

Planning Statement

84 Hatton Garden, London, EC1N 8JR

Iceni Projects Limited on behalf of 84 Hatton Garden Ltd

October 2019

Iceni Projects

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

Edinburgh: 11 Alva Street, Edinburgh, EH2 4PH Glasgow: 177 West George Street, Glasgow, G2 2LB Manchester: 68 Quay Street, Manchester, M3 3EJ

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of a full planning application submitted by 84 Hatton Garden Ltd ('the Applicant') to the London Borough of Camden ('the Council') for proposed development works at 84 Hatton Garden, London, EC1N 8JR ('the site').
- 1.2 This application seeks planning permission for the following development:

"Reconfiguration of ground floor level including changes to the layout resulting in improved hotel (Use Class C1) access and improvements to retail (Use Class A1) unit including new shopfront."

1.3 This Planning Statement has been prepared by Iceni Projects Ltd and provides the planning case in support of this application. It assesses the proposal in the context of the relevant adopted and emerging planning policy and guidance at national, regional and local levels.

Background and need for application

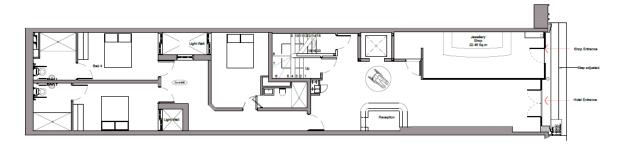
1.4 Planning permission was granted on the site in December 2015 (ref: 2015/1925/P) for

"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. "

- 1.5 This was subsequently amended by the Applicant under Section 73 of the Town and Country Planning Act (1990) and these changes were approved on 4th July 2016 (LPA ref: 2016/1647/P). This application varied condition 2 (approved plans) in relation to the approved drawings and converted the 9 x serviced apartments to 31 x hotel rooms. This scheme is currently under construction.
- 1.6 This change from serviced apartments to hotel requires a significantly different plan form, internal arrangement and entrance due to the higher densities and service associated with hotel use. The structural envelope and plan form of the development has already been substantially built in relation to the original permission for serviced apartments. The implications of a hotel use were not considered at the stage of original implementation of the permission. In comparison to the serviced apartment use, the hotel use requires a more functional reception area to greet guests. Furthermore, a wider access is required on the ground floor to provide improved wheelchair accessibility.

- 1.7 Furthermore, the current layout on the ground floor is not compliant with Building Control requirements for accessibility. As outlined in point a) under the requirements of 3.28 of Document M, Volume 2 (2015) lifts are required to have a manoeuvring space of 1500mm x 1500mm in front of the lift to satisfy Part M1 or M2 for accessibility. The turning space in front of the lift of the current approved proposals only measures 1068mm at its widest point in front of the lift, falling significantly short of this requirement. This was accepted by Building Control however due to the nature of the works being a conversion, and the location of the wheelchair accessible rooms on the ground floor. However, with the new use as a hotel providing facilities including dining on the lower ground floor, it is important that the lift is accessible to all users.
- 1.8 Therefore, the Applicant, is now in a position where they need to retrofit a plan form designed for serviced apartments to fit a hotel use and to satisfy Building Control requirements for accessibility.
- 1.9 All of these requirements manifest in the proposed changes to the ground floor to provide wider access and larger reception and lobby space at ground floor for the hotel use. This is shown on the proposed plan below:

Figure 1: Proposed Ground Floor plan (drawing no. HGH-P01-RevG)



Retail Space

- 1.10 Notwithstanding these necessary changes to the ground floor as a matter of use, building control and accessibility, the Applicant wishes to make a virtue of these changes rather than have them be detrimental to the layout and use of the space. The Applicant is keen to use this as an opportunity to also rethink and enhance the retail space.
- 1.11 This rethinking of the retail layout has been informed by a marketing exercise of the premises and a commercial jewellery retailer tenant has been lined up to take over the lease of the retail space which is currently vacant. Therefore, the proposals for this space have been designed to fit the specific needs of the end user's business model, which is also reflected in the general trends of the fine jewellery industry across the UK and specifically, Hatton Garden. This business model is outlined further in the next section of this report.

