

Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department

Tele phone [REDACTED]

Email [REDACTED]



Date 27 January 2025

Our Ref DS/FS25/0004

Your Ref PT_A T/24/01262/FULMA J

Subject 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

In response to your request for comments in relation to the application the District Surveyors Office has the following comments to make:

I have reviewed the submitted fire statement and have no comments.

I consider that policies D5 and D12 have been met.

Memo

To Assistant Director (Development Management)
Environment Department
Email plncomments@cityoflondon.gov.uk



From Kyri Eleftheriou-Vaus
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 29/1/2025

Your Ref: 24/01262/FULMAJ

Subject: 319 - 325 High Holborn (Heron House), 326- 332 High Holborn And 26 Southampton Buildings (Holborn Gate), and 44 Southampton Buildings, WC1and WC2
Demolition of existing buildings at 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings and construction of new building comprising of two basement levels, ground plus 9 upper stories (65.8m AOD), including a mezzanine at upper ground level and external plant space at roof level, consisting of office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)-(b)) at ground level and flexible cultural/ exhibition/ performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)-(e)/ F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels; creation of public realm, including new hard and soft landscaping, external terraces, provision of new servicing facilities and associated access from Southampton Buildings, cycle parking and other associated works.

The proposed development will employ an electric heating and cooling strategy i.e. reversible air source heat pumps (ASHPs). However, a life safety diesel generator is proposed.

In addition, servicing and delivery vehicles are expected to significantly increase as a result of the development. The transport assessment states that the proposed site would generate 113 servicing vehicles per day, reduced to 36 per day (a total of 226 and 72 two-way trips per day, respectively). The Delivery and Servicing Management Plan refers to assumptions of 60 and 50% reductions for deliveries. However, the extent of the stated reduction assumed appears to be closer to 70%. The DSP proposes the reduction is achieved by collective procurement and consolidation. Therefore, it is necessary that a monitoring system is developed to ensure that the Facilities Management (FM) team will undertake the necessary steps to achieve the stated reductions.

Based on the CoL Code of Practice for Deconstruction and Construction Sites, the Site is considered to be a 'high risk' site and therefore appropriate mitigation measures to control dust are to be adopted.

Should the development be approved please attach the following conditions:

Condition M28C

Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must be the latest Euro standard available. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.

Reason

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

Condition M29

Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

Reason

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

Condition M32 NRMM

Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development

shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason

To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: [Medium combustion plant and specified generators: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-and-specified-generators-environmental-permits)

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk



From Ms Hazel Austin
Environmental Health Officer
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 29 January 2025
Our Ref 25/00697/NPLN
Your Ref PT_A T/24/01262/FULMA J

Subject 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

Demolition of existing buildings at 326- 332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319- 325 High Holborn (Heron House) and 44 Southampton Buildings and construction of new building comprising of two basement levels, ground plus 9 upper stories (65.8m AOD), including a mezzanine at upper ground level and external plant space at roof level, consisting of office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)- (b)) at ground level and flexible cultural/ exhibition/ performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)- (e)/ F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels; creation of public realm, including new hard and soft landscaping, external terraces, provision of new servicing facilities and associated access from Southampton Buildings, cycle parking and other associated works.

This department acknowledges receipt for the above application and have the following comments and observations to make:

Roof Terrace & Balcony Hours:

The roof terraces on levels 7, 8 & 9, Balconies on levels 1, 3, 5 & 7, hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank or Public Holidays, other than in the case of emergency.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Roof Terrace Music

No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Fumes from Use Class E / Sui Generis affecting offices or residential:

No cooking shall take place within any Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) unit hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission. REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

Noise from use Class E / Sui Generis affecting offices / non offices:

The proposed Class E / Sui Generis development sharing a party element with office / non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the existing neighbouring premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

Noise control:

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often as is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Demolition:

There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

Construction:

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

Noise and vibration from mechanical systems or other plant:

Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

Sewer Vent Condition:

Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Non-Road Mobile Machinery Register:

Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Full Lighting Strategy submission:

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036.

