

PD10361/JE/SS

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10 December 2015

London Borough of Camden  
Development Control  
2<sup>nd</sup> Floor, 5 Pancras Square  
C/o Town Hall, Judd Street  
London  
WC1H 9JE

**Planning Portal: PP-04685994**

Dear Ms Chivers

**TOWN AND COUNTRY PLANNING ACT 1990 – APPLICATION FOR PLANNING PERMISSION  
74 CHANCERY LANE AND 309 – 310 HIGH HOLBORN, LONDON, WC2A 1AD**

On behalf of our client, GMS Estates Limited, please find enclosed an application for planning permission seeking the use of the basement and ground floor of 74 Chancery Lane and 309 – 310 High Holborn (the “Site”) for flexible uses comprising either Class A1, Class A2 or Class A3. The application also seeks external alterations, namely the installation of a flue on the rear elevation of the building. Flexible uses are sought to widen the range of uses which could lawfully occupy the unit and improve the prospect of the unit being let.

**Application Submission**

Please find enclosed the following documents:

- form for Application for Planning Permission incorporating Ownership Certificate A pursuant to the Town and Country Planning (Development Management Procedure) (England) Order 2015 Article 13 and an Agricultural Land Declaration;
- a site location plan;
- application drawings (see attached schedule);
- Design and Access Statement; and
- Community Infrastructure Levy (CIL) Form.

As this application represents a resubmission of an application (2014/6793/P) previously submitted on behalf of the applicant which was withdrawn, and is made within 12 months of making the earlier application, the application is exempt from an application fee in accordance with The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012.

**Site Context**

The Site comprises a basement and five storey building located on the west side of Chancery Lane at the junction with High Holborn. Planning permission (2014/0972/P) was granted on 31 March 2015 for the change of use of the first to fourth floors of the building from offices (Class B1) to residential (Class C3) including the creation of access openings between 74 and 75 Chancery Lane, new windows from the first to fourth floor and a new shopfront on ground floor. The permission involves the amalgamation of three vacant ground floor units (previously Romeo’s Menswear, Money Exchange and Dry Cleaning Co) to create one single retail unit. This permission is currently being implemented by our client.

Planning permission is sought to widen the range of uses that could lawfully occupy this unit.

### **Planning Policy**

Section 38 (6) of the Planning and Compulsory Purchases Act 2004 requires planning applications to be determined in accordance with policies of the statutory development plan, unless material considerations indicate otherwise.

In this case, the statutory Development Plan consists of the:

- London Plan Consolidated with Alterations Since 2011 (2015);
- Camden Core Strategy (2010);
- Camden Development Policies (2010);
- Site Allocations (2013); and
- Fitzrovia Area Action Plan (2014).

The Site is not allocated in the Site Allocations development plan document nor does it fall within the boundary of the Fitzrovia Area Action Plan. As such, neither of these documents will be discussed further.

The Council has also adopted a series of Supplementary Planning Guidance referred to collectively as Camden Planning Guidance (CPG). CPG 5 (Town Centres, Retail and Employment) (2013) and CPG 1 (Design) are material considerations in this instance

### Policy Designations

The key policy designations particularly relevant to the application are the Site's location in a Central London Frontage (Holborn Central Frontage) and in the Bloomsbury Conservation Area. The building is noted as making a positive contribution to the character and appearance of the conservation area.

### London Plan

The purpose of the London Plan is to provide a strategic level planning policy for Central and Greater London planning policy and therefore is of little relevance in this instance. Nevertheless, **Policy 2.15** (Town Centres) of the London Plan maintains that development proposals in town centres should sustain and enhance the vitality of the centre.

### Local Town Centre Policies

**Policy CS7** (Promoting Camden's centres and shops) of the Core Strategy states that the Council will promote successful and vibrant centres to serve the needs of residents, workers and visitors by:

*"e) seeking to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located;*

*f) providing for, and maintaining, a range of shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice;*

*g) promoting small and independent shops, and resisting the loss of shops where this would cause harm to the character and function of a centre;*

*h) making sure that food, drink and entertainment uses do not have a harmful impact on residents and the local area, and focusing such uses in Camden's Central London Frontages, Town Centres and the King's Cross Opportunity Area;*

*i) supporting and protecting Camden's local shops, markets and areas of specialist shopping; and*

