

# Alterations and Extensions SPD

## Regulation 18: Consultation Statement April 2019

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## 1. Executive Summary

- 1.1. Lewisham Council has prepared a planning policy document called the Alterations and Extensions Supplementary Planning Document (SPD). The Alterations and Extensions SPD will provide advice and guidance to ensure that the highest design quality is achieved in residential extensions and alterations within the Borough.
- 1.2. This document is the consultation statement responding to the Regulation 18 consultation carried out between 16th August and 27th September 2018. During this stage of formal consultation, the Council sought feedback on the final draft of the SPD.
- 1.3. This document supports the preparation of the Local Plan and has been prepared in accordance with the Council's Statement of Community Involvement (SCI) (July 2006) and the draft replacement SCI approved for consultation purposes by Mayor and Cabinet in January 2018 and the Town and Country Planning (Local Planning) (England) regulations 2012 (as amended).
- 1.4. The consultation statement establishes the following, supported where appropriate by a number of appendices:
  - Who we involved;
  - How they were involved;
  - A summary of main issues raised;
  - Officer responses to issues raised; and
  - Conclusion.
- 1.5. During the consultation, the Council used a number of techniques, namely:
  - Online surveys;
  - Letters or email; and
  - Stakeholder Meetings.
- 1.6. A list of stakeholders that were invited to participate using these techniques can be found in Appendices 1 and 2. These include statutory consultees and local residents. Please note, some individuals may have participated in multiple activities.
- 1.7. Written representations have been considered and deemed to fall into the following categories: addition, deletion and revision. These were individually assessed and were either implemented in the revised document or not. The full schedule of the representations and their assessment can be found in Appendix 5.
- 1.8. In total, 366 comments were received from 8 organisations and 9 individuals; these include 161 additions, 198 revisions and 7 deletions. 210 of these comments were added or revised in the final document and no action was taken for the remaining. Some of the reasons for no action that apply to different comments are:
  - Additional information if required can be found on the Council's website and the Planning Portal;
  - The current statement is clear enough for the purposes of this document;
  - The Council cannot take action towards this;
  - This comment does not reflect the purpose of this SPD which is to provide generic information and guidance on residential extensions. This information is too detailed to serve this purpose;
  - This comment is addressed elsewhere in the document;
  - This is not a planning consideration and cannot be addressed within this SPD;
  - Whilst the comment is noted, the Council holds a different opinion on this topic.

## 2. Introduction

- 2.1. The Council is committed to supporting development that allows everyone in Lewisham the opportunity to make the most of their property in a positive way, not just for them but also for their neighbours and the community as a whole.
- 2.2. Currently there is great local interest in the *don't move - improve* approach and the Council wishes to help residents stay in their properties by accommodating their changing needs.
- 2.3. Well-designed extensions and alterations can increase the amount and quality of accommodation and enhance the appearance of buildings. The improvement and conversion of existing buildings also makes effective use of urban land and makes good environmental sense.
- 2.4. Poorly considered proposals however can cause harm to the amenities and characteristics of our borough. Through carefully considered alterations and extensions, we have the potential to improve and enhance our community to make Lewisham the best place to live, work and learn in London.
- 2.5. The guidance given within this SPD seeks to strengthen the design process and ensure that alterations and extensions meet the highest design standards as required by planning policy.

- 2.6. This SPD aims to:

### **Encourage high quality design**

In the SPD we have set out principles and parameters as a means of assisting applicants to achieve an 'acceptable' standard of design.

### **Help applicants to prepare a successful planning application**

By following the advice in this document, applicants should be able to engage in a clear design process that will help them to achieve a positive planning decision.

- 2.7. This SPD is intended to be a design manual and a working tool. It is intended for frequent reference and will be essential for all charged with preparing or assessing the quality of planning applications for residential alterations and extensions.
- 2.8. The design guide should be read by:
  - Householders.
  - Design professionals, in drawing up proposals.
  - Development management officers, as a material consideration in assessing the suitability of applications.
  - Statutory and non-statutory consultees and the public in commenting on planning applications.
  - The Council, in determining planning applications and in upholding decisions at planning appeals.
- 2.9. The consultation process for Development Plan documents such as this SPD is set out in the Statement of Community Involvement (SCI). It is a legal requirement to undertake the consultation stated in the SCI. The consultation process ran for six weeks and involved:
  - Publishing the SPD and any associated documents on the Council's website
  - Contacting stakeholders and statutory consultees
  - Holding presentations to Local Amenity Groups
  - Provide printed copies to key locations, e.g. libraries.

- 2.10. After the 6 week consultation period, all representations received were taken into consideration and form part of this statement.
- 2.11. Key findings include:
- In total, 366 comments were received from 8 organisations and 9 individuals;
  - These include 161 additions, 198 revisions and 7 deletions.
  - 210 of these comments were added or revised in the final document and no action was taken for the remaining;
  - Several comments related to non-planning matters or were addressed elsewhere in the document;
  - Specific cases were recommended to be added by residents;
  - Several comments formed objections in principle to the content of the SPD when others were supportive of the same topic.
- 2.12. The schedule of representations and the Council's response to each one of them can be found in Appendix 5.

### 3. Who we involved

- 3.1 The National Planning Policy Framework (NPPF, 2019) states that a wide section of the community should be engaged in the preparation of Local Plans, so that as far as possible, they reflect a set of agreed priorities for the sustainable development of the area (paragraph 16(c)).
- 3.2 We, the Local Planning Authority, are required by legislation, Regulation 18(2) of the Town and County Planning (Local Planning) (England) Regulations 2012 to consult:
- Specific consultation bodies such as national agencies and neighbouring planning authorities that they consider may have an interest in the subject of a proposed Local Plan.
  - General consultation bodies such as organisations that represent the interest of different ethnic groups, and
  - Such residents or persons conducting business within the area and from whom representations would be appropriate.
- 3.3 We, the Local Planning Authority, are required by legislation, Regulation 12(a) of the Town and County Planning (Local Planning) (England) Regulations 2012 to prepare a statement setting out:
- The persons the local planning authority consulted when preparing the supplementary planning document;
  - A summary of the main issues raised by those persons; and
  - How those issues have been addressed in the supplementary planning document.
- 3.4 During the consultation period, we invited groups identified below to make representations:
- Existing residents and businesses within the borough
  - Local Amenity Groups
  - Consultees listed on the planning policy database
  - Statutory organisations
- 3.5 A list of general consultation bodies that were consulted is provided in Appendix 1 and includes the statutory organisations, local amenity groups and the consultees listed on the planning policy database. A list of specific consultation bodies that were consulted is provided in Appendix 2.

