POLICY AND LEGISLATIVE FRAMEWORK

- 5.1 All planning decisions should must be made in accordance with the Development Plan, unless material considerations indicate otherwise, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004.

- 5.2 Since the original application was approved in December 2015 there have been no relevant changes in national and development plan policies, and other material considerations.

6. RATIONALE FOR AMENDMENTS

- 6.1 The site was acquired by the Crown Group of Hotels at the end of 2015. They are an experienced London hotelier who is focussed on business-friendly luxury contemporary hotels for the cost conscious mobile traveller.
- 6.2 The Crown Group of Hotels currently have five hotels across London, including:
- Great St Helen's Hotel, City of London
 - The Bloomsbury Palace Hotel, Bloomsbury
 - The Mabledon Court Hotel, Bloomsbury
 - The Cavendish Hotel, Bloomsbury
 - The Arran House Hotel, Bloomsbury
- 6.3 The site's location within Hatton Garden makes it well-suited for both the business and tourist traveller. The building has the potential to be ideally adapted to the Crown Group of Hotel's successful business model.
- 6.4 The minor material amendments seek to work with the existing design intent and envelope. To this end, the owners have retained the full design team. The tweaks to the scheme have been kept to a minimum so that the scheme can be built out under the existing permission with the view of saving time and allowing the new hotel to open as soon as possible.

7. ASSESSMENT

7.1 This section assesses how the minor material amendment is acceptable.

7.2 In determining this application, the key consideration is whether the changes proposed are minor material in nature or if the amendments would result in a scheme whose scale and nature would be not be substantially different from the scheme approved.

7.3 The key considerations are:

- Principle of partial demolition in a conservation area
- Principle of redevelopment and land use;
- Design and heritage;
- Transport, servicing and access;
- Sustainability and energy;
- Construction impacts and mitigation; and
- S106 and Community Infrastructure Levy (CIL).

7.4 Each of these is addressed in turn below.

Partial Demolition in a Conservation Area

7.5 The principle of partial demolition was accepted in the original application.

7.6 Demolition would meet the Council's and developer's aspirations for the site, delivering the best overall package of planning benefits in the public interest, including:

- Reproducing jewellery workshop space;
- Introducing of high quality modern architecture, which takes positive cues from the vernacular;
- Retaining and occupied retail unit and business;
- Improving the character and appearance of the conservation area; and
- Providing future flexibility and minimising energy running costs.

Principle of redevelopment and land use

- 7.7 The original application gave consent for nine serviced apartments in Class C1 use. This minor material amendment proposes a 31bed hotel (also Class C1), within substantially the same envelope.
- 7.8 The principle of visitor accommodation is supported by the London Plan Policy 4.5 and also Camden's policies CS8 and DP14. In this regard, the policy context is unchanged since the original grant of planning permission.
- 7.9 In considering the proposal against Policy DP14, The site is in the Central London Area. Hatton Garden itself is predominantly commercial with the historic jewellery trade and office uses. There is also residential properties, and the Leather Lane neighbourhood centre, in the wider area, as well as hotels and other commercial uses typical of a central London location. As such, the site is considered appropriate for a hotel use given its location and high level of accessibility. The proposed development would not harm the balance and mix of uses in the area and would support the character of Hatton Garden by encouraging visitors to the established jewellery businesses in the conservation area.
- 7.10 The proposed scheme would contribute Hatton Garden's appeal to tourist and visitors. Other benefits include:
- High quality hotel service in a redeveloped building;
 - Increased tourist appeal to the Hatton Garden Area; and
 - Retained jewellery space in keeping with the wider Hatton Garden area and its function.
- 7.11 The increased number of rooms would in turn increase the amount of local footfall and jobs, and would help to support the vitality and viability of the area, in a manner appropriate to its context.
- 7.12 The opportunity to enhance the appeal of the Hatton Garden area to tourists with the provision of serviced apartments is one that would benefit the area in accordance with London Plan Policy 4.5 and Camden Policies CS8 and DP14.