*j) pursuing the individual planning objectives for each centre...including through the delivery of environmental, design, transport and public safety measures.”*

**Policy DP12** (Supporting strong centres and managing the impact of food, drink, entertainment and other town centres uses) of the Development Policies states that:

*“The Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. We will consider:*

- a) the effect of non-retail development on shopping provision and the character of the centre in which it is located;*
- b) the cumulative impact of food, drink and entertainment uses taking into account the number and distribution of existing uses and non-implemented planning permissions, and any record of harm caused by such uses;*
- c) the impact of the development on nearby residential uses and amenity, and any prejudice to future residential development;*
- d) parking, stopping and servicing and the effect of the development on ease of movement on the footpath;*
- e) noise and vibration generated either inside or outside of the site;*
- f) fumes likely to be generated and the potential for effective and unobtrusive ventilation; and*
- g) the potential for crime and anti-social behaviour, including littering.”*

The supporting text of the policy notes that town centre uses includes shops and markets (Class A1), financial and professional services (A2), cafes and restaurants (A3), drinking establishments (A4), hot food takeaways (A5), offices (B1a), hotels (C1), community uses (D1) and leisure uses (D2).

Alongside the adopted development plan, Camden have also published guidance relating to the town centres called CPG 5 (Town Centres, Retail and Employment) to assist in understanding how the policies above may be applied.

CPG5 states that the Holborn Central Frontage is *“an area dominated by office development and large office entrances often break up the continuity of shop premises.”* The Guidance states that:

- *“the Council will generally resist proposals that would result in less than 50% of the total premises in each individual frontage being in A1 retail use.*
- *Planning permission for food, drink and entertainment uses will be granted in this area, as long as it does not exceed the maximum of 25% of premises being in that use within each frontage.”*

The Guidance identifies individual frontages within the wider Holborn Central Frontage for the criteria above to be assessed against. In this instance, the frontage which the Site is part of stretches from 262 High Holborn in the west to 76 Chancery Lane in the east (**Appendix 1**).

#### Local Design Policies

Policy DP24 (Securing High Quality Design) of the Development policies states that the Council will expect developments to consider:

“ ...

*b) the character and proportions of the existing building, where alterations and extensions are proposed;*

... ”

*e) the appropriate location for building services equipment.”*

CPG1 (Design) says that building services equipment should be incorporated into the development, have minimal impact on the environment and should not harm occupant or neighbour amenity. In respect of ducting required on the outside of a building, Paragraph 11.8 states that it *“must not obscure access to daylight and sunlight, or provide any nuisance for occupants of the development or adjacent buildings.”*

### **Assessment against Policy**

#### Change of Use from Class A1 to a flexible use comprising Class A1, Class A2 and Class A3

When assessing the proposal against **Policy CS7** of the Core Strategy and **Policy DP12** of the Development Policies, the key test is whether the proposals cause harm to the character, function, vitality and viability of the centre, or the local area or amenity of neighbours.

CPG5 sets out the Council’s guidance to assist the Council in applying these policies and suggests a minimum threshold for Class A1 uses in a frontage and a maximum threshold for food, drink and entertainment uses (A3, A3 and A5) in a frontage in order to provide a default quantitative range that can be assessed to advise the policy objective.

In accordance with the guidance set out in CPG5, a land-use assessment of the frontage was undertaken on 12 August 2015 (**Appendix 2**). The assessment included two scenarios: one scheduling the existing uses on the frontage (Scenario 1) and one assessing the uses on the frontage if the planning permissions at 262 – 267 High Holborn (2013/3983/P) and 309 – 310 High Holborn (2014/0972/P) are implemented (Scenario 2). In the assessment, entrance cores to offices were not counted unless the office was located on the ground floor.

Under Scenario 1, there was 38% of the frontage in Class A1 use and 24% of the frontage in either Class A3, A4 or A5 use. Under Scenario 2, there would be 37% of the frontage in Class A1 use and 21% of the frontage in either Class A3, A4 or A5. Therefore, from a purely quantitative assessment against the guidance, the mix exceeds the default percentages and thus a more detailed consideration against policy itself must be undertaken. This approach accords with the consideration and accepted position by an officer and an inspector in Camden who have both suggested that applying a minimum percentage Class A1 threshold is too simplistic an approach in defining town centre vitality and viability (267 West End Lane, West Hampstead - 2012/0276/P & APP/X5210/A/13/2192328). As the officer report concludes in the application, *“the key test, as laid down in policy DP12, is whether the loss of retail floorspace would serve to erode or undermine the character, function, vitality and viability of the frontage.”* These are now assessed separately.