- 1.12 External changes are also proposed to the façade and shopfront at ground floor level to reflect the new access provisions and revitalise the frontage in line with the new businesses on the premises.
- 1.13 In summary, these requirements manifest in the following changes to the ground floor:
 - Reconfiguration of the retail (Use Class A1) and hotel (Use Class C1) space;
 - Improved access widened lobby hotel access, particularly in front of the lift in line with Building Control regulations;
 - Increased reception space for hotel;
 - Enhanced retail frontage and jewellery sales window via the installation of a glazed partition between the hotel reception and relocated retail space; and
 - External changes to the elevation and new shopfront at ground floor level to provide a more balanced and inkeeping shopfront elevation.

The Submission

- 1.14 This Planning Statement should be read in conjunction with the other drawings, plans and documents submitted in support of this Application. The submission comprises:
 - Application Forms and Certificate of Ownership;
 - CIL Form 0;
 - Site Location Plan;
 - Existing approved drawings, including plans, sections and elevations;
 - Proposed drawings, including plans, sections and elevations;
 - Design and Access Statement; and
 - Planning Statement.

2. JEWELLERY RETAIL CHANGES

- 2.1 The internal reconfiguration of the jewellery retail unit has been designed in line with requirements of the new tenant for the unit, and as such also reflects the changing context for jewellery retail in Hatton Garden.
- 2.2 The new tenant that is lined up for the jewellery retail unit has a specific business plan that is focused on the provision of a bespoke customisation service and a small number of high-value sales, rather than the traditional operational model of shops which display all their products in order to attract and sell to customers from the street.
- 2.3 The existing jewellery retail unit at ground floor has a very traditional retail layout. It consists of an area of active retail shop space, with a display cabinet fronting the entrance area and curving in. At the rear of the unit, there is a back of house ancillary space and toilet, which is not part of the active retail shop floor. This layout lends itself to a very traditional model of jewellery retail in which the shopfront and main retail floor mainly acts as an opportunity to showcase the full range of items that the shop has to offer.
- 2.4 However, the jewellery market, as with the rest of the retail sector, has undergone quite a bit of change over the past decade. As such, the traditional layout of a shop front and display of readymade items to showcase products to attract customers in off the street is no longer as relevant to a market that now thrives off of research, online sales and most-notably a rise in bespoke design, customisation and customer experience.

Key Jewellery Market Trends

2.5 The approach of the new tenant is in line with the changing jewellery industry which is not immune to the wider trends within the UK retail industry as a whole which in recent years is seeing a drop in footfall and sales on the high street and an increase in online sales¹.

¹https://www.retail-jeweller.com/news-and-insight/vacancy-rate-rises-to-highest-level-in-four-years/7035754.article?blocktitle=More-market-news&contentID=15944

- 2.6 However, despite wider retail concerns, the global jewellery market is growing and the UK, in particular London, has a large market share. Reuters note that the industry is projected to grow even further between 2019-2023, driven by a range of factors including digital sales and a growing high net worth individual (HNWI) demographic. However, the market is not free from challenges and other influences that are distinctly changing its way of operating. The key emerging issues effecting retail of jewellery in the UK currently can be summarised as:
 - · Decline in high street footfall;
 - Increase in online sales and online brand interaction;
 - Growth of High Net Worth Individual population (HNWIs);
 - · Rise in customisation and bespoke jewellery; and
 - Rise of technology (Computer-Aided Design and 3D printing).
- 2.7 Similarly to many other areas of retail, Mintels most recent annual report (Sept 2018) into the jewellery industry, notes low levels of UK footfall, and McKinsey note that this is hitting mid-market brands hardest. Mintel's latest Jewellery and Watches Retailing report also highlights that last year 53% of jewellery or watch shoppers went online to purchase an item, compared to 65% who shopped in-store. Over one in three (35%) consumers say they use social media for inspiration when shopping for jewellery, rising to over half (54%) of those aged 16-34-years².
- 2.8 However, whilst the industry is seeing these trends, similarly to other areas of retail, within the jewellery industry the role of the independent retailer is still prominent, still ranking as the third most popular retailer for purchases in Jewellery and Watch Birmingham's 2017 report on UK purchases³.
- 2.9 The resilience of independent retailers of the high-end jewellery market is arguably faring better than many other sectors of the high street, due to the nature of the experience of buying jewellery. Indeed, McKinsey note that whilst online sales are growing, most in the sector believe that they will stagnate around 10% of fine jewellery sales by 2020. Their reasoning for this is the nature of fine jewellery sales meaning that most consumers prefer to buy expensive items from brick-and-mortar stores, which are perceived as more reliable and which provide the opportunity to touch and feel the merchandise⁴.

