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Regeneration & Planning Development Management
London Borough of Camden
Town Hall
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Coly to: Catherine Bond Principal Planner Conservation - Heritage

30th March 2016

Dear Kate

Planning application ref 2016/1027/P 47 Doughty Street

Thank you again for taking the time to visit on $22^{\rm nd}$ March with regard to the above planning application.

I have examined the proposal and plans in detail and, being the Director of the adjacent Charles Dickens Museum, I know the site and the area well. I have submitted my comments online but thought it might be helpful to follow up with a letter, which I am copying to Catherine Bond with whom I hope to meet soon.

The Charles Dickens Museum was founded (as the Dickens House) in 1925 to preserve and promote the life and work of Charles Dickens, the greatest novelist of the Victorian era. It is fully accredited and operates as a charity (charity number 212172). The Museum holds the world's finest and most comprehensive collection of material (over 100,000 items) relating to Dickens's life and work. It was here at 48 Doughty Street (a Grade 1 listed building) that Dickens established himself as a writer in the 1830s and rose to international fame. The Museum also houses an extensive archive and research library used continually by leading scholars, and it is the headquarters of the international Dickens Fellowship. 48 Doughty Street is a place of pilgrimage for people from all over the world – fans, scholars, researchers, writers – and it is a place of learning for thousands of children and young people. We receive 200-300 visitors daily, as well as 50+ school pupils each day during term time.

The Museum is open Tuesday – Sunday inclusive, plus all Mondays in December and all Bank Holiday Mondays throughout the year. We are usually closed on Christmas Day and New Year's Day. We are routinely open 10 am – 5 pm, with extended, evening opening on up to 50 days a year. We operate a cafe, including in the garden, all year round. Although we are closed to the public on Mondays (with the exceptions noted), on all but 12 of these Mondays we conduct education work on site, group tours and other events. There are, therefore, only 12 days each year when we are not trading.

Charles Dickens Museum 48 Doughty Street London WC1N 2LX

+44 (0)20 7405 2127 info@dickensmuseum.com www.dickensmuseum.com The Charles Dickens Museum is a small charity and an independent museum that does not receive any regular funding. It relies entirely on trading activities to generate sufficient revenue to meet its operating costs. Trading income is approximately £500,000 annually. The Museum employs 14 staff (11 FTEs), a range of freelance personnel, and has a pool of 70+ volunteers, with approximately 10 volunteers on site each day.

The proposed works to 47 Doughty Street are very extensive, involving major demolition, excavation, percussive piling, and construction, including substantial work along the party wall with 48 Doughty Street. According to the documentation submitted, the works that would cause noise, dust, debris, emissions, vibration and other disruption to neighbouring properties would last for a period of at least 28.5 weeks.

Rather worryingly, what is not mentioned in any of the documentation submitted with the planning application is that the closet wing of 47 Doughty Street — which is proposed to be demolished — is actually built right up against, overlapping on to 48 Doughty Street. This can be seen clearly in a photograph of the closet wing on p 9 (section 3.1) of the Design & Access Statement. This photograph is taken from the garden café of the Charles Dickens Museum and shows how the closet wing of 47 Doughty Street overlaps onto 48 Doughty Street. It also shows that the closet wing effectively forms part of the garden wall of the Museum.

Therefore, the proposed demolition of the closet wing would have a major impact on 48 Doughty Street, against which is it is built; it is highly likely that it would cause serious (and possibly irreparable) damage to this Grade 1 listed building and would most certainly pose a safety risk to Museum visitors, staff and volunteers. Moreover, the closet wing forms part of the boundary wall and therefore any demolition would render the garden at 48 Doughty Street (which forms part of the Museum's café) unusable.

With regard to vibration, the Construction Management document refers to limits on vibration of 2mm/s and 12mm/s immediately adjacent to the site address. Magnitudes of ground vibrations that are considered to be able to cause structural damage to buildings are defined in BS7385. Acceptable limits are detailed in BS7385 as 15mm/s at 4Hz increasing at higher frequencies and that these should be halved to allow for structural resonances – particularly critical when dealing with historic buildings. So the limit should be 7.5mm/s. At below 4Hz, the BS says the limit should be 0.6mm/s.

Therefore, even without the demolition of the closet wing, any excavation or construction works causing vibration at the levels outlined would most likely cause significant structural damage to 48 Doughty Street, the Grade 1 listed building, putting at risk the extensive, world-class collection of irreplaceable objects and material that the building houses.

With regard to deliveries and collections, 3 of the 4 illustrations on pp 21-22 of the CMP indicate that the Museum's entrance would be directly affected on a daily basis, for several periods of up to 40 minutes each day. This would be extremely problematic to our ability to operate, particularly with large parties of school children arriving and departing throughout the day, alongside our 200-300 daily general visitors.

Taken all together, the proposed work at 47 Doughty Street – particularly the demolition, excavation and new build – would have a major impact on the Charles Dickens Museum. The works as outlined have the potential to cause significant damage to 48 Doughty Street, a Grade I listed building, and the collection of international significance which it houses.

Furthermore, the works would cause extensive disruption to the Museum's daily trading activities, including in the historic house and the garden café adjacent. This would seriously disrupt the Museum's ability to operate and would result in major loss of trading income – as much as £350,000 depending on timing.

Therefore, I regret that I must object strongly to the proposed development as set out in the planning application.

I appreciate that the owner of 47 Doughty Street is seeking to refurbish, repair, reinstate and preserve aspects of the Georgian terrace house, and that is to be applauded. However, the extent of the proposed demolition, excavation and construction work seems to disregard the potential impact on the Grade I listed property adjacent and the Charles Dickens Museum which has operated at 48-49 Doughty Street since 1925.

I would be grateful if you would let me know that date of the Committee meeting in due course, and please do let me know if you require any further information or clarification.

With best wishes

Dr Cindy Sughrue OBE

Director

cc Catherine Bond, Principal Planner (Conservation & Heritage) London Borough of Camden