

From: [PlanningGatewayOne](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 24/01262/FULMAJ (Our ref pgo-6523)
Date: 17 January 2025 14:16:23
Attachments: [image001.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Further information is available on the HSE website [here](#).

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-6523) in all future correspondence.

Kind regards

Lisa Gaskill

Operational Support for Planning Gateway One

Health and Safety Executive | Building Safety Division

PlanningGatewayOne@hse.gov.uk



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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: Friday, January 17, 2025 12:27 PM

To: PlanningGatewayOne <PlanningGatewayOne@hse.gov.uk>

Subject: Planning Application Consultation: 24/01262/FULMAJ

Dear Sir/Madam

Please see attached consultation for 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1

And WC2 .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou

Environment Department

City of London

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However, if a crane is needed for installation purposes? We would like to draw your attention to the following:

The following details should be provided before the crane is erected:

- Kind regards
Simon Vince | Airport Planning Manager
On behalf of Heathrow Airport Ltd.

WEBSITE

Visit our website: [Home - Airport Safeguarding Limited](#) or connect on LinkedIn - [Airport Safeguarding Limited](#).



Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Please see attached consultation for 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2.

Mapping Administration

On behalf of

Aiza Tzetzoglou

Environment Department
City of London

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From: [NATS Safeguarding](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 24/01262/FULMAJ [SG38748]
Date: 20 January 2025 11:13:08
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG38748

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Friday, January 17, 2025 12:23 PM
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: Planning Application Consultation: 24/01262/FULMAJ

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached consultation for 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2 .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

From: [Active Travel England Planning](#)
To: [PLN - Comments](#)
Subject: LPA Reference: 24/01262/FULMAJ Standing Advice Response
Date: 20 January 2025 16:42:19

THIS IS AN EXTERNAL EMAIL

LPA Reference: 24/01262/FULMAJ

ATE Reference: ATE/25/00107/FULL

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

Proposal: 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.

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,



Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ref:a0zTw000002IDQfIAO;6b39d9786cba48f8c182a455dc51e0c6:ref]

□

Hackney Council
Planning Service
1 Hillman Street
London E8 1DY
www.hackney.gov.uk
Hackney Reference:2025/0171
31-01-2025

Anna Tastsoglou
Po Box 270 Guildhall

London
EC2P 2EJ

Dear Sir/Madam

**Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order
2015**

Application Number: 2025/0171

Site Address: 24/01262/FULMAJ 19-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2 .

Development Description: 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.

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 1 Hillman Street, London, E8 1DY, by email to planning@hackney.gov.uk, or by phone to 020 8356 8062.

Yours sincerely



Natalie Broughton

Assistant Director Planning and Building Control
Climate, Homes and Economy

PLANNING DECISION NOTICE

Town and Country Planning (Development Management Procedure) (England) Order 2015

Agent: Anna Tastsoglou
Po Box 270 Guildhall
London
EC2P 2EJ

Applicant: Anna Tastsoglou
Po Box 270 Guildhall
London
EC2P 2EJ

Part 1- Particulars of the Application

Application No: 2025/0171
Date of Application: 30-01-2025
Date Validated: 30-01-2025
Application Type: Adjoining Borough Observations

Proposal: 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.

Location: 24/01262/FULMAJ 19-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2 .

Part 2 – Particulars of Decision: **No Objection**

Date of Decision: 31-01-2025

Yours sincerely



Natalie Broughton

Assistant Director Planning and Building Control
Climate, Homes and Economy



Historic England

Ms Anna Tastsoglou
City of London Corporation
Environment Department
PO Box 270, Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: P01587760

6 February 2025

Dear Ms Tastsoglou

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**319-325 HIGH HOLBORN (HERON HOUSE), 326-332 HIGH HOLBORN AND 26
SOUTHAMPTON BUILDINGS (HOLBORN GATE), AND 44 SOUTHAMPTON
BUILDINGS, WC1 AND WC2
Application No. 24/01262/FULMAJ**

Thank you for your letter of 17 January 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The area around Holborn has been associated with the legal profession since the medieval period and remains synonymous with the prestigious courts, inns and chambers. The Inns of Court are one of London's best collections of buildings and squares, representing historic styles of several centuries.

The overall scale of the proposed development is likely to be highly visible due to their height, scale and contrasting elevational treatment. It will be particularly apparent in views of and through the Inns of Court in Bloomsbury Conservation Area. Historic England has concerns about these proposals on heritage grounds and recommends that the application be deferred to enable amendments to be made that would address the impacts on the historic environment.

Historic England Advice

Significance

The area around Holborn has been associated with the legal profession since the medieval period and remains synonymous with the prestigious courts, inns and chambers. Whilst many of the buildings have been redeveloped over time, the medieval street pattern in Holborn, Chancery Lane, Fleet Street and Fetter Lane



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

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remains clearly recognisable. The tight street pattern of lanes and narrow passages between them together with names such as Barnard's Inn, Staple Inn, Took's Court and Rolls House reinforces its historic origins.

High Holborn remains one of the main routes between the City of London and the West End whilst Chancery Lane marks the western boundary of the City of London and LB Camden. High Holborn, between Holborn Circus and Chancery Lane, is generous in width, affording both long views through it and offering the ability to appreciate the full facades of even its largest buildings.

Camden

The *Inns of Court* of Lincoln's Inn and Gray's Inn were established in the fourteenth century. Their collegiate character of smaller scale buildings set around courtyards and open green spaces, together with narrow lanes and alleys, all contribute to its historic appearance. Long associated with the legal profession, the Inns are largely hidden from street views and offer an oasis of peace within this busy area of London. As a series of quads, they create a sense of enclosure that is largely uninterrupted by modern development.

Lincoln's Inn Fields, registered grade II, is the largest of London's garden squares. Originally laid out in the early seventeenth century, some of its earliest buildings still survive. Numbers 12, 13 and 14, on the north side, are particularly notable as the work of architect Sir John Soane and listed grade I. They are home to a museum dedicated to his life and work. The eastern side of the square is defined by New Hall, Library and boundary wall, all listed grade II*. Built in 1842, they are highly distinctive in a neo-Tudor style with polychromatic brickwork, stone dressings and crenelated parapet. They form part of the boundary to the Inns of Court beyond.

Stone Buildings lies behind the listed boundary wall. Built in the Classical style, in the late eighteenth and early nineteenth centuries, the Portland stone terraces (numbers 1-7) are monumental in character with fine detailing including Corinthian pilasters, pediments and modillion cornice with balustrade above. Although set back from the frontage of Lincoln's Inn Fields, their rear elevations are clearly visible. Their height and scale are representative of that found at the Inns of Court and they are of high significance, listed grade I.

New Square is a complete late seventeenth century square with a large central lawn, trees and fountain known as Cotterell Gardens. The buildings that surround it are largely historic, of a similar scale and with clearly discernible rooflines and tall chimneys. The buildings of *Gray's Inn* are largely post-war due to bombing, but they were carefully rebuilt in a style that reflects the heritage of the wider area.



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Together, these are one of London's best collections of buildings and squares, representing historic styles of several centuries. All of these heritage assets fall within Bloomsbury Conservation Area.

The City

Staple Inn is a landmark, distinctive as one of the few surviving half-timbered buildings in the City of London. Originally constructed in c1586, it was altered and extended until Alfred Waterhouse removed these later accretions as part of a restoration by the Prudential Assurance Company, whose headquarters he designed opposite. The façade was rebuilt in facsimile in 1954-5 following bomb damage in WWII. With its eighteenth-century quad to the rear, it retains its collegiate appearance enhanced by the gardens between it and the former Patent Office. It is listed Grade II*.

Its neighbour, *Staple Inn Buildings*, was built in 1903 by Waterhouse as part of his wider commission for the Prudential. The Gothic Revival style offices are set back from Staple Inn to reveal the jettied frontage of the timber-framed building in views along High Holborn. Waterhouse's tall, elegant red-brick building is a fitting and considered neighbour and listed Grade II.

Waterhouse used the same style and palette for the Prudential Assurance Company headquarters opposite, now known as *Waterhouse Square*. Built 1885-1901, the polished granite and red-brick façade to High Holborn is finely detailed with terracotta and ironwork. Grand in height, scale and detail, it is also distinctive in the streetscape and a landmark in this part of the City. It is listed Grade II*.

The *WWI memorial to the Royal Fusiliers* forms part of this ensemble of historic buildings and is located on a pedestrian island in the centre of the road opposite Staple Inn. The lifesize figure of the soldier is poignant and resonates with Waterhouse's buildings. Staple Inn often features in images of it as a backdrop. The memorial is also considered to be a marker between the City and Holborn and is listed Grade II*.

The site

Built as offices 1965-8, *Holborn Gate* and *Heron House* are two neighbouring buildings that stand on High Holborn and are similar in design. Together they form, a distinctive post-war pair that have some landmark qualities due to their height (9 storeys), scale, massing and distinctive design. Their horizontality is emphasised by its projecting concrete floor plate faced with white tiles. These can be read in conjunction with the jettied frontage of Staple Inn. The buildings have a low floor to ceiling height consequently. Combined with windows that run uninterrupted along the width of the extensive elevation, it provides visual interest and is notable in views along High Holborn. These buildings are not in a conservation area.



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44 Southampton Buildings was built between 1910-14 as offices in a stripped classical style of brick with stone dressings. The building has been substantially extended with additional floors at roof level and alterations to its fenestration. The façade remains recognisable and has been treated sympathetically. As such, it makes some contribution to the character and appearance of the Chancery Lane Conservation Area.

All three buildings were granted a Certificate of Immunity from Listing by the Secretary of State in September 2024.

Proposals and their impact

The scheme

The proposals are for the demolition of all the buildings on the site of Holborn Gate, Heron House and 44 Southampton Buildings, all of which are within the City of London. Make Architects' scheme seeks to develop a 10-storey mixed-use building to include retail, offices and cultural spaces.

Impacts

The site falls within views identified in the London View Management Framework (LVMF) adopted Supplementary Planning Guidance (SPG) issued by the Greater London Authority (GLA) to protect key views of Westminster World Heritage Site and St Paul's Cathedral from public spaces across the capital. The site's location requires the scheme be assessed to understand its impacts on the settings of more distant designated heritage assets in key views of them.

LVMF 4A.1 Primrose Hill: the summit looking toward St Paul's Cathedral: The focus of this panoramic view is of the dome, peristyle and western towers of the cathedral. The site is some distance from the cathedral in the view and will have a negligible impact on it.

LVMF 5A.2 Greenwich Park: the General Wolfe statue - north-east of the statue: The elevated viewing point in Greenwich Park offers a panoramic view of the City across the River Thames. The proposed development would sit behind existing development and not appear in the view.

LVMF 6A.1 Blackheath Point - near the orientation board: the panorama view affords a view of the dome and western towers of the cathedral, with the dome silhouetted against the sky. The development would be within the wider setting but would not be visible from the viewing point.

LVMF 16B.2 The South Bank: The development will be screened by existing



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development and the tree line along the Embankment with a negligible impact on this view.