https://www.professionaljeweller.com/exclusive-insight-what-firms-in-the-uk-jewellery-industry-need-to-do-to-win-market-share/

³ https://www.jewelleryandwatchbirmingham.com/__media/2017-uk-jewellery-retail-market-opportunity.pdf

⁴ https://www.mckinsey.com/industries/retail/our-insights/a-multifaceted-future-the-jewelry-industry-in-2020

2.10 Furthermore, jewellery is still seen by many as a purchase to be experienced, either as a treat for oneself, a gift, or to mark a special occasion. However, as a result, consumers are expecting a high-level experience to match the luxury of treating themselves to new jewellery when they buy in-store. The expectations are also for a higher level of bespoke service. Mintel's latest Jewellery and Watches Retailing report also notes the rise in customisation noting that 35% of those who purchased jewellery or watches would pay more for items that can be personalised. This figure jumps to 51% of consumers aged 16-34⁵.

Focus on customer experience

- 2.11 As a result of this changing customer behavior, it is crucial for retailers of fine jewellery to respond to this changing market and offer a higher level of customer experience in-store as well as bespoke service and customisation.
- 2.12 This is manifesting itself physically in retail jewellery shops as they begin to focus less on overall floorspace to showcase all their products at once, but instead on the ability to provide an experience for customers, and the ability to offer a more bespoke service and design⁶. Many jewellery retailers across the country have been increasingly using their retail shop floorspace in new dynamic ways to sell the experience of buying jewellery, rather than perhaps the traditional sense of displaying all their stock.
- 2.13 Professional Jeweller magazine notes some innovative new approaches to using this retail space including the launch of Tiffany & Co's concept store in Covent Garden with an interactive style studio, Swarovski's transformed Oxford Street boutique to offer a unique and immersive customer experience, while Links of London used its Cambridge store to play with new 'Instagrammable ideas', and Astrid & Miyu saw sales soar with the introduction of a piercing bar⁷.
- 2.14 The focus of the use of the floorspace is shifting from cabinet display space to areas for private consultation, and in Glasgow, Laings is in the process of refurbishing its flagship store in the city, transforming its office spaces into private areas for customers to have jewellery valued and attend intimate bespoke appointments with the jeweller's talented designers.
- 2.15 Similarly, Chisholm Hunter has made over its flagship Edinburgh store to make it an attractive destination, with the shop including a champagne bar on the first floor will be used for exclusive

⁵ https://www.professionaljeweller.com/exclusive-insight-what-firms-in-the-uk-jewellery-industry-need-to-do-to-win-market-share/

⁶ https://www.jewelleryandwatchbirmingham.com/news/consumer-buying-behaviour-of-jewellery

 $^{^{7}\ \}underline{\text{https://www.professionaljeweller.com/10-things-the-jewellery-industry-learned-in-2018/}$

events and consultations with watch collectors and jewellery customers. The space has epic views of Edinburgh Castle, making it a highly attractive destination for the wealthy tourists that the city attracts and who stay in the Chisholm Hunter Suites luxury short-stay apartments next door and above. Chisholm Hunter's CEO says that the intention is to provide a luxury experiences for customers that they cannot find anywhere else, where they can stay in their luxury suites and then head downstairs and can continue that luxury experience whilst buying jewellery⁸. As a result, Chisholm Hunter is one of the fastest growing jewellery and watch retailers in the UK.





