

20 February 2017

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**

**COMMENTS ON BIA AUDIT BY CAMPBELL REITH DATED JANUARY 2017**

This document has recently been added to the application web page and I would be grateful if you would take into account these further comments. I commented on the original application (letter dated 24 April 2016) and on the revised plans on 2 November 2016.

In the BIA Audit two queries remain to be closed out.

Query 5:

The Audit quotes the BIA report as saying that: 'the proposed basement does not go any lower than the current basement.'

**Comment:** This is contradicted by a note on the revised plan no. A-300 Rev D which, regarding the basement, states: 'Existing floor level lowered to match hallway'. Regardless of the finished floor levels, the plans also show a new floor slab which will require further excavation below existing levels. Furthermore, the plans do not show the substantial foundations that will be required on the party wall below the basement level to support the new three storey rear extension.

Taking these three aspects (lower finished floor, new floor slab and foundations for the extension), it is clear that there would be extensive works at a lower level than the existing basement.

The BIA Audit goes on to state: 'It is assumed from this that the proposed basement is not deeper than the foundations/basements to the neighbouring properties.'

**Comment:** Given the first comment above, this cannot be assumed. The opposite assumption is much more likely; that is, the proposed works will be significantly deeper than the foundations/basement at no 48. The implications of this on the structural stability of no 48 must be further assessed.

As far as I am aware there has been no request from the applicant to carry out exploratory works or relevant inspections at no. 48 to establish what the actual position is.

Query 6:

Requests are made for calculations regarding underpinning, construction sequence and temporary works drawings.

**Comment:** It is extremely concerning that the information requested has not been provided given the length of time since the application was made. It illustrates that the detailed work necessary to enable a proper assessment of the impacts of the proposals has not yet been done. This means that

the LPA is not in a position to fully assess the impacts particularly in respect of the highly sensitive neighbouring use at no 48.

This full information is critical in assessing the impacts on the Museum and in particular the business impacts and whether the Museum can viably continue to operate during the works. Therefore this information must be provided, assessed and neighbours given the opportunity to comment before any decision on the application.

It is worth emphasising that the Museum is in the highest category of sensitivity for a number of reasons including its Grade 1 Listed status; the importance of the atmosphere of quiet to its function as a visitor attraction and therefore to its viability and very existence; the sensitivity of the historic documents and artefacts etc particularly to vibration.

Much more work is required from the applicant to demonstrate that this has been properly and fully taken into account. For example, much more site specific work is needed on noise and vibration including what are appropriate levels given the most sensitive receptor at 48, monitoring and mitigation and enforcement. I have already commented on the need for a formally established liaison process through the s106 agreement.

I note that in the recent case at 11 Rosslyn Hill NW5 5UL (2015/7079/P) Camden has rightly recognised that the construction impacts of a basement extension are a material consideration where there is a particularly sensitive neighbouring use. In such cases the highest level of mitigation, detailed information and planning and site specific protocols enforced through a s106 agreement are required. I would suggest that the proposals at 47 Doughty Street require a similar approach.

Yours sincerely

John Gardener