Camden

The increased height, scale and mass of the proposed development would be clearly visible above the roofline of Stone Buildings in the view east from the NW side of Lincoln's Inn Fields. The scale and monumentality of the terrace would be reduced by the height and bulk of the proposal in the backdrop of the composed view. The upper floors of the green roof terrace would sit clearly above part of the roofline of the grade I listed buildings. As they form a perceived boundary to the Inns of Court, this represents a change to the perception of their historic character and that of the wider conservation area. The proposals would, in my view, cause harm to the setting of the listed buildings through development in their setting.

From within the Inns of Court, the development will be visible in some views from within the squares. The silhouette of the historic rooflines within Gray's Inn Gardens (at the top of the central pathway steps and west), Gray's Inn Square (north-east corner) and New Square (north-east) are currently admired largely uninterrupted and against clear sky. The new development in their backdrop will alter this and reduce the sense of enclosure within these historic spaces. Given that modern development is largely unseen, this change will have a harmful impact on the setting of the designated heritage assets.

City of London

The increased height, scale and bulk of the development will be clearly present on High Holborn. Its highly urban character is long-established, the proposals do not represent a significant change to the setting of the heritage assets here. Any harm would, in my view, be at the lower end of the scale of less than substantial.

Relevant Planning Policy

Section 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it a statutory duty for Local Planning Authorities to have special regard to the desirability of preserving a listed building or its setting. Section 72 imposes a statutory duty on planning authorities to ensure that proposals preserve or enhance the character or appearance of Conservation Areas.

The London View Management Framework (LVMF) is a piece of Supplementary Planning Guidance (SPG) published by the Greater London Authority (GLA) in support of policies in the Mayor of London's 'London Plan' 2021. It is a material consideration in all planning decisions that relate to the designated views it identifies which focus on the Westminster WHS and St Paul's Cathedral.



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The City of London Local Plan, adopted in 2015, includes policies which seek to protect the Historic environment (CS12), Protected Views (CS13) and only allow tall buildings in suitable locations (CS14).

Guidance on the fulfilment of statutory planning duties is set out in the government's National Planning Policy Framework 2024 (NPPF). The NPPF makes clear that when considering the impact of a scheme, any conflict with the conservation of heritage assets should be avoided or minimised (para.208). Great weight should be given to the conservation of heritage assets, and this weight should be greater for the most important assets (para.212). Clear and convincing justification should be provided for any harm caused (para.213), and any harm should be weighed against the public benefits of the scheme (para.2015).

Historic England Position

Historic England has concerns about these proposals on heritage grounds.

Harm

The overall scale of the proposed development is likely to be highly visible due to their height, scale and contrasting elevational treatment. It will be particularly apparent in views of and through the Inns of Court in Bloomsbury Conservation Area. The harm would arise from the alteration to the existing silhouette of the historic buildings particularly where they are perceived against clear sky from designed historic spaces. This harm, through development within their setting, is of concern to Historic England given the very special historic character of these spaces and the highly graded assets around them. In the language of the NPPF, we consider this harm to be situated in the middle of the range of less than substantial harm.

The loss of 44 Southampton Buildings, which contributes to the character and appearance of the Chancery Lane Conservation Area, would also cause harm. Its contribution to the character and appearance of the conservation area should be given weight in the planning balance.

Having considered the LVMF views identified, the impact of the development in these views will be limited and Historic England does not wish to raise concerns.

Reducing harm

To address the harm arising from these proposals and in accordance with the policies set out above, we would welcome the reduction in height of the proposed development to minimise the impact of its visual prominence in views from within the Inns of Court and Lincoln's Inn Fields.



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Public benefits

The NPPF also states that, if harm is unavoidable, opportunities should be sought for mitigation and enhancement. I recognise that the scheme seeks to deliver public benefits, such as a new cultural space and improvements to the public realm.

Consideration should also be given to the WWI memorial on High Holborn, given its proximity to the site and that this development will be seen in conjunction with it, particularly looking west. Should there be any condition or repairs issues, this development presents an opportunity to address these and offer an important public benefit to the heritage of this place.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We recommend that this application be deferred to enable amendments to be made that would address the impacts on the historic environment highlighted above.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Breda Daly

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
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Historic England



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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: City of London Planning Application - 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26
Date: 07 February 2025 12:56:10
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)

Some people who received this message don't often get email from adam.greenhalgh@camden.gov.uk.
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THIS IS AN EXTERNAL EMAIL

Hi City of London/Anna Tastsoglou

You consulted us (LB Camden) on the above planning application and stated that any observations should be received within a period of 21 days from the date of this letter, which was January 17th 2025.

We are not going to be able to get our comments to you by this date (i.e. today February 9th)

The application has potential impacts on the following LB Camden planning issues:

1. Amenity - challenging impact on our residents
2. Impact on scale and massing on local townscape as well as heritage assets
3. Construction impacts
4. Architectural detailing
5. Things that we are doing in the local area

We estimate that we need two more weeks to complete our response. Please confirm that the deadline for comments can be extended to February 23rd 2025

Many thanks

Adam Greenhalgh
Senior Planning Officer

Supporting Communities
London Borough of Camden

Web: camden.gov.uk

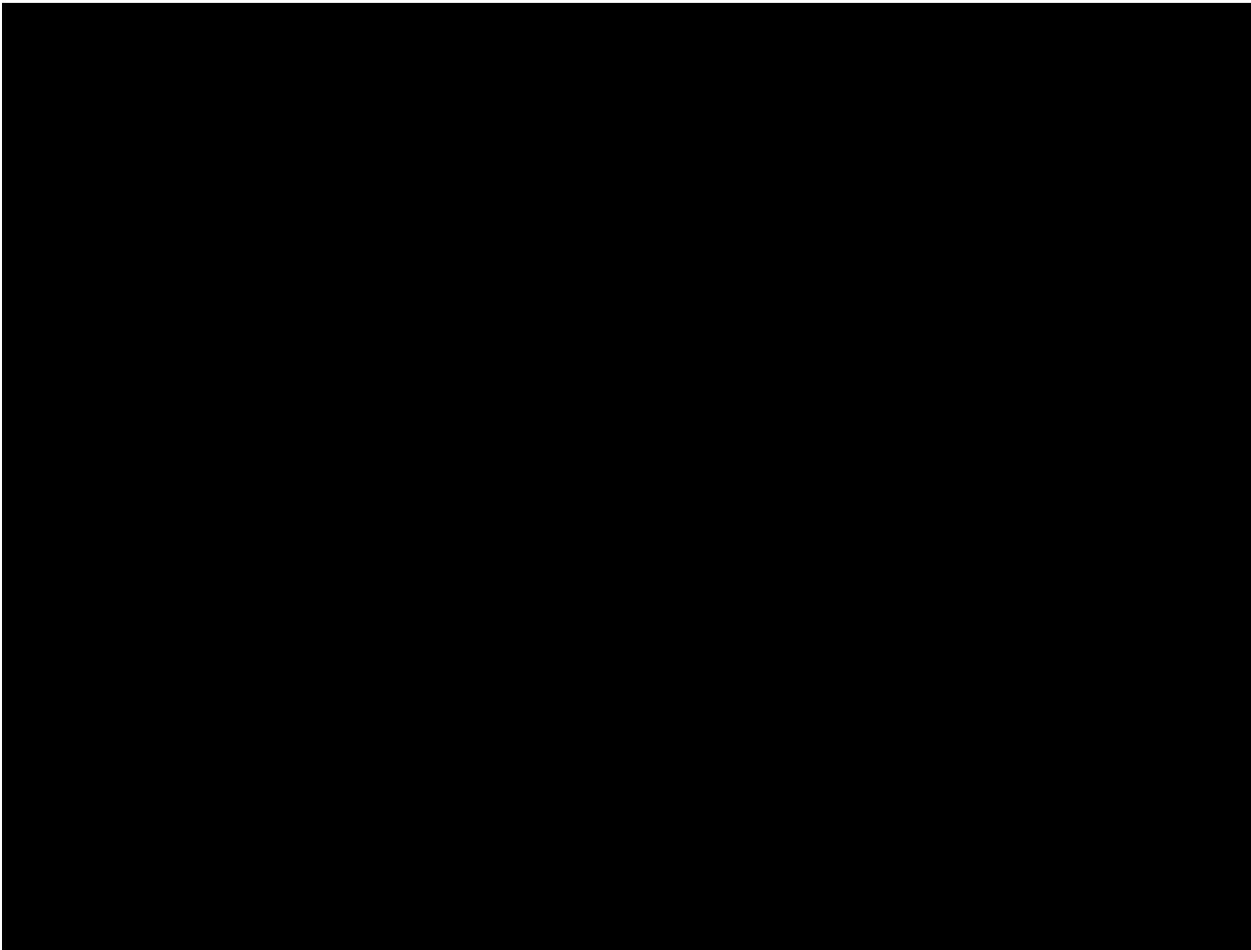
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From: Gregory Barrett <[REDACTED]>
Sent: 07 February 2025 13:50
To: Tastsoglou, Anna <[REDACTED]>
Cc: Oliver Caroe <[REDACTED]>
Subject: 319-325 High Holborn (ref: 24/01262/FULMAJ)

THIS IS AN EXTERNAL EMAIL

Dear Anna,

Many thanks for organising the additional information we requested.

Upon review, we have no comment to make on this scheme.

Kind regards,

Greg

Gregory Barrett

BA (Hons) MPhil (Cantab) FRSA IHBC

Lead Heritage Consultant and Clerk to the Surveyor

Mobile: [REDACTED]

on behalf of Caroe Architecture Ltd

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Cambridge Office:

Office 5, Unit 8; 23–25 Gwydir Street

Cambridge CB1 2LG

Tel: [REDACTED]

London Office:

The Surveyor's Office, The Chapter House, St Paul's Churchyard

London EC4M 8AD

Tel: [REDACTED]

Visit our website: caroe.com

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From: [Location Enquiries](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 24/01262/FULMAJ
Date: 07 February 2025 16:18:50
Attachments: [image001.png](#)
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

FAO Anna Tastsoglou,

Application No: 24/01262/FULMAJ

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

Proposal: 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.

Thank you for your consultation.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground/DLR railway infrastructure.

Therefore, we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed.

1. Before the pre-commencement/Site formation/Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
 - a) provide an overview of the overall development including both design on temporary and potential long term works;
 - b) provide demolition details;
 - c) identify existing London Underground structures in the vicinity of the existing building structure including its foundation;
 - d) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and potential long term changes in loading for the demolition stage;
 - e) an assessment of railway noise and vibration shall be carried out and precautions taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration;
 - f) provide details on the use of tall plant/scaffolding for the demolition stage;
 - g) demonstrate to TfL's satisfaction that the methods and timing of the works are not contrary to the contents of LU's document "Special Conditions for Outside Parties working on or

near the railway”.