- 2.16 These trends as detailed above are increasingly apparent in the Hatton Garden area. Hatton Garden is one of the most famous areas for jewellery in London and plays a large role in supporting the UK's medium and smaller independent jewellery retailers and designers.
- 2.17 Increasingly, the focus of jewellery retail in Hatton Garden is also towards the bespoke customer experience with brands such as Holts Gems, one of the oldest and most respected jewellers in Hatton Garden recently launching a new joint venture with Hearts of London to create a new, immersive retail experience focused on personal and bespoke fine jewellery. Indeed, the nature of Hatton Garden as being a location not only for retail but with workshops and designers often co-located with shops on-site, it presents a unique opportunity for customers to experience bespoke design, moreso than anywhere else in London.

In general, as noted by Hatton Garden designers interviewed by Professional Jeweller in March 2019:

"there's a distinct change afoot. The designers moving in are all championing individuality and a personal service, which is something we feel is essential for that all important commitment purchase."

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⁸ https://www.professionaljeweller.com/the-big-interview-investment-in-people-product-and-property-is-key-to-chisholm-hunters-success/

"To hold on to a heritage does not mean to stand still. Places survive when they evolve to meet current market needs. For companies in Hatton Garden that means welcoming new industry professionals to the area; finding ways to stay relevant in a digital-age; and helping emerging designers find their feet⁹."

Design of the Retail unit at 84 Hatton Garden

- 2.18 As previously noted, the Applicant is determined to use the required configuration of the ground floor for hotel accessibility reasons to improve the retail space.
- 2.19 The tenant's business plan and the changing nature of the jewellery retail market has informed the design proposals for the reconfigured retail space in order to provide a space that responds to current market needs and allows for innovative new professionals to bring their bespoke models to Hatton Garden.
- 2.20 As such, proposals have been designed to include an increase in active retail floorspace for customer consultations over back of house space, and to maximise internal frontage and interaction between the retail and hotel space to enhance customer experience. The details of the proposals are further specified in the following section 4 of this statement.

⁹ https://www.professionaljeweller.com/feature-meet-the-designers-keeping-hatton-gardens-sparkle-alive/

3. SITE AND SURROUNDING AREA

- 3.1 The site is located on the west side of Hatton Garden. It is located within the designated Hatton Garden Specialist Shopping Area, an area renowned for its jewellery industry. It lies on a stretch of Primary Protected Frontage, and the wider street is characterised at ground floor level by a range of retail functions including jewellery retail shops, cafes and restaurants, as well as a growing number of offices.
- 3.2 The site itself consists of a 6-storey building that is currently undergoing works in line with the extant planning permission for a hotel and jewellery retail unit and workshop at ground and basement levels. Adjacent to the premises to the north is a large office development, and to the south, at ground floor level are a range of retail frontages including jewellery shops and cafes.
- 3.3 The site also lies within the Hatton Garden Conservation Area.

Relevant Planning History

- 3.4 Planning permission was originally granted on the site on 3 December 2015 under application reference 2015/1925/P, for the erection of a 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.
- 3.5 The applicant later sought to make material amendments to the approved scheme under Section 73 of the Town and Country Planning Act (1990) and these changes were approved on 4th July 2016 (LPA ref: 2016/1647/P). This application varied condition 2 (approved plans) in relation to the approved drawings and converted the 9 x serviced apartments to 31 x hotel rooms.
- 3.6 This development is currently under construction in line with the amended scheme, with the majority of conditions having been discharged, and only a small number of pre-occupation conditions remaining.

4. THE PROPOSED DEVELOPMENT

- 4.1 This planning application seeks internal reconfiguration and associated external changes to the ground floor level. This planning permission is sought in order to:
 - Make better use of the internal space, and improve access to the hotel;
 - Provide a retail space for a jewellery business that better reflects the current bespoke jewellery market in Hatton Garden; and
 - Improve the shopfront to provide balanced access and be more inkeeping with the character of the building.
- 4.2 The description of development is as follows:

"Reconfiguration of ground floor level including changes to the layout resulting in improved hotel (Use Class C1) access and improvements to retail (Use Class A1) unit including new shopfront."

