

Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2016/1027/P	John Gardener	84 Richmond Road	24/04/2016 18:34:35	OBJLETTE R	From: John Gardener 84 Richmond Road London E11 4BU 24 April 2016

Dear Ms Phillips

47 Doughty Street WC1N 2LW: Proposed alterations, extension and basement construction.

Planning Application ref 2016/1027/P

LB Application 2016/1183/L

I am a volunteer at the Charles Dickens Museum, 48 Doughty Street. I am familiar with the house and collection at no 48 and talk to visitors regularly about their experience of visiting the house. I would like to make the following comments and objections to the proposals. I'm aware that the Director of the Museum has written to object. I support her objections which are well made but will generally not repeat the same points here.

Planning Policy

The National Planning Policy Framework (NPPF) makes it clear that where proposals cause substantial harm to designated heritage assets they should be refused. It also notes that:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. (Paragraph 134)

Relevant local planning policies against which the proposals should be assessed include the Camden Local Plan Submission Draft 2016. Although this is not yet formally adopted it is the most up to date emerging policy which contains detailed policy on basements and which takes into account feedback from initial engagement, consultation of a draft plan and a series of evidence studies and national policy and legislation. It should therefore be given substantial weight. The following extracts appear to be particularly relevant to the proposals:

Policy A5 Basements (extract with my underlining)

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- f. not comprise of more than one storey;
- g. not be built under an existing basement;
- h. not exceed 50% of each garden within the property;
- i. be less than 1.5 times the footprint of the host building in area;
- j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- k. not extend into or underneath the garden further than 50% of the depth of the garden;
- l. be set back from neighbouring property boundaries where it extends

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beyond the footprint of the host building; and
m.avoid the loss of garden space or trees of townscape or amenity value

It is clear that the proposals are contrary to these criteria in a number of significant areas as highlighted. That the proposal is contrary to over half the criteria listed above is a reflection of the restricted plot size of a site which already has five floors of accommodation including extensive basement area.

Although a courtyard would remain above the basement there would no longer be scope for planting in the ground or permeable surface treatment. Paragraph 6.136 of the policy justification states that the Council will expect a minimum of 1m of soil above the basement to enable garden planting, rainwater runoff and flood mitigation. None is provided in this case.

Paragraph 6.137 notes that basement development underneath a listed building can harm the fabric, structural integrity, layout, inter-relationships and hierarchy of spaces and architectural features of the building.

The NPPF states that any harm to Listed Buildings should be weighed against any public benefits.

There are no public benefits from the proposals which are not necessary to secure the viable use of the property.

Harm to character of Listed Building at no. 47

The scale and location of the proposed basement would have an unacceptable impact on the special character of this Listed Building. By extending to create a basement room to both side boundaries and right to the rear of the plot a space is created significantly larger than any of the principal rooms of the original house. In addition the depth of excavation results in a room with a floor to ceiling height similar to the first floor front room of the house (the principal room and likely drawing room originally). It is not subordinate to the host building and does not respond to the hierarchy of spaces in the original house. An idea of the excessive scale can be had by looking at the photograph of the rear light well showing the existing basement floor level (DAS 3.1) and imagining a further excavation depth of 1.5m (allowing for floor slab) below the existing basement floor over the whole of the rear plot.

That the existing garden is small should not be a reason to disregard the policy which seeks to restrict basement coverage to a reasonable proportion of the site. It is simply a reflection of the fact that this is a five storey house on a small plot which already has extensive basement area extending through the whole of the original footprint and out under the street at the front. In fact in such cases it is even more important that what little unbuilt on (or under) garden remains is retained.

The increase in height and depth of the rear extension at 47 is more than just 'slight' with depth appearing to increase by about 1.2m to over 4m. This changes the current subordinate relationship of rear addition to original house. While it may be similar to the extension at 46 this should not justify further harm to the character of the Listed Building.

Harm to character of Listed Building at no. 48 (Grade 1)

The increase depth and height of the rear extension at no. 47 would adversely impact on the rear garden of no. 48 (used as garden to the Museum's café) increasing the sense of enclosure. It is hard to see how the garden boundary wall (which may be original or at least 19th century) would survive the basement excavations immediately adjacent to it. Further aspects of harm to no 48 are set out below.

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Outlook from the Morning Room and Study of no. 48

The increased height and depth of the rear extension at no 47 would adversely affect the outlook from rear facing rooms at no 48. The increase in depth of approximately 1.2m is significant (around 30%) and would be evident particularly from the ground floor rear facing room at 48 known as the Morning Room and the first floor Study. It should be remembered that this is a Grade 1 Listed Building because of its historic and literary associations. This is a living room where the Dickens family would spend time and the Study where Dickens wrote Oliver Twist and Nicholas Nickleby and which would be relatively well lit especially in the mornings. These rooms are now becoming increasingly hemmed in by the proposed extension and a small part of the original character is further eroded. No sunlight or daylight analysis is provided to justify this larger extension on the boundary.

Construction / amenity issues

It is clearly a concern that the extensive excavations proposed right up to all rear boundaries could cause structural problems or other impacts in the future.

Basement Impact Assessment (BIA) para 7.3.1 Foundations and retaining structures:

By this method, any settlement experienced by the neighbouring properties adjacent to the rear of the main house will be kept to a minimum. Some small movements may occur as the new load paths are established in the revised structural arrangement but these are expected to be minimal with any resulting cracking being limited to aesthetic cracking only (category (i) on the Burland scale).

Although 'aesthetic cracking only' may not concern the structural engineer, it is not reassuring to custodians of a Grade 1 Listed Building with 1000s of valuable documents and artefacts and less than extensive foundations typical of the period of construction. Confirmation should be provided that an independent technical audit of the BIA has been received and made available on the public website.

The Construction Management Plan is largely generic and leaves some areas blank pending the appointment of contractors. If planning permission were granted I would suggest that a much more detailed and rigorous document is required by condition or legal agreement which recognises the specific concerns at this site and the vulnerability of the site and use at no 48. Specific and detailed measures, monitoring and enforcement with regard to noise, vibration and dust would be required. Given the lack of access to the rear of the site it is not clear how the very large amount of spoil would be removed. Is it all dug by hand and removed through the house? How is any plant got into the rear of the property? Either way there is likely to be very extensive disruption and disturbance at the front of the house as well as at the back.

The proposals appear to show the demolition of existing party walls at the rear and construction of a new party wall. Is it then correct that the applicant has completed Certificate A to the effect that nobody other than the applicant was an owner of any part of the land to which the application relates?

Conclusion

Any harm to a Listed Building needs to be weighed against any public benefit. There is no public benefit in this case. The basement proposals represent an over scale attempt to squeeze maximum floorspace from the site and would contravene numerous of the criteria in Camden's policy. The proposals would harm the special character of the Listed Buildings at both nos. 47 and 48 Doughty Street. No 48 is Grade 1 Listed and is unique in its national and international importance attracting

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visitors from across the world.
Given the lack of access to the rear of the site, the small site, proximity of neighbouring properties and depth and extent of excavation, the basement construction would give rise to unacceptable amenity and logistic impacts which could not be mitigated satisfactorily by planning conditions.
Please keep me informed of any Committee date when this proposal may be considered.

Yours sincerely

John Gardener