Contaminated Land:

Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site

receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):

- a) a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.
- b) an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.
- c) A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, to prevent pollution of the water environment, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Regards

Hazel Austin
Environmental Health Officer
Pollution Team

Environment Department
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: [REDACTED]

MEMORANDUM

To Anna Tastsoglou

From City Gardens
My reference
Your reference 24/01262/FULMAJ
Being dealt with by Alex Roebuck
Telephone [REDACTED]
Date 31 January 2025

319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

Demolition of existing buildings at 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings and construction of new building comprising of two basement levels, ground plus 9 upper stories (65.8m AOD), including a mezzanine at upper ground level and external plant space at roof level, consisting of office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)-(b)) at ground level and flexible cultural/ exhibition/performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)-(e)/F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels; creation of public realm, including new hard and soft landscaping, external terraces, provision of new servicing facilities and associated access from Southampton Buildings, cycle parking and other associated works.

An Arboricultural Impact Assessment (AIA) from Treefellas Arboriculture Limited has been supplied. The AIA states that 3 trees are required to be removed including 2x young privately owned birch trees and a semi mature Alder tree owned by CoL. Since the issue of the AIA an additional cherry tree has also been planted by CoL at the eastern end of Southampton Buildings and the tree report will need to be updated to capture this.

Policy OS5 within the City Plan recommends that: other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with trees that can attain an equivalent value

The CoL owned trees proposed to be removed are in good condition and are planted in tree pits in the ground. It would be preferable for the existing trees to be retained within the proposals or at minimum the existing tree pits to be retained and protected during the development, to be replanted with trees capable of achieving as large a canopy size as is reasonable in this location.

The trees within the pocket park are proposed to be within planters connected to the ground. We would query whether any investigations have taken place to determine if the proposed planters can be connected to the ground and if the required soil volumes for the proposed trees are achievable.

The proposed trees in the pocket park area are all multistems with the exception of a number of feathered ginkgo trees. The Ginkgo trees are specified at 35-40 cm girth

which is too large a size given the conditions and soil volumes that these are being planted into and can be liable to poor establishment and failure. We recommend new trees are planted at a maximum of 20-25 cm girth depending on available soil volumes.

It should be noted that the Urban Greening Factor plan shows the proposed trees as Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree. However, the Ground Floor Planting Plan shows the majority of these trees to be multistem trees planted into raised planters with as yet unproven soil volumes. Multi stem trees do not provide the same amount of benefits that larger canopy trees bring, and if sufficient soil volume is not available they may not be able to establish properly.

Consideration should be given at this stage that if the stated UGF score cannot be met by delivery of the pocket park as to how this would affect the overall UGF score of this development.

The area where the pocket park is proposed is publicly maintained highway and as such these proposals would be delivered and maintained by the City. We would expect maintenance to be dealt with via a commuted sum.

Tree sizes, species and tree pit designs should be secured by condition

An Arboricultural Method Statement (AMS) should be secured by condition particularly to ensure that the adjacent offsite trees are adequately protected throughout the course of the development.

Regards,

Alex Roebuck
Arboricultural projects officer

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Tele phone [REDACTED]

Email [REDACTED]



Date 7 February 2025

Our Ref DS/SUDS25/0001

Your Ref PT_A T/24/01262/FULMA J

Subject 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 WC2

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the submitted information for the above application and would recommend the following conditions should the application be approved:

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2 l/s from each outfall and from no more than two distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 662 m³;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) A Lifetime Maintenance Plan for the SuDS system to include:

- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

From: [Countryside Agency](#)
To: [Planning@cityoflondon.gov.uk](#)
Subject: RE: 2017/0007/0000 - 174-175 High Holborn (Heron House), 120-122 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings
Date: 19 March 2019 09:36:20
Attachments:

Hi all,

Can the following responses from the waste team please be registered on matters and uploaded as sites?