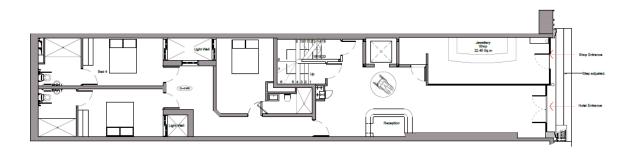
Internal changes

- 4.3 The reconfiguration internally, can be summarised detailed below:
 - Reconfiguration of retail space;
 - Widened hotel access to include double door entry;
 - Enlarged hotel reception area;
 - Glazed partition to run along the length of retail unit and hotel entrance; and
 - Internal access to the retail unit also provided from the hotel lobby area.
- 4.4 The manifestation of these internal changes can be seen on the plans below:

Figure 2: Existing Consented Ground Floor Plan (drawing no. HGH-E01)



Figure 3: Proposed Ground Floor Plan (drawing no. HGH-P01-RevG)



External changes

- 4.5 The proposals also have a number of changes that manifest externally at ground floor level on the shopfront elevation. These changes can be summarised as:
 - · Glazed shopfront and hotel entrance;
 - Increased width of hotel entrance to provide uniform openings;
 - Bronze finish entrance doors and screen;
 - Faience panels as shopfront glazing surround; and
 - Bronze finish metal canopy with raised lettering.
- 4.6 The manifestation of these external changes can be seen on the plans below:

Figure 4: Approved (left) and Proposed (right) elevation (drawing nos. HGH-E02 & HGH-P02-RevG)



Floorspace

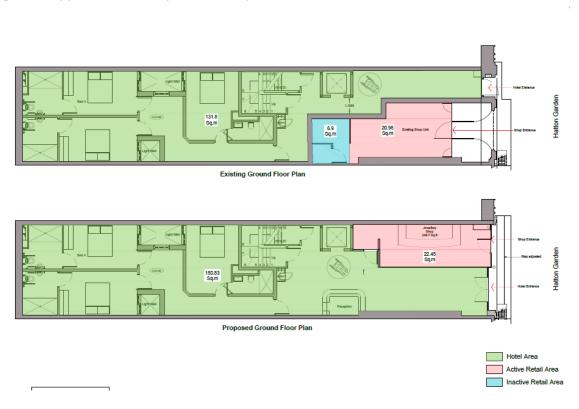
- 4.7 The internal reconfigurations of the ground floor would result in the following alterations in floorspace at ground floor level.
- 4.8 The proposed development would result in a net increase of 13.67 sqm of overall floor space compared with the currently consented scheme. This has been achieved through the replacement of thick internal walls with a glazed partition and the siting of doorways slightly further forward. The footprint of the ground floor has not been increased outside the consented envelope.
- 4.9 The proposed changes would also result in a small decrease in retail (A1) floorspace of 5.43sqm. However, the reconfiguration has been carefully designed to have no detrimental impact on functionality of the space and the active retail space is actually increased by 1.47sqm. The hotel floorspace (C1) is proposed to increase by 19.1sqm.
- 4.10 The changes in floorspace at ground floor level are summarised in the table below.

Table 4.1 Approved versus proposed area and land use schedule (ground floor and basement levels)

Land Use		Consented GIA (Sqm)	Proposed GIA (sqm)	Net change (sqm)
	Active retail	20.98	22.45	+1.47
Retail (A1)	Inactive retail (back of house space)	6.9	0	-6.9
	TOTAL	27.88	22.45	-5.43
Hotel (C1)		131.8	150.9	+19.1
TOTAL		159.68	173.35	+13.67

4.11 The delineation between the active and inactive retail space in the approved and proposed schemes can be seen in drawing HGH Ep1 Rev H enclosed in this submission and shown below.

Figure 5: Approved and Proposed floorspace uses



5. PLANNING CONSIDERATIONS

5.1 This section of the Planning Statement defines the Development Plan and assesses the proposed development against the relevant adopted and emerging planning policy and guidance at national, regional and local level.