2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) provide details of foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent);
- b) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and potential long term changes in loading for the sub-structure construction stage;
- c) an assessment of railway noise and vibration shall be carried out and precautions taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration;
- d) demonstrate to TfL’s satisfaction that the methods and timing of the works are not contrary to the contents of LU’s document “Special Conditions for Outside Parties working on or near the railway”.

3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) provide details on the use of tall plant/scaffolding for the super-structure construction stage;
- b) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and permanent changes in loading for the super-structure construction stage;
- c) an assessment of railway noise and vibration shall be carried out and precautions taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration;
- d) demonstrate to TfL’s satisfaction that the methods and timing of the works are not contrary to the contents of LU’s document “Special Conditions for Outside Parties working on or near the railway”.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and ‘Land for Industry and Transport’ Supplementary Planning Guidance 2012

This response is made as a Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015”. It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Tom Li

Safeguarding Engineer (LU+DLR) | Infrastructure Protection
5 Endeavour Square | 7th Floor Zone B | Westfield Avenue | E20 1JN

INFRASTRUCTURE PROTECTION

Interfacing with our Neighbours



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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: Friday, January 17, 2025 12:23 PM

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: Planning Application Consultation: 24/01262/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2 .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou

Environment Department

City of London

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Corporation of London Department of Planning & Transportation
PO Box 270 Guildhall London EC2P 2EJ
10 February 2025

Our DTS Ref: 78184 Your Ref:
24/01262/FULMAJ

Dear Sir/Madam

Re: 319-325 HIGH HOLBORN (HERON HOUSE), 326-332 HIGH HOLBORN AND, 26 SOUTHAMPTON BUILDINGS (HOLBORN GATE), 44 SOUTHAMPTON BUILDINGS, LONDON, WC1V 7PX

Waste Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from

construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local

underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either: - all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://www.thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow

if you're considering working above or near our pipes or other structures.
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

Supplementary Comments

Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all piling and the clearance between the face of the pile to the face of a pipe. If any basements intended to be constructed as part of the development, please clearly indicate the location and footprint. Without these drawings and cross-sectional details Thames Water will not be able to review your proposals and discharge your planning condition.

The Developer is also requested to confirm whether they have been in touch with Thames Water to discuss or arrange for the abandonment of any existing assets beneath the development site. Please give a short summary of any correspondence to date and any references they have been provided.

Plans of Thames Water apparatus can be obtained through our website at www.thameswater-propertysearches.co.uk. Please use the following reference in all future correspondence: DTS 78184.

Yours faithfully

Development Planning Department

Tel: 020 8921 5222



City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Directorate of Place and Growth
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

25/0420/K

Your Ref: 24/01262/FULMAJ

11 February 2025

DECISION NOTICE –RAISE NO OBJECTION

Dear Sir/Madam,

Town & Country Planning Act 1990 (As Amended)

The Town and Country Planning (General Permitted Development) (England) Order 2015

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

Applicant: C/O Agent

Proposal: 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.

Drawings

I refer to your letter dated 30 January 2025 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director



Historic England

Anna Tastsoglou
PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/01262/FULMAJ
Our Ref: 229544

Contact: Helen Hawkins

26th February 2025

Dear Anna,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2024**

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.

Recommend Archaeology Conditions

Thank you for your consultation received on 17 January 2025.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

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Assessment of Significance and Impact

The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

An archaeological desk-based assessment has been submitted with the planning application (MOLA 2024) and an archaeological evaluation comprising window samples was also carried out in advance of the application. Part of the site was excavated in 2000.

The desk-based assessment identified that the site is located adjacent to a Roman road and it lies within Londinium's western Roman cemetery, as a Roman burial was found in the 2000 excavation.

In 1144, the Knights Templar founded their 'Old Temple' under what is now 319-325 High Holborn. The Old Temple was replaced by the New Temple, located further south at what is now Temple, in the late 12th century. The excavation in 2000 found some of the original Old Temple church and a 1m stretch of the church is believed to be preserved in the basement already, to the east of a lift. The window samples carried out in 2024 suggested a low potential for survival for the Old Temple due to high levels of truncation. However, there is still some potential for truncated Roman and medieval material below the current slab, except for in the sub-basement of 326-332 High Holborn which is likely to have removed all archaeological remains.

Both the western cemetery and the Old Temple should be recognised as non-designated heritage assets of archaeological interest. The western cemetery is of local-regional significance and the Old Temple could be argued to be of national significance, given its unique nature. The proposed development will entail the need to excavate the archaeological remains in advance of development, which will cause some harm to the heritage assets. However, the presentation of the remains of the Old Temple to the public will provide a positive heritage benefit for the site, in accordance with policy HC1 of the London Plan.

A Cultural Plan has also been provided (FutureCity 2024). The plan outlines several heritage benefits for the site, with some relating to the archaeology. A plaque providing the history of the Knights Templar will be provided on the site at street level. The remaining section of wall will be exposed and made visible as a permanent exhibit from within The Holborn Dome Auditorium and could be integrated as part of a permanent exhibition with some



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interpretation in the Auditorium. Public art around the building explaining and referencing the history of the site is also proposed, including cultural space metalwork, art vitrines on the west, historic plaque, loading bay doors and patent timeline within the landscape.

A number of archaeological conditions are recommended for the site. The Section 106 agreement will also need to consider the long term maintenance and upkeep of the Temple remains and exhibition. If further masonry remains of the Temple are found, consideration of preservation and display will also be necessary.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using planning conditions.

I therefore recommend attaching conditions as follows:

- Condition 1 No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and
- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
 - B. A protocol for identifying remains worthy of preservation according to the conditions 2 and 3
 - C. Details of a programme for delivering related positive public benefits



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- D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Condition 2 Foundation Design ...

Irrespective of the approved drawings, the final basement configuration should be submitted to and approved in writing with the Local Planning Authority in consultation with Historic England. This shall include details of the basement and foundation design and construction method to protect and where appropriate conserve, interpret and display archaeological remains. The development shall be carried out in accordance with the approved details.

Informative: to ensure that if further substantive remains of the Temple church are identified, they are also preserved and displayed to the public and to protect the known remains of the Temple Church. It will only be possible to submit details once the archaeological investigation has identified which archaeological remains are to be preserved.

Condition 3 Condition survey, protection and preservation of archaeological remains

No development shall commence until a condition survey of the known Temple remains has been carried out and the remains have been consolidated. Details of fencing, signage and other control measures to be provided during the construction period to protect discovered archaeological remains that are to be retained should be submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of operational works. A management plan for the remains should be produced once they have been fully identified.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If



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the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with the NPPF.

I envisage that the archaeological fieldwork would comprise the following:

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

Full excavation of any surviving archaeology should take place on the site, other than where complete truncation of archaeological deposits can be demonstrated or where substantive remains are identified for preservation and display.

Public engagement

Where appropriate, local planning authorities and the developer are advised to make investigative works open to and interpreted for the public and to include that as part of the WSI. Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may be communicated, in addition to formal publication and deposition of the archive, through displays, exhibitions and popular publications and might inform site design and public art.

An educational programme relating to the Templar and Roman archaeology on the site should be carried out in conjunction with the public engagement plans detailed in the Cultural Plan. Material found during the archaeological excavation on the site should be included where relevant in the exhibition material.

Preservation

Where archaeological remains are to be preserved within a development there will normally be a requirement to provide details of how this will be achieved. Typically this would involve a design and method statement for groundworks. Where particularly important or vulnerable features are to be preserved there may also be a requirement to monitor their



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

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condition and take remedial action in the event of decay.

Any substantive remains of the Templar Church exposed during the archaeological excavation, including those already identified, should be preserved and displayed to the public within the new basement.

Condition Survey and Management Plan

Management Plans help pull together an understanding of significance to evidence the conservation and management of heritage assets. From this informed basis, plans are then used to develop programmes of repair, restoration or to draw up proposals for change. Management Plans should be structured to meet the needs of the specific site and designed to be used for every day reference by staff managing the site. Management Plans not only pull together and analyse the history of a site or landscape, they can also be an important record in their own right.

A condition survey and consolidation of the remaining wall of the Templar church should be carried out and a management plan for its long term conservation and display provided. Any newly exposed substantive remains of the Templar church to be preserved and displayed should also be included in the management plan.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser-City of London
Greater London Archaeological Advisory Service
London and South East Region



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SOUTHWARK COUNCIL

LBS Registered Number: 25/OB/0005

Date of issue of this decision: 28/02/2025



LBS Reg. No.: 25/OB/0005

Date of Issue of Decision: 28/02/2025

Your Ref No.:

Applicant Ms Anna Tastsoglou - City Of London Corporation
City of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

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'.

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

In accordance with your letter received on 10 February 2025 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

DECISION NOTICE

LBS Registered Number: 25/OB/0005

Date of issue of this decision: 28/02/2025



GREATER**LONDON**AUTHORITY

Good Growth

Anna Tastsoglou
City of London
By Email

Our ref: 2025/0070/S1
Your ref: 24/01262/FULMAJ
Date: 10 March 2025

Dear Anna Tastsoglou

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2
Local Planning Authority reference: 24/01262/FULMAJ

I refer to the copy of the above planning application, which was received from you on 31 January 2025. On 10 March 2025 Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority, considered a report on this proposal, reference 2025/0070/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in 76 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to approve the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Council may therefore proceed to determine the application without further referral to the Mayor. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

City Hall, Kamal Churchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Please note that the Transport for London case officer for this application is Paklim Wong, email [REDACTED]

Yours sincerely



John Finlayson

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL

10 March 2025

Heron House, Holborn Gate, and 44 Southampton Buildings

Local Planning Authority: City of London

Local Planning Authority reference: 24/01262/FULMAJ

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and construction of a new ten storey building consisting of 52,656 sq.m. of office floorspace ,1,197 sq.m. of retail/food and beverage floorspace and flexible cultural and community floorspace.

The applicant

The applicant is **High Holborn Limited** and the architect is **Make**.

Strategic issues summary

Land use principles: The redevelopment of this CAZ site to provide an office-led mixed-use development, with retail, cultural and community uses at ground level, is supported in land use terms, in line with London Plan Policies SD4, SD5 and E1.

Urban design and heritage: The urban design principles are broadly supported. Less than substantial harm has been identified to a number of heritage assets. Subject to agreeing and securing the public benefits, the less than substantial harm identified above would be outweighed by the public benefits of the scheme. An update will be provided at decision making stage.

Transport: A gate-line assessment for Chancery Lane Underground Station should be undertaken; a contribution towards accessibility improvements at the Station may be required. A contribution of £120,000 is sought toward improving cycle hire facility in the vicinity of the site. Conditions and obligations should secure details relating to car park management, construction logistics, deliveries and servicing, and travel plan.

Other issues on **sustainable development** and **environmental issues** also require resolution prior to the Mayor's decision making stage.

Recommendation

That City of London be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 76. Possible remedies set out in this report could address these deficiencies.