#### *Function*

Taking into account the location of High Holborn and its position within the Central Activities Zone of London, we consider that the function of the Holborn Centre Frontage does not solely derive from being a retail destination for Class A1 uses. Rather, it acts a hub for a range of “town-centre” uses anchored by a large worker population. This is recognised in CPG5 which acknowledges that the area is dominated by office development and other employment generating uses and the Camden Retail Study (2008) which is stated as *“providing retail and service facilities for the daytime office worker population.”* As the area is therefore not overly reliant on retail uses to function and generate footfall and pedestrian flow to the benefit of the vitality and viability of the frontage, we consider that it would be too simplistic in this case to assess the health of the frontage on the basis of the proportion of the frontage within Class A1 uses as well as Class A3, Class A4 and Class A5 uses against default target levels.

Given that there is a large employment offer in the area, other “town-centre” uses particularly Class A2 and Class A3 uses provide a vital role that contribute towards the function of the frontage. For example, Class A2 uses such as banks provide a valuable service for workers during lunch hours particularly as this often presents the only window of opportunity in the week for them to visit them. Class A3 uses also provide places for workers to get lunch as well as provide destinations for business meetings. We consider that these uses provide a pivotal role in the function of the Holborn Central Frontage and enhance it rather than cause any harm to it. A greater proportion of non-A1 uses is therefore appropriate to maintain the area’s function.

#### *Character*

**Policy DP12** of the Development Polices also seeks to protect the character of the frontage against any harm derived from new town centre uses. The frontage of which the Site forms part as defined by the CPG5 guidance stretches from 262 High Holborn in the west to 76 Chancery Lane in the east, yet the character of these locations are remarkably different. For example, the buildings on the western part of the frontage such as 262 High Street are generally twentieth-century, seven to eight storey mansion office blocks with a large building footprint whereas the buildings on Chancery Lane (including the subject building) are typically nineteenth century architecturally decorated buildings with a small footprint. The shopfronts are different too with those on Chancery Lane (including the subject building) typically containing traditional shopfront features such as stallrisers, pilasters and decorated corbels whilst those further west along the frontage being modern - typically aluminium framed with large glazing. We would note that that the recent planning permission (2014/0972/P) for the Site included a new shopfront with the refurbishment of the period detailing to further emphasise its traditional features and character.

In this instance, we suggest that the frontage adopted in CPG5 fails to reflect a coherent character which is part of the criteria to consider under **Policy DP12**. In terms of devising a frontage based on character, we would identify a smaller frontage than that devised under CPG5 which would comprise all the units on the northern side of Chancery Lane including those on the corner of High Holborn (**Appendix 3**). If one was to assess the percentage of A1 uses and percentage of food, drink and entertainment uses in this frontage on the basis of the unit being in use under Class A3 against the guidance in CPG5, the composition within the frontage would consist of 58% of the frontage being in Class A1 and 17% of the frontage being in Class A3, Class A4 and Class A5 under Scenario 1 and 60% of the frontage being in Class A1 and 20% of the frontage being in Class A3, Class A4 and Class A5 under Scenario 2 (**Appendix 4**). Under both scenarios, the composition would comply with the guidance in CPG5.

#### *Vitality and Viability*

As all the uses proposed under this application are “town-centre” uses, we consider that they would all make a positive contribution to the vitality and viability of the Holborn Central Frontage. Vitality and viability, however, are influenced by occupation levels as occupied units provide active frontage, activity on the street and encourage pedestrian footfall. The flexible range of uses sought under this permission will improve the prospect of the unit being let and minimise any potential period of vacancy. The prospect of attracting tenants across three use classes is more likely to result in an occupier being found than across one use class which can only be to the benefit of the vitality and viability of the Holborn Central Frontage rather than causing any harm.