Design and Heritage

- 7.13 The summary paper statement, prepared by Works Architecture, sets out the amendments to the scheme and should be read in conjunction with this Planning Statement.
- 7.14 Works Architecture designed the original scheme, so have a good understanding of the building and its context.

7.15 The new building would still comprise the retained retail unit at ground floor and new workshop space to part of the lower ground floor while the rest of the building would be in hotel use (Class C1).

7.16 It is proposed that the ground floor level is altered to facilitate direct and level access from the street but with the existing retail unit retained in place, with a lift from ground floor serving up to the top floor would ensure that the building is accessible at all. This is a significant planning benefit, above the poor access levels of the existing building and the extant scheme proposal.

7.17 The hotel rooms would be arranged as:

- Lower Ground – 1 bedroom;
- Ground Floor – 2 x wheelchair accessible bedrooms and 1 bedroom;
- First Floor – three x bedroom (front) and two x bedroom (rear);
- Second Floor – four x bedroom (front);
- Third Floor – four x bedroom;
- Fourth Floor – four x bedroom;
- Fifth Floor – four x bedroom;
- Sixth Floor – three x bedroom; and
- Seventh Floor – three x bedroom.

7.18 The general principle of the rebuild design and height and mass of extensions, was approved under the original scheme. There are a number of minor architectural revisions associated with the change from serviced apartments to hotel, as detailed in the briefing paper, prepared by works. All these amendments are considered to be align with the original vision of the scheme's design and amount at most to minor material amendments, so changes are so insignificant that in insolation they may have been considered non-material.

Sunlight/Daylight

7.19 Given the minor changes to the roof extension and the form of the rear building Right to Light Consulting, who prepared the original sunlight/daylight report, have reviewed the amended drawings against the Building Research Establishment (BRE) guidelines 2011.

7.20 In conclusion Right to Light Consulting found that the proposed scheme would achieve a good level of daylight, in accordance with Policy DP24 and DP26.

Amenity

7.21 The impact on neighbouring amenity was considered in full for the original scheme.

7.22 It is considered that given the relatively modest scale of the proposed hotel that the overall impact on the amenity of neighbouring occupiers would be limited.

7.23 Overall, the proposal would function well and adds to the overall quality of the area over the lifetime of the development, responding to the site's character and local context. The resulting development would enhance the streetscape and buildings, creating an attractive and comfortable places to stay. The proposal also would optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses, and support local facilities and transport networks.

The proposed hotel use in this location is therefore considered acceptable. For these reasons the proposal complies with Policy CL2, CL5 and CL9 and general design policies contained within the NPPF.

Heritage

7.24 The proposal has been reviewed in the light of relevant planning policy and guidance relating to the historic environment.

7.25 The proposed development, as shown on the submitted drawings would enhance the character and appearance of the Hatton Garden Conservation Area, as encouraged by Paragraph 131 and 137 of the NPPF, the Council's local heritage policies and statutory tests.

Transport, Servicing and Access

7.26 This application is accompanied by an update Transport Technical Note, prepared by TPA, which should be read in conjunction with this assessment. This statement addresses the increase in number of bedrooms and the resulting impact on trip generation and staff numbers.

7.27 The Policy context remains unchanged from the original consent.

7.28 Level access to the building is provided from street level on Hatton Garden, with shared main access with the retail unit, this remains unchanged.

7.29 The servicing/delivery of the building would be managed by an on-site hotel manager. As before, there are no servicing bays along Hatton Garden, so vehicles would stop on the single yellow line restriction outside the building with engines switched off. Deliveries would be scheduled with the service apartment manager, to avoid double booking and arrivals at peak times.

7.30 This is an accessible site, which would remain car free.

- 7.31 Cycle parking (two Sheffield stand) would be located in the basement storage room, as required by CPG7.
- 7.32 The Transport Technical Note confirms that the site provides opportunities to use modes other than the car and in particular would provide staff and visitors with the opportunity to use sustainable modes of travel. The site is located close to frequent bus and rail services, which provide linkages to local facilities. As such, the site is ideally located to take advantage of sustainable travel opportunities and conforms with policy, where site constraints allow. As required by policy the scheme would also not have a detrimental impact on highway safety and free flow of traffic.

