

Kate Phillips
Senior Planning Officer
Regeneration & Planning Development Management
London Borough of Camden
Town Hall
Judd Street
London
WC1H 8ND

20th February 2017

Dear Kate

Planning application ref 2016/1027/P 47 Doughty Street

I am writing further to my letter of 21st December 2016 with regard to the above planning application and on behalf of the Charles Dickens Museum, located at 48-49 Doughty Street.

I note that the Basement Impact Assessment has now been audited by Campbell Reith and that the applicant's consulting engineers have supplied further information. I have several concerns to raise in response to these documents and would be most grateful if you would take my comments into consideration.

The BIA audit notes that the applicant's BIA report "states that the proposed basement does not go any lower than the current basement. It is assumed from this that the proposed basement is not deeper than the foundations/basement to the neighbouring properties. Please confirm maximum differential depths."

However, it is clearly noted on the revised plan no. A-300 Rev D that 'Existing floor level lowered to match hallway'. Plan no. A-350 Rev B shows a new slab floor, which requires further excavation below existing levels, and the proposed new three-storey extension requires substantial foundations along the party wall below basement level. The applicant's consultants have replied, 'Apart from the first couple of hundred millimetres of the garden party wall No. 47/48, the proposed basement extension does not go any lower than the foundations of the basements to the adjoining properties.' This is based on assumption only: there has been no attempt by the applicant to carry out exploratory works or inspections at 48 Doughty Street to establish the actual position.

Notwithstanding the ongoing due diligence with regard to the basement impact, for which I am grateful, I continue to have significant concerns about the proposed demolition of the existing closet wing. As highlighted in my previous letter, the closet wing of 47 Doughty Street is actually built right up against, and overlapping onto, the rear elevation of 48 Doughty Street (see images 1 and 2), the Grade I listed building in which Charles Dickens lived – his only surviving house in London – and which holds the collection of the Charles Dickens Museum.

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Despite the changes to the plans for the basement and new extension, the proposed development at 47 Doughty Street remains extensive and – according to the applicant's Construction Management Plan – would involve major demolition, excavation, percussive piling, and construction, including significant work along the party wall with 48 Doughty Street. According to the documentation submitted by the applicant and his advisers, the works would cause substantial noise, dust, debris, emissions, vibration and other disruption to neighbouring properties. The vibration levels alone, as detailed in my letter of 30th March 2016, would most likely cause significant structural damage to the Museum building and would pose a safety risk to Museum visitors, staff and volunteers. Furthermore, the closet wing forms part of the boundary wall and therefore any demolition would render the garden, which forms part of the Museum's café, unusable (see image 3).

The proposed development would have major construction impacts in any circumstance, but I would ask you to take into consideration the very special nature of the neighbour at 48 Doughty Street – the building and contents of which comprise a museum of international standing and exceptional quality, which has been operating since 1925. The proposed development, if planning permission is granted, would have a profound impact on the Museum's ability to operate. The demolition of the closet wing and subsequent new construction, as well as various excavation and structural works, would make it impossible for us to open to the public while the work is underway.

As a small charity without any public funding to provide a cushion, we must earn – through admission fees and other trading activities – every penny we need to cover the cost of maintaining this Grade 1 listed building and its irreplaceable collection. Therefore any interruption to our daily trading activities presents a real risk to our ongoing viability and the potential loss of a major cultural asset.

The applicant has failed to demonstrate that construction noise and vibration would not harm the amenity of the neighbouring Charles Dickens Museum, and the area generally.

Camden Council recently published its decision on a similar case at 11 Rosslyn Hill NW3 5UL (app ref: 2015/7079/P), a site adjacent to Air Studios. The similarities between that case and 47 Doughty Street are compelling.

In the case of Rosslyn Hill/Air Studios, Camden Council concluded that: 'The applicant has failed to demonstrate that construction noise and vibration would not harm the amenity of the neighbouring recording studio, and the area generally, contrary to policy CS5 (Managing the impact of growth and development) of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 (Managing the impact of development on occupiers and neighbours) and DP28 (Noise and Vibration) of the London Borough of Camden Local Development Framework Development Policies.' I understand that 11 Rosslyn Hill is now the subject of an appeal to the Planning Inspectorate.

In setting out its position to the Inspectorate, Camden Council states: 'The Council considers that the adjacent business, a recording studio, is particularly sensitive to the impacts of noise and vibration from construction and the applicants have failed to adequately demonstrate that conditions or planning obligations would sufficiently protect the business, contrary to the relevant policies and guidance. The Council considers the impact from construction to be a material consideration in this instance.'