Context

1. On 31 January 2025 the Mayor of London received documents from City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category of the Schedule to the Order 2008:
 - 4: Development in respect of which the local planning authority is required to consult the Mayor by virtue of a direction given by the Secretary of State under article 10(3) of the GDPO
3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or, allow the Corporation to determine it itself. In this case, the Corporation need not refer the application back to the Mayor if it resolves to refuse permission.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

5. The site is 0.7 hectares in size and comprises 319-325 High Holborn (Heron House), 326-332 High Holborn and 26 Southampton Buildings (Holborn Gate), And 44 Southampton Building. The site is bounded by High Holborn and the Southampton Buildings. Chancery Lane Underground Station is to the East of the site.
6. The site is located within the Central Activities Zone (CAZ). A small section of the site (44 Southampton Building) is within the Chancery Lane Conservation Area. Bloomsbury Conservation Area is Northwest of the site whilst Hatton Garden Conservation Area is Northeast of the site.
7. The site is within London View Management Framework (LVMF) View 4A.1 in the foreground of the Protected Vista of St Paul's Cathedral from Primrose Hill; View 5A.2 in the background of the Protected Vista of St Paul's Cathedral from Greenwich Park view and View 6A.1 in the background of the Protected Vista of St Paul's Cathedral from Blackheath Point.
8. The three existing buildings, ranging in height from 5-8 storeys, provide approximately 35,000 sq.m of commercial/office floorspace. This includes ground floor retail, and 322 High Holborn also contains 7 residential units (573 sq.m. of residential floorspace) on the top floor. The surrounding land uses are mostly commercial with some residential units to the north of the site.

9. The site records a public transport access level of PTAL 6b, where 0 is the lowest and 6b is the highest, served by frequent London Underground services from Chancery Lane and Holborn Station within walking distance, plus numerous local bus routes. City Thameslink Rail Station, served by Thameslink Rail services is also approximately 900 metres south-east of the site. The C41 Cycle route runs approximately 400 metres west of the site, and two Cycle Hire Docking stations (Red Lion Street to the east, and Holborn Circus to the west) are both located within 500 metres to the site.

Details of this proposal

10. The proposal is for the 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.

Strategic case history

11. The GLA hosted a pre-application meeting with the applicant team (also attended by the LPA) in relation to the proposals in March 2024 where strategic matters were discussed including land use principles, urban design, transport, heritage and sustainability. A written note was issued following the meeting (GLA Reference: 2024/0095/P2I).

Strategic planning issues and relevant policies and guidance

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan (2015), the City of London Local Plan Proposals Map (2015); and, the London Plan 2021.
13. The following are also relevant material considerations:

The National Planning Policy Framework (NPPF) and National Planning Practice Guidance; and,

City Plan 2040 (DRAFT- examination version)

Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on Central Activities Zones, offices and retail use, community facilities and social infrastructure, culture, equalities, urban design, fire safety, strategic views, heritage, inclusive access,

sustainable development, air quality, green infrastructure and transport which can be found on the GLA's website [here](#).¹

Land use principles

CAZ and proposed office use

14. The proposed office-led development in this Central Activities Zone (CAZ) location is acceptable in land use terms, in accordance with London Plan Policy SD5.
15. The proposals would significantly increase the quantum of office floorspace on site, with an overall uplift of 23,438 sq.m.. The proposals would also improve the quality, flexibility and adaptability of the workspaces provided, ensuring that provision can adapt to the changing requirements of future occupiers. This uplift in quantum and quality of office floorspace in the CAZ is strongly supported in land use terms, in line with London Plan policies SD4, SD5 and E1.

Affordable workspace

16. The proposals include 221 sq.m. of affordable workspace at ground level, fronting onto the proposed pocket park. The proposal for affordable workspace is supported, in line with Policy E3. Public access arrangements and affordability thresholds should be agreed with the Corporation and secured in the Section106 agreement.

Culture

17. The proposals include cultural venue, named "The Holborn Dome", located on the northwest corner of the site. The 1,090 sq.m. of space is provided over three floors and includes an immersive auditorium, flexible exhibition spaces, areas for community events.
18. Given the location of site, which abuts Chancery Lane and the choice to position the cultural uses at ground floor, the proposals are supported in line with Policy HC5. Public access arrangements should be agreed with the Corporation and secured in the Section106 agreement.

Flexible retail provision and loss of retail floorspace

19. The existing site houses several retail units across the ground floor of the three separate buildings totalling 3,044 sq.m. The new proposals include 1,197sq.m. of retail floorspace, and thus, while the proposals would result in the loss of 1,847 sq.m of retail floorspace, the proposals include retail floorspace at ground level, alongside new cultural and affordable workspace uses, retaining the active frontages along High Holborn. Noting this, and the scale of the proposed

¹ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

loss of retail uses, there is no strategic objection raised to the reduction of retail floorspace at the site.

Housing- Loss of Residential

20. Policy H8 makes provisions to ensure that any housing lost as a result of redevelopment should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.
21. 322 High Holborn currently contains 7 residential units (573 sq.m.) which will be lost as part of the development proposals.
22. The proposed development is part of a land use package with an accompanying 'donor' development at 1-2 St Andrew's Hill, which has been developed alongside the proposed development. 1-2 St Andrew's Hill is within an 'Identified Residential Area' in the existing and emerging local policy context. The application details that this would be controlled via a Section 106 agreement to ensure that the two developments are built out together. The applicant must confirm the tenure of the existing and proposed housing prior to Stage II.
23. While the loss of the seven residential units from the application site is non-compliant with Policy H8 of the London Plan, noting that it is proposed this application will be linked through the Section 106 to a change of use application for the creation of 7 residential units at 1- 2 St Andrew's Hill, then the proposals (which include a significant increase in office floorspace) will not result in the net loss of existing housing units from within the City, aligning with Policy H8 of the London Plan. On this basis, no strategic concerns are raised.

Contribution towards delivering affordable housing

24. The London Plan seeks to maximise the delivery of affordable housing. The City of London's Local Plan and Planning Obligations SPD require office developments to make a financial contribution towards affordable housing-off site (which is usually invested in the Corporation's affordable housing programmes beyond the CoL boundary). The final contribution will be confirmed by the City Corporation and would ultimately be secured by way of a Section 106 agreement. An update should be provided to GLA Officers in respect of this element of the scheme, prior to Stage 2.

Equalities

25. Objective GG1 of the Mayor's London Plan underscores the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities. More generally, the 2010 Equality Act places a duty on public bodies, including the GLA, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising

disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

26. An equalities impact assessment (EqIA) has been submitted with the planning application that identifies positive and negative impacts on persons with protected characteristics of age, disability, race/ethnicity, religion/belief, sex, sexual orientation, gender reassignment, pregnancy and maternity, as well as socio-economic status and other relevant groups. The EqIA includes a number of recommendations to mitigate adverse effects and/or enhance positive effects and monitoring, and these should be secured by condition or obligation.

Urban design

Development layout and public realm

27. The layout principles are broadly supported. The provision of a new cultural space linked to the site's association with the Knight's Templar Church has potential to anchor the proposal into the wider public realm network and locating this space to be legible along High Holborn is welcomed. The applicant is encouraged to continue to work with City Corporation Officers to ensure the sizing and legibility of the public entrance are designed to appear welcoming and accessible for all.
28. The pocket public space at the southern end of the site is supported noting it's addition to the local public realm network in terms of usable public space. The Council should secure a high quality of this public space through conditions and obligations. Public access through the proposed public realm should be secured in line with the Public London Charter LPG and London Plan Policy D8.

Height and massing

29. London Plan Policy D9 states a tall building is more than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. The existing local plan does not define tall buildings; the proposal meets the London Plan definition of tall buildings. The adopted 2015 Local Plan identifies part of the site is identified as inappropriate for tall buildings (in Figure N of the Local Plan). Accordingly, the proposals fail to meet the locational requirements of London Plan Policy D9 (Part B).
30. It is noted that the City Plan 2040 (DRAFT) defines tall buildings within the City of London in Policy S12 "as buildings over 75m above Ordnance Datum (AOD) in height", and the proposal does not meet the emerging plan definition of tall building.
31. The proposed massing and height have evolved through an iterative design process, with due regard to minimising townscape impacts to key identified local views. Most notably from Lincoln Inn Fields and New Square. The

resulting strategy of stepping the roofline towards the northeast corner is supported.

32. It is noted there would be a significant change in the perception of enclosure at street level along the southern part of Southampton Buildings and along Staple Inn Buildings. The applicant is encouraged to work with City Operation Officers to ensure the pedestrian environment along these edges is designed to feel overlooked, safe and well-lit outside of daylight hours.
33. There is no impact from the proposed development on LVMF views.
34. While the proposal does not accord with Policy D9 Part B(2) of the London Plan, as noted above, the proposal does not meet the emerging plan definition of a tall building, however the proposals are generally considered acceptable subject to the Councils detailed review of local impacts. An update in respect of compliance against the criteria outlined in London Plan Policy D9(C) will be provided at decision making stage.

Architecture

35. The approach to breaking down the perceived mass of the building into defined modules is supported and helps to respond to the site's character and historic context. The use of long-lasting, robust terracotta and stone facing materials is welcomed. Key details should be agreed with CoL officers to secure high quality design as part of any permission.

Fire safety

36. In line with Policy D12 of the London Plan, a fire safety strategy has been submitted that has been prepared by a third party, suitably qualified assessor (approved by an assessor with CEng MIFireE qualifications), as required by Policy D12 and the Fire Safety draft LPG. In respect of the London Plan fire evacuation lift requirement, the fire statement states "A key aspect of the proposal to satisfy Policy D5 requirements is the provision of six evacuation lifts, one in each core, to be used by the building management team to support evacuation of any persons with restricted mobility, that would require assistance. This Fire Statement describes how and states that "the fire strategy design meets Policy D12 (Fire Safety) of the London Plan 2021, and other relevant policies, specifically Policy D5 (Inclusive Design)". The measures required to meet London Plan Policies D5(b5) and Policy D12 should be secured by condition.
37. The inclusion of a green wall should be reviewed against London Plan policy and it must demonstrated the proposals comply Policy D12.

Strategic heritage

38. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. HC1 applies to designated and non-designated

heritage assets. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Significance of the buildings and area

39. Number 44 Southampton Buildings is located within the Chancery Lane Conservation Area and contributes positively to the significance of the conservation area. Number 44 Southampton Buildings is recognised as a Non-Designated Heritage Asset (NDHA) by the City of London Corporation.

Direct impacts

40. Hazlitt House, Number 44 Southampton Buildings is proposed to be wholly demolished. This will involve the total loss of a NDHA, causing a low level of less than substantial direct harm to the Chancery Lane Conservation Area.
41. The existing three buildings are proposed to be replaced by a single ten-storey building occupying the whole island plot. The construction of this building, partially within the Chancery Lane Conservation Area causes a low level of less than substantial harm to the conservation area, as it is out of scale with the height and mass of the historic buildings within the area.
42. The proposed changes to the building footprint to the south of the site and the provision of a new public realm provides a small heritage benefit to the Chancery Lane Conservation Area and the setting of the adjacent Grade II* listed 25 Southampton Buildings.

