

Application ref: 2025/0227/P  
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City of London Authority  
Anna Tastsoglou  
Development Division

Dear Sir/Madam

## **DECISION**

Town and Country Planning Act 1990 (as amended)

### **Request for Observations to Adjoining Borough - No objection**

Address:

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

Drawing Nos:

Letter from City of London, dated 17/01/2025.

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

## Informative(s):

### 1 Reasons for no objection:

The proposal includes the demolition and subsequent redevelopment of the whole site as outlined in the description of development.

#### LAND USE:

The application proposes a number of uses including 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. It is for The City of London to determine the acceptability in principle of the proposed uses in accordance with the provisions of the Development Plan. LB Camden has no objections in principle to the proposed uses as these are all broadly acceptable for London's Central Activities Zone and would all be located within the City of London.

#### VIEWS:

The site is located within the protected vistas outlined in the London View Management Framework (LVMF). It falls within the strategic and wider viewing corridor from Primrose Hill to St Pauls and the background corridor from Greenwich and Blackheath to St Pauls views 4A1, 5A2 and 6A1 respectively). It is recommended that the proposal should be considered in line with the LVMF policies in the London Plan and in line with the boroughs own local plan policies in relation to this designation, and no objection is raised by LB Camden.

#### HERITAGE:

The application site is located in close proximity to the boundary with the London Borough of Camden, on the opposite side of High Holborn. The site is located in close proximity to the Bloomsbury Conservation Area to the north and west and Hatton Garden Conservation Area to the north east. To the north lie the Grade II listed buildings at nos. 22 and 23 High Holborn (Cittie of York Public House) which are Grade II listed and no. 142 Holborn (Waterhouse Square) which is Grade II\* listed.

#### Impact on the conservation area:

The special character of the Bloomsbury Conservation Area is found in the range and mix of building types and uses and the street layout. The character is not dominated by one particular period or style of building, but rather it is their combination that is of special interest. The existing buildings mainly date from the 1960s with 44 Southampton Buildings dating from the 1910s but undergoing external changes and refurbishment in the 1960s which has significantly altered its appearance. The overall height of the proposed building would be 10 storeys with plant at the upper floors being set back helping to minimise their visibility from street level. Views would be possible along

Holborn to the east however the proposed building would be suitable for the local townscape. Other areas of townscape and heritage sensitivity within this part of the conservation area include Gray's Inn to the north which is a Grade II\* Listed Registered Park and Garden, Lincoln's Inn Fields to the west which is a Grade II Listed Registered Park and Garden, and Lincoln's Inn New Square to the south west. The verified view document demonstrates that, although the upper part of the new building would be visible from these vantage points, they would be within the background views and would be screened by trees even in winter time. The proposal would not be considered to have a detrimental impact on this part of the Bloomsbury Conservation Area within Camden, so no objection is raised.

2 Impact on significance of listed buildings:

There are a number of listed buildings within close proximity to the site including Grade II listed Staple Inn Buildings at no. 335 High Holborn and the Grade II\* listed Waterhouse Square. All of the listed buildings are distinct and high quality examples of their type. However, it is the diversity of style and scale of each of the listed buildings in close proximity to each other that result in their varied setting. The current setting for each of the buildings listed is seen in the context of each other and the varied grouping of commercial buildings along High Holborn. The buildings range in age from 16th century to modern 20th century office developments. The settings of the listed buildings are within this dense urban environment and there is limited continuity of styles in the area. The proposal would not harm the significance of any of the listed buildings within Camden, so no objection is raised.

AMENITY (DAYLIGHT AND SUNLIGHT):

The proposed development is directly to the south of no. 7 High Holborn which is an 8 storey building within Camden and includes commercial uses on the ground floor and residential flats above on the 1st to 7th floors. Following a pre-application consultation with LB Camden, the daylight and sunlight consultants were asked to present the results for this property on a flat by flat basis which has been included in the Daylight and Sunlight Assessment document submitted in support of the application.