Thank you,
Anna

Anna Tarrington / Principal Planning Officer (Development Management)
Environment Department / City of London (Central) / London EC2N 7BH

anna.tarrington@cityoflondon.gov.uk <https://cityoflondon.gov.uk/2017/0007/0000>

Kate Stewart - Executive Director Environment

-----Original Message-----

From: Victoria Vinal
Sent: 16 March 2017 11:50
To: Tarrington, Anna
Cc: Tarrington, Anna
Subject: 2017/0007/0000 - 174-175 High Holborn (Heron House), 120-122 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings

Hi Anna,

The proposed waste storage and collection facilities indicated on drawings no. 204009-ARP-ATR 001, Issue A, REF: MAK-XX-ZZ-DR-AR-001/007, Rev 00, and 204009-ARP-ATR 002, Issue A, REF: MAK-XX-ZZ-DR-AR-001/008, Rev 00 and as outlined in the Delivery and Servicing Management Plan, November 2014, comply with our requirements. This Division will, therefore, raise no objections to this application.

Thanks

Yvonne

-----Original Message-----

From: Victoria Vinal
Sent: 17 January 2017 10:20
To: Victoria Vinal
Cc: Tarrington, Anna
Subject: Planning Application Consultation: 2017/0007/0000

Dear Sir/Madam

Please see attached consultation for 2017/0007/0000 - 174-175 High Holborn (Heron House), 120-122 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WCT1 And WCT2 .
Reply with your comments to: 2017/0007/0000 2017/0007/0000
PLSC: 2017/0007/0000

Kind Regards

Planning Administration

On behalf of

Anna Tarrington
Environment Department
City of London

From: Bishop, Ben (DES)
Sent: 09 May 2025 14:57
To: Tastsoglou, Anna
Cc: Kane, Kerstin
Subject: Re: [External] FW: Holborn Gate BNG and UGF (24/01262/FULMAJ)

Hi Anna,

Thank you for taking this to the applicant and do please thank them for their time going through my comments, having read through there responses I feel that the applicant has taken forward possible greening and ecological measures that are feasible within the scope of the proposal. Kerstin any final thoughts or comments?

All the best,

Ben

Ben Bishop MSc ACIEEM (he/him)



Environmental Resilience Officer

City of London | Environment Department | Planning & Development
Division Guildhall | London | EC2V 7HH

[Redacted] | www.cityoflondon.gov.uk

Katie Stewart, Executive Director, Environment.

From: Tastsoglou, Anna <[Redacted]>
Sent: Friday, May 9, 2025 2:48 PM
To: Bishop, Ben (DES) <[Redacted]>
Cc: Kane, Kerstin <[Redacted]>
Subject: FW: [External] FW: Holborn Gate BNG and UGF (24/01262/FULMAJ)

Hi Ben,

With regard to the above application, I have now received responses from the applicant to your comments.

I am currently finalising the report. It is possible to review and let me know if the responses

address your concerns and what conditions we should be imposing the scheme?

Thank you,

Anna

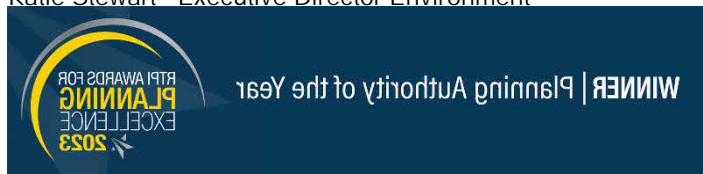


Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH



| www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment



From: Matthew Spencer <[REDACTED]>

Sent: 09 May 2025 14:43

To: Tastsoglou, Anna <[REDACTED]>; Edward Kitchen
<[REDACTED]>; Emma Mounsey <[REDACTED]>;
Jeremy Randall <[REDACTED]>

Cc: Kane, Kerstin <[REDACTED]>

Subject: Re: [External] FW: Holborn Gate BNG and UGF

THIS IS AN EXTERNAL EMAIL

Hi Anna,

Apologies for the delay on this.