#### *The local area or the amenity of neighbours*

We consider that the use of the unit for either Class A1, A2 or Class A3 is unlikely have any detrimental impact on the local area or local amenity of neighbours. The unit will have its own secured internal refuse area which will store refuse until collection day. This will ensure that waste is appropriately stored and managed properly thus avoiding any potential impacts on the amenity of the area. In respect of the proposed flue, our client is willing to accept a condition requiring a noise assessment to be undertaken prior to its installation. The appearance of the flue is discussed below.

### *Other Considerations*

We would like to note that since CPG5 was published (2013), the role of high street has changed significantly. In particular, the the National Planning Practice Guidance (2014) calls on local planning authorities to be flexible, encourage economic activity and achieve a mix of uses in town centres. This has been further enforced by legislation introduced in May 2013 which allows the temporary change of use (up to two years) from A1 to A2, A3 or B1 to enhance vitality and viability as well as the more recent General Permitted Development Order 2015 which allows the change of use from Class A1 to Class A2 without any conditions and the change of use from Class A1 to Class A3 subject to a prior approval procedure. It is therefore clear that there is a national drive to ensure that town centre retail policy is flexibly managed and that other town centre uses, aside from A1 Class, play a vital role in creating and maintaining a healthy town centre. It is our view the Guidance under CPG5 must not be applied rigidly and must respond to changes to high streets and the important and varied role they play.

### The installation of a flue on the rear elevation

The flue is proposed on the rear elevation of the building and would run vertically up the building from the ground floor up to roof level. Any potential visual impact of the flue would be mitigated by its siting in a corner recessed behind the rear building line of No.75 Chancery Lane – the same location of a former flue which has now been removed but which we understand was in place when the building was used as a public house in the mid-twentieth century, and potentially subsequently by the various food-related uses the premises has previously been occupied by.

As the site falls within a conservation area (a designated heritage asset), an assessment needs to be made as to whether the proposals would result in any harm to the significance of the conservation area. An inspection of the rear elevation and the rear of surrounding buildings was undertaken in August 2015. Photographs were taken (**Appendix 5**) and show that there has been a number of alterations to the rear of these properties. This includes additions such as flues, plants machinery and external staircases. Whilst some of these additions are not particularly sensitively designed, the impact they have on the significance of the conservation area is minimal as they are out of view from the public particularly as setting is defined in the NPPF as “*the surrounding in which a heritage assets is experienced.*” In this instance, the installation of a flue would not be out of keeping with the surrounding environment and would have a neutral effect on the significance of the Bloomsbury Conservation Area.

Assessed against **Policy DP24**, we consider that the proposed flue is in character with the surrounding environment and by being located on the rear elevation out of sight from the public is an appropriate location for building services equipment.

### **Concluding Remarks**

The proposed uses applied for under this application are appropriate town centre uses and the flexible approach sought will improve the prospect of the unit being let to the wider benefit of the vitality and viability of the Holborn Central London Frontage. We are of the view that there is a clear limitation in the guidance set out in CPG5 which seeks to control land uses by minimum and maximum use class representation through sub-frontages which in some instances poorly reflect the character and function of the retail area. The guidance fails to react to the changing role of high streets recognised by the establishment of national permitted development rights which we consider to be a strong material consideration that clearly outweighs an out-dated quantitative threshold methodology for assessing harm to town centres.

We also consider that applying the guidance rigidly does not respond to the criteria set out under **Policy DP12** of the Development Policies for protecting town centres against harm – notably harm to function, character, vitality and viability and effect on local amenity. In particular, it fails to acknowledge the distinct function of the Holborn Central Frontage, which relies on a range of uses to provide variety, vibrancy and choice to support the needs of a strong worker population, nor does it appropriately respond to the character areas within the Frontage. It is our view that the guidance set out in CPG5 needs to be considered in light of the shift in national policy and statute as well as the specific circumstances in this instance. In turn, this leads us to

conclude that greater weight should be given to the overarching policy position which we consider the proposals to comply with.

The proposed flue by way of its siting and its location, alongside other flues and additions to the rear elevations in this location would not cause harm to the setting of the Bloomsbury Conservation Area and our client is willing to accept a condition requiring a noise assessment to be undertaken prior to the installation of the flue to ensure that it does not have any detrimental impact on the local area or local amenity of neighbours

As a whole, we consider that the application proposal meets the policy requirements of **Policy CS7** (Promoting Camden's centres and shops) of the Core Strategy, **Policy DP12** (Supporting strong centres and managing the impact of food, drink, entertainment and other town centres uses) of the Development Policies and **Policy DP24** (Securing High Quality Design) of the Development Policies. For these reasons, we kindly request that planning permission is granted for the proposed works.