## 4. How we involved the community

4.1 Consultation was undertaken in accordance with the Council's Statement of Community Involvement (SCI) (July 2006). The SCI establishes the consultation methods used in the preparation of planning policy documents in order to fulfil statutory requirements.

4.2 Consultation was undertaken over a 6-week period between 16th August and 27th September 2018. Consultees were invited to participate via a number of mechanisms, as follows:

- **Notification letters/emails** were sent at the commencement of the engagement process inviting groups and organisations to participate in the engagement process. See Appendix 3;
- **Questionnaire surveys** were available online. Questions were used to gain feedback on the specific chapters of the SPD. See Appendix 4;
- A **presentation** to the Community Group Planning Forum was held on the 8<sup>th</sup> November 2018; that included a brief overview on the status of the Alterations and Extensions SPD, acknowledgement of the helpful comments that were received during the 6 week consultation and that the document would be revised in relation to these;
- **Hard copies** of the draft SPD were placed in the following libraries:
  - Blackheath Village community library service
  - Catford Library
  - Crofton Park community library service
  - The Library at Deptford Lounge
  - Downham Library
  - Forest Hill community library service
  - Grove Park community library service
  - Lewisham Library
  - Manor House community library
  - New Cross community library service
  - Pepys community library service
  - Sydenham community library service
  - Torridon Road community library service

4.3 Stakeholders were informed that they had a number of methods to respond via a written representation or in person and the dates with which consultation responses were required. Details provided were as follows:

- **Online:** <https://consultation.lewisham.gov.uk/planning/spd>
- **Email:** [planningpolicy@lewisham.gov.uk](mailto:planningpolicy@lewisham.gov.uk)
- **Letter:** Planning Policy, London Borough of Lewisham, 3rd Floor, Laurence House, 1 Catford Road, SE64RU
- **In person/verbally:** at stakeholder meeting via note taking

## 5. Feedback Levels and Summary of the Main Issues

- 5.1 Regulation 18 consultation sought representations on the draft Alterations and Extensions SPD.
- 5.2 The following section, and supporting appendices, have been prepared to meet the requirements of the SCI and relevant legislation, Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 which details how reporting back on consultation must be conducted.
- 5.3 This section provides a quantitative assessment of feedback. Appendix 4 identifies the issues raised by stakeholders during the consultation and provides the Council's response to the issues presented. The comments are sorted by the part of the SPD they relate to.
- 5.4 Table 1 below, identifies that a number of engagement activities were used and it should be noted that some individuals may have participated in multiple activities. Table 1 also identifies the level of participation with each activity.

Table 1: Engagement Activities and Participation Levels

Engagement Activity		Participation Levels
Written Representations	Online survey	7 responses received
	Letter or email	10 letters and emails
In person engagement	Presentation to community group planning forum	27 individuals from 25 amenity societies/neighbourhoods attended

- 5.5 The online survey asked 13 questions – please refer to Appendix 4 for full details. The questions seek feedback on whether each chapter is clear and if there are any additional comments. All respondents added comments either relating to specific chapters or to the nature of the document overall. The full details of these can be found in Appendix 5.
- 5.6 The presentation to the Community Group Planning Forum provided an update on all planning matters and included a section on the SPD. Two questions were raised, one relating to the images provided with a request for a more diverse range of architects and the other to monitoring and enforcement which is not directly related to the SPD.
- 5.7 Written representations have been considered and deemed to fall into the following categories: addition, deletion and revision. These were individually assessed and were either implemented in the revised document or not.
- 5.8 In total, 366 comments were received from 8 organisations and 9 individuals; these include 161 additions, 198 revisions and 7 deletions. 210 of these comments were added or revised in the final document and no action was taken for the remaining.
- 5.9 Even though the number of respondents was relatively low, the comments each respondent made were multiple and related to the entire document. The reasons some of them did not form part of the final document are identified below:
- Additional information if required can be found on the Council's website and the Planning Portal.
  - The current statement is clear enough for the purposes of this document.
  - The Council cannot take action towards this.



- This comment does not reflect the purpose of this SPD which is to provide generic information and guidance on residential extensions. This information is too detailed to serve this purpose.
- This comment is addressed elsewhere in the document.
- This is not a planning consideration and cannot be addressed within this SPD.
- Whilst the comment is noted, the Council holds a different opinion on this topic.

5.10 A detailed schedule of all the comments received and the Council's response can be found in Appendix 5.

5.11 There are sections of the document that were almost entirely revised following consultation as it was evident that more clarity was required. These sections are:

5.11.1 Basements: the section was re-written to be clearer to the intended user and to provide additional information, like technical matters. It was also re-organised under headings to make it more user friendly and was moved to the end of the chapter to allow for more space for the final layout.

5.11.2 Chapter 3 was re-structured to be more comprehensive.

5.11.3 Chapter 4: the bullet points under each heading, i.e. rear extensions, side extensions, etc, were re-organised to lead from key information like dimensions to other matters like access.

5.11.4 Detached outbuildings: this section was moved from Chapter 4 (Extensions) to Chapter 6 (Other alterations) as it was better fitted under alterations.

5.11.5 Additional information was added on solar panels and equipment as requested during the consultation process.

5.11.6 Mansard roof extensions: the guidelines were amended to reflect comments received towards more flexibility.

5.11.7 Hip to gable extensions: the guidelines were amended to reflect comments received towards more flexibility.

5.12 Overall, several photographic examples were replaced following concerns that the examples given were not local.

## 6. Conclusion

- 6.1. Regulation 18 Consultation was carried out in accordance with the Council's Statement of Community Involvement (SCI) (July 2006), draft replacement SCI (January 2018) and the Town and Country Planning (Local Planning) (England) regulations 2012 (as amended).
- 6.2. All representations (letters, emails, survey responses, and focus group meetings) have been recorded. This consultation statement serves as a record of how consultation was conducted, with whom it was conducted, what the main issues were and how these issues are influencing the development of the Alterations and Extensions SPD.
- 6.3. Even though the number of respondents was limited, there was a significant response to this consultation in terms of the number of comments which were received from statutory consultees, amenity groups, professionals and residents from across the borough.
- 6.4. Taking account of comments received, the SPD was revised to reflect the concerns raised by the stakeholders in the cases where these did not conflict with the Council's principles.

