

# Friends of



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Lambeth Planning,  
For the attention of Miss Lauren Shallcross,  
[planning@lambeth.gov.uk](mailto:planning@lambeth.gov.uk)

Dear Sirs,

**Carnegie Library, Herne Hill Road, SE24 0AG**  
Planning application numbers 16/06270/FUL and 16/06271/LB

## **Introduction**

Friends of Carnegie Library raised objections to the proposed development at the pre-application stage of the Planning process. These were:

- A. The proposed basement excavation is not deep enough for a gym and the proposal from the applicants, GLL, to use the main floor of the building for exercise classes would effectively preclude use for other purposes.
- B. The construction proposed at the rear of the building would effectively destroy a valuable public garden, the Reading and Wildlife Garden created through the hard work of local and other volunteers with funding obtained by the Friends from various sources including the Lottery and Metropolitan Public Gardens Association.

The purpose of this present letter is to reiterate these objections and add two more:

- C. At the pre-application stage the proposals were presented as a gym for people from the local area. From the applications and, in particular, the Transport Assessment it is apparent that the proposed gym and classes are intended to attract customers from outside the locality. In the light of this

additional information the Friends object to the proposals that they are unsuited to the wholly residential area in which the library is located.

- D. The application is lacking in detail and it is therefore impossible to gauge the impact on the interior of this heritage library building which, except for the basement, has remained almost unaltered since it was built 110 years ago.

Below we expand on the objections and demonstrate that approving the proposals would breach Lambeth's Planning Policies in numerous significant respects. But first we think it would be helpful to provide some context by touching on three aspects of the architect's design of the library which would make it extremely difficult to combine use as a library with use as a gym and exercise rooms. These are:

1. The basic layout of the main floor is as a main room, intended for use as a lending library, which gives access to rooms which surround it and is the sole means of access to some of these. This can be clearly seen on the original plan which is attached as Appendix 1. If, as the application indicates, it is intended to terminate the use of the main room as a library an alternative use would have to be found for it which is consistent with it being the access to surrounding rooms. The applicants have not been able to do so and the Friends believe that no one else could do so either. In other words a practical alternative to use of the room as a library does not exist.
2. The design emphasises light and assumes that noise or vibration is not a problem. The internal walls separating the main room from surrounding rooms are thin and glazed so that noisy activities in any one of these is almost equally loud in the others.
3. Noise and, even more so, vibration is readily transmitted through the structure of the building. So, even extensive sound proofing at the expense of adequate daylight would not mitigate the disturbance from vigorous exercise classes involving the participants jumping up and down in unison to a heavy bass beat. This transmission of noise and other vibration through the structure is almost certainly a feature deliberately designed into the building by the architect. A detailed explanation is attached as Appendix 2.

As may be apparent, these are all aspects of the building being designed for the predominantly calm uses associated with a library. The challenge would be to find ways of combining use for a gym and vigorous exercise

with this calm character of a library. It should be apparent from what follows that the applicants have completely failed to rise to this challenge.

In fairness to the applicants and their advisers it is right to mention major constraints under which they are operating. The intention to excavate the basement to the depth now proposed was announced in 2013 by a body set up by councillors and local people were then surveyed in the hope of finding a use for the basement as excavated. The reason for the decision to excavate has never been disclosed. Similarly, Lambeth have for some years been trying unsuccessfully to find an excuse for removing the group of trees near the rear wall of the library. Copy email correspondence dealing with this is attached as Appendix 3. The water ingress referred to was at the front of this large building and not near the trees. Finally, the figures published in the Culture 2020 Report indicate that the budget for the alterations is less than £3 million, which would not cover the cost of enough work to satisfactorily combine a gym with the library.

### **Need for the Library**

A gym is not a substitute for a library. It only provides a very limited range of services to a limited range of customers, who have plenty of alternatives available to them anyway. The library needs to be retained with adequate accommodation and not marginalised as just a token service or optional possibility in a room used for other purposes.

The purposes served by the library prior to closure were those set out in paragraph 2.95 of the Lambeth Local Plan Adopted September 2015 namely:

" In order to become strong, safe, healthy and self-reliant, communities need local spaces that can accommodate a wide range of community activity. This is particularly true in Lambeth, which is home to such diverse groups. Community activity contributes positively to community cohesion and wellbeing and can include active citizenship and volunteering, activities and meeting space for young people, parenting support, projects to prevent social isolation among the elderly and vulnerable and among people recently arrived in the borough, social events, cultural, cross-cultural and inter-generational activity, community group meetings, social enterprise and enterprise start-up, internet access, interest in co-housing and the aspiration for community gardens and local food production. Above all, communities need local spaces that allow informal day-to-day contact and social interaction among their members."