Yours sincerely



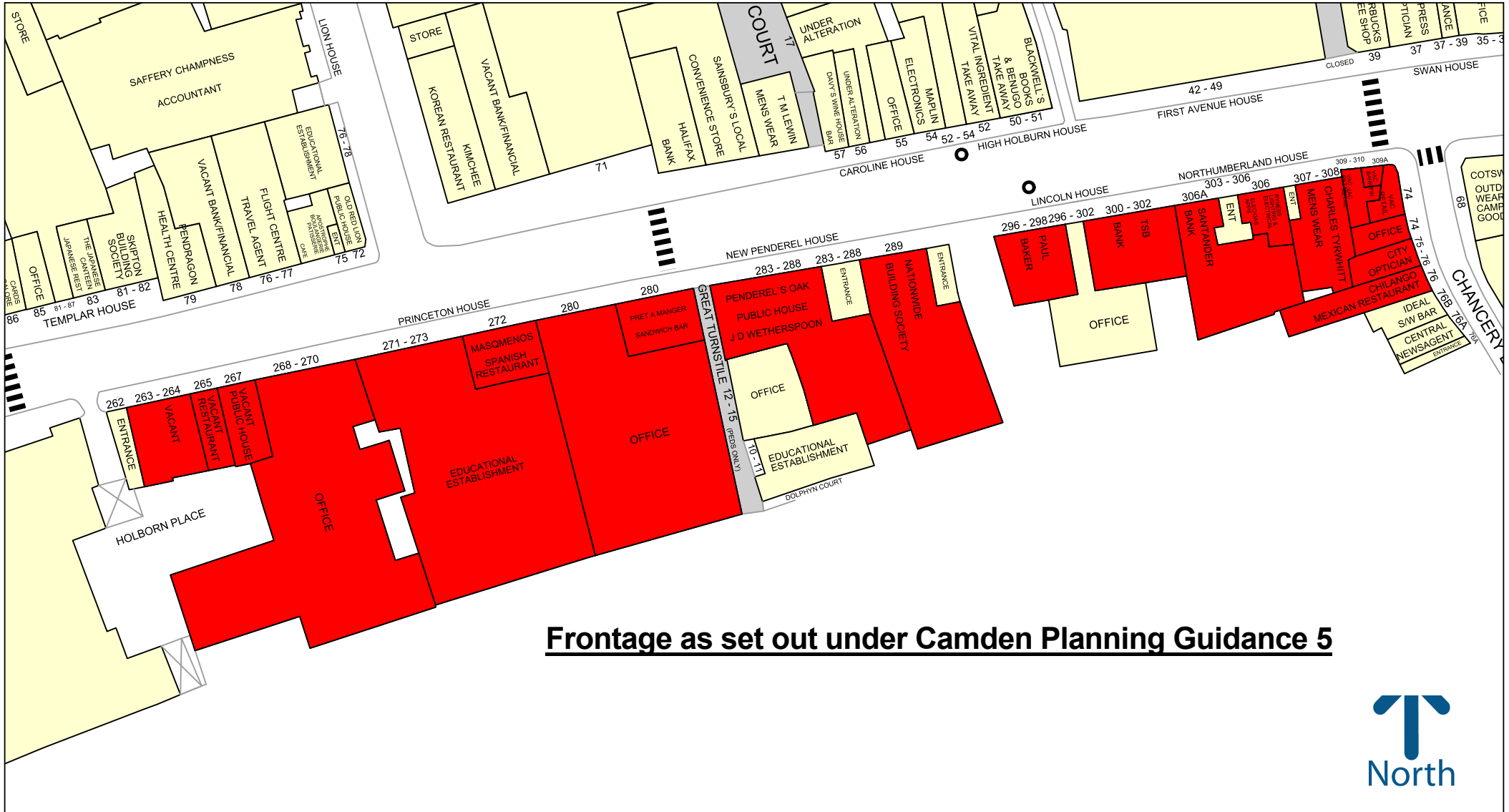
**Montagu Evans LLP**

Encl. - Appendices:

- 1 – Frontage as set out under CPG5;
- 2 – Schedule of Occupiers – CPG Frontage;
- 3 – Proposed Frontage based on Character;
- 4 – Schedule of Occupiers – Character Frontage; and
- 5 – Site Photographs.