Please see below our responses to the queries raised by the Environmental Resilience Officer in red.

Kind regards,

Matthew

Application: 24/01262/FULMAJ Holborn Gate		
Considerations	Notes	Response
Urban Greening Factor	<p>The urban greening factor has raised some concerns, primarily regarding the feasibility of achieving the level of greening proposed, as well as potentially missing opportunities.</p> <p>UFG Score</p> <ul style="list-style-type: none"> Score for full redline is below policy (0.3) this needs to be questioned as clearly the development is not delivering requirements, although it is often acceptable to submit for the building redline. I would suggest that the designs are reviewed to ensure that opportunities are maximised within the public realm, ensuring the full redline achieves 0.3. The score for building is higher achieves 0.3, however it would seem more clarity is required to ensure this will be achieved through the scoring see below. 	<p><i>In order to better understand how the UGF score is allocated across the site, we have undertaken two new UGF calculations for comparison;</i></p> <p><u>1. Total building area only</u> <i>Based on the total building area of 5051m² (excluding the pocket park and S278 areas), and without making any changes from the submitted scheme, we achieve a score of 0.297, very close to the policy requirement of 0.3.</i></p> <p><u>2. Building ownership boundary (building + basement extents)</u> <i>If we include the basement extent (this is the ownership redline, which extends halfway into the Pocket Park) then the score increases to 0.302 (5506m²). This is a direct result of the significant greening being introduced within the pocket park.</i> <i>Please note that this is within our ownership, and therefore entirely achievable and not subject to any feasibility risks.</i></p> <p><i>The two scores above include the</i></p>

retention of the existing Alder tree. We have modified the planter to accommodate the tree.

- *Street level greening should be reviewed to increase accessible greening and achieve the score for full redline.*

These two scores are important to note, since when including the S278 public realm areas in the overall site area, the increased area has a significant impact on the scores. Whilst we are uplifting the pavement surfaces to Southampton Buildings and Staple Inn Buildings, there is a significant quantum of public realm on Chancery Lane where we are only making good.

We endeavoured to maximise opportunities for greening to the ground floor public realm, and indeed across all external levels of the building.

- *Building boundary score includes the pocket park; this is surely overscoring the building greening to over achieve the 0.3 score. The full redline score should be achieved.*

In addition to the dialogue presented in our previous file note, outlining the aspirations for the public realm, we have listed below some more specific challenges that further limit the opportunity to incorporate further greening.

- There is not enough width in pavements for additional greening on Southampton Buildings (west)

- There is not enough width in pavement for additional greening on the north. Lots of services in the pavement.

UGF Calculation:

- *There are areas of intensive green roof that*

are factored into the calculation which are questionable within the General Arrangement/UGF plan. Particularly smaller compartments of planting that once could argue are 'planters' (balcony with planting 01,03, 05 & 07).

- Green wall not included in the building factor calculation.
- Tree canopy extending into full application boundary is being scored. These cannot be removed by the development so should not be considered as contributing towards the score.

- There is not enough width on Staple Inn Buildings (east), due to cycle racks. No depth to allow for trees.

- There is a need to provide circulation space around planters to the pocket park, and generous movement space within the centre of the space as the main access route.

- Space creation for outdoor café seating on the south-west corner of our building

- There is a need to keep entrances free of planting in the pocket park, both our building and the Former Patent Building

- Incorporation of a water feature, and informal performance/gathering space

- The existing post box, drinking water and cycle racks need to be incorporated into the landscape, and associated access to these features.

- Planting and tree size on terraces are limited by planter depth, weight.

- Most of the unplanted areas of the terraces comprise access routes (needed for two directions for fire escape) or are in front of doors. Again, we believe opportunities have been maximised.

