



Written by CPMG for and on behalf of the Dr Williams's Library Trust

Applicant Address  
Dr Williams's Library  
14 Gordon Square  
Bloomsbury  
London  
WC1H 0AR  
26.03.2020

Planning Application Reference

*2019/5890/P: Erection of 2x rear extensions to accommodate archive storage; various external alterations, including creation of new entrance to south wing, removal of modern extension below access ramp, replacement of external staircases, cleaning of brickwork to rear, installation of additional rainwater pipes, refurbishment of windows, alterations to roof including addition of new dormers and chimney stack repair*

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Dear Kate Henry,

We write for and on behalf of the Dr Williams's Library Trust in response to the email of the 17.03.20 sent on behalf of the Catholic Apostolic Church Trust, owners of the adjacent Cloisters building and the Catholic Apostolic Church of Christ the King.

The adjoining owners were provided with the information informing them of the application in advance. In addition, Dr Wykes (the Director of the Library) and Dr Eaton (lead consultant) held discussions concerning the proposed development on various occasions to discuss the impact of the extension. These were undertaken prior to the application being made in an open and congenial manner.

We noted that Camden Council did provide notification, as a planning notice was prominently placed outside of Dr Williams's Library close to the Cloisters building.

For ease of reference our responses to the five items raised in the e-mail of 17.03.2020, are prefaced by the text of the e-mail.

- 1. Loss of windows on The Cloisters north elevation - there are four windows on the Cloisters Elevation which faces the Library grounds which will need to be completely*

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*blocked up because of the extension being built across them. One window to the top floor Flat 11 can remain in place as it is above the proposed extension flat roof level. The other windows serve:-*

- Flat 1 lobby between lavatory and store*
- Flat 3 shower room*
- Flat 5 shower room for wheelchair bound resident*
- Flat 8 store*

*If these windows are to be blocked up then these rooms will need some means provided to offset for the loss of daylight and ventilation and we would ask that these compensatory facilities be required as a formal condition on any consent granted.*

#### Point 1- Response

This is an issue that the Library Trust has discussed with the representative of the Catholic Apostolic Church Trust. There is every intention and commitment on the part of the Library Trust to appropriately compensate in consequence for any losses, costs and liabilities arising from the obstruction (in whole or in part) of the identified windows and other openings.

The windows identified are secondary windows and are unconnected with the provision of daylight/sunlight to habitable rooms. As such, this is an issue between the Library Trust and the Catholic Apostolic Church Trustees and is out with any other legal assessment of the application proposals.

*2. Effect on windows to light well on The Cloisters north elevation - there is a recessed section on the Cloisters Elevation which faces the Library grounds which has generously sized sash windows serving main access corridors leading to the five Flats in The Cloisters west wing (Flats 1, 3, 5, 8 & 11). The applicant's design respects this and has set out a corresponding recess in the design proposal. Whilst the proposed extension is on the north side of The Cloisters and therefore there is unlikely to be any issues of loss of sunlight, the situation with regard to daylight is less obviously able to be assessed. Unfortunately the submitted 'BRE Daylight and Sunlight Assessment' does not include an assessment at all on the impact of the proposal on the windows referred to and we would respectfully suggest an assessment should be undertaken, especially to include the effect on existing windows in the lower parts of what will become a light well. This study would need to be undertaken and discussed with the Trustees before the current application can be determined.*

#### Point 2 - Response

Similar arguments apply here as to those discussed at 1) above. The windows identified are secondary windows and are unconnected with the provision of daylight/sunlight to habitable rooms.

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These windows are referenced on page 8 of the submitted BRE Daylight and Sunlight Assessment. For ease please see extract below –

*"The residential block to the west of the site has not been assessed as the rooms that overlook the courtyard and may be impacted by the proposed development are store rooms, bathrooms and corridors. The BRE guidelines state that the assessment is only needed for rooms where daylight is required and that "Windows to bathrooms, toilets, storerooms, circulation area and garages need not be analysed."*

On this basis, and in accordance with Camden's Planning Policy A1, the submitted daylight and sunlight report was based on the BRE's Site layout planning for daylight and sunlight: A guide to good practice (the 'BRE guidance'), and as such we consider that the applicant has fully met the requirements of Camden Council's Planning application requirements.

3. *Structural stability – one of the Trustees' main concerns is to ensure the structural stability of the flats is maintained. We are aware of trial hole investigation having been undertaken along The Cloisters north wall and understand that the design of the proposed works will take into account the existing flats foundations and also that the necessary Party Wall procedures will be entered into. A planning condition should be included to ensure that this is all undertaken. We note that the submitted 'structural engineering report' solely relates to work on the existing building. The Design & Access Statement does touch upon foundation design but in outline terms only.*

#### Point 3 – Response

This form of condition is to be fully expected and the Library Trust has no issue with it.

In relation to queries in respect to the planning documents, the package of information submitted is to be read as a whole, which is why each of the reports reference the other. The Structural Engineer's Report is submitted as a supporting document to the Heritage Statement as part of the Listed Building Application. As such it has focused on the alterations to the listed building. The proposed foundation design for the extension is outlined within the Design and Access Statement in general principal. This is based on the level of information available at the time, and is a quite normal level of detail submitted at the planning stage. This will be developed further and agreed with Camden Planning subject to consent being granted.

