



CARNEGIE COMMUNITY TRUST CIO

c/o Carnegie Library
192 Herne Hill Road
London SE24 0AG

1st December 2016

For the attention of Miss Lauren Shallcross, Case Officer

Development Management
London Borough of Lambeth
Phoenix House
10 Wandsworth Road
London SW8 2LL

Dear Miss Shallcross,

Carnegie Library Herne Hill

Planning Applications 16/06270/FUL and 16/06271/LB: **OBJECTION**

*Retention of the existing library together with the erection of a two storey extension to the south west elevation. Change of use and part excavation of the basement from a library (Use Class D1) to a gym and studio (Use Class D2) and the construction of an external plant compound provided at basement level.
(Town Planning and Listed Building Consent)*

Carnegie Community Trust CIO (CCT) objects to the proposed Change of Use and to the proposed Development at Carnegie Library, on the following grounds.

Proposed Change of Use

1. The proposed Change of Use to a private gym, if allowed, would end the long life of Carnegie Library as 'community premises' and as a public building. On purchasing the land for Carnegie Library in 1903 Lambeth Council covenanted with the vendor to build '*a proper building for a public library and reading room*'. The parties' intention was clear that Carnegie would remain a public building. Moreover it is a listed public building. Since '*the vast majority of listed buildings in Lambeth are residential*' (Local Plan 2015, 10.81) it follows that Carnegie Library is a public heritage asset that is both precious and scarce in Lambeth. The proposed Change of Use should be refused.
2. **Local Plan: 'agreed strategy' for Carnegie.** The proposed Change of Use conflicts with Lambeth's Local Plan 2015 (the statutory development plan for the borough):
 - Support for community facilities: the Executive Summary says this is one of the Plan's guiding principles. A number of 'key elements of infrastructure' are identified, including a programme of borough-wide investment in '*co-operative libraries and community hubs*'.
 - Agreed strategies to deliver that infrastructure are listed at Annex 2. The 'agreed strategy' for Carnegie Library is the 'Carnegie Library/ Hub' Scheme. The 'Need for Scheme' is stated as: '*Redevelopment of historically significant building to deliver improved library service provision, community access, enterprise and other uses*'.

Under the agreed strategy CCT is currently bidding to Lambeth for a Community Asset Transfer of the

building, in order to raise funding for expanded, and greatly needed, community space in an area where Carnegie is the only remaining community space following the sale of St John's Hall, Heron Road.

The proposal for Change of Use would effectively privatise a public building. The gym would be private, with a private entrance and private facilities. Fees would be 'similar' to those levied at the Council's leisure centres; but Carnegie would not be a Council gym. Lambeth confirms that the plan for Carnegie is standalone and unconnected with the current Leisure Contract, expiring in 2022. Carnegie would be leased to GLL for 25 years.

Any surviving community activity would depend on the willingness of GLL in a private capacity to accommodate it.

The proposed Change of Use conflicts with the 'agreed strategy' for Carnegie and should not be supported.

3. **Safeguarding existing community premises.** The proposed Change of Use conflicts with Local Plan Section 7 (Social Infrastructure). This concerns Community spaces, and sets out Policies that are '*intended to facilitate the implementation of agreed strategies for the provision and improvement of community premises*' as listed in Annex 2.

Policy S1 Safeguarding existing community premises

(a) *The council will support and encourage the most effective use of community premises to address different and changing priorities and needs in the borough, in accordance with **agreed strategies** where relevant.*

(b) *Existing community premises... **will be safeguarded unless** it can be demonstrated that either:*

- (i) there is no existing or future need or demand for such uses, including reuse for other community services locally, and adequate alternative accommodation is available to meet the needs of the area; or*
- (ii) replacement facilities are proposed on or off site of the same or better size and quality to serve the needs of the area; or*
- (iii) development of the site/premises for other uses, or with the inclusion of other uses, will enable the delivery of approved strategies for service improvements.*

(c) *Change of use between D1 and D2, and vice versa, will be supported in principle in order to maintain a flexible stock of land and premises for social infrastructure.*

None of the conditions in (b) above is met by the proposed Change of Use:

(i) It **cannot be demonstrated** that 'there is no existing or future need or demand for' community uses or re-uses. There is HUGE need and demand for community space locally, for which Carnegie is ideally situated. Uses include:

- continued library and educational, lifelong learning uses
- schools and pre-school liaison, homework and quiet study
- UK citizenship and language classes; Citizens Advice-type services
- adult social care programmes, reducing loneliness
- community health and welfare programmes
- youth provision: clubs; jobs and career advice, mentoring
- start-up affordable desk space for newly self-employed
- space for meetings and gatherings, both public and private
- space for events and entertainments

(ii) It **cannot be demonstrated** that 'replacement facilities' exist on or off site 'of the same or better size and quality to serve the needs of the area'. What can be shown, by local surveys going all the way back to 2000, is that another gym is neither needed nor wanted by local people.

(iii) Development of the Carnegie building as a further private gym in Herne Hill would **in no way enable** delivery of Lambeth service improvement strategies. On the contrary, the proposed Change of Use **would represent a very serious loss of existing community premises** for service improvement.

Since the Local Plan's agreed strategy for Carnegie is a perfectly workable and sustainable Community solution for the building, the proposed Change of Use is a **totally unwarranted departure** from the Local Plan and should not be supported.