## Appendix 1: General and Other Consultees

The Government has defined General Consultation Bodies as voluntary bodies some or all of whose activities benefit any part of the authority's area and other bodies who represent, in the authority's area, the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and business interests.

The Lewisham Planning Policy database contains over 1500 groups, organisations and companies including following categories. Consultation notices were sent to these bodies alongside individuals who have signed up to the database.

- Advice and information groups
- Amenity groups
- Architects, planners and other professionals
- Black and Minority Ethnic Groups
- Builders
- Community groups
- Conservation and heritage groups
- Developers
- Disability groups
- Education/children/young people's groups
- Elderly groups
- Employment/business interests
- Environmental and ecology groups
- Faith groups
- Health organisations including NHS Trusts
- House builders
- Housing associations
- Landowners
- Police and other emergency services
- Political parties
- Regeneration groups and partnerships
- Rivers and riverside interest groups
- Shopkeepers
- Sport and leisure groups
- Statutory consultees
- Tenants and residents' associations
- Town centre partnerships
- Transport groups
- Utility companies
- Women's groups
- Youth Groups

## Appendix 2: Specific Consultees

The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended) defines the following organisations as 'specific consultation bodies'. The following bodies were consulted as part of the Regulation 18 consultation.

- London Fire Brigade
- Lewisham Clinical Commissioning Group
- Metropolitan Police
- Deputy Director Public Health
- Telefonica
- Three
- British Telecommunications
- Marine Management Organisation
- Natural England
- Office of Rail and Road
- Mayor's Office for Policing and Crime
- SELCHP
- Transport for London (TfL)
- Greater London Authority (GLA)
- Environment Agency
- London Borough of Bromley
- London Borough of Croydon
- London Borough of Lambeth
- London Borough of Southwark
- Royal Borough of Greenwich
- London Borough of Tower Hamlets
- London Borough of Bexley
- London Enterprise Panel
- Historic England
- UK Power Networks
- City Fibre
- Arquiva
- National Grid
- Hyperoptic
- Southern Gas Networks
- Thames Water
- Network Rail
- Sport England
- Coal authority
- Crown Estates

## Appendix 3: Notification Letter/email

Dear Sir/Madam,

### Consultation on Alterations and Extensions Supplementary Planning Document

The London Borough of Lewisham is consulting on the new Alterations and Extensions SPD (Supplementary Planning Document) for a 6 week period until **Thursday 27 September**.

This SPD provides advice and guidance on the implementation of policies and proposals contained in Lewisham's development plan. SPDs form part of the Local Development Framework (LDF).

We want to ensure that the highest design quality is achieved in residential extensions and alterations within the Borough of Lewisham. To create a high quality proposal the design process must be carefully considered from the outset.

Lewisham Residents are encouraged to feedback and comment on the Alterations and Extension SPD which seeks to strengthen the design process and ensure that alterations and extensions meet the highest design standards as required by planning policy.

Your feedback will be taken into consideration when shaping the final document.

Please read the Alterations and Extensions SPD document before completing the survey which can be found by following the link: [https://consultation.lewisham.gov.uk/planning/spd/user\\_uploads/20171130\\_residesignstandard\\_draft\\_ds\\_low-2.pdf](https://consultation.lewisham.gov.uk/planning/spd/user_uploads/20171130_residesignstandard_draft_ds_low-2.pdf)

Representations can be made by e-mail to [urbandesign@lewisham.gov.uk](mailto:urbandesign@lewisham.gov.uk) , by post at the address below, or online via the Council's consultation portal <https://consultation.lewisham.gov.uk/planning/spd/>

If you have any further questions please do not hesitate to contact [urbandesign@lewisham.gov.uk](mailto:urbandesign@lewisham.gov.uk).

Yours Sincerely

Strategic Planning  
Resources and Regeneration Directorate  
2<sup>nd</sup> Floor Civic Suite  
Catford  
London  
SE6 4RU

## Appendix 4: Questionnaire – online survey

Question 1: Is the Introduction section clear?

Question 2: Do you have any comments about the Introduction section? Please write your comments in the box below.

Question 3: Is the Context section clear?

Question 4: Do you have any comments about the Context section? Please write your comments in the box below.

Question 5: Is the General Principles section clear?

Question 6: Do you have any comments about the General Principles section? Please write your comments in the box below.

Question 7: Is the Guidance on Extensions section clear?

Question 8: Do you have any comments about the Guidance on Extensions section? Please write your comments in the box below.

Question 9: Is the Guidance on Roof Alterations section clear?

Question 10: Do you have any comments about the Guidance on Roof Alterations section? Please write your comments in the box below.

Question 11: Is the Other Alterations and Considerations section clear?

Question 12: Do you have any comments about the Guidance on Roof Alterations section? Please write your comments in the box below.

Question 13: Do you have any other comments about the Alterations and Extensions Supplementary Planning Document? - Please write your comments in the box below.

The answers to the online survey are incorporated in the table in Appendix 5: Schedule of responses.