4. *Construction Management Plan Draft – we note under the section on community liaison that a neighbourhood consultation process is required to be undertaken prior to submission of the CMP first draft and that the Council expects meaningful consultation to have been undertaken. In the submitted answer to CMP point 11 consultation the comment has been included that "Pre construction the client has discussed the project with the neighbours regarding its scope and extent". Whilst the outline design of the extension has been discussed with us, we must advise that there has been no consultation*

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*about details of the works implementation and as such we consider the statement which has been made to be misleading.*

#### Point 4- Response

There is a clear intention (and indeed a necessity) to fully engage with the neighbouring properties in discussing and settling the Construction Management Plan (CMP). This has already formally been highlighted by the Planning Department. The final CMP will be controlled by a Section 106 Agreement with Camden Council, subject to consent being granted.

It is noteworthy that CPMG has had a number of conversations with the Camden Planning department in relation to the Construction Management Plan. The validation of the application was based on a draft CMP being submitted. It will be seen on page six of the submitted 'Construction Management Plan Pro Forma v2.3' the documented route for the CMP was agreed with the Planning Department in that a draft would be submitted with formal community consultation following a contractor being appointed, and planning permission granted. The formal route for submitting CMP in accordance with Camden Council, 'Construction Management Plan Pro Forma v2.3' is agreed, as follows –

- Grant of Planning Permission
- Appointment of Principal Contractor
- Commencement of Community Liaison
- Submission of Draft and finalisation of CMP

On this basis we disagree with the comment "we consider the statement which has been made to be misleading". As a matter of course the Catholic Apostolic Church Trustees will be properly consulted concerning this and the important safeguards it provides as soon as a Contractor has been appointed.

*5. Impact on the setting of the Listed Buildings - whilst the submitted Heritage Statement is extensive we do not think that it has adequately enough considered the impact of the proposed extensions on the adjacent Listed buildings. The Cloisters is Grade 2 listed and Church of Christ the King Grade 1 listed and officers will be aware that a thorough consideration of the impact of the proposal on the setting of these Listed buildings is required.*

#### Point 5- Response

To one side of the Library is a terrace of Georgian style buildings in the ownership of University College London (UCL) and to other is the Cloisters forming part of the Catholic Apostolic Church of Christ the King, which stands at the corner of Gordon Square and Byng Place. To the rear of the site is an area of open space containing a further two-story building in the ownership of the Trust.

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The Cloisters, constructed after the Library, is listed in its own right (Grade 2) and the Catholic Apostolic Church of Christ the King is also listed (Grade 1). Both were built in the period 1850 – 1854 to designs by Raphael Brandon. To Gordon Square it is proposed to make a comparatively small change at pavement level by introducing a matching and symmetrical door in the North wing for pedestrian and disabled access. The Library is built to a strictly symmetrical design and the proposed change is wholly consistent with this design characteristic. Taken as an ensemble of buildings along the Western side of Gordon Square the changes are minor and the change will have a very small, if at all appreciable, impact on this urban composition. It follows therefore that its effect on both the Cloisters and the larger and more remote church will be insignificant.

To the rear, the proposed new archive buildings will it is argued, have no significant impact on the Church of Christ the King. The church is situated with the Cloisters building between it and the Library (Image 1). The proposed new buildings for the Library are lower than the Cloisters building and as there are no proposals to use the roof space of the Library for additional accommodation. There is therefore no prospect of the church, or any other adjacent buildings being overlooked by any aspect of the Library over and above the conditions that prevail at present.



Image 1- Aerial Image showing Church of the King, Cloisters and Dr Williams's Library

The new archive building will abut the Cloisters on the South West boundary. Reference should be made to the points discussed above concerning the discussions and consultations that have taken place between the adjoining owners. From a purely aesthetic perspective it might justifiably be said of the Cloisters that it is a typical case of "Queen Anne front and Mary Anne back". The front of the Cloisters to Gordon Square is a pleasantly worked Gothic Revival façade while the rear presents a purely utilitarian aspect in marked contrast to the Library which is of a consistent design quality to both front and back. Along the boundary wall between the two properties, the Cloisters is simply a cliff of unprepossessing brick work devoid of architectural merit and is such as to be found all over the capital in rear back-land areas (Image 2).



Image 2- Cloisters Boundary Wall



It is because of the quality of the rear of the Library that the proposed extensions have been designed to reflect the symmetrical nature of the existing building. In consequence, the significant additions proposed to the rear have been designed not to compete with the heavily embellished style of the Victorian work but rather to provide a far simpler contrast to reflect the work of the present era. Of critical importance has been the transition from the existing work to the new by introducing two new link enclosures. These will serve to separate the old and new elements of the building and do so with the lightest possible touch.

The roof levels of the proposed new work will be significantly lower than both the existing Library and the Cloisters. The Cloisters is a residential complex attached to the Church and all of its principal habitable rooms are located either facing Gordon Square or to the internal courtyard between it and the Church. It is argued that the setting of the Cloisters will not be compromised by the proposed work as this abuts its most unprepossessing aspect. Viewed from Medawar Walk (which runs behind the range of buildings behind the Western façade of Gordon Square) the new archives will present a visual terminus in a modern and contemporary style. This will be in marked contrast to the present arrangements and this will, it is argued, have no significant impact on the setting of the Cloisters or the Church.

We trust thus this letter addresses the points raised in the e-mail. We remain open to address and further issues as they may arise.

Yours sincerely,

Helen Wood

Architect  
For CPMG Architects Limited

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