Indirect impacts

43. GLA officers consider that the following levels of indirect harm are caused by the proposed development (in all cases the assessment is based on the cumulative scenario); the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

Table 1: Indirect (setting) impacts			
Designated heritage asset	Category of harm	Extent of harm	View reference
Staple Inn Buildings group, including 1 to 4 Holborn Bars (Grade I) and 337 to 338 High Holborn (Grade II*), the remainder Grade II;	Less than substantial	Low to middle	Views 17, 18, 19, 26, B19
The former Prudential Assurance Building on High Holborn, listed Grade II*;	Less than substantial	Very low	Views 17, 18, 20, 21

Gatehouse, High Holborn, and the Cittie of Yorke Public House, High Holborn, both listed Grade II;	Less than substantial	Very low	Views 19, 20, 21
Former London Patent Office, 10 Furnival Street and 25 Southampton Buildings and the attached railings, listed Grade II*;	Less than substantial	Low to middle	Views 22, 23, 24, 25, 26
Stone Buildings, listed Grade I and associated lamp posts, listed Grade II;	Less than substantial	Middle	Views 10, 11, 15, 16, B15
Lincoln's Inn Old Square and New Square group including the Chapel, Old Hall and attached gateway, Nos 12 and 13 and Nos 16 to 23 Old Buildings (Grade I) and Nos 1 to 11 (Grade II*) the remainder Grade II;	Less than substantial	Low	Views 12, 13, 14
Lincoln's Inn Hall and Library group including New Hall and Library (Grade II*) the remainder Grade II;	Less than substantial	Low	Views 11, 12, 13, 14, 15, 16, A7, B16
Lincoln's Inn Fields southern group including the Royal College of Surgeons (Grade II*) the remainder Grade II;	Less than substantial	Very low	View B11
Lincoln's Inn Fields western group including Lindsey House (Grade I), Nos 57 and 58 and No 65 and Powis House (Grade II*) the remainder Grade II;	Less than substantial	Very low	Views 10, B11, B12
Lincoln's Inn Fields northern group including the Sir John Soane Museum (Grade I) the remainder Grade II;	Less than substantial	Low	Views 10, 11
Lincoln's Inn Registered Park and Garden, Grade II;	Less than substantial	Low	Views 10, 11, A5, A6, B11, B12
Group of buildings to the south of Gray's Inn Gardens, listed Grade II;	Less than substantial	Low to middle	View 7
Gray's Inn and South Square group including the Hall (Grade I) and Nos 1, 6, 7, 8, 12, 13 and 14 (Grade II*) the remainder Grade II;	Less than substantial	Middle	Views 8, 9, B08, B09, B10
Group of buildings around Gray's Inn Square, all Grade II;	Less than substantial	Low to middle	Views 5, 6, 7
Gray's Inn, Registered Park and Garden, Grade II*;	Less than substantial	Low to middle	Views 5, 6, 7, 8, 9
Chancery Lane Conservation Area;	Less than substantial	Low to middle	Views 17, 18, 19, 20, 21, 22, 23, 24, 25, B19
Bloomsbury Conservation Area to the west and north;	Less than substantial	Middle	Views 4, 5, 6, 7, 8, 9, 10, 11, 12,

			13, 14, 15, 16, 20, A5, A6, B11, B12, B13, B14, B15, B16
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Conservation conclusions

44. The proposed development is contrary to London Plan Policy HC1. NPPF Paragraph 216 states that “In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or the loss and the significance of the heritage asset”. In this case, a NDHA is totally lost. NPPF Paragraph 215 states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...” The proposed development causes less than substantial harm to the heritage assets, as identified within Table 1, above.
45. The proposal includes a number of public benefits including provision of freely accessible public space for community/cultural uses, the retention in situ and public display of any archaeology, new and improved office floorspace provision, affordable workspace, employment benefits through creation of jobs during construction and operation and new public realm.
46. Subject to these proposed public benefits being agreed with, and satisfactorily secured by the LPA the less than substantial harm identified above would be outweighed by the public benefits of the scheme. An update will be provided at Stage II decision making stage.

Transport

Car parking and access

47. The proposals retain loading bay access from the Southampton Building. The scheme would remove 90 car parking spaces and provide two blue-badge parking spaces. This is strongly supported. Electric vehicle charging points (EVCP) should be provided to meet the London Plan parking standards; and this should be secured by condition. A Parking Management Plan should be secured to regulate the use of the disabled parking spaces.

Cycle parking and access

48. The provision of 746 long stay and 71 short stay cycle spaces meets the London Plan cycle parking standards, which is supported. The details and design of the cycle facility should be secured by condition along with shower and changing facilities, in line with London Plan Policy T5. The proposed cycle parking access is acceptable.

Cycle hire docking station and Cycle Promotion Plan

49. A contribution of £120,000 is sought toward improving cycle hire facility in the vicinity of the site, either in form of providing a new docking station or expanding/ enhancing level of service for existing docking stations at Red Lion Street and Holborn Circus.

Public transport - service capacity

50. The proposals generate an additional 257 Underground trips with 60% of them assigned to Chancery Lane Station. As such, a gate-line assessment to Chancery Lane Station should be undertaken. A proportion of the 375 rail trips assigned to Farringdon Station should also be re-assigned to Chancery Lane with the expectation that commuters interchange from Elizabeth Lane services. Depending on the outcome of the revised assessment, a contribution towards accessibility improvements at Chancery Lane Station, to provide lift access between street level and the ticket hall, could be sought.

Healthy Streets and Vision Zero

51. A Pedestrian Level of Comfort (PCL) assessment has been undertaken for routes in close vicinity of the site, which shows nearly all sections are with good pedestrian level of service and is acceptable.
52. An Active Travel Zone (ATZ) assessment has been undertaken; four routes have been studied and local improvements have been identified which should be secured by the Corporation.

Servicing

53. Servicing will take place from a proposed loading area off Southampton Building. A Draft Delivery and Servicing Management Plan (DSMP) has been produced alongside with swept paths demonstrating the safe access and egress of eight metres servicing vehicle to/ from the site, which is supported. It is supported that the applicant is committed to partial servicing consolidation; clarity is requested on measures to facilitate cargo-bike servicing. The production of the finalised DSMP should be secured would be secured by condition, in line with London Plan policies T2 and T7F.

Construction

54. In line with London Plan Policy T7, a Construction Logistics Plan (CLP), produced in line with CLP guidance should be secured by condition.

Sustainable development

Energy strategy

55. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.
56. An energy statement has been submitted with the application. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Corporation and applicant in a technical memo; however outstanding policy requirements include:

Be Lean – further exploration of energy efficiency measures for the non-domestic element;

Be Clean – demonstration that the number of energy centres has been minimised;

Be Green – demonstration that renewable energy has been maximised, including more detailed roof layouts showing the extent of PV provision;

Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;

Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;

57. For the non-domestic element, the development is estimated to achieve a 11% reduction in CO2 emissions compared to 2021 Building Regulations.
58. The development falls short of the net zero-carbon target and does not meet the minimum 35% carbon reductions on site required by Policy SI2. The carbon savings should be improved. Once the on-site carbon savings have been maximised, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

Whole life-cycle carbon

59. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

60. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2. Detailed comments have been circulated to the applicant and the Corporation, which should be addressed prior to the Mayor's decision making stage. To summarise, further information is required on material quantity, assumptions and end of life scenarios and GWP potential for all life-cycle modules.
61. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)².

Circular economy

62. The submitted Circular Economy Statement does not yet comply with London Plan Policy SI7. Detailed comments have been circulated to the applicant and the Corporation, which should be addressed prior to the Mayor's decision making stage. To summarise, further information is required on the design approach, pre-redevelopment audit, design principles, bill of materials, recycling and waste reporting, operational waste and end-of-life strategy.
63. Given that there is a significant existing building on site, further technical justification should be provided demonstrating why the existing structure or its components cannot be retained. Regarding pre-demolition, it is supported that it is proposed to recover a significant number of items from the existing building. In the next stages, a breakdown of the expected waste management routes for each waste stream should be provided. In terms of design, more specific details are required on how different circular economy metrics will be achieved. Additionally, it is expected that the Applicant submits the recycled content by value calculations.
64. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)³.

Environmental issues

Urban greening

65. The Urban Greening Factor (UGF) score is calculated as 0.26, which is below the target set by Policy G5 of the London Plan. The urban greening proposed should be reviewed, seeking to improve the quality or quantity, to increase the application's UGF. If the target score cannot be achieved, the applicant should set out robust justification.

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

³ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

Biodiversity

66. Quantitative evidence has been provided with the application that demonstrates that the proposed development secures a biodiversity net gain of 0.63 habitat units (equivalent to a net gain of 937.29%), in accordance with Policy G6 of the London Plan. The applicant has also confirmed that trading rules have been satisfied. No further information on this matter is required.

Flood risk

67. The Applicant has submitted Flood Risk Assessment (FRA) with the application. There is the potential for elevated groundwater beneath the site. Groundwater monitoring should be undertaken ideally during winter months to inform the exact mitigation measures required, to be secured by condition.
68. The FRA adequately assesses the risk of flooding from pluvial, sewer and groundwater. When mitigation measures are considered, the residual flood risk to the site is low.
69. Subject to securing of appropriate conditions, the FRA provided for the proposed development generally complies with London Plan Policy SI12.

Sustainable drainage and water efficiency

70. The surface water drainage strategy for the proposed development generally complies with London Plan Policy SI13. The LPA should ensure that the sustainable urban drainage systems (SuDS) maintenance plan, exceedance flow routes and London Sustainable Drainage Proforma have been submitted and approved by the relevant stakeholders.
71. In terms of water efficiency matters, the proposed development generally meets the requirements of London Plan Policy SI5.

Air quality

72. The proposed development is located within the Holborn High Street and Southampton Row Junction Air Quality Focus Area. An Air Quality Assessment was provided with the application, however further information is required to determine compliance with London Plan air quality policies. Detailed comments have been circulated to the applicant and the Corporation, which should be addressed prior to the Mayor's decision making stage. It is noted that construction traffic has not been assessed as the number of construction vehicles is not known and therefore a planning condition is recommended to ensure this is assessed at a later stage. Conditions are also recommended in relation to construction and control of emissions and the use of the backup generator. An Air Quality Neutral Assessment was undertaken. It has been determined that the Proposed Development is air quality neutral.

Local planning authority's position

73. The City of London Corporation planning officers are currently assessing the application. In due course the Corporation will formally consider the application at a planning committee meeting.

Legal considerations

74. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Corporation under Article 6 of the Order to refuse the application. In this case, the Corporation need not refer the application back to the Mayor if it resolves to refuse permission. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

75. There are no financial considerations at this stage.

Conclusion

76. London Plan policies on land use principles, urban design, heritage, sustainable development, environmental issues and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not currently comply with these policies, as summarised below:

Land use principles: The redevelopment of this CAZ site to provide an office-led mixed-use development, with retail, cultural and community uses at ground level, is supported in land use terms, in line with London Plan Policies SD4, SD5 and E1.