The "informal day-to-day contact and social interaction" cannot be given enough emphasis. This drop-in facility is especially important to elderly local people who were encouraged to overcome the mobility difficulties which inevitably come with age by having a venue nearby where they were welcomed and valued. Similarly, a parent with a young child and

buggy in tow had the opportunity to visit a facility which benefitted the child while providing the opportunity to socialise with other adults. Anyone stressed had the opportunity to visit a calm space. This was especially important to the significant number of autistic people who used the library. For them there was not any alternative without the challenge of travelling considerable distances.

In addition to the drop-in use by individuals and families, the library housed numerous group activities. Indeed, the library manager struggled at times to fit them all in. A list of those activities is attached as Appendix 4. A noticeable feature is that these activities tally with what local people consistently said they wanted in surveys carried out in 2000 and 2014. A copy of the survey from 2000 is attached as Appendix 5. The survey from 2014 has the title Results of the Public Consultation on the Options Appraisal, March 2015 and is available at <http://carnegiehernehill.org.uk/project-documents/>

In contrast to the library providing a broad range of health and wellbeing support for all ages and abilities a gym provides only physical fitness for a restricted range of ages and abilities, and then only if they can afford the fees.

## **Heritage**

The aspects of heritage with which the Friends are directly concerned are what might be described as the intangible ones. We are determined to see the library continue to serve all local people as:

- A genuinely welcoming hub of the local community, with the opportunity to drop-in to socialise, as well as to take part in group activities.
- A reliable source of information and advice.
- The provider of a wide range of learning and health & wellbeing opportunities.

This said, however, we are concerned about the physical features of the building both internally and externally since these do so much to make the library attractive to existing and potential users. In particular the library is pretty well ideal for a 21st Century library and is aesthetically very much an integrated whole which has been little altered over the 110 years since it was built. It is attractively furnished in a way sympathetic to its heritage character and the furnishings are on castors or otherwise easily moved which provides great flexibility.

The heritage nature of the building reinforces the points made below about how specific Planning policies relate to the proposed alterations and use. In this respect it should be noted that the building and its grounds have national Listing and Policy Q20 provides that:

"Development affecting listed buildings will be supported where it would:

- (i) conserve and not harm the significance/special interest;
- (ii) not harm the significance/setting (including views to and from);"

### **North West Facing Elevation**

We think that starting with this elevation, which faces onto Ferndene Road, will provide the easiest way to follow the objections.

The applicants' drawing of this elevation as proposed discloses an extension intended to provide an entrance to the gym. The extension is totally unsympathetic to the building and in itself is not attractive. Policy Q2 provides, amongst other things, "Development will be supported if: (i) visual amenity from adjoining sites and from the public realm is not unacceptably compromised." Visual amenity clearly would be compromised and we submit that this would be unacceptable. The Visual Impact Assessment included in the applications argues that this extension is set back so far that it will only be visible from a section of Ferndene Road and we assume that this meant to make it acceptable. We do not agree but in any event a second argument in the same assessment, that the materials would match those of the building is clearly untenable. The elevation of the extension consists of glazing unlike anything in the building topped by a roof which bears no resemblance to any roof of the building. We submit that the extension should be rejected for not complying with Policy Q2.

Even if this extension could be regarded as complying with a very generous interpretation of Policy Q2 it is clearly in breach of Policy Q5 "Local Distinctiveness" and Q11 dealing with "Building alterations and extensions." Q5 includes:

"(a) The local distinctiveness of Lambeth should be sustained and reinforced through new development.

(b) Proposals will be supported where it is shown that design of development is a response to positive aspects of the local context and historic character in terms of:

- (i) urban block and grain, patterns of space and relationship with other buildings and spaces;
- (ii) built form (bulk, scale, height and massing) including roofscapes;
- (iii) siting, orientation and layout and relationship with other buildings and spaces;
- (iv) materials; and

(v) quality and architectural detailing (including fenestration and articulation)."

And Q11 includes:

"(a) when considering proposals for the alteration or extensions of buildings the council will generally expect proposals:

(i) to have a design which positively responds to the original architecture, roof form, detailing, fenestration (including design, materials and means of opening) of the host building and other locally distinct forms (such as group characteristics); such features should be respected, retained and where necessary on heritage assets authentically reproduced;"

We are unable to find any respect in which the extension would comply with any of these provisions of Policies Q5 and Q11.

Appendix 6 reproduces some photographs of the elevation as it is at present. It will be seen that the area in which the extension is proposed to be built is currently an unattractive van park. This is acceptable because it is needed for the library Home Visit Service for the housebound, which is based in the basement. If, as implied by the applications, that use were to be permanently discontinued then a positive response, required by both policies, would be to improve the appearance of the van park area. If the extension were to be built we submit that it would need to be redesigned to fit the building visually and be brought forward to the front elevation, or set back only slightly from the front elevation. This would cover up more of the van park.