**APPENDIX 1**  
**Frontage at set out under CPG5**





50 metres

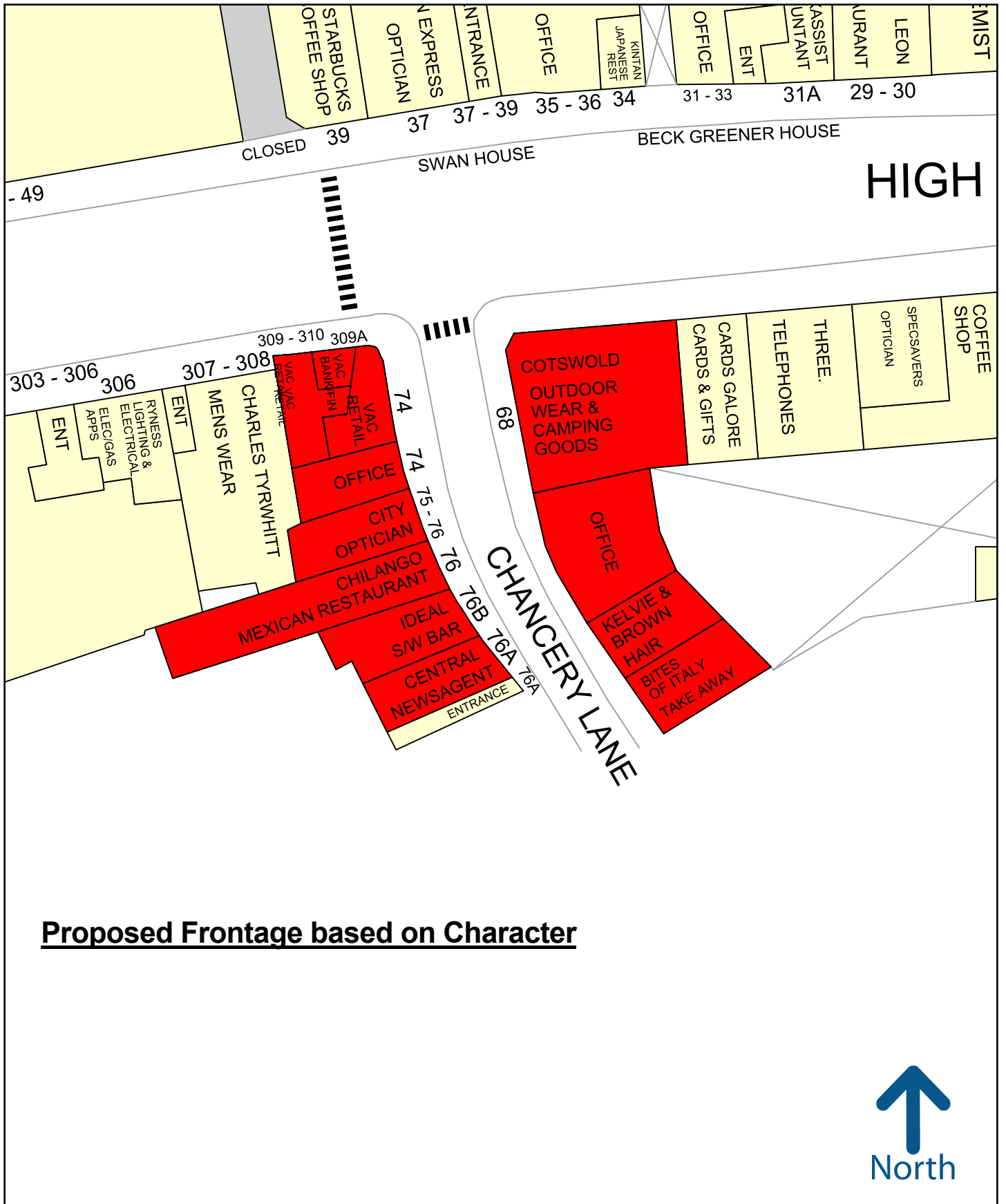
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**APPENDIX 2**  
**Schedule of Occupiers – CPG5 Frontage**