Urban design and heritage: The layout principles are broadly supported. Less than substantial harm has been identified to a number of heritage assets. Subject to agreeing and securing the public benefits, the less than substantial harm identified above would be outweighed by the public benefits of the scheme. An update will be provided at decision making stage.

Transport: A gate-line assessment for Chancery Lane Underground Station should be undertaken; a contribution towards accessibility improvements at the Station may be required. A contribution of £120,000 is sought toward improving cycle hire facility in the vicinity of the site.

Conditions and obligations should secure details relating to car park management, construction logistics, deliveries and servicing, and travel plan.

Sustainable development (energy, circular economy and whole life cycle carbon matters): Detailed comments have been circulated to the applicant and the Council regarding energy, circular economy and whole life-cycle carbon matters which should be addressed prior to the Mayor's decision making stage. The submitted energy statement addresses a number of policy requirements however further information is required to address the London Plan's energy hierarchy (be lean, be clean, be green and be seen). For whole life cycle carbon matters, to summarise, further information is required on material quantity, assumptions and end of life scenarios and GWP potential for all life-cycle modules. For the circular economy strategy, to summarise, additional detail should be provided in respect of the design approach, pre-redevelopment audit, design principles, bill of materials, recycling and waste reporting, operational waste and end-of-life strategy.

Environmental issues (Greening, flood risk and air quality matters): The UGF score is calculated as 0.26, below the target score of 0.3 set by the London Plan. The urban greening proposed should be reviewed, seeking to improve the quality or quantity, to increase the proposal's UGF. While the submitted flood risk assessment generally complies with London Plan Policy SI12, there is the potential for elevated groundwater beneath the site, so groundwater monitoring should be undertaken during winter months to inform the mitigation measures required, to be secured by condition. The Corporation should also ensure that direct engagement should also take place with relevant stakeholders concerning tidal, fluvial and reservoir flood risk. Detailed comments have been circulated to the applicant and the Corporation regarding air quality matters. In summary, further information is required to determine compliance with London Plan air quality policies, and conditions are recommended in relation to construction, construction traffic, control of emissions and the use of the backup generator.

For further information, contact GLA Planning Unit (Development Management Team):

Emily Leslie, Principal Strategic Planner (case officer)

email: [REDACTED]

Connaire O'Sullivan, Team Leader – Development Management

email: [REDACTED]

Allison Flight, Deputy Head of Development Management

email: [REDACTED]

John Finlayson, Head of Development Management

email: [REDACTED]

Lucinda Turner, Assistant Director of Planning

email: [REDACTED]

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City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

13th March 2025

Dear Sir/Madam,

At its meeting on 27th February 2025 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.21 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate) And 44 Southampton Buildings, WC1 And WC2 Chancery Lane Conservation Area/Farringdon Without Ward. Ward Club rep. Lester Hillman.

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.

Although the Committee agreed that a number of the issues had been addressed in the revised application, particularly in relation to the open space, the Committee objected strongly to the size and bulk of the building. Members considered that the mass of the building was too large for the proposed site and that it did not relate well to the street scene and would adversely impact on the character and appearance of the adjacent Conservation Area.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox
Secretary

Anna Tastsoglou
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Development Management
Planning and Building Control
Housing and Regeneration Directorate
Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ
www.towerhamlets.gov.uk

Application Number: PA/25/00158
Your ref: 24/01262/FULMAJ

Enquiries to: Shahara
Tel: Ali-Hempstead
Email: 

2 April, 2025

Dear Anna Tastsoglou,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2
Proposal	Observations requested by City of London in relation to 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

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out above into consideration:-



The best of London in one borough

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

1. LBTH has not comments to make on the application.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control



Your ref:
My ref: 25/00397/OBS

Please reply to: Nikki Mitchell
Tel No: [REDACTED]
Email: [REDACTED]

Anna Tastsoglou
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

10 April 2025

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 25/00397/OBS **Application Date:**
Date Received: 17.01.2025 **Date Amended:** 17.01.2025

Plan Nos: Consultation Letter from the City of London dated 17 January 2025

Address: Heron House 319-325 And 326-332 High Holborn And 26 And 44, Southampton Buildings, City Of London, London

Proposal: 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.

Yours faithfully,

[REDACTED]

Tracy Darke
Director of Town Planning & Building Control

Note:

- '3f' The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.





Our ref: CITY25/2
Your ref: 24/01262/FULMAJ

Transport for London
Borough Planning

Anna Tastsoglou
City of London
Guildhall
London

5 Endeavour Square
Westfield Avenue,
Stratford, London
E20 1JN
Phone 020 7222 5600
Fax 020 7126 4275
www.TfL.gov.uk

14 April 2025

Dear Anna

319-325 High Holborn (Heron House), 326-332 High Holborn and 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2 – TfL's Detailed comments

Thank you for consulting TfL about this referable planning application. It is understood that the proposal comprises the "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'

These comments follow the Mayor's recent consideration of the case at stage 1.

TfL is in receipt of the Transport Assessment, Design & access statement; and another associated document all dated November 2024. These form the basis of the response below.

Site Location and Context

The site is bounded by High Holborn to the north, Southampton Buildings to the west, and Staple Inn buildings to the east. It achieves a public transport access level of PTAL 6b, as it is served by several rail and underground stations. The closest London Underground Station is Chancery Lane (Central Line) is 50m to the east, Holborn Station (Piccadilly and Central) is approx. 640m to the west, and City Thameslink (Thameslink Rail) is approx. 800m to the east. The site is also served by a number of bus routes from bus stops within walking distance. High Holborn forms part of the Strategic Road Network (SRN). The A201 Farringdon Street, which is part of the Transport for London Road Network (TLRN) is approximately 480m east of the site.

The C41 Cycle route runs approximately 400m west of the site.

Two Cycle Hire Docking stations (Red Lion Street to the east) and (Holborn Circus to the west) are both located within 500m to the site

Access

Pedestrian and cycle access

Pedestrian access will be improved by having separate accesses for each element of the scheme which would also improve the permeability of the site and is therefore welcomed.

Long stay cycle parking is proposed to be provided via Southampton Buildings via a cycle lift for basement cycle storage area and end-of-trip facilities. Access to the short stay cycle parking for the cultural land uses will be provided via the southern footway on High Holborn, and from Southampton Building for the short-stay office cycle parking. Short stay cycle parking provided on Staple Inn Buildings is accessed on the street.

Vehicular Access

Vehicular access for the disabled parking space and loading bay would be from Southampton Building.

It is considered that the proposed access arrangement is principally acceptable.

Car Parking and access

The proposals will result in the removal of 90 car parking spaces with only two disabled spaces retained with access from Southampton Building. This is strongly supported in a high PTAL location, this is in line with London Plan Plan policy T6. Car Parking.

The applicant is encouraged to provide electric vehicle charging points (EVCP) meet the London Plan parking standards; this exact level of provision should be clarified and be secured by condition accordingly. A Parking Management Plan should be secured to regulate the use of the disabled parking spaces.

Cycle Parking

The provision of 746 long stay and 71 short stay cycle spaces meets the London Plan cycle parking standards, which is welcomed. The details and design of the cycle facility should be secured by condition along with shower and changing facility for the non-residential part of the proposal, in line London Plan Policy T5 Cycling.

Trip rate & mode share assessment

The trip generation assessment is satisfactory. With the removal of car parking, there is a significant uplift in public transport, walking and cycling trips with an additional 800 two-way person trips during the AM peak from the existing 911 trips, (1711 overall).

Public Transport

Service Capacity

The proposals would generate an additional 257 Underground, trips with 60% of them assigned to Chancery Lane Station, therefore a gate-line assessment to Chancery Lane Station should be undertaken.

It is also considered that a proportion of the 375 rail trips assigned to Farringdon Station should also be re-assigned to Chancery Lane with the expectation that commuters interchange from Elizabeth Lane services.

TfL is also exploring the option to provide improve accessibility at Chancery Lane Station with lift access between street level and the ticket hall; if it is deemed feasible, third-party funding to enable its delivery is expected, therefore a contribution may be sought toward this.

Healthy Streets and Vision Zero

The proposal seeks to stop up a small part of the public highway footway of High Holborn to re-align the proposed building line with other parts of the existing private lane. This is unlikely to have an adverse impact to pedestrian comfort and the operation of bus stop adjacent to the site.

The proposal to provide new hard and soft landscaping including new pocket park at ground floor level will enhance public realm within the site, which is supported.

An Active Travel Zone (ATZ) assessment has been undertaken; four routes have been studied and it has identified a minor number of local issues City of London may secure improvement from the proposal. TfL also requests that a Nighttime ATZ be undertaken in line with the ATZ guidance.

A Pedestrian Level of Comfort (PCL) assessment has also been undertaken for routes in close vicinity of the site, which shows nearly all sections are with good pedestrian level of service, with the except of one where physical constrain would prevent any further improvement.

Cycle Hire Docking Station

TfL considers that it would be necessary to improve local cycle hire facilities in the vicinity of the site; it is therefore seeking a financial contribution of of £120K toward either providing a new cycle hire hub near Holborn Circus or toward enhancing service level in the vicinity of the site.

Servicing

Servicing will take place from a proposed loading area off Southampton Building. Building occupiers using this loading area should be asked to coordinate their delivery times with the onsite management company to ensure effective use. T A Draft Delivery and Servicing Management Plan (DSMP) has been produced alongside with swept paths demonstrating the safe access and egress of 8m servicing vehicle to/ from the site; which is welcomed. While it is supported that the applicant is committed to partial servicing consolidation; clarity is needed on measures to facilitate cargo-bike servicing. The production of the finalised DSMP should be secured would be secured by condition, in line with London Plan policy T7 Delivery, Servicing and Construction.

Construction

In line with London Plan policy T7 Delivery, Servicing and Construction, it is expected that the Construction Logistics Plan (CLP), produced in line with TfL's latest CLP guidance (DSP) the proposed development would submit and be

secured by condition. The applicant shall identify efficient, safe and sustainable arrangements to be employed at each stage of implementation the development to reduce and mitigate impacts of freight vehicle movements arising from the scheme, including impacts on the expeditious movement of traffic, amenity and highway safety. Details should, where relevant, include Freight Operator Recognition Scheme (FORS) or similar accreditation, site access, loading/unloading and parking arrangements, booking systems and timing of arrivals at and departures from the site, vehicular routes, scope for load consolidation and use of alternative modes and measures to reduce risks and impact of collisions with vulnerable road users.

Consideration should be given to prioritise pedestrian/ cyclists' safety when developing the finalised CLP, considering narrow streets in the vicinity and activities The final submission and approval of the CLP should nevertheless be conditioned in line with London Plan policy T7 Deliveries, Servicing & Construction.

Given the proximity of the Central Line tunnels and Chancery Lane Station., conditions may be required to protect the infrastructure. Further details will be provided.