## Appendix 5: Schedule of responses

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
LBL Conservation	1	Front Cover	bottom left hand picture inappropriate			X	Make Change	
LBL Development Management	1	Front cover	Bottom right photo - appropriate?			X	Make change	
LBL Development Management	4	1.00	would we allow a side infill extension to this height on the boundary			X	Make change	
Brockley society	4	1.00	covering photo - state source and location of the image and confirm if it is local	X			Make change	
Brockley society	4	1.2.1	Comment on the legal status of SPDs needed, ie as part of the Local Plan process to accord with para 153 of the NPPF as per Regulations 11 to 16 of the T&CP (Local Planning) (England) Regulations 2012.	X			Make Change	
CitizenSpace	5	1.00	There is a considerable amount of "infill" as a result of bombing in WW2 where the newer buildings are out of character with those surrounding them. There needs to be more context about how these newer building will be viewed for planning purposes when, despite meeting requirements, the "enhancement" in fact makes them more of an outlier in the neighbourhood. Should these properties be reigned back so they are more harmonious with their surroundings?			X	No Action	This comment would mean that the Council supports pastiche architecture. It is made clear elsewhere in the document that this is not the case.
Blackheath Society	6	1.00	We would like to see the inclusion of a section on 'How the SPD is to be used'. This should emphasize the expectation that the guidance and principles contained in it will be followed. It is recognized that guidance of this kind cannot cover all potential designs and schemes but it is important: a) that the principles set out in the	X			No Action	This comment is addressed elsewhere in the document.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			document should be closely adhered to; and b) that significant departures from the guidance and principles will be considered only in exceptional circumstances.					
Brockley Society	8		Covering photo - state location as Albury Street	X			Make Change	
Historic England	9	2.00	We would suggest that section 2 (Context) would be an appropriate place to introduce a reference to relevant Conservation Area Appraisals and Management Plans. These documents are likely to contain helpful background and pointers to potential applicants in terms of what is significant about their conservation area and what would be regarded as development that would enhance its appearance. Similarly, signposting readers to the relevant policies in the Borough's Local Plan dealing with conservation areas would be helpful.	X			Make Change	Additional information on the Council's conservation areas and their respective appraisals can be found on the Council's website. There is no intention of providing links to the website as these can change.
LBL Conservation	9	2.2.2	The Primrose, a ship built in Deptford in 1551, sailed from Deptford in 1562 on what was to become the first triangular slave trade voyage. What is this? No explanation here. Perhaps this statement needs a slant as we simply say it was important...	X			No Action	The sentence relates to the context.
CitizenSpace	9	2.00	More thought needs to be given to very modern buildings in the Borough and how they might be "developed" over time. A view of "the future" for Lewisham buildings would be not only useful but also start a debate about the issue which is sadly lacking when one looks at the "style" of modern blocks being built.			X	No Action	This comment does not reflect the purpose of this SPD which is to provide generic information and guidance on residential extensions.



ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
LBL Tree Officer	9	2.2	add - the significance of the Great North Wood in the area for ship building and other uses. The main canopy species are oak and hornbeam and Lewisham's mace has decorative spirals of oak leaves and acorns (see image). eg The Great North Wood once stretched from Croydon in the south to Deptford near the Thames in the north. Trees such as sessile oak and hornbeam dominated the Wood. Throughout the Middle Ages it had a strong ownership by local people and was managed for timber (including ship building and housing), charcoal, tannin (for Bermondsey's leather making industries), as well as firewood and fencing such as hurdles. The Industrial Revolution and the enclosure Acts from the late C18th onwards led to the Great North Wood losing its economic validity and much was partitioned and sold off for arable use and housing development. The Great North Wood is now restricted to parts of the Sydenham Ridge with remnants of the old Great North Wood in Lewisham at High Level Drive/Sydenham Hill and New Cross Gate Nature Reserve.	X			No Action	This information is too specific for this document.
LBL Tree Officer	9	2.2	Add Garden plot sizes - relevance of setting of Villas and character of housing areas	X			No Action	This information is too specific for this document.
LBL Tree Officer	9	2.2	Add conservation areas - importance of trees to character, visual amenity and setting of buildings in	X			No Action	This information is too specific for this document.
Blackheath Society	9	2.2.1	Delete 'of Watling Street'			X	Make change	
LBL Conservation	9	2.2.1	The Domesday Book of 1086 records eleven mills along the Ravensbourne River. Another influence on settlement was Watling Street			X	Make Change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			which was a key historic route of Watling Street from London to Canterbury and on to Hastings which is now the A21.					
LBL Conservation	9	2.2.3	The Lewisham area was primarily farmland as it was well drained and fertile, whilst being both arable and pasture.	X			Make Change	
LBL Conservation	9	2.2.4	This trend began in the 16th century when merchants and wealthy artisans moved to country houses outside London. Prestigious brick houses were built in Sydenham, Lewisham, Deptford and Blackheath, some of which still survive.	X			Make Change	
LBL Tree Officer	9	2.2	Add History of Lewisham's Parks - importance to character of an areas development of eg Hilly Fields, Blythe Hill, Telegraph Hill and Upper T Hill Park, Downham, Park Manor Park, squares.	X			No Action	This is addressed elsewhere in the document.
Brockley Society	10	2.2.7	paras 2.2.7 to 2.2.10 - mention development was also linked to the introduction of gas and water mains as well as sewers - see John Coulter's Lewisham History & Guide, 1994	X			No Action	This information is too specific for this document.
Blackheath Society	10	2.2.10	Comma after 'park'			X	Make change	
Blackheath Society	10	2.2.11	Delete 'which were'			X	Make change	
Blackheath Society	10	2.2.7	Replace 'lead' with 'led'. What are 'aid commuters'?			X	Make change	
Blackheath Society	10	2.2.8	Replace 'following being' with 'having been'. Replace 'station' with 'two stations'			X	Make change	
Blackheath Society	10	2.2.9	Replace 'The railway line branches' with 'The railway lines branch'			X	Make change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
Brockley Society	11		Add key references, eg local books by John Coulter + Jess Steele's Turning the Tide: A History of Everyday Deptford	X			No Action	This document is a planning document and there is no requirement for these references to be added.
LBL Conservation	11	2.2.13	Add: The borough was heavily bombed in the Second World War, especially around the docks, former naval yards on the Thames and Lewisham town centre. The GLC and Lewisham Council led on housing redevelopment through the 50s-70s, employing low rise flat blocks , towers (e.g. Lewisham Park Towers) and high rise interconnected slab blocks (e.g. Pepys Estate which created new street layouts and landmarks.	X			Make Change	
Conibere Phillips Architects	12	2.3.2	2.3.2 The assertion here seems dubious. Given Old London Bridge was built completed in 1209 it is safe to say that houses would have existed before then but if not, wouldn't have followed long after. Certainly long before 'late 17 <sup>th</sup> century'. Perhaps the intention was to say that they are among the oldest surviving houses in South London?			X	No Action	This comment repeats the information already in place within the document.
Blackheath Society	12	2.3.3	Delete 'who built'			X	Make Change	
LBL Conservation	12	2.3.3	Georgian housing is typified by uniformity and symmetry, with careful attention to proportion, both in the overall arrangement and in the detail. Properties which have survived from this period include the early 18th century terrace in Albury Street, Deptford and houses on Eliot Place at Blackheath. Following the Enclosure Act in 1810 large new areas of land came into development such as at Deptford New Town	X			Make Change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			(1805-1840) and Lee New Town, which had formal terraces of houses laid out on a uniform grid with a range of house types and sizes. . Forest Hill also had its origins in this period and its name came into use with the development of fifteen large houses on high ground on the edge of Sydenham Common.					
Blackheath Society	13	2.3.6	Does 'Upper Norwood' mean Crystal Palace. If so, say so.			X	No Action	The sentence relates to the context.
Brockley Society	13	2.3.8	Para 2.3.8 - include Brookmill Road CA artisan dwellings of 1850s by Jonathan Lucas	X			No Action	This comment does not reflect the purpose of this SPD which is to provide generic information and guidance on residential extensions. This information is too detailed to serve this purpose.
CitizenSpace	13	2.3.8	2.3.8 includes the Corbett Estate which is good and support our eventual neighbourhood plan, though the Forster Estate isn't included which is significant in size and character.	X			No Action	This comment does not reflect the purpose of this SPD which is to provide generic information and guidance on residential extensions. This information is too detailed to serve this purpose.
Blackheath Society	13	2.3.7	Replace 'tutrets' with 'turrets'			X	Make change	
Brockley Society	13	2.3.7	Para 2.3.7 - mention Loampit Hill as the historical source of local bricks in Brockley	X			Make Change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
LBL Conservation	13	2.3.5	style, and placed the architectural importance on the group or terrace rather than the individual house.	X			Make Change	
LBL Conservation	13	2.3.7	Larger houses were often grand	X			Make Change	
LBL Conservation	13	2.3.8	Vicars Hill in Ladywell (1880) and Jew's Walk in Sydenham are notable examples from this period.	X			Make change	
Blackheath Society	14	2.3.12	Replace 'slender sections' with 'with slender sections,'			X	Make change	
LBL Conservation	14	2.3.10	Development in the Edwardian period often started with a street layout which was then built out by different developers.	X			Make Change	
LBL Conservation	15	2.3.16	Amongst the more daring projects was the Pepys Estate at Deptford, built by the LCC/GLC in 1963-66 on former Royal Navy Yard.	X			Make Change	
Blackheath Society	16	2.00	It would be helpful to provide links in Section 2.4 to the list of Conservation Areas on the Lewisham website. The section could also usefully flag the points made more fully later on in the document about the more onerous restrictions on development in Conservation Areas, including where Article 4 conditions exist, again with links to the relevant sections of the Lewisham website.	X			No Action	Additional information on the Council's conservation areas and their respective appraisals can be found on the Council's website. There is no intention of providing links to the website as these can change.
Brockley Society	16	2.4	section 2.4 Conservation Areas - include references to Article 4 protection & give list of Amenity Societies as local information sources.	X			No Action	Additional information on the Council's conservation areas and their respective appraisals can be found on the Council's website. There is no intention of providing