Please see response above.
By including the Pocket Park (within our ownership boundary), we achieve a UGF score of 0.302.

		<p><i>The planters in question are permanent (built in to the building fabric and NOT freestanding) elements. We believe these should therefore be included in the UGF calculation.</i></p> <p><i>The green walls and climbers on levels Levels 09 & 10 have been included in the calculation, as per UGF Guidance.</i></p> <p><i>Please refer to the response above, and the additional calculations provided.</i></p>
<i>Intensive green roof</i>	<p><i>· It would be good to know how the GRO code has been followed in terms of designing the roof system, and to highlight the key layers within the landscape sections (drainage/reservoir layer, filter layer, growing medium etc), as this is not fully clear, although it seems to be there. This will illustrate best outcomes for planting.</i></p> <ul style="list-style-type: none"> <i>• Some areas classified as IGR are negligible (as above), these should not contribute to the overall scoring.</i> 	<p><i>Assumptions within the BNGA were that extensive green roof with varied substrate depths would be provided, in line with GRO code 2024.</i></p> <p><i>All terrace level planting areas have been classified as intensive green roof in accordance with UGF Guidance.</i></p> <p><i>Level 10 has been classified as extensive green roof.</i></p>

<p><i>Further investigations</i></p>	<p><i>Review street trees/other greening opportunities planting along Staples Inn to maximise street level greening</i></p> <ul style="list-style-type: none"> <i>Has the pocket park feasibility been reviewed and approved by the highway authority? this might be an area that requires access. You should carry out ground investigations to assess feasibility and scale of opportunity as this greening provides a significant uplift to the outcomes to the development. This should not be relied on.</i> 	<p><i>Refer to comments above in relation to maximising greening opportunities and working with the existing site constraints. There is not enough width on Staple Inn Buildings (east), due to cycle racks, and no depth to allow for trees.</i></p> <p><i>As noted above, we <u>can</u> rely on the greening within the ownership boundary in the Pocket Park. Building ownership boundary (building + basement extents) achieves a UGF score of 0.302 Further below ground investigation will be needed at a later design stage to the area south of the ownership line. We are confident that even without further investigation south of the basement, ornamental planting in raised planters will be possible. To integrate trees, further investigation will be needed to be carried out.</i></p>
<p><i>Biodiversity Net Gain</i></p>	<ul style="list-style-type: none"> <i>BNG also needs to take into consideration the above. With the potential for areas of greening not being achieved, this should be reviewed once investigations are conclusive.</i> <i>Again, I would prioritise street level greening, but also particularly for BNG focus on the mosaic of habitats that can be created through</i> 	<p><i>BNGA to be reviewed if/where landscape design/ RLB changes are applied (not required at present)</i></p> <p><i>This is our design intent when proposing green roofs.</i></p> <p><i>We agree with this and these measures will likely be secured</i></p>

	<p><i>extending the extensive green roof area. This should be maximised where possible as we know that these habitats can target a range of the BAP target species.</i></p> <ul style="list-style-type: none"> • <i>They should include artificial nesting sites for ground nesting invertebrates and open faced nesting boxes, as well as BS 42021:2022 integrated nest boxes for swift within the fabric of the building.</i> <p><i>BNG Notes:</i></p> <ul style="list-style-type: none"> • <i>Site is 0.6894 ha</i> • <i>Onsite 0.07 units</i> • <i>Achieved 0.69 units</i> 	<p><i>through planning condition. The ground-nesting invertebrates habitat can be created on extensive green roof by depositing sand mounds, log piles and/or invertebrate houses.</i></p>
<i>Conclusion</i>	<p><i>Overall there is a decent proposal to achieve considerable greening, however this is at risk due to feasibility, if ground investigations have not taken place. While there is a good amount of greening on the building, you should consider how this can be maximised, particularly where there is an opportunity to extend extensive green roof for target species. Given it's location this site has potential to be a good stepping stone between fairly green urban spaces, Lincoln's Inn and Gray's Inn. There should be further investigations at street level to</i></p>	<p><i>The greening of the site to maximise the potential of the Building and Pocket Park to be a stepping stone between adjacent green spaces has been a goal throughout the RIBA Stage 2, and communicated through the pre-application process.</i></p> <p><i>We have endeavoured to maximise the quantum and variety of planting typologies across the site to present a meaningful, and realistic approach to the landscape design.</i></p> <p><i>This is demonstrated by the scores as noted above, but notably 0.302, for the areas</i></p>