Cycle Promotion Plan

A Cycle Promotion Plan has been included in the TA submission, as required by the City Additional measures such as cycle training are recommended to promote the uptake of cycling by occupiers. The final Travel Plan should nevertheless be secured by s106 agreement.

Community Infrastructure Levy

The MCIL2 rate for City of London is £80 per square metre.

Summary

The following matters should be resolved before the application can be considered in line with the transport policies of the Intend to Publish London Plan;

1. Provide EVCP to parking spaces, and secure the production of Car Parking Management Plan, regulating the use of disabled spaces.
2. Secure the submission and approval of cycle parking details by condition, including provision of larger cycle spaces meeting the minimum London Plan standards (5%).
3. Undertake a Night time ATZ and, secure appropriate contribution toward local walking/ cycling/ Healthy Street improvements considering finding of ATZ.
4. Review trip generation and distribution in light of comments
5. Secure a financial contribution of £120K toward the cycle hire.
6. Securing contribution toward Chancery Lane LUL Station accessibility improvement
7. Secure the DSP and CLP by conditions.

8. Review the Cycle Promotion Plan considering comments.
9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail.

I trust that these comments are of assistance. If you have any further queries, please let me know.

Yours sincerely,

PakLim Wong

Planner

Email: 

From: [Elaine Quigley](#)
To: [PLN - Comments](#)
Subject: 319-325 High Holborn, 326-332 High Holborn and 26 and 24 Southampton Buildings
Date: 30 April 2025 14:44:06
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)

You don't often get email from elaine.quigley@camden.gov.uk. [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

For the attention of Anna Tastsoglou,

Hi Anna,

I am dealing with the above application which Camden has received a request for obs consultation letter.

Having reviewed the proposal I would raise initial concerns about the impact that the proposal would have on the daylight and sunlight to the adjoining residential flats at no. 7 High Holborn which falls within Camden's borough boundary. Has there been any discussed with the applicant about the daylight and sunlight issues in relation to this property? I am just wondering if there will be any revisions to the daylight and sunlight assessment that I should be aware of before I make formal comments on the application. I appreciate that we are outside the 21 day statutory consultation period but there has been a change to the case officers dealing with the request for obs application and I see that the application is still pending consideration on your website.

I look forward to hearing from you.

Best

Elaine

Elaine Quigley
Senior Planning Officer

Economy, Regeneration and Investment
Supporting Communities
London Borough of Camden

Tel: 020 7974 5101
Web: camden.gov.uk

5 Pancras Square
London N1C 4AG

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2
Date: 28 May 2025 10:42:09
Attachments: [image003.png](#)
[Proposed_Foundation_Condition_Area.pdf](#)

THIS IS AN EXTERNAL EMAIL

Hi Anna

Here are the renegotiated conditions with the figure that's referenced in them also attached. Hope they're ok, let me know if you need anything else

Regards

Helen

Condition 1 No development, except demolition to basement slab, shall take place until a Stage 1 written Scheme of Investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no development, except demolition to basement slab, shall take place other than in accordance with the agreed WSI, and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1, then for those parts of the site which have archaeological interest, a stage 2 WSI shall be submitted to and approved by the local authority in writing. For land that is included within the stage 2 WSI, no development, except demolition to basement slab, shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, and the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. A protocol for identifying remains worthy of preservation according to the conditions 2 and 3
- C. Details of a programme for delivering related positive public benefits
- D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Condition 2 Foundation Design ...

Irrespective of the approved drawings, in the area of the Temple Church as shown in Drawing XXX, the final basement configuration should be submitted to and approved in writing with the Local Planning Authority in consultation with Historic England. This shall include details of the basement and foundation design and construction method to protect archaeological remains. The development shall be carried out in accordance with the approved details. Where appropriate details of the conservation, interpretation and display will also be submitted. Informative: to ensure that if further substantive remains of the Temple church are identified, they are also preserved and displayed to the public and to protect the known remains of the Temple Church.

Condition 3 Condition survey, protection and preservation of archaeological remains

No works, other than those required to undertake a condition survey and conservation works, will commence in the area of the known Temple remains until a condition survey has been carried out and the remains have been consolidated. Details of fencing, signage and other control measures to be provided during the construction period to protect discovered archaeological remains that are to be retained should be submitted and approved in writing by the local planning authority prior to development works that could affect identified remains. The development, in the area of identified remains, shall be carried out in accordance with the approved details. A management plan for the remains should be produced once they have been fully identified.



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historicengland.org.uk

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From: Tastsoglou, Anna

Sent: 22 May 2025 15:50

To: Hawkins, Helen ; Parker, Joanna

Cc: PLN - Comments

Subject: RE: 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Thank you!

From: Hawkins, Helen <[REDACTED]>

Sent: 22 May 2025 15:48

To: Tastsoglou, Anna <[REDACTED]>; Parker, Joanna <[REDACTED]>

Cc: PLN - Comments <[REDACTED]>

Subject: RE: 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

THIS IS AN EXTERNAL EMAIL

I'll chase them up!



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From: Tastsoglou, Anna <[REDACTED]>

Sent: 22 May 2025 15:47

To: Hawkins, Helen <[REDACTED]>; Parker, Joanna <[REDACTED]>

Cc: PLN - Comments <[REDACTED]>

Subject: RE: 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2


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Thank you, Helen.


For the time being I have included the conditions as you suggested them. The print deadline would be on the 2nd June. Do you think we will have the wording before that date?

Thank you,

Anna



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

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Katie Stewart –Executive Director Environment


From: Hawkins, Helen <[REDACTED]>
Sent: 22 May 2025 15:03
To: Tastsoglou, Anna <[REDACTED]>; Parker, Joanna <[REDACTED]>
Cc: PLN - Comments <[REDACTED]>
Subject: RE: 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

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Hi Anna
Thanks for checking, I don't think an informative is necessary as the archaeological contractor understands what's needed from the condition itself. The planning agent has asked me to let you know that we're currently discussing the wording of the archaeological conditions-I'm just waiting for the revised versions that we've negotiated, and then I can forward them onto you
Regards
Helen



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From: Tastsoglou, Anna <[REDACTED]>
Sent: 20 May 2025 12:25
To: Hawkins, Helen <[REDACTED]>; Parker, Joanna <[REDACTED]>
Cc: PLN - Comments <[REDACTED]>
Subject: RE: 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

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Hi Helen,
I hope you are well.
I have a quick question re your consultation response. Towards the end of the consultation response, you say what you envisage that the archaeological fieldwork would comprise. Does this need to be added as an informative or anywhere within the report?
Thank you,
Anna



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

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Katie Stewart –Executive Director Environment


From: Hawkins, Helen <[REDACTED]>
Sent: 26 February 2025 15:52
To: Tastsoglou, Anna <[REDACTED]>; Parker, Joanna <[REDACTED]>
Cc: PLN - Comments <[REDACTED]>
Subject: FW: 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

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Hi Anna and Jo
Please find attached my advice for the Holborn Gate site. I've recommended three archaeological conditions, annoyingly I'm afraid condition 1 does reference the other two, so the numbers will need updating once all the condition numbers are known. I'm also wondering if it's worth asking for the history of the site to be represented on the site hoarding as well, if the hoarding isn't being used for anything else?
Let me know if you want to discuss or need anything else
Regards
Helen

Helen Hawkins BA MA MCIFA

Archaeology Adviser, City of London
Greater London Archaeology Advisory Service (GLAAS)
Phone: [REDACTED] Mobile: [REDACTED]

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill. London EC4R 2YA

www.historicengland.org.uk

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

From: [REDACTED] <[REDACTED]>
Sent: 17 January 2025 12:24
To: E-Glaas <[REDACTED]>
Subject: 24/01262/FULMAJ - 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

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Dear Sir/Madam

Please see attached consultation for proposed works involving a material change to a building which is listed grade NO.

The application and associated documents are available for viewing at <http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=SNO84ZFHGKU00>

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Anna Tastsoglou
[REDACTED]

Details

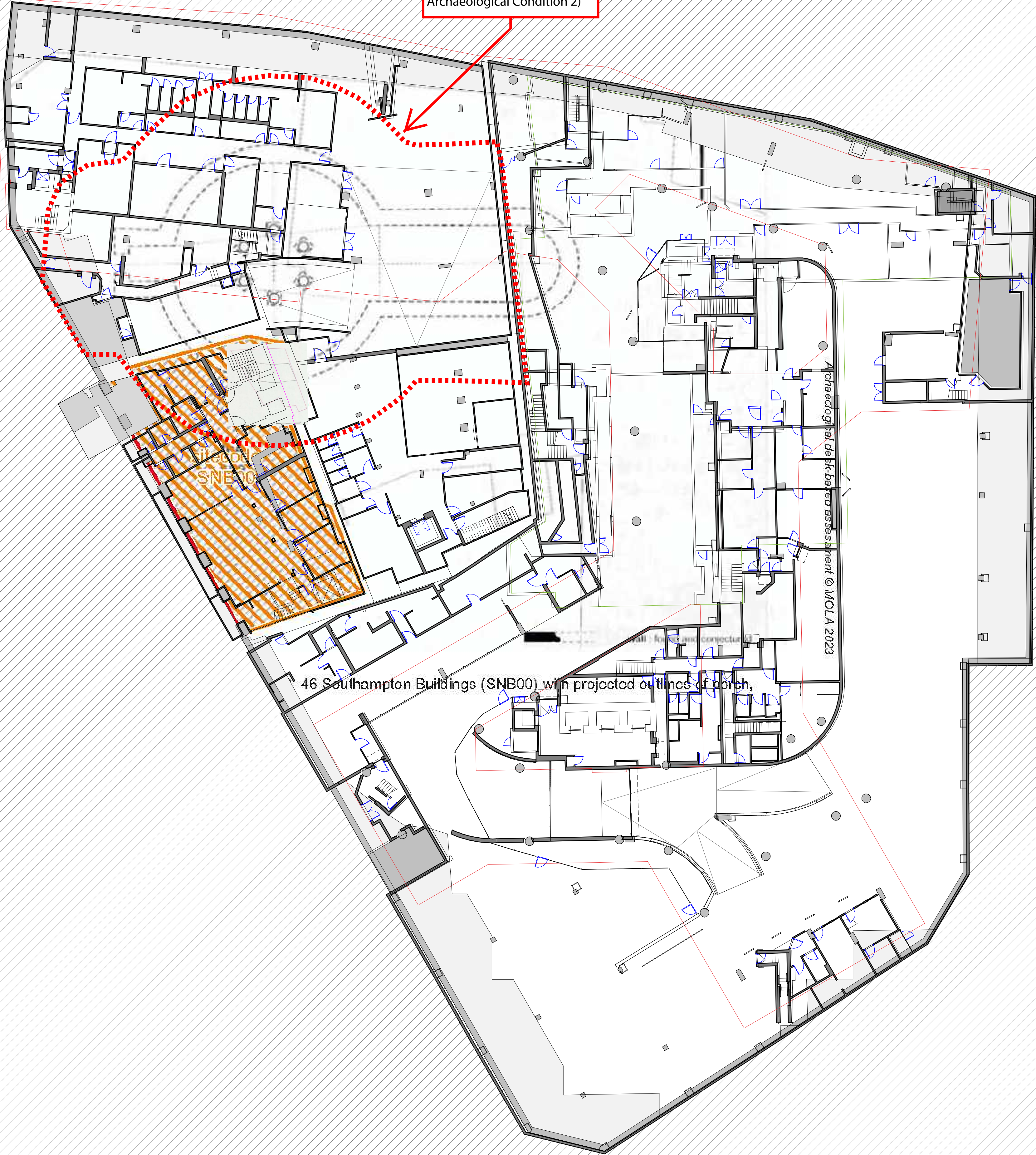
OUR REF: 24/01262/FULMAJ

ADDRESS: 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2 (Grid Reference: 531042, 181600)

PROPOSAL: 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 THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

Proposed area to be covered by foundation condition relating to archaeology (Draft Archaeological Condition 2). The area includes a 5m buffer around the projected extent of the Temple Church. The rest of the site, outside this area, to be excluded from the foundation condition.