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE
							links to the website as these can change.
Conibere Phillips Architects	16	2.4.6	2.4.6: Starts by discussing how building functions have become obsolete and then only zeros in on visual issues. Surely resolving the fundamental functional issues with much of the building stock is the absolutely priority? There is precious little acknowledgement of this fact throughout the whole SPD, other than high level statements in the foreword and brief mentions such as this that much of our building stock is fundamentally not fit for purpose or substantially sub-standard.	X			No Action  Whilst the comment is noted, the Council holds a different opinion on this topic.
Blackheath Society	16	2.4.1	Replace 'larger' with 'large'			X	Make change
Conibere Phillips Architects	16	2.4.3	2.4.3: presumption towards conservation. How does this relate to the foreword statement "the council is committed to supporting development in Lewisham the opportunity to make the most of their property in a positive way, not just for them, but for their neighbours and the community as a whole"			X	Make Change
LBL Conservation	16	2.4.1	Lewisham has 27 conservation areas. Some are larger and complex, such as Blackheath, whereas others are small and cohesive such as Mercia Grove, Lewisham. Nearly all are predominantly residential, but commercial and retail uses animate centres in Blackheath, Deptford High Street and Forest Hill. Deptford	X			Make Change

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			Creekside is the only CA which is characterised chiefly by its industrial uses.					
LBL Conservation	16	2.4.2	Density and grain of development within the Borough heavily influences an area's character and environment. In the north of the borough, in places like Deptford Wharf and New Cross, there is a wide variety of block sizes which create a mixed urban grain. In the south, block sizes tend to be uniform and a less varied urban grain can be found.	X			Make change	
LBL Conservation	16	2.4.3	The basic presumption with all heritage assets (conservation areas, statutory listed buildings, locally listed buildings, registered landscapes, etc.) is to preserve what is identified as being of particular significance. . When assessing development affecting designated heritage assets, the Council has a duty to pay 'special regard' to preserving or enhancing their special interest.	X			Make Change	
LBL Urban Design	17	2.4.7 Fig. 2.11	Conservation Areas map - I find the green colour confusing.			X	Make Change	
Brockley Society	18		cover photo - state location	X			Make Change	
Blackheath Society	19	3.00	This section aims to set out general principles. It should be made clear that there is an expectation that these principles should, in general, be adhered to and that significant deviations from them will be permitted only in exceptional circumstances.	X			No Action	This comment is addressed elsewhere in the document.