Planning Policy Framework

- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.3 The relevant Development Plan for the site consists of:
 - The London Plan (2016); and
 - The Camden Local Plan (2017).
- 5.4 Camden also has a number of Camden Planning Guidance documents (CPGs) and Conservation Area Appraisals which form material considerations for this application.
- 5.5 The Revised National Planning Policy Framework (NPPF) was published on 24 July 2018 and sets out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.
- 5.6 The Mayor of London is in the process of preparing the New London Plan, which was subject to Examination in Public (EiP) from January to May 2019.

Planning considerations

- 5.7 The relevant planning considerations associated with this application include:
 - Land Use;
 - Access:
 - Design & Heritage;
- 5.8 Each consideration is assessed in turn below

Land Use

5.9 The proposals do not propose any new land uses at ground floor level than those established under the consented scheme. However, due to the internal reconfigurations there are minor amendments in the floorspace and quantum of each land use.

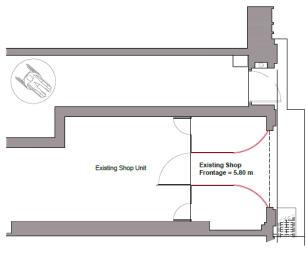
Retail

- 5.10 Policy TC1 'Quantity and location of retail development' of the Local Plan (2017) notes that in Specialist Shopping Areas, there should be an appropriate level of retail provision and that retail floorspace is expected to be supported by a range of other town centre uses, including food, drink and entertainment uses.
- 5.11 The level of retail space can be evaluated both in terms of frontage and floorspace, and assessment of each is carried out below.

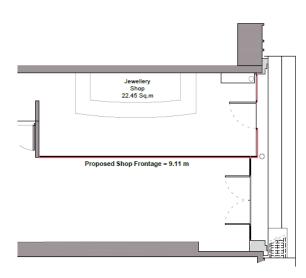
Retail Frontage

- 5.12 Policy TC2 'Camden's centres and other shopping areas' notes that the Council will seek to protect primary frontages with a high proportion of A1 retail. Individual mixes for areas is set out in Appendix 4 of the Local Plan (2017) which notes for Hatton Garden that there should be no loss of A1 retail frontage.
- 5.13 The proposals do not propose a loss of retail frontage. In fact, the proposals result in an overall increase, due to the glazed partition within the hotel lobby access area providing internal frontage with the hotel use.
- 5.14 The existing retail frontage which is inset in a recess measures 5.8m. However, the proposed scheme results in 9.11m of frontage for display and visual permeability. As such, there is an increase of 57% of frontage.

Figure 6: Extent of frontage in approved scheme (above) and in proposed development (below)



Existing Ground Floor Plan



Proposed Ground Floor Plan

Notably, this increased frontage is primarily located fronting the hotel reception lobby rather than the street. This is an important design feature in line with the tenant's business plan and the changing jewellery market. The tenant intends to provide a more bespoke service, as well as provide a seamless transition and luxury service for hotel guests to enjoy bespoke jewellery consultations. Given the current jewellery market trends, they anticipate to receive increased business growth from hotel guests than from passers-by in the street, and therefore the internal frontage is seen as intrinsic to this offering.

Retail Floorspace

- 5.16 The jewellery industry, both retail and workshop spaces, is a protected land use by the Council, as noted in Policy E1 'Economic Development'. This is applied more rigorously to jeweller workshop (B1c) spaces, as detailed in Policy E2 'Employment Premises and Sites', however, retail space for jewellery shops is also important to the local economy and supporting the workshops. Indeed, the site under the extant permission has a jewellery workshop contained at the lower ground floor level.
- 5.17 Policy TC1 'Quantity and location of retail development' notes that there should be an appropriate provision of retail floorspace and other town centre uses in Camden's Specialist Shopping Areas, of which the Hatton Garden area is one.
- 5.18 The proposals result in a loss of 5.43sqm of retail (A1) space at ground floor level.