The area in front of the building on this extension has never been attractive. It is mostly hard surfacing with a thin layer of soil in places and even there not much grows. As will be seen from the photographs there is an ugly gas meter attached to the wall. A positive response would be to make some worthwhile use of that area which would conceal the gas meter. A suitably screened refuse storage area or bicycle park would do this nicely. In this connection it should be noted that Policy Q11 stipulates that "the council will generally expect proposals... (ii) to ensure, wherever possible, that...meter boxes...are fully integrated into the building, are not placed on publically-visible elevations and, where integration is not an option, are adequately and robustly screened."

### **Reading and Wildlife Garden**

This garden was a valuable part of the accommodation provided to the public as part of the library and was used for group activities as well as individual reading and relaxing. There is nothing with the same character within several miles. (Areas of Ruskin Park are somewhat similar but these are at the far end of the park from the library.) It needs to be preserved and this is required by the council's Planning policies. Policy EN1 provides that the "council will meet requirements for open space by:

(a) Protecting and maintaining open spaces and their function. Development which would involve the loss of existing public or private open space will not be supported." Exceptions are specified but clearly none of these apply.

Policy Q14 "Development in gardens and on backland sites" is even more specific. It provides:

"(a) The council does not consider gardens to be potential development sites and will resist proposals which would result in loss of biodiversity, soft landscaping/permeable drainage or openness...

(c) Development in rear gardens has the potential to erode the amenity value and habitat value of rear gardens generally. For these reasons new buildings will only be supported where:

(i) a significant proportion (no less than 70 per cent) of the existing garden is retained with the host building."

In contrast to all of this, the proposed development would take up the majority of the garden and reduce it to a strip of minimal practical value, separated from the building.

No justification has been offered for the development on the garden and we submit that the applicants should be required to justify it. It is not at all obvious why an extension for plant would be required when there would be a plant room inside the building anyway or why two bike parks would be needed.

Even if all that construction were necessary it could be located on the van park and the previously mentioned area in front of the Ferndene Road elevation. There would be no need to put it on the garden. Moreover, as previously mentioned, this could be expected to improve the appearance from Ferndene Road.

The groups of trees labelled 2 and 3 on the Tree Protection Plan and referred to in the Introduction merit special mention. These are a great asset to the garden, providing a welcome degree of shade. Policy Q10 includes "(b) Development will not be permitted that would result in the loss of trees of significant amenity...value." Some compelling reason for removing the trees would therefore be needed and none has been shown. Appendix 7 consists of a photograph of the trees and a sketch of what would be a simple way of rearranging the construction in the garden to preserve the trees even if all that construction went ahead. This would also keep the connection between the garden and the building and result in a more usable shaped garden. On no reasonable view could the removal of these trees be justified.

### **Other losses of amenity for the neighbours**

The Traffic Assessment discloses that substantial numbers of gym users will come from outside the area but advises that the effect on parking

should be acceptable because many of those users would travel to and from the gym by train or bus. We cannot believe this. One of the main advantages of using a gym for exercise is that it is indoors and away from the weather. If users travel from a distance we are sure that they will want to do so by car and that there would be additional pressure on the limited parking in the area round the library.

The applicants propose that the gym machines would be in the basement but exercise classes including "higher energised ones" such as "body pump." In other words we can expect that there will often be a group of people jumping up and down to a heavy bass beat. As explained in the Introduction, the building's structure transmits vibration. If the proposals went ahead we should expect significant noise nuisance to the neighbours, especially the occupiers of the flats in the building. The Noise and Vibration Assessment Report included in the application documents relates only to air conditioning plant.

The applicants were originally proposing to open for about 70 hours a week. The application documents propose an increase to 105 hours (6am to 10pm on weekdays and 7.30am to 8pm at weekends) and there would no doubt be further increases if this would make the gym financially viable. Many budget gyms open 24 hours a day and the plans appear to show the automated entry machines needed for this purpose.

Even opening from 6am to 10pm in this wholly residential area to provide a gym for people from outside the locality should not be accepted. In particular we can expect the energised people leaving a gym to cause noise in the surrounding streets.

There might also be a smell from the exhaust of the air conditioning.