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Blackheath Society	19	3.00	Paragraphs 3.2.2 and 3.2.4 refer to Permitted Development. The points made in these paragraphs are well made but current practice does not always seem to conform to these. In reality we observe very substantial and inappropriate developments involving buildings which are locally listed and/or in Conservation Areas under the banner of Permitted Development and apparently with the acquiescence of planning officers.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Conibere Phillips Architects	19	3.2.1	3.2.1: To meet the aim set out in para 1.3.1, Lewisham must be doing everything possible to encourage residents to participate in the planning process. PD extensions are almost entirely terrible and significantly harm our built environment.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Conibere Phillips Architects	19	3.2.6	3.2.6: perhaps the guidance would be good guidance but it is impossible to ignore the futile nature of the whole endeavour until people are incentivised to go the planning route.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Blackheath Society	19	3.00	In places the Section goes somewhat beyond general principles and might usefully be re-titled 'General principles and good practice'			X	Make change	
Brockley Society	19	3.2.6	para 3.2.6 - not just 'this SPD' - include Brockley CA SPD			X	Make Change	
LBL Urban Design	19	3.2.3	change from: Flats, houses converted into flats, maisonettes and listed buildings do not have permitted development rights... to: Flats, houses converted into flats,			X	Make change	



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			maisonettes and listed buildings may not have the relevant permitted development rights...					
CitizenSpace	19	3.2.7	3.2.7 regarding Land Development Certificate would benefit from Council suggesting or implying they would prefer people getting these in the retention of the character to make it a bit stronger. It just sees incidental and no need to get one. In the Corbett Neighbourhood Plan could people be required to get one?			X	Make change	
Blackheath Society	19	3.00	It should be made clear early on in this section (eg 3.1.1) that even matters which may appear minor (crossovers, trees) may require planning permission, especially in Conservation Areas.	X			Make change	
CitizenSpace	20	3.3.3	3.3.3 - does this apply to non-listed buildings and areas/buildings of particular interest	X			No Action	The sentence this comment relates to, is very clear in the document.
Brockley Society	20	3.3.7	para 3.3.7 - obscure vs translucent needs definition re opacity and extent of being opaque (nb experience at 165 Upper Brockley Road)	X			No Action	This comment does not reflect the purpose of this SPD which is to provide generic information and guidance on residential extensions. This information is too detailed to serve this purpose.
CitizenSpace	20	3.3.4	3.3.4 - does this include Lime Trees in Corbett Estate	X			No Action	This comment does not reflect the purpose of this SPD which is to provide generic information and guidance on residential extensions. This information is too

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE
							detailed to serve this purpose.
Brockley Society	20	3.3.2	para 3.3.2 - applications must include reference to latest T&CP (GPD) (England) Order 2015 (as amended) re latest permitted development changes et al			X	No Action This comment is addressed elsewhere in the document.
CitizenSpace	20	3.3.7	3.3.7 - loft conversions cause high levels of shadow	X			No Action This comment is addressed elsewhere in the document.
Conibere Phillips Architects	20	3.3.7	3.3.7: There is a significant loneliness problem in this country. Part of it stems from housing being designed in such a way as to avoid neighbourly interactions. Part of this is the bizarre and nonsensical planning rules around overlooking. Many of the most liked and highest value areas of cities around the world have windows that would be considered to be an overlooking problem if proposed now. If you look abroad, for example in Montreal, many town-houses and flats within townhouse like buildings, have large balconies that run down the sides of the 'rear additions'. This creates wonderful social interactions and cohesion. As a body that is responsible for social care and health within the borough, issues such as this must be considered in a coherent and holistic way. We have had balconies 'overlooking' public highways resisted by Lewisham. This is the height of bizarre application of policy. If there is one thing that could single handily improve our	X			No Action Whilst the comment is noted, the Council holds a different opinion on this topic.

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			streetscape, crime and general sense of safety would be more people inhabiting the street.				
Blackheath Society	20	3.3.5	3.3.5 refers to the risk to 'protected trees'. Given the importance of trees in the area it is not, in our view, only the impact on protected trees that should be considered but the potential implications of development for <i>all</i> trees. The references to trees here and later (in Section 6) should be amplified and strengthened to reflect this			X	Make change
Blackheath Society	20	3.3.6	'Context' does not seem to be the right word. 'Area' instead?			X	Make change
Conibere Phillips Architects	20	3.3.2	3.3.2: Mentions various things that should be considered. Of course they should be considered but it should be clarified to note that mimicry is not required. Good design will consider all these things (agreed) but many people will read this as a requirement to deliver pastiche.	X			Make Change
Woodland Trust	20	3.3.5	I suggest an additional paragraph after your 3.3.5: "Where the placement of an alteration or extension is likely to result in the loss or damage to a significant tree, either in the applicant's garden or within a neighbouring property, a suitable design solution that retains the tree(s) should be found." I would also	X			Make change

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			recommend specific reference to BS 5837: 2012 Trees in relation to design, demolition and construction.					
Blackheath Society	21	3.4.2	Is this really the definition? It seems a bit garbled.			X	No Action	The definition was checked and is correct.
Brockley Society	21	3.4.2	para 3.4.2 - add ref to Prescription Act 1832 quive	X			No Action	This comment does not reflect the purpose of this SPD which is to provide generic information and guidance on residential extensions. This information is too detailed to serve this purpose.
Brockley Society	21	3.5.4	para 3.5.4 - provide drawings/photos as 3.3.3 above	X			No Action	This guidance is generic and we cannot provide diagrams.
Brockley Society	21	3.4.6	para 3.4.6 - spell out that compliance with Building Regulations Part M is needed re Disability Access			X	No Action	This is not a planning consideration and cannot be addressed within this SPD.
Brockley Society	21	3.4.3	- para 3.4.3 - encourage full ownership statements to be made on applications, ie to distinguish between leaseholders, freeholders and frontager rights to mews			X	No Action	This is not a planning consideration and cannot be addressed within this SPD.
Conibere Phillips Architects	21	3.4.2	3.4.2: It is (bizarre I know) 'Rights of Light' not 'Rights to Light'. Strange wording but that's the way it is.			X	No Action	This sentence is correct.

