

OC/AS/P6658  
26 September 2017

London Borough of Camden  
Planning and Built Environment  
5 Pancras Square  
London  
N1C 4AG

**Planning Portal reference: PP-06145505**

Dear Sir/Madam,

**Shropshire House, 2-10 Capper Street, London, WC1E 6JA**  
**Full Planning Application for installation of five external ducts, rooftop AHU plant, and repositioning of access door**

On behalf of our client HCA International Ltd, we write in support of a full planning application for the provision of five external ducts, rooftop plant and repositioning of external access door to the rear of Shropshire House, 2-10 Capper Street, WC1E 6JA.

The following documents have been submitted via the Planning Portal:

- Application Form
- CIL Form
- Existing and Proposed drawings (prepared by Sonnemanntoon Architects)
- Design and Access Statement (prepared by Sonnemanntoon Architects)
- Noise Impact Assessment (prepared by Hann Tucker)

We confirm that the requisite application fee of £385 has been paid online via the planning portal.

**Site Location and Description**

Shropshire House is a six storey building located on the southern side of Capper Street, close to the junction with Tottenham Court Road. Queen's Yard is located to the rear of Shropshire House which is a private highway linking Tottenham Court Road and Capper Street. The building is not listed, but is located within the Bloomsbury Conservation Area.

The property is let on a multi-tenanted basis and contains predominantly offices (Class B1a) with a pathology laboratory (Class B1b) operated by the applicant within the basement and ground floors. The immediate surrounding character of the area comprises a mix of mainly office, retail, and medical use properties.

**Planning History**

The planning history for the subject site includes the following:

- **2011/5393/P** - Replacement of three entrances with double doors and critical side lights to

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- ground floor front elevation of existing offices (Class B1). Granted 19/12/2011.
- **2009/3680/P** - Retention of louvers to front, rear and side (east) elevations at ground floor level; and air conditioning unit at roof level and associated ductwork at rear facing Queens Yard. Granted 23/11/2009.
- **2008/5747/P** - Installation of 4 air conditioning units in acoustic enclosure at roof level and retention of associated ductwork on the roof and rear elevation. Granted 02/04/2009.
- **2008/5744/P** - Installation of 5 air conditioning units in acoustic enclosure and air handling unit at roof level and retention of associated ductwork on roof and rear elevation. Granted 02/04/2009.
- **2008/1909/P** - Removal of existing air conditioning units at rear ground floor (Queen's Yard) roof level and their associated ducting, and the installation of new air conditioning/ventilation units at roof level with service ducts on the Queen's Yard elevation (for operation 24 hours a day). Granted 09/09/2008.
- **2008/1906/P** - Change of use of part ground floor (west) from office (Class B1) to an alternative use of either office (Class B1) or medical consulting and physical recuperation facilities (Class D1). Granted 08/07/2008.
- **2008/0744/P** - Amendments to planning permission dated 21/12/07 (2007/2503/P) for alterations to the existing building (Class B1) including the erection of a new single-storey entrance pavilion to Queens Yard, together with the installation of 6 new condensers to rear first floor roof area, namely alterations to fenestration at the entrance of Shropshire House. Granted 22/04/2008.
- **2007/2503/P** - Alterations to the existing building (Class B1) including the erection of a new single storey entrance pavilion to Queens Yard, together with the installation of 6 new condensers to rear first floor roof area. Granted 21/12/2007.
- **2005/1641/P** - Alterations to front entrance of offices. Granted 14/06/2005.
- **2005/0738/P** - Replacement entrance door and windows at ground floor level. Withdrawn.

### **Planning Policy (Designations)**

The site has the following planning policy designations:

- The building is not listed as being of any heritage significance;
- The site is within the Bloomsbury Conservation Area and is identified as a 'positive contributor';
- Within the Fitzrovia Area Action Plan;
- Public Transport Accessibility Level (PTAL) rating of 6b;
- Flood Zone 1 which indicates a low risk of flooding; and
- Western part of the building is identified as being within a 'Strategic Landmark Viewing Corridor'.

The statutory development plan for the Borough of Camden comprises the London Plan (2016) and the Camden Local Plan (2017).

### **Client Background**

HCA is a leading private hospital group who operate six major private acute care hospitals in central London, each being a centre of excellence and delivering the highest standard of medical care. The hospitals include the Harley Street Clinic, Lister Hospital, and Wellington Hospital. The hospitals owned and managed by HCA have established an enviable reputation as providers of medical services of national and international repute. Associated with the hospitals, satellite centres providing

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consulting and diagnostic facilities and laboratories enable medical consultants to meet their patients' needs ahead of potential treatment at one of the acute care hospitals.