Proposed area covered by foundation condition relating to archaeology (Draft Archaeological Condition 2)



- General Notes
1. Dimensions are in millimetres unless stated otherwise.
 2. Levels are in metres AOD unless stated otherwise.
 3. Dimensions govern. Do not scale off drawing.
 4. All dimensions to be verified on site before proceeding.
 5. All discrepancies to be notified in writing to Make Limited.
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DRAFT

REV	Date	Reason For Issue	Chk
For Information			
DRAWING STATUS			

make

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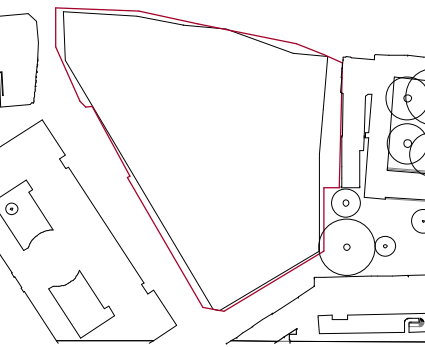
tel +44 (0) 20 7636 5151

info@makearchitects.com
www.makearchitects.com

Client

Hoi Hup Realty Pte Ltd

Keyplan



Project

Holborn

Drawing Title

Existing Basement MOLA
Overlay

Scale at A1

1 : 200

Project No.

1677

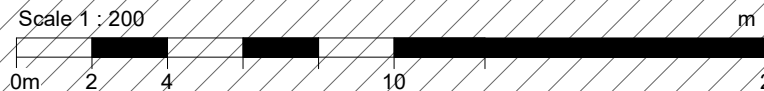
Drawing No.

1677-OP03-MAK-XX-ZZ-DR-AR-090064

Date

20/07/23

Rev No.



From: Claire Giraud <[REDACTED]>
Sent: 02 June 2025 10:50
To: Tastsoglou, Anna <[REDACTED]>; Stedman, Gavin
<[REDACTED]>
Subject: Re: FW: [External] Holborn Gate - 24/01262/FULMAJ - suicide prevention

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thanks they don't seem like they want to follow my advice so i am going to see about putting some suicide prevention planning conditions on then

Gavin, this is for your info, hopefully after this week's meeting with Gwyn and Gundrun we will know how to do this

Kind Regards

Claire Giraud

Senior Public Health Practitioner



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On Mon, 2 Jun 2025 at 10:47, Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk> wrote:

Hi Claire,

This is at application stage. Details thought will be secured by condition.

Kind regards,

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: Claire Giraud <[REDACTED]>

Sent: 02 June 2025 10:45

To: Tastsoglou, Anna <[REDACTED]>

Subject: Re: FW: [External] Holborn Gate - 24/01262/FULMAJ - suicide prevention

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Hello Anna

sorry whilst I remember the building well I do not remember, is this at pre design approval stage?

thanks

Kind Regards

Claire Giraud

Senior Public Health Practitioner





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On Thu, 8 May 2025 at 09:54, Tastsoglou, Anna <[REDACTED]> wrote:

Hi Claire,

I hope you're well.

Please see below the applicant's responses (in red) to your comments.

Please let me know if you have any further comments.

Thank you,
Anna

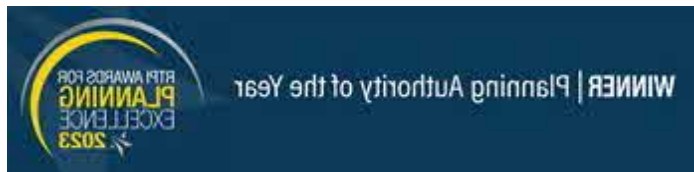


Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH



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Katie Stewart – Executive Director Environment



From: Matthew Spencer <[REDACTED]>
Sent: 07 May 2025 16:10

To: Tastsoglou, Anna <[REDACTED]>; Jeremy Randall
<[REDACTED]>; Edward Kitchen <[REDACTED]>
Subject: Re: [External] Holborn Gate - 24/01262/FULMAJ - suicide prevention

THIS IS AN EXTERNAL EMAIL

Hi Anna,

Thank you for the comments provided below - we have discussed with the project team and sought to provide responses below in red.

Do let us know if you have any further questions or queries.

Kind regards,

Matthew

Matthew Spencer
Planning Consultant
Newmark [Planning and Development](#)

NEWMARK
[REDACTED]

From: Tastsoglou, Anna <[REDACTED]>
Sent: Tuesday, April 29, 2025 1:14 PM
To: Jeremy Randall <[REDACTED]>; Edward Kitchen
<[REDACTED]>; Matthew Spencer <[REDACTED]>
Subject: [External] Holborn Gate - 24/01262/FULMAJ - suicide prevention

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Dear all,

Following discussion with the Suicide prevention advisor, the following points have been raised; and I would appreciate if you could provide responses.

- Although the terraces are not publicly accessible, there is still a risk to staff + a duty of care to the people walking by in the street below

Noted.

- The building is staggered which is a good thing for level 8 and 9. Level 7 has a clear unobstructed path to the ground which makes it more likely to be used for the purpose of suicide thus ideally the balustrade should be at least 1.8 meters glazing (for protected views) rather than 1.4 meters.

We're not currently proposing glazed balustrades so that they are more permeable for where there is planting behind. 1.4m has been selected as it is a private terrace (only accessible to certain offices) and above approved document guidance, while allowing visibility over.

- The incorporated seating cannot be moved and is far away from the balustrade to be used as steps but any furniture that is not fixed can be used as footstools and should be removed (on all levels but mostly on level 7)

Noted.

- The tree planters that are 35 cm high on level 9 are not preferable because they can be used as steps. Although that side looks down on level 8 so that lessens the risk, it would be better if the plants were flushed with the floor and thorny to create a barrier.

There isn't enough floor build up to have the planting flush with the floor without raising the whole floor to allow for it. It is a private terrace, and we are still achieving approved document guidance of 1.1m. We considered this a low risk area due to only having one storey drop, and with a similar storey difference on lower levels would normally only allow for 1.1m guarding. Noted about potential to using types of planting to create a barrier.

- Level 9 on the north side has a clear unobstructed path to the ground which makes it more likely to be used for the purpose of suicide, thus ideally the ballustrade should be at least 1.8 meters glazing (for protected views)

We're not currently proposing glazed balustrades so that they are more permeable for where there is planting behind. 1.4m has been selected as it is a private terrace and above approve document guidance. It should be noted that on this terrace, the 1.4m is measured from the top of upstand, so 1.75m from actual floor level. Although this could be used as a step it would be very shallow making it it harder to be used to climb over than if it were 1.4m from FFL.

- Regarding the smaller balconies, I am not concerned about level 1 and level 3, that is not very high but level 5 and level 7 have raised planters similar to level 9 that can be used as steps and it would be preferable if the planting was flush with the floor and

thorny rather than ornamental so as to create a barrier/deterrent

There isn't enough build up to get the planting flush. Given the size of the balconies and as they are private to only some offices we felt 1.4m was sufficient for the fully accessible area, with 1.1m still meeting approved document height.

- Can you please explain what is their CCTV provision? Will there be motion activated lighting?

- VSS camera type: Fixed Camera mounted on the façade.
- Observation level –fixed: 100% coverage to view the activity on the terrace areas.
- Whilst it is accepted that these areas may be within the tenanted areas, coverage is required for Health and Safety risk reasons.
- Lighting design should be coordinated to ensure there is not impact on the VSS camera operation.

The terraces will be tenanted areas, so it will ultimately be for the tenant to apply. In the base build design there is some allowance so as to permit such provision. This is outlined below.

Area	VSS Camera Type	VSS Camera Task/Observational Requirement
Upper Floor Levels:		
Tenant Areas	Provided by the tenant.	It is assumed that all VSS cameras required by the tenants will be provided by the tenants. The facility should exist to connect the tenant's cameras to the landlord's system if the tenant requires.
All Lift Lobbies Passenger and Goods Lifts	Fixed camera(s). Mounted in the lift lobbies. <u>Note: all floor levels</u>	(Recognition level) – to view persons using the lifts.
Tenant Areas to Back of House Corridor Areas	Fixed camera(s). Mounted in the corridor outside of the tenant's area.	(Recognition level - Fixed) – to view all persons entering the back of house areas that may be restricted to authorised persons only. Note: cameras must not be located within the tenant's areas.
Terrace Areas	Fixed cameras mounted on the facade.	(Observation level - Fixed) – 100% coverage to view the activity on the terrace areas. Whilst it is accepted that these areas may be within the tenanted areas, coverage is required for Health & Safety risk reasons.
Fire Stair Cores (Optional)	Fixed camera(s). Mounted within the stair core.	(Recognition level) – to view person(s) exiting \ entering the floor level via the stair cores. These locations would also support the monitoring of emergency evacuation via the cores.
Roof Access	Fixed camera(s).	(Identification level) – all points that provide access to the roof. Plant areas to have cameras mounted both externally & internally.
Access Controlled Points (General)	Fixed camera(s).	(Recognition level) – external to the controlled point to view person entering an area that has controlled access. Enforcement of security zoning and segregation strategy, where reduced VSS should be provided at the zone transition point.

- What are the opening hours of all the terraces?

Most of the terrace faces onto commercial areas so we wouldn't consider terrace opening hours to be restrictive. The residential units to the north would be expected to require some restrictions locally to the northern areas of the terraces.

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

Kind regards,

Anna



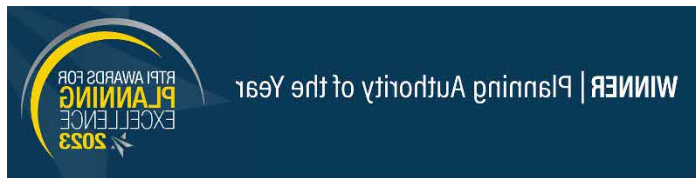
Anna Tastsoglou | Principal Planning Officer (Development Management)

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