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CitizenSpace	21	3.4.6	3.4.6 should reference Approved Inspectors as an alternative to Council's Building Control service.			X	Make Change	We cannot refer to specific inspectors; however a reference to the Council's Building Control service has been added to provide this information.
Brockley Society	21	3.5.7	para 3.5.7 - correct BRE ref to 2011 and not 1991 and add report ref as BR 209	X		X	Make Change	
Brockley Society	21	3.4.4	para 3.4.4 - correctly name Party Wall Act as Party Wall, etc Act, 1996			X	Make Change	
CitizenSpace	22	3.5.1	3.5.1 - refer readers to 4.2.3 where the dimensions are	x			No Action	4.2.3 relates to rear single storey extensions only when 3.5.1 relates to generic principles.
Conibere Phillips Architects	22	3.5.1	3.5.1: Must is a very strong statement for something that is most definitely not 100% true. If the existing building is extremely poor (for whatever reason) it could be entirely reasonable for the extension to become the dominant part of the composition. Similarly if the existing building is peculiarly small and underutilising the site. Statements such as this betray a poor appreciation for the complexity of the situations in hand.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Conibere Phillips Architects	22	3.5.4	3.5.4: too often amenity of a un-used side return alleyway for a neighbour is used as a reason for highly compromising an extension. When space standards require 2.5m floor to ceiling heights, a neighbours amenity value of a currently poorly used space / poor quality space shouldn't result in building of yet more compromised accommodation. The difference			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

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			of 200-300mm will not make a noticeable difference to the neighbour but would be a huge difference to an internal space in an extension.					
CitizenSpace	22	3.5.8	3.5.8 suggests these 'tests' must be included with a planning application. They might be useful but it is assumed that they are not essential and failure to provide would not be a reason to invalidate.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Blackheath Society	22	3.5.3	The drafting of 3.5.3 needs attention. It suggests that if an extension replicates the original building, the works need to be 'carried out to a very high quality'. We agree but this stipulation should apply to all works, not just where the original building is replicated.			X	Make Change	
LBL Development Management	22	3.5.8	do we think the 45 and 25 degree guides are also congruent with a general threshold for overbearing impact?	X			Make change	
Brockley Society	23	3.5.8	para 3.5.8 - add ref to Basements at p39	X			No Action	These are generic principles applicable to all alterations.
Conibere Phillips Architects	23	3.2.10 3.5.11	3.5.10 & 3.5.11: The diagram is a bit bizarre for the 25° rule. While the section diagram doesn't encroach on the 25° line, the existing building already does. Surely in this instance, the line should be drawn from the eaves of the existing buildings to the centre of the window because there is no loss of access of visibility to the sky until the extension encroaches beyond this eaves to centre of window line.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

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LBL Development Management	23	3.5.9	Should this be a guide, rather than rule?			X	Make Change	
Blackheath Society	24	3.5.12	We have a similar point on para 3.5.12. All materials used for extensions and alterations should be of appropriate and high quality, especially in Conservation Areas – not just in the cases noted where the original building is being matched or the design is 'contrary and modern'. The point is that in all cases, materials should be of high quality and should harmonize with the existing, even where the style of the new building is different.			X	No Action	The sentence is already clear in the document, using "either way" to cover both cases.
Brockley Society	24	3.6.3	para 3.6.3 - add need to consult local Amenity Societies for local information	X			No Action	This comment is addressed elsewhere in the document.
Blackheath Society	24	3.5.12	Why 'modern'?			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
CitizenSpace	24	3.5.12	3.5.12 use of the word 'contrary' has negative implications. It is more typical to describe 'contrasting' materials in this context.			X	Make Change	
CitizenSpace	25		no reference to either single or 2 storey extensions behind shops which causes significant problems to neighbouring properties and impacts out on the street and Council service where special collection arrangements have to be put in place	X			No Action	This case is too specific to be addressed in this SPD which is mainly focused on residential extensions.
Brockley Society	25	3.7.2	para 3.7.2 - add note for CAs re need to provide D&A/Heritage Statements plus examples of relevant/local precedents.	X			No Action	This forms part of the local validation list which is updated regularly.

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CitizenSpace	25	3.7.1	3.7.1 - give more guidance about consultation in similar way a lot of detail about the 25% and 45% shadow rule	X			No Action	This is not a planning consideration and cannot be addressed within this SPD.
Brockley Society	26		cover photo - state location	X			Make Change	
Brockley Society	27	4.1.2	Change 'type' to 'typologies'; add 'However' to beginning of former 4.1.1 and renumber as 4.1.2; renumber 4.1.2 as 4.1.3			X	No Action	The current numbering addresses the points made.
Brockley Society	27	4.1.3	4.1 Introduction - use 4.1.3 as intro and renumber as 4.1.1			X	No Action	The current numbering addresses the points made.
CitizenSpace	27	4.00	Most of the green/red illustrations only involve immediate neighbours; I think a wider context could be used so its not just about how an extension impacts on the immediate building and next door but the wider scope of the road from a visual aspect.			X	No Action	These illustrations are indicative and do not include all the cases and wider context. Each application is assessed on its own merits.
Brockley Society	27	4.1.4	add new para as 4.1.4 to say 'A useful reference is 'Renovations: an Inspirational Primer' by Richard Wilcock, RIBA Publications, 2016	X			No Action	This guidance is too specific for the purpose of this document.
LBL Development Management	27	4.1	Unless the neighbour already has a similar extension, our guidance wouldn't tend to permit an extension like this.			X	Make change	
Blackheath Society	28	4.2 Fig. 4.3	The principle of retaining a 1 m path for side access makes a great deal of sense but seems to be undermined in several of the examples given (eg figures 4.3 and 4.18)			X	Make change	
Conibere Phillips Architects	28	4.2 Fig. 4.2	Figure 4.2: I would say that the reason this is a bad extension is that the overall design is terrible and the existing building was poor in the first place. The relationship of the windows is not the issue here.			X	No Action	The caption addresses the issue and is clear.



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Brockley Society	28	4.2.3	4.2.3 bullet points 6 + 8 - add '...and must comply with Building Regulation Approved Document B, Volume 1, Section 9 on boundary wall fire protection requirements	X			No Action	This is not a planning consideration and cannot be addressed within this SPD.
CitizenSpace	28	4.2.3	4.2.3 guidance is more onerous than permitted development options. Does this not simply encourage PD schemes? If applicants feel they can get more of what they want with PD they will tend to do this. If they can achieve the same spatial / volume outcomes with a scheme through the planning process it would allow a dialogue with the authority and the encouragement of better design. It seems counter productive when trying to achieve better design the SPD guidelines will encourage applicants to default to PD solutions.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
LBL Urban Design	28	4.2.3	keep consistent approach on cill/sill.			X	Make change	
Conibere Phillips Architects	28	4.2.3	4.2.3: This could do with a diagram. Where is the depth measured to and from? Is it from the back face of the rear most wall to the furthest end of the garden? A minimum of '2 or 3 brick courses' is surely a minimum of '2 brick courses'.	X			Make change	
LBL Development Management	28	Fig. 4.3	Add the roof design respects neighbouring amenity	X			Make change	

