

**From:** [Morgan Jenkins](#)  
**To:** [PLN - Comments](#)  
**Subject:** 24/01262/FULMAJ - Morgan Jenkins representations  
**Date:** 11 February 2025 20:44:17  
**Attachments:** [24.01262.FULMAJ - M Jenkins Representations.pdf](#)

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THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Please find attached my comments/representations on the proposed demolition/development at 319-325 High Holborn (Heron House), 326-332 High Holborn and 26 Southampton Buildings (Holborn Gate), and 44 Southampton Buildings (reference 24/01262/FULMAJ).

I would be grateful if these could be added to the record and considered as part of the planning decision.

Many thanks,  
Morgan Jenkins  
7 High Holborn  
London WC1V 6DR

To: PLNComments@cityoflondon.gov.uk

11 February, 2025

**319-325 High Holborn (Heron House), 326-332 High Holborn, 26 Southampton Buildings (Holborn Gate) and 44 Southampton Buildings**

Dear Sir/Madam,

The proposals for the demolition of Heron House, Holborn Gate and 44 Southampton Buildings are deeply troubling.

Firstly, because of the loss of numerous essential high street stores which currently service the local community; secondly, because of the significant disruption, noise pollution and air pollution which will continue for such a substantial period of time; and thirdly, because of the inadequacy and uninspired nature of the replacement structure planned to be built in their place.

**Loss of retail businesses**

As you may be aware, the existing structures currently house six retail stores: a large M&S; Barclays branch; Cafe Nero; Pret; Black Sheep Coffee; and Jones Bootmaker. There is also currently a vacant retail lot recently NatWest.

As a resident who has lived at 7 High Holborn, directly opposite the proposed site, for close to a decade now I can assure you first hand that these stores are of great importance and utility to the local community. Whether it's people who work nearby or those living within many of the apartment buildings in the vicinity. The M&S in particular is the largest and most diversely stocked supermarket on High Holborn, was recently renovated September 2024, and on any given day services hundreds if not thousands of office workers and residents alike. The Barclays is now the last bank on High Holborn as well as the last set of cash points.

As a result of and since the Covid pandemic, many retail stores on High Holborn have permanently closed and the high street is sadly a shadow of what it once was. A walk up this street will show you numerous empty retail lots, some of which have been vacant for in excess of five years. Losing yet more stores, and in particular such a critical supermarket, will only harm the local community more.

**Disruption and pollution**

The collective size of the building proposed to be levelled and associated site is significant. No doubt the disruption from the demolition and construction work will be equally significant. There are a number of residential buildings in close proximity to the site and the negative impact this will have on residents for such a protracted period of time (at least six years estimated in the planning application!) should not be underestimated. 7 High Holborn for example is literally opposite the street to the proposed site and contains close to 70 apartments; the residents in this building, some of whose windows look/open directly towards the proposed site, will have to live with the noise, dust and ugly sight for a very long time.

### **Inadequacy of proposed new build**

Perhaps the most disheartening aspect of the whole proposal is that, even notwithstanding the loss of the valued stores and the extended period of disruption/pollution, the proposed replacement building is yet another generic uninspired mixed use office block – is that really what the local community/City needs more of?

The existing buildings contain a number of flats and it appears that there are no plans to include any replacement residential premises in the new building. Reducing the number of flats available in central London, with the cost of renting or buying at a ridiculous all time high, is really not what this community needs and its very discouraging that the developers have chosen the cheaper/lazier option to not include any residences in the new building.

On top of that, the ground floor plans for the new building show only one (!) retail unit fronting onto High Holborn, down from the six units we currently have fronting that street. There is only one other retail unit shown on the plans, fronting onto Southampton Buildings, bringing the grand total to two. How exactly is this an improvement when the current building provides seven?


The ‘vision’ section of the development website is filled with buzz words and corporate jargon the purpose of which appears to be satisfying various positive initiatives, but this really just seems to be a veneer behind which nothing particularly new, innovative or exciting is being offered. I find it unconvincing that including some showers in the new building can be lauded as a great catalyst for the use of sustainable transport.

### **Conclusion**

All things considered, the new building in its current planned form appears to be a net loss to the community, with significantly less retail stores and no residential offerings. Though I don’t doubt it will look more modern and architecturally pleasing than the current brutalist style building we have, I’m not sure that this can outweigh six years of disruption and the aforementioned losses.

As such, for all of the above mentioned reasons, I would urge the planning department to refuse permission for the demolition and new development in its current form. At the very least, please consider making it a condition of approval that the number of retail spaces in the new development be no less than what the community currently benefits from.

Kind regards,



Morgan Jenkins  
7 High Holborn  
London WC1V 6DR

Sent by email to: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk), [plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk)

For the attention of: Anna Tastsoglou  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

Our ref:134849  
Your ref:24/01262/FULMAJ

10 March 2025

Dear Ms Tastsoglou,

**24/01262/FULMAJ**

**319-325 High Holborn (Heron House), 326-332 High Holborn and 26 Southampton Buildings (Holborn Gate)**

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. | 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC [Application No]. [Description]. [Address].

I am a member of the Planning and Conservation Working Group for the London Historic Parks and Gardens Trust, trading as London Parks and Gardens (LPG). LPG is affiliated to The Gardens Trust (TGT) — a statutory consultee in respect of planning proposals affecting sites included in Historic England's Register of Parks and Gardens.

LPG is the County Gardens Trust for Greater London and makes observations on behalf of TGT in respect of Grade II registered sites and may also comment on planning matters affecting other green open spaces of historic interest, especially when included in [LPG's Inventory](#). In this instance we are aware that the site is ADJACENT TO Staple Inn Garden which is on the

LPG Inventory as: Staple Inn Garden

<https://londongardenstrust.org/conservation/inventory/site-record/?ID=COL109>.

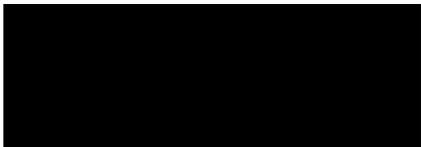
We have reviewed the documents submitted on the planning portal and wish to highlight several areas that may require further consideration:

- There are three mature trees within Staple Inn Garden which are noted within the Arboricultural Report submitted with the planning application, which are deemed not to be at risk by the proposed development. We would recommend that conditions are attached to the consent that these trees are protected from harm caused by the development.

Whilst LPG does not take a formal position supporting or opposing this application, we urge the planning officer to consider this point. Conditions could help to address this aspect to ensure that the development aligns well with the long-term interests of the community [name the park/garden and/or local interest group i.e. Chelsea Physic Garden] and adheres to established planning guidelines for the protection of historic green spaces.

In making these observations, LPG seeks to maximise the amenity and heritage benefits that can be secured for this historic garden to achieve sustainable development.

Yours sincerely,



Hazel Morris

For and on behalf of the Planning & Conservation Working Group

Cc: The Gardens Trust ([conservation@gardenstrust.org](mailto:conservation@gardenstrust.org))