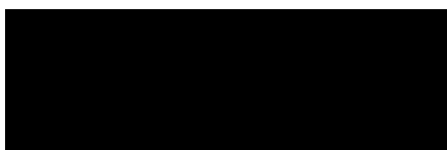
	<i>maximise and create contingency for achieving UFG and BNG, and for the whole redline achieve 0.3 UGF.</i>	<i>within the ownership boundary, and for which we have full control over.</i>
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Matthew Spencer

Planning Consultant

Newmark [Planning and Development](#)

NEWMARK



From: Tastsoglou, Anna <[REDACTED]>
Sent: Monday, April 14, 2025 12:06 PM
To: Edward Kitchen <[REDACTED]>; Emma Mounsey <[REDACTED]>; Matthew Spencer <[REDACTED]>; Jeremy Randall <[REDACTED]>
Cc: Kane, Kerstin <[REDACTED]>
Subject: [External] FW: Holborn Gate BNG and UGF

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Hi all,

I am not sure whether Kerstin has already forwarded the below to you in my absence.

Please see below comments from the Environmental Resilience Officer re UGF and BNG.

Application: 24/01262/FULMAJ Holborn Gate	
Considerations	Notes
Urban Greening Factor	<p>The urban greening factor has raised some concerns, primarily regarding the feasibility of achieving the level of greening proposed, as well as potentially missing opportunities.</p> <p>UFG Score</p>

	<p>Score for full redline is below policy (0.3) this needs to be questioned as clearly the development is not delivering requirements, although it is often acceptable to submit for the building redline. I would suggest that the designs are reviewed to ensure that opportunities are maximised within the public realm, ensuring the full redline achieves 0.3.</p> <ul style="list-style-type: none"> • The score for building is higher achieves 0.3, however it would seem more clarity is required to ensure this will be achieved through the scoring see below. • Street level greening should be reviewed to increase accessible greening and achieve the score for full redline. • Building boundary score includes the pocket park; this is surely overscoring the building greening to over achieve the 0.3 score. The full redline score should be achieved. <p>UGF Calculation:</p> <ul style="list-style-type: none"> • There are areas of intensive green roof that are factored into the calculation which are questionable within the General Arrangement/UGF plan. Particularly smaller compartments of planting that once could argue are 'planters' (balcony with planting 01,03, 05 & 07). • Green wall not included in the building factor calculation. • Tree canopy extending into full application boundary is being scored. These cannot be removed by the development so should not be considered as contributing towards the score.
Intensive green roof	<ul style="list-style-type: none"> • It would be good to know how the GRO code has been followed in terms of designing the roof system, and to highlight the key layers within the landscape sections (drainage/reservoir layer, filter layer, growing medium etc), as this is not fully clear, although it seems to be there. This will illustrate best outcomes for planting. • Some areas classified as IGR are negligible (as above), these should not contribute to the overall scoring.
Further investigations	<ul style="list-style-type: none"> • Review street trees/other greening opportunities planting along Staples Inn to maximise street level greening • Has the pocket park feasibility been reviewed and approved by the highway authority? this might be an area that requires access. You should carry out ground investigations to assess feasibility and scale of