The same can be said of the Charles Dickens Museum. The Museum holds the world's largest, 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 up to 300 visitors daily, as well as up to 200 school pupils each week during term time. 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.

I regret that I must maintain my objection to the proposed development at 47 Doughty Street. I would be grateful if you would let me know the date of the Committee meeting in due course.

With best wishes



Dr Cindy Sughrue OBE
Director

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

enc photos attached



Image 1: closet wing of 47 Doughty Street from the garden of the Charles Dickens Museum at 48 Doughty Street.

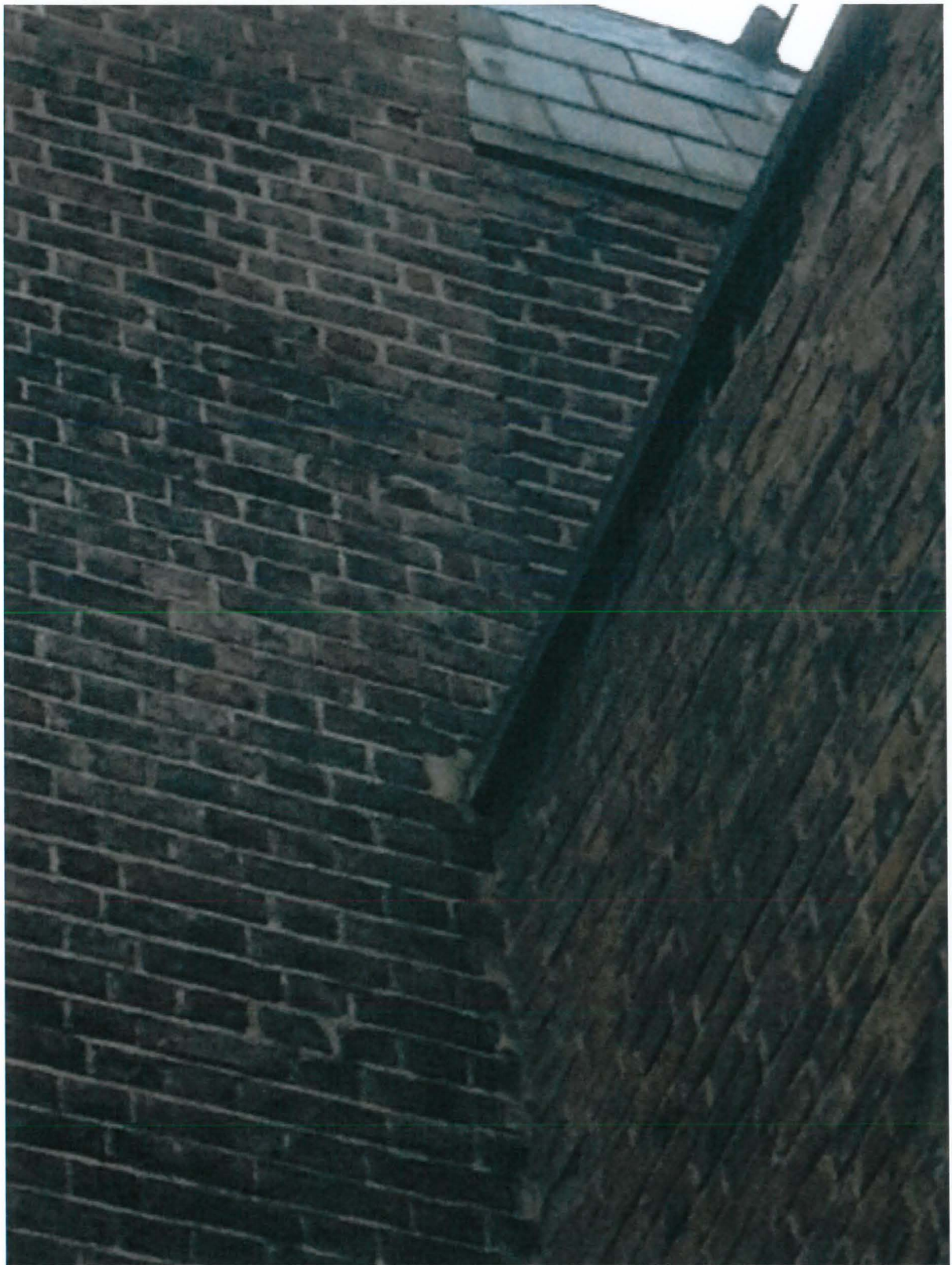


Image 2: detail showing closet wing of 47 Doughty Street overlapping onto the rear elevation of 48 Doughty Street, the Grade I listed home of Charles Dickens.



Closet wing of 47 Doughty Street taken from Charles Dickens Museum garden café.