SCENARIO 1 - SCHEDULE OF OCCUPIERS - HOLBORN FRONTAGE - ASSESSMENT UNDERTAKEN ON 12 AUGUST 2015				
FASCIA	ACTIVITY	STREET NUMBER	ROAD NAME	USE CLASS
Chilango	Mexican Café	76	Chancery Lane	A3
City Opticians	Opticians	75-76	Chancery Lane	A1
Office	Office	74	Chancery Lane	B1
Vacant	Formerly Romeos Menswear	74	Chancery Lane	A1
Vacant	Formerly Money Exchange	309a	High Holborn	A2
Vacant	Formerly Dry Cleaning	309 - 310	High Holborn	A1
Charles Tyrwhitt	Clothing Retailer	307 - 308	High Holborn	A1
Ryness Lighting and Electrical	Electrical Store	306	High Holborn	A1
Santander	Bank	306a	High Holborn	A2
TSB	Bank	300 - 302	High Holborn	A2
Paul	Bakery	296 - 298	High Holborn	A1
Nationwide	Bank	289	High Holborn	A2
Penderel's Oak	Pub	283 - 288	High Holborn	A4
Pret a Manger	Sandwich Bar	280	High Holborn	A1
Office	Office	280	High Holborn	B1
Masqmenos	Restaurant	272	High Holborn	A3
UAL	Education	271 - 273	High Holborn	D1
Vacant	Formely BT Archives	268 - 270	High Holborn	B8
Vacant	Formerly Lounge Bar	267	High Holborn	A4
Vacant	Formerly ASAP	265	High Holborn	A3
Vacant	Formerly Waterstones	263 - 264	High Holborn	A1
	Existing	Change to A2	Change to A3	
TOTAL	21	21	21	
A1	8	7	7	
A3 / A4	5	5	6	
OTHER	8	9	8	
PERCENTAGE IN A1	38%	33%	33%	
PERCENTAGE IN A3 / A4	24%	24%	29%	

SCENARIO 2 - SCHEDULE OF OCCUPIERS - HOLBORN FRONTAGE - INCLUDING UNIMPLEMENTED PLANNING PERMISSION AT 262 - 267 HIGH HOLBORN 2013/3983/P AND 74 AND 309-310 HOLBORN (2014/0972)				
FASCIA	ACTIVITY	STREET NUMBER	ROAD NAME	USE CLASS
Chilango	Mexican Café	76	Chancery Lane	A3
City Opticians	Opticians	75-76	Chancery Lane	A1
Office	Office	74	Chancery Lane	B1
Vacant	Formerly Romeos Menswear, Money Exchange and Dry Cleaning	74 and 309-310	Chancery Lane	A1
Charles Tyrwhitt	Clothing Retailer	307 - 308	High Holborn	A1
Ryness Lighting and Electrical	Electrical Store	306	High Holborn	A1
Santander	Bank	306a	High Holborn	A2
TSB	Bank	300 - 302	High Holborn	A2
Paul	Bakery	296 - 298	High Holborn	A1
Nationwide	Bank	289	High Holborn	A2
Penderel's Oak	Pub	283 - 288	High Holborn	A4
Pret a Manger	Sandwich Bar	280	High Holborn	A1
Office	Office	280	High Holborn	B1
Masqmenos	Restaurant	272	High Holborn	A3
UAL	Education	271 - 273	High Holborn	D1
Vacant	Formely BT Archives	268 - 270	High Holborn	B8
Vacant	Formerly Lounge Bar	267	High Holborn	A4
Vacant	Formerly ASAP	265	High Holborn	A1
Vacant	Formerly Waterstones	263 - 264	High Holborn	B1
	Existing	Change to A2	Change to A3	
TOTAL	19	19	19	
A1	7	6	6	
A3 / A4	4	4	5	
OTHER	8	9	8	
PERCENTAGE IN A1	37%	32%	32%	
PERCENTAGE IN A3 / A4	21%	21%	26%	

**APPENDIX 3**  
**Proposed Frontage based on Character**



**Proposed Frontage based on Character**

25 metres

Experian Goad Plan Created: 30/10/2015  
Created By: Montagu Evans

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**APPENDIX 4**  
**Schedule of Occupiers – Character Frontage**