With regards to daylight, the vertical sky component (VSC) and non-skyline (NSL) have been tested. The BRE recommends using significance criteria which allows clearer understanding of where the more significant impacts are:

BRE compliant - negligible

20.1% to 30% reduction - Minor adverse

30.1% to 40% reduction - Moderate adverse

More than 40.1% reduction - Major adverse

Of the 172 windows tested serving 79 rooms on the 1st to 7th floors of the building, only 63 (36%) will meet the BRE guidance. The remaining 109 windows (64%) show failures. Where transgressions occur, 69 are minor (between 20% and 29.9% reductions), 16 show a moderate loss (between 30% and 39.9% reduction), and 24 are major (above 40% reduction).

The annual probable sunlight hours (APSH) measures the number of hours that direct sunlight reaches unobstructed ground across the whole year and

also over the winter period. The main focus is on living rooms.

The Annual Probable Sunlight Hours (APSH) assessment shows that 70 of the 79 rooms tested will comply with the BRE guidance. 2 windows will see minor transgressions and 7 windows will experience a major transgression. The rooms which experiences the major transgressions are mainly bedrooms, which are considered less important in the BRE guidance.

#### Daylight - 1st to 5th floors

Within the lower floors of the building on the 1st to 5th floors the noted VSC transgressions are minor and are not considered to be significant. Of the 16 noted NSL transgressions, the majority relate to bedrooms. Bedrooms are considered to have lesser significance by the BRE guidance and whilst a number of the bedroom transgressions are major, they are not considered to be particularly detrimental to the enjoyment of the flats in question.

#### Sunlight - 1st to 5th floors

The window map illustrates that the majority of the windows within the 1st to 5th floors will experience minor to moderate transgressions. The retained natural sunlight with the proposed development in place is considered acceptable.

### 3 Daylight - 6th and 7th floors

The majority of the windows on these floors will experience moderate to major impacts in terms of daylight. The windows on the 6th and 7th floor of the building are located beneath an overhang. When tested with the overhang removed as per BRE guidance, the effects of the proposed development are minimal. As such, it is clear that the overhang overly affects the natural light to the top floors of the building.

#### Sunlight - 6th and 7th floors

The window map illustrates that the majority of windows will remain compliant with the BRE Guidelines. The windows that experience transgressions are predominantly located on these 6th and 7th floors which are affected by the buildings overhang. There are also a number of smaller secondary windows on the 7th floor which have major transgressions. However the rooms are BRE compliant in relation to sunlight due to other mitigating windows.

#### AMENITY - PRIVACY / OUTLOOK:

The proposals would not cause undue harm to neighbouring privacy or outlook given the Central London location, and subject to conditions controlling hours of use, plant noise, deliveries and servicing hours, the proposals would not cause undue harm to neighbouring amenity in this regard.

#### AMENITY - CONCLUSION:

It is acknowledged that there would be some notable daylight / sunlight impacts to the rooms of the flats in no 7 High Holborn, within Camden. The majority of the daylight / sunlight impacts are generally negligible to moderate and are considered acceptable in the urban context. However a number of flats on the 6th and 7th floors will experience major adverse impacts to living rooms and

bedrooms. It has been shown that the overhangs on these floors of the building reduce current natural light access or that otherwise the affected rooms are bedrooms, a room use considered to have a lesser daylight and sunlight need. As such, whilst the reductions in daylight and sunlight appear to be significant percentage changes, this may not fairly represent the experience of the occupants. Overall, it is considered that the retained natural light amenity with the proposed development in place is considered appropriate, and no objection is raised by LB Camden.

#### TRANSPORT:

Camden Council recommend any planning permission be subject to transport obligations and conditions including, but not limited to; provision of cycle parking in line with the London Plan standards, car free development, travel plan, delivery and servicing management plan, and construction management plan. Otherwise, no objection is raised by LB Camden from a transport perspective.

One letter of objection has been received from Gamages Estate Tenants and Residents Association who are concerned about the principle of the proposed works and uses within the proposed new building. The objection is available to view on Camden Council's website (under the reference number 2025/0227/P). The principle of the works and the uses within the new building would be considered and addressed by the The City of London according to the provisions of the relevant development plan.

#### CONCLUSION:

The London Borough of Camden therefore raises no objection to the application.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

Yours faithfully

A handwritten signature in black ink, appearing to read 'DPope', is written over a light blue rectangular background.

Daniel Pope  
Chief Planning Officer