Table 5.1: Comparison of retail floorspace between approved and consented schemes

Land Use	Approved scheme sq.m (GIA)	Proposed sq. m (GIA)	Net change sq.m (GIA)
Retail (A1)	27.88	22.45	-5.43

5.19 However, in the consented scheme the total floorspace of the retail unit is not all active space. The area at the rear of the unit, measuring 6.9sqm is in fact back of house space ancillary to the main retail shop floor. The proposals make provision for the entirety of the new space to be used as part of the main active floorspace of the shop for customer consultation, with back of house facilities to be shared with hotel staff. As such, when only active retail floorspace is take into account, the proposals actually result in a minor increase of active A1 retail floorspace:

Table 5.2: Comparison of active retail floorspace

Land Use		Consented GIA (Sqm)	Proposed GIA (sqm)	Net change (sqm)
	Active retail	20.98	22.45	+1.47
Retail (A1)	Inactive retail	6.9	0	-6.9
	TOTAL	27.88	22.45	-5.43

- 5.20 The design of the retail unit to be comprised only of active floorspace allows for the unit to meet the business needs of the potential future tenant, who has increased requirement for functional space in which to meet and discuss bespoke designs with clients, rather than to showcase existing products for sale.
- 5.21 Therefore, it is considered that the proposals maintain an appropriate level of retail space within the Specialist Shopping Area, and indeed, enhance the provision by providing a minor increase in the active functional retail space.

Hotel floorspace

- 5.22 The remainder of the ground floor would continue to operate as hotel use (C1), as per the approved scheme.
- 5.23 The proposals would actually result in a minor increase in hotel floorspace of 19.1sqm due to the internal reconfiguration. This is due to the replacement of the existing walls to the retail unit which are currently are 350mm thick, with a thinner glazed partition, and the reduction of the inset of the front facade wall and entrance door. As such, the proposals result not only in a more functional hotel floor space with enlarged lobby and reception area, but also result in a slight increase in the functional floorspace.

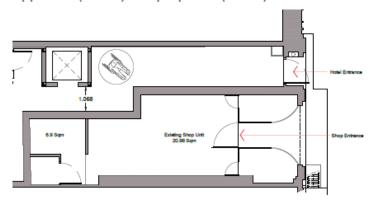
Access

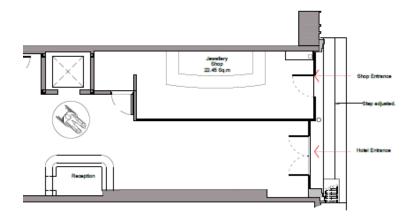
- 5.24 Local Plan Policy D1 'Design' seeks high quality design which includes design that is inclusive and accessible for all. The supporting text to this policy notes that any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the building's character and appearance.
- 5.25 Policy C6 'Access for All' promotes fair access in developments and expects all buildings to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.
- 5.26 The proposals have been primarily formulated in order to improve access to the hotel reception area, and to provide improved wheelchair accessibility for hotel guests.
- 5.27 The current layout on the ground floor is not compliant with Building Control requirements for accessibility. As outlined in point a) under the requirements of section 3.28 of Building Control document M, Volume 2 (2015), lifts are required to have a manoeuvring space of 1500mm x 1500mm in front of the lift to satisfy Part M1 or M2 for accessibility. The turning space in front of the lift of the current approved proposals only measures 1068mm at its widest point in front of the lift, falling significantly short of this requirement. This was accepted by Building Control however due to the

nature of the works being a conversion, and the location of the wheelchair accessible rooms on the ground floor. However, with the new use as a hotel providing facilities including dining on the lower ground floor, it is important that the lift is accessible to all users.

5.28 The current proposals propose an increase to the hotel lobby and reception space, allowing for widened space in front of the lift where a 1500mm turning space is now possible. This is demonstrated in the below drawings.