**SCENARIO 1 - SCHEDULE OF OCCUPIERS - CHARACTER FRONTAGE - ASSESSMENT UNDERTAKEN ON 12 AUGUST 2015**

FASCIA	ACTIVITY	STREET NUMBER	ROAD NAME	USE CLASS
Cotswold	Clothing Store	68	Chancery Lane	A1
WSP	Office	70	Chancery Lane	B1
Kelvie and Brown Hair	Hair Salon	69	Chancery Lane	A1
Bites of Italy	Sandwich Bar	67	Chancery Lane	A1
Central Newsagents	Newsagent	76a	Chancery Lane	A1
Ideal Sandwich Bar	Sandwich Bar	76b	Chancery Lane	A1
Chilango	Mexican Café	76	Chancery Lane	A3
City Opticians	Opticians	75-76	Chancery Lane	A1
Office	Office	74	Chancery Lane	B1
Vacant	Formerly Romeos Menswear	74	Chancery Lane	A1
Vacant	Formerly Money Exchange	309a	High Holborn	A2
Vacant	Formerly Dry Cleaning	309 - 310	High Holborn	A1
	Existing	Change to A2	Change to A3	
TOTAL	12	12	12	
A1	8	7	7	
A3 / A4	1	1	2	
OTHER	3	4	3	
PERCENTAGE IN A1	67%	58%	58%	
PERCENTAGE IN A3 / A4	8%	8%	17%	

**SCENARIO 2 - SCHEDULE OF OCCUPIERS - CHARACTER FRONTAGE - INCLUDING UNIMPLEMENTED PLANNING PERMISSION AT 74 AND 309-310 HOLBORN (2014/0972)**

FASCIA	ACTIVITY	STREET NUMBER	ROAD NAME	USE CLASS
Cotswold	Clothing Store	68	Chancery Lane	A1
WSP	Office	70	Chancery Lane	B1
Kelvie and Brown Hair	Hair Salon	69	Chancery Lane	A1
Bites of Italy	Sandwich Bar	67	Chancery Lane	A1
Central Newsagents	Newsagent	76a	Chancery Lane	A1
Ideal Sandwich Bar	Sandwich Bar	76b	Chancery Lane	A1
Chilango	Mexican Café	76	Chancery Lane	A3
City Opticians	Opticians	75-76	Chancery Lane	A1
Office	Office	74	Chancery Lane	B1
Vacant	Formerly Romeos Menswear, M	74 and 309-310	Chancery Lane	A1
	Existing	Change to A2	Change to A3	
TOTAL	10	10	10	
A1	7	6	6	
A3 / A4	1	1	2	
OTHER	2	3	2	
PERCENTAGE IN A1	70%	60%	60%	
PERCENTAGE IN A3 / A4	10%	10%	20%	

**APPENDIX 5**  
**Site Photographs**



Photographs of rear elevation and surrounding buildings (August 2015)

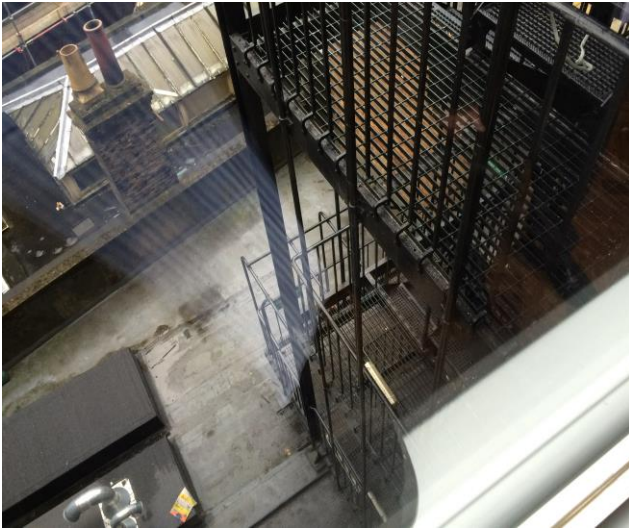
Remnants of previous flue



Plant machinery on ground floor roof



Plant machinery on ground floor roof



External Staircase



Flue on neighbouring building



Flue on neighbouring building