	<p>opportunity as this greening provides a significant uplift to the outcomes to the development. This should not be relied on.</p>
Biodiversity Net Gain	<ul style="list-style-type: none"> • BNG also needs to take into consideration the above. With the potential for areas of greening not being achieved, this should be reviewed once investigations are conclusive. • Again, I would prioritise street level greening, but also particularly for BNG focus on the mosaic of habitats that can be created through extending the extensive green roof area. This should be maximised where possible as we know that these habitats can target a range of the BAP target species. • They should include artificial nesting sites for ground nesting invertebrates and open faced nesting boxes, as well as BS 42021:2022 integrated nest boxes for swift within the fabric of the building. <p>BNG Notes:</p> <ul style="list-style-type: none"> • Site is 0.6894 ha • Onsite 0.07 units • Achieved 0.69 units
Conclusion	<p>Overall there is a decent proposal to achieve considerable greening, however this is at risk due to feasibility, if ground investigations have not taken place. While there is a good amount of greening on the building, you should consider how this can be maximised, particularly where there is an opportunity to extend extensive green roof for target species. Given it's location this site has potential to be a good stepping stone between fairly green urban spaces, Lincoln's Inn and Gray's Inn. There should be further investigations at street level to maximise and create contingency for achieving UFG and BNG, and for the whole redline achieve 0.3 UGF.</p>

I am looking forward to receiving your responses to the above matters.

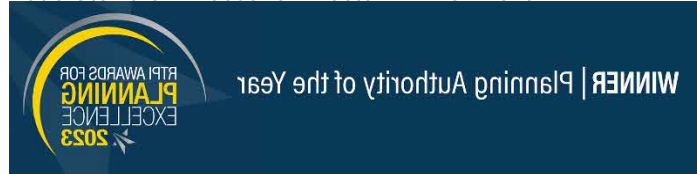
Kind regards,

Anna



www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment



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MEMORANDUM

To Anna Tastsoglou

From City Gardens
My reference
Your reference 24/01262/FULMAJ
Being dealt with by Alex Roebuck
Telephone [REDACTED]
Date 20 May 2025

319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

Demolition of existing buildings at 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings and construction of new building comprising of two basement levels, ground plus 9 upper stories (65.8m AOD), including a mezzanine at upper ground level and external plant space at roof level, consisting of office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)-(b)) at ground level and flexible cultural/ exhibition/performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)-(e)/F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels; creation of public realm, including new hard and soft landscaping, external terraces, provision of new servicing facilities and associated access from Southampton Buildings, cycle parking and other associated works.

Further to previous discussions an updated Arboricultural Impact Assessment (AIA) from Treefellas Arboriculture Limited has been supplied. T3 the alder tree which was previously proposed to be removed is now to be retained and protected throughout the development.

The cherry tree planted by CoL at the eastern end of Southampton Buildings has not been included within the report, the tree report will need to be updated to capture this and the tree report which omits the cherry tree should not become an approved document. It is important that both trees and their planting locations are retained and protected throughout the development, consideration can be given to replanting if necessary at the landscaping stage.

The proposed trees in the pocket park area are all multistems with the exception of a number of feathered ginkgo trees. The Ginkgo trees are specified at 35-40 cm girth which is too large a size given the conditions and that these are being planted into and can be liable to poor establishment and failure. We recommend new trees are planted at a maximum of 20-25 cm girth depending on available soil volumes. With suitable irrigation in place this could potentially be increased to 25-30. Details could be secured by condition.

The area where the pocket park is proposed is publicly maintained highway and as such these proposals would be delivered and maintained by the City. We would expect maintenance to be dealt with via a commuted sum.

Tree sizes, species and tree pit designs should be secured by condition

An Arboricultural Method Statement (AMS) and Tree Protection Plan in accordance with BS5837 should be secured by pre commencement condition to ensure that the trees on site and adjacent offsite trees are adequately protected throughout the course of the development.

Regards,

Alex Roebuck
Arboricultural projects officer