Sustainability and Energy

- 7.33 This application is accompanied by an Energy Strategy Report and BREEAM 2014 Pre-Assessment Report, prepared by Price & Myers, which should be read in conjunction with this assessment.
- 7.34 Following the energy hierarchy, passive design measures, energy efficient equipment and LZC technologies the development could achieve a 35% improvement over Building Regulations Part L 2013 Target Emissions Rate (TER). There would also be a 11.1% saving in carbon emission through the introduction of photovoltaic panels on the roof of the building, which occupy as much space as is available. In addition, the fabric improvements to the building would lead to U-Values which are extremely low and far exceed current Building Regulations.
- 7.35 Overall, the development can achieve a total of 10 credits under BREEAM New Construction 2014 Pre-Assessment Ene 01. The development achieves an improvement over Part L in excess of 35%, as required by London Plan Policy 5.2 and performs as well as possible against Camden's renewable energy target policy.

Temporary construction impacts

- 7.36 A Construction Management Plan (CMP) has been approved with the grant of planning permission 2015/1972/P. With the minor material amendment application, it is unnecessary to submit a further CMP as the construction process is not proposed to change.

S106 and Community Infrastructure Levy

- 7.37 The requisite CIL form accompanies this application. IcenI have also made contact with the CIL officer in order to organise the Liability Form.
- 7.38 It is understood that a Deed of Variation would be required to tie this minor material amendment to the Section 106 agreement that was associated with the last application.

8. CONCLUSION

- 8.1 The baseline position is that the development has been agreed in principle. This minor material amendment application offers an increase in employment with the change of use within Class C1 from serviced apartments to hotel use.
- 8.2 The proposed amendments are in relative terms considered to be minor material and would have negligible impact on amenity including sunlight/daylight, neighbour outlook and neighbour and street scape views; and, fundamentally, would enable the new owners (Crown Group of Hotels) to deliver the hotel. It is important to note that the overall design concept, including its look and feel, would remain unchanged.
- 8.3 In determining this application, the changes would result in a scheme whose scale and nature would not be substantially different from the scheme approved. It should also be noted that there have been no relevant changes in national and development plan policies, and other material considerations, since the original application was approved in December 2015. For these reasons, consent for the Section 73 should be given.

A1. LIST OF APPLICATION DOCUMENTS

A1.1 This application submission comprises:

- Cover letter, prepared by Icen Projects Ltd;
- Application forms and certificates, duly completed;
- CIL Further Information Form;
- Updated Planning and Heritage Statement, prepared by Icen Projects Ltd;
- Briefing paper Design and Access Statement, prepared by Works Architecture;
- Revised Planning drawings, prepared by Works Architecture;
- Revised Transport Technical Note, prepared by TPA;
- Revised Energy Strategy Report, prepared by Price & Myers;
- Revised BREEAM 2014 Pre-Assessment Report, prepared by Price & Myers;
- Letter regarding Daylight/sunlight report, prepared by Rights to Light Consulting;
- Updated Structural Report, prepared by Chris Brown Structural Engineering Ltd;

A2. PLANNING HISTORY

Application ref.	Description	Decision	Date of Decision
2015/1925/P	Erection of 3 to 8 storey plus basement building comprising retail unit (Class A1) at ground floor level, jewellery workshop (Class B1c) at lower ground floor level, and serviced apartments (Class C1) above, following demolition of upper floors (1st - 5th) of existing building.	Approved – Subject to S106 Legal Agreement	3 December 2015
2010/2161/P	Installation of a new shop front and security shutter including removal of cladding material to existing shop (Class A1)	Approved	29 June 2010
2011/3927/P	Change of use of first, second, third, fourth and fifth floors from vacant jewellery workshops (Class B1c) to create 5 self-contained 2 bedroom flats (Class C3) plus relocation of roof level staircase hatch	Refused	4 November 2011
APP/X5210/A/13/219 6094	Appeal against Council's decision to refuse 2011/3927/P	Appeal allowed	29 June 2013