### **Physical extent of the change of use**

At first sight the applications appear to be for use as a gym (Use Class D2) in the basement and community use of the ground floor and the single room on the first floor within Class D1. However, the proposed basement excavation is too shallow for a full range of gym uses. It is only 3 metres before fitting out with floor, ceiling and light fixtures. People over 2 metres tall are now quite common and gym users raise their arms in the air. Even much shorter people doing star jumps would strike the ceiling or light fittings. The applicants propose using the ground floor for exercise classes. Their leaflet saying this is attached as Appendix 8. We may infer that other uses requiring more headroom than in the basement, such as weight lifting, would also take place on the ground floor.



The applicants must be assuming that if they have permission for D2 use in the basement Lambeth would not take enforcement action against D2 use of other parts of the building. However, the way the uses have been presented by the applicants would have potentially serious impacts on possible future community D1 use. The ground floor proposed layout plan labels all the ground floor accommodation and the first floor room with an identical use except for some possible options. This implies that all of the rooms would be available for exercise classes and nothing would be reserved for D1 use. The applications as they stand therefore do not make adequate provision for combining the gym with other uses. The best solution if there were to be a gym in the building would be to excavate the basement by another half metre or so to enable it to accommodate all of the gym uses. A second best solution might be to reserve a specific room on the ground floor for D2 use.

In relation to combining uses it should be appreciated that D1 uses would be on sufferance from the applicants and that local organisations do not have the funds needed to pay hire fees to the applicants which would be large enough to yield substantial profits. It would not be appropriate merely to rely on the generosity of the applicants. The extent of D2 use would need to be properly defined.

### **Alterations**

The applications are woefully lacking in detail. Carnegie Library is a heritage building. Internally just as much as externally it is aesthetically a unified whole. It deserves to be treated with respect.

If there were to be an exercise room on the ground floor, the other rooms would obviously need to be protected from the vibration of a class jumping up and down. We assume that a floor would have to be sat on a damper mechanism. Extensive sound insulation, which we expect would cover over attractive internal glazing would no doubt also be needed. These are matters of great significance and definite information should be required before considering the applications. If people were jumping up and down to a heavy bass beat in one ground floor room the others would be rendered unusable in the absence of adequate protection from the vibration and noise.

The applications are definite that air conditioning would be installed but we are not provided with any information about this inside the building. If it were overhead in the gym it would restrict the headroom further. There does not appear ever to have been any information from the applicants about the extent, if any, of air conditioning for the ground floor. It would obviously be needed if exercise classes were taking place there but installing quiet air conditioning in heritage buildings is notoriously difficult. If there were no air conditioning there a lingering

smell of stale sweat could be expected to spread through the ground floor rooms.

We strongly recommend that full details of these and any other alterations be obtained before considering the applications.

### **Ground Floor Layout**

The impracticality of changing the use of the main room from a library was explained in paragraph 1. of the Introduction.

The proposed layout of the ground floor includes inserting a doorway between the landing and the adjoining front room and installing partitioning to make a corridor to the entrance lobby. We cannot see that these works would be justified. They would not solve the problem of crossing the main room. Although they might provide some privacy to the users of the front room this would be at the expense of losing part of the room to the corridor and intervening in the heritage fabric of the building.

Otherwise, the problem of crossing the main room is not addressed. Indeed, the proposals aggravate it by locating the toilets where the kitchen is now.

In any event, the applicants should not be permitted to remove the library or kitchen without providing replacements. These are community assets of considerable value for which an option for the community to install replacements would be a wholly inadequate substitute.

### **Justifying the change of use**

The application documents state several times that the proposed facilities are intended to aid and support the continued use of the building thereby implying that the proposals would be financially viable and support the provision of accommodation for community uses. However, such information as is publicly available strongly suggests the opposite:

- When local people were surveyed by Lambeth and the Carnegie Project Group, set up by councillors, less than 16% of respondents favoured having a gym in the library.
- Gym users are mobile and there is plenty of competition from other gyms and leisure centres in the surrounding area, some of which offer far more facilities than the proposed gym would.
- Carnegie Library is near the border with Southwark and Southwark residents get free gym and swim in their borough's leisure centres all day Friday and after 2pm on Saturdays and Sundays.

- The approved Culture 2020 Report in paragraph 12.4 provides for massive subsidy of the running costs of gyms made by converting libraries. The full amount has not been disclosed but there is mention of a contribution towards it of £1 million, with the balance coming from leisure centre profits which would otherwise go to Lambeth to spend on any of the council's services (paragraph 5.8).

We submit that the applications should not be considered until the applicants have provided evidence from their business planning to support the assertions of aid and support.

A specific concern is that as local authority finances tighten Lambeth will no longer feel able to subsidise the gym. Paragraph 12.4 specifies that the subsidy would only be for an initial transitional period but does not say when the period would expire.

Yours faithfully,

Jeff Doorn,  
Chair of Friends of Carnegie Library