4. **Local Plan: Assets of Community Value.** In January 2016 the Council registered Carnegie Library as an ACV under the Localism Act 2011. Local Plan paragraph 7.10 says that where premises have been registered by the Council as an ACV '*this is likely to be a material consideration in the determination of applications for the site for change of use to non-community related use*'. As the proposed Change of Use to a private gym **would** be 'non-community related' it follows that the building's ACV registration is likely to be a material consideration for this planning application.

Proposed Development: a two-storey building extension, and construction of external plant compound.

5. **Loss of garden amenity.** The proposed Development conflicts with Local Plan Section 10 (Quality of the Built Environment). Carnegie Library is a large detached building but its grounds are relatively small. On three sides, the garden is open to the roads, with perimeter railings. Only the rear garden is secluded, and backs on to the neighbouring houses. This garden, though small, is much-loved 'breathing space' enjoyed by all users of the building, including the residents of the Carnegie flats. The proposed Development seems (from Plans 105B and 106) to take roughly half the garden for new 'Plant Compound' and 'Air Handling Unit' buildings, which would stretch along the entire rear wall of the centre block.

Development on garden land is assessed against Policy Q14 which says at 10.53 '*Front gardens provide a landscaped setting to buildings and an important defensible semi-public space...Rear gardens provide much-needed quiet, private amenity space and are collectively important biodiversity spaces*'.

Policy Q14 Development in gardens and on backland sites:

(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%) of the existing garden is retained with the host building;*
(ii) *it is single storey and subordinate in form;*

...

As the proposed Development would result in far less than 70% of the rear garden being retained with the building, it conflicts with Policy Q14 and should not be supported.

The proposed Development would mean a **serious loss of garden amenity** and conflicts also with Lambeth's SPD 'Building alterations and extensions' which says at para 6.2 '*Gardens are particularly important to the character and appearance of conservation areas, their settings **and the settings of heritage assets generally***'.

6. Heritage building.

Carnegie Library, listed Grade 2, is the jewel in Herne Hill's architectural crown and one of Lambeth's landmark buildings. The proposed development includes construction of an unsympathetic new reception building on the car park, and intrusive plant and machinery buildings in the rear garden.

The proposed reception building is an extension to the Ferndene Road aspect of Carnegie Library. As such an extension, it clearly affects Carnegie Library's character as a listed building of special architectural and historic interest. While it can be considered acceptable conservation practice to make proposals for extensions which contrast in 'architectural language' to listed host buildings, this proposal is banal, generic and crude and the overall effect is to degrade Carnegie Library and its setting.

It is evident that in developing this proposal, minimal consideration, beyond the pragmatic, has been given to the character, setting and architectural significance of Carnegie Library. For example, the proposed elevation drawing GLL_015-111 titled "north west elevation as proposed" seeks to visually represent the proposed extension as a (currently fashionable) "minimal glass box", albeit with a sloping roof. However, the flimsiness of this "glass box" aesthetic is exploded when one looks at drawing GLL_015-107, and notes the proposed "red faced brickwork to match existing". Something solid is required to wrap around the proposed store area, and "red brick to match existing" has been seized upon as convenient contextual shorthand.

The Local Plan (at 2.44) says: '*Heritage assets are exceptionally important across Lambeth. They are our most recognisable landmarks and most cherished places – they contribute in very great part to reinforcing Lambeth's local distinctiveness as part of the wider city.*'

As such Carnegie Library is protected by Lambeth's heritage strategy. Under Policy Q18 Lambeth is preparing a Historic Environment Strategy. Meanwhile (10.69) the Council undertakes through its decision-making '*to use its planning powers to ensure that special regard is paid to sustaining and enhancing the historic environment*' and to follow national guidance to deliver best practice in relation to management and alteration of heritage assets.

Policy Q20 (Statutory listed buildings). Item 10.82 states '*The council will support only the minimum amount of alteration necessary to secure the **optimum viable use** of a listed building*'. There is no evidence that the proposed private gym use is viable, let alone 'the optimum viable' use of this listed building. On the contrary (see 3 above) there is heavy local demand for many other uses and evidence that Herne Hill residents do not want another gym, public or private.

Past works of *internal* alterations and insertions to the Carnegie building were 'intrusive and damaging' and should now be reversed (Conservation Statement). The proposed Development would add inappropriate *external* constructions, further defacing this fine building and its setting. The applicant's Heritage Statement is scant, and the proposal does not pay special regard to 'sustaining and enhancing the historic environment'. It should not be supported.

7. Transport.

Servicing - loss of car park. The proposed new Reception building would consume the car park. Given the size of the Carnegie building as compared with its very small grounds, the car park is absolutely essential off-road space for contractors' service vehicles and other visiting, loading and delivery vehicles, as well as for occasional off-road storage by, for example, event organisers, film crews and the like.

Local Plan Policy T8 (Servicing) provides that: '*(b) Servicing will be expected to be on-site unless demonstrated it can take place on street without affecting highway safety or traffic flow*'.

The proposal to build a Reception block over the car park is in direct conflict with Policy T8 and should accordingly be refused.

Parking. The existing 12-2pm restriction will not deal with gym users arriving by car at all hours of the day and evening.

Yours sincerely

Carol

Carol Boucher

Chair

Carnegie Community Trust CIO

Correspondence to:

email: bouch2@gmail.com

Post: 178 Lowden Road, Herne Hill, SE24 0BT