### **Proposed Scheme**

The applicant seeks to undertake external works to the premises associated with the existing pathology laboratory which is located in the ground and basement floors of the building. The proposed changes are resultant of a proposed reconfiguration of the existing laboratory space and the expansion of the laboratory into a former ancillary administration space at ground floor. These internal reconfigurations have led to the need for alteration of some of the existing ventilation services as well as provision of additional roof top plant to serve the expanded laboratory space.

External alterations to the rear elevations and roof are proposed and are summarised as follows:

- 2 external supply and extract ducts (750 x 650mm) to pass over existing roof plant on the rear facade and connect to new Air Handling Unit (AHU);
- New roof mounted AHU on eastern end of the roof;
- 2 new lab ducts and 1 new 250mm safety cupboard duct on the rear façade to rise to roof level and connect to new AHU; and
- Reconfiguration of rear entrance door and glass panel on Western Elevation.

The proposed works are essential to enable the expansion of the laboratory space to meet the growing demand for pathology services. The proposal does not result in the creation of any additional floorspace, and a change of use is not required for the expansion of the laboratory space as the existing administration space and proposed laboratory space are within the same use class (change from B1a to B1b).

Acoustic consultants, Hann Tucker Associates, have carefully assessed the proposed plant to ensure it meets the required noise conditions for the surrounding area.

Please refer to the existing and proposed drawings, and Design and Access Statement for further details.

### **Planning Considerations**

Shropshire House is identified as a 'positive contributor' in the Bloomsbury Conservation Area Appraisal, and Policy D2 seeks to preserve or where possible enhance the character or appearance of conservation areas. Policy D1 seeks to secure high quality design in development and schemes will be required to respect local context and character, and be comprised of materials that are of high quality and complement the local character.

The proposed ductwork and rooftop AHU plant has been carefully located to the rear of the building to ensure the preservation of the conservation area setting. The ductwork will not be visible from the street frontage, and the rooftop plant is located in the south eastern part of the building so will largely be obscured from view with the exception of from within Shropshire Place to the east. The building contains existing ductwork on the rear elevation, and the new ductwork has been designed to match the appearance of the existing ducts as much as possible. The proposed plant will therefore preserve the character and appearance of the conservation area and respect the existing local character in accordance with Policies D1 and D2.

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Policy A1 seeks to protect the amenity of communities, occupiers and neighbours and balance the needs of development with the needs and characteristics of local areas and communities. The policy considers factors such as visual privacy / outlook, sunlight and daylight, transport impacts, and noise and vibration levels. Policy A4 seeks to control and manage noise and vibration impacts and states that the Council will only grant permission for noise generating development (including plant and machinery) if it can be operated without causing harm to amenity.

The proposed plant has been assessed against the Council's noise criteria. To ensure the plant stays within the maximum noise levels, an accompanying acoustic report has been prepared by consultants Hann Tucker and is submitted as part of this application.

The Noise Report recommends acoustic attenuators be installed on both the inlet and discharge sides of both proposed AHUs, and provided these mitigation measures are implemented the Report concludes that the proposed plant will be capable of achieving the Council's noise requirements. An assessment of the top floor windows of Shropshire House (directly below the proposed plant) was also carried out and the Report confirms that the proposed plant will achieve the necessary criteria at these windows. The proposal is therefore compliant with Policies A1 and A4 in that it won't have an adverse impact on the amenity of neighbours or occupiers of the building and will achieve the necessary noise requirements.

The proposed plant is essential for the continued operation of the existing pathology laboratory which supports HCA's hospital and medical consulting uses in accordance with the Fitzrovia Area Action Plan which highlights the importance of medical uses in the area.

We note that the western part of the site is identified as being within a 'Viewing Corridor', however the proposed rooftop plant is located in the south eastern corner of the building which is outside of the Viewing Corridor. It therefore will not have a detrimental visual impact or obstruct any important views.

The repositioning of the access door is a very minor alteration which is also located to the rear of the building and therefore will not have an impact on the conservation area setting.

## **Summary**

The proposed external ducts and rooftop AHU plant are required for the continued operation of the existing pathology laboratory in the basement and ground floors. The proposed ductwork is located on the rear elevation of the building and has been designed to be of a similar appearance to the existing ductwork. The rooftop plant has been located in the south eastern corner of the building to ensure that it is not visually obtrusive and is located outside of the viewing corridor.

The proposed plant has been sensitively located to ensure the character of the conservation area is preserved. A Noise Report is submitted with the application which recommends acoustic mitigation measures and demonstrates that the proposed plant will achieve the Council's noise requirements. The proposal is therefore considered to be in accordance with the Local Plan.

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We trust you will find the submitted information is sufficient to validate our client's application and we look forward to a swift and positive outcome. Should you require any further details, please do not hesitate to contact the undersigned.

Yours sincerely

*Analeise Smith*

For and on behalf of  
Rolfe Judd Planning Limited

cc Michelle Williams HCA