Figure 7: Current approved (above) and proposed (below) access for wheelchair users





5.29 Furthermore, general widening of the access is considered necessary as part of the new hotel use. Building Control Document M, Volume 2 also notes that accessible entrances should be wide enough to allow unrestricted passage for a variety of users including wheelchair users, people with luggage or small children and pushchairs etc. This use of space is highly likely in a hotel and therefore entrances and lobbies should be appropriate widths to allow this. The requirements for Part M1 or M2 specify that the width of entrance lobbies (excluding any projections) must be at least 1200mm, and at least 1800mm when double leaf doors are used.

- 5.30 The consented proposals currently have an entrance corridor width of 1600mm, whilst current proposals increase this to 2800mm, with double doors. As such, whilst the consented proposals do comply with Building Control regulations, they provide little additional space for any congestion associated with a hotel lobby/entrance. The revised proposals also minimise projections into the space, providing a more navigable entrance area, with fewer corners and turns.
- 5.31 Overall, the proposals improve access for all users to the hotel space, providing a more functional reception area, and crucially, comply with Building Control Regulations providing better access for wheelchair users and improved access to the lift through the increased turning space.

Design & Heritage

- 5.32 Local Plan Policy D1 'Design' seeks to secure high quality design in all development that respects local character and context. Specifically, in relation to shopfronts, it encourages active shopfronts that add vitality to the street and provide views into and out of buildings, and specific proportions at ground floor level to attract pedestrians.
- 5.33 Policy D2 'Heritage' requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.
- 5.34 Hatton Garden Conservation Area Appraisal and Management Strategy (2017) outlines the key character of the area and notes at paragraph 9.4 that the existing shopfronts are very mixed and many of them are of poor quality and fail to relate to the historic character. Proposals for new shopfronts or alterations to existing shopfronts will be expected to preserve or enhance the historic character of the Area through careful, high quality design, while respecting the proportions, rhythm and architectural form of any nearby shopfronts of merit (see Audit). Shopfronts of merit should be retained or sensitively adapted; their loss will be strongly resisted.
- 5.35 84 Hatton Garden is not identified within the appraisal as either making a positive or a negative contribution to the conservation area and can therefore be considered to make a neutral contribution currently.
- 5.36 The proposed alterations to the shopfront addresses the new building character by integrating the hotel and retail entrances into a uniform façade that improves the proportions and balance of the openings while using appropriate and complementary materials. The use of bronze complements the dark brick palate of the building, thus improving the retail frontage to preserve the character and appearance of the Conservation Area.
- 5.37 The proposed Art Deco detailing has also been carefully considered to allude to the period when Hatton Garden emerged as an important jewellery quarter in the early half of the 20th century,

suggesting luxury and modernity. Further details on the design of the shopfront are provided in the Design and Access Statement enclosed with this submission.

5.38 Overall, the external proposals for the shopfront are considered to preserve the character and appearance of the Conservation Area in line with local policy and guidance.

6. CONCLUSION

- 6.1 This Planning Statement has been prepared in support of a planning application that seeks the reconfiguration of the ground floor level at 84 Hatton Garden, London, EC1N 8JR. Planning permission would allow for an improved floor plan that provides a better-serviced and accessible reception to meet the needs of the hotel, as well as an improved retail unit.
- 6.2 Specifically, planning permission is sought for:

"Reconfiguration of ground floor level including changes to the layout resulting in improved hotel (Use Class C1) access and improvements to retail (Use Class A1) unit including new shopfront."

- 6.3 The proposals would deliver a number of planning benefits. These include:
 - Optimised accessibility for wheelchair users and traffic associated with hotel use, to meet Building Control requirements;
 - New widened hotel access to provide a more functional reception;
 - Improved layout of the retail unit to maximise frontage and active retail space in line with the business need requirements of identified tenant; and
 - A re-proportioned and balanced shopfront designed to preserve and enhance the character and appearance of the Conservation Area.
- 6.4 The proposals have been assessed and considered to comply with the relevant adopted and emerging planning policy and guidance.
- Overall, the proposed development presents an opportunity to reconfigure the ground floor of the approved scheme to allow it to better serve the needs of the two new businesses on the premises, and their customers, to contribute to the vitality and economy of Hatton Garden.