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Conibere Phillips Architects	29	4.2.3	4.2.3 continued: This comes back to the guidance being (incorrectly) more restrictive than PD. The paragraph “on semi-detached properties extensions should not extend beyond the main side walls of the host buildings except where an L shape form is proposed”. This is illogical. In planning terms, what’s the difference between an extension with 500mm of L vs one that is completely rectangular in form? It is an arbitrary requirement that has no public benefit. This whole paragraph should be omitted. “L-shaped extensions which combine a single storey rear extension and a single storey side extension should not over dominate the original building”. If we look again at Figure 4.2, an ‘over dominating’ extension of the high quality you are after, would massively improve this property. The issue is about quality of design and quality of construction, not about the scale of the extension.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Blackheath Society	29	4.2.3	1st bullet point: I don’t understand ‘described adjacent’.			X	Make change	
LBL Development Management	29	4.2.3	Deeper extension could also be set in from the boundary	X			Make change	
Blackheath Society	30	4.2.4	We strongly agree with the requirement in 4.2.4 that extensions ‘respect the original design and architectural features of the existing building’ – questions remain about what this means in practice. We agree that several of the contemporary examples given appear to be quite acceptable but it is not clear how they meet the requirements as stated. This is true of the example in Figure 4.6 for example. The			X	Make Change	More traditional examples provided.

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			example in Figure 4.9 seems not to comply with the requirements and is a poor choice					
Brockley Society	30	4.2.4	- 4 Extensions - CA block para 4 - to '..'design quality' add '...and avoid light pollution from rooflights.'			X	No Action	This is not a planning consideration and cannot be addressed within this SPD.
Conibere Phillips Architects	30	4.2.4	4.2.4 - Not sure how the first paragraph differs from your aims elsewhere? Surely we are after highest quality everywhere? Same about ridge heights and window sills. - Conservation areas were originally about the streetscape and I think reverting to this approach would be highly beneficial. Realistically, the benefit / harm analysis of a well designed back extension has minimal or no impact on wider society, only likely affecting up to 3-5 neighbours. - Figure 4.6. I think a better example could be found - Figure 4.8. It is missing lots of typologies for back extensions for L shaped footprint houses. If you're going to show examples, at least make an attempt to show the most common ones. Further, the examples shown typically result in poor quality spaces.	X		X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
LBL Conservation	30	4.2.4	A modern, high quality design can be successful in achieving a clear distinction between old and new. In some locations a traditional approach can be a more sensitive response to a historic building, particularly	X			Make Change	

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			where homogeneity of groups of buildings is part of their special character					
LBL Conservation	30	4.2.4	pics: need one that responds closely to the historic character (e.g. telescopic side extension in Forest Hill)	X			Make Change	
LBL Development Management	30	Fig. 4.6	I suggest a third example of an acceptable design which is in keeping with the period character of the original property.	X			Make change	
LBL Development Management	31	Fig. 4.8	Should we show some unacceptable extensions in 4.8? E.g. extends across the back (without an infill)	X			No Action	This comment is addressed elsewhere in the document.
Brockley Society	31	4.2.3 Fig. 4.8	Fig 4.8 change '...on L-shaped footprints' to "...on outriggers'			X	Make change	
Brockley Society	32	4.3.6	re CA block re Additional Guidance for CAs - add need to consult local Amenity Societies	X			No Action	This is too specific for the purpose of this SPD.
Conibere Phillips Architects	32	4.3.6	4.3.6 Two storey extensions to flat backed houses would be turning them into an L shape. Are you saying that the L shape is not OK? Most houses in the borough follow this L shape typology.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
LBL Conservation	32	4.3 Fig. 4.9	doesn't illustrate the guidance well – may be a good response to this site, but not likely to be acceptable in many situations.			X	No Action	
Brockley Society	32	4.3 Fig. 4.9	Fig 4.9 - better example is needed - 1 Whatman Street is not suitable for CAs			X	No Action	
Conibere Phillips Architects	33	4.4.1, 4.4.2	4.4.1 & 4.4.2 – Old projects are good and new ones are bad? I think you can do better than that.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Blackheath Society	33	4.4.4	I don't understand 'and host'.			X	Make change	

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LBL Conservation	33	4.4 Fig. 4.10	I don't consider this to be harmful – it is subordinate, relates to the host building in terms of material and detailing, retains sufficient front garden, is applied to both in a semi-detached pair so retains the symmetry.			X	No Action	
LBL Development Management	33	4.4.3	Are well designed porches outside of CAs so harmful? Could we add a para about to make them acceptable, esp where there is a preponderance of them in the street.	X			No Action	
Conibere Phillips Architects	34	4.5.2	4.5.2: as per earlier comment, a diagram is needed	X			Make change	Diagram added (Fig: 4.4)
LBL Conservation	34	4.5.3 + 4.5.2	should be swapped around as the latter is the introduction to the former para.			X	No Action	The numbering reflects the purpose of the sentence.
Blackheath Society	34	4.5.4	last bullet point: Replace 'p.21' with 'p.23'			X	No Action	The page reference was removed.
Blackheath Society	34	4.5.3	More thought needs to be given to proposals to remove the fabric of existing buildings – for example through the removal of outrigger side walls. The issue of removal of original fabric is quite fundamental to the preservation of historic assets and goes beyond purely structural considerations. We are not arguing for a ban on removal of such fabric but a more considered approach would seem to be warranted			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Conibere Phillips Architects	34	4.5.4	4.5.4: - The height requirement here, at least for extensions up to 3m, is very close to that allowed by PD. Why not just match it and take away one reason why people would go down the PD route rather than planning? For longer extensions, your guidance is substantially worse than that allowable under PD.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

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			- You have to realise that the roof build up is probably going to be in the region of 300mm thick. With an external height of 2.5 (assuming a flat street) this gives just 2.2m floor to ceiling height in what might be a 6m+ extension. The proportions of the space are then highly compromised for the sake of a few hundred mm in additional external height.					
CitizenSpace	34	4.5.4	4.5.4 - 1st bullet point. Stating categorically that extensions should always remain subordinate to the host property is too strong a statement, is open to subjective interpretation and restricts creative design. In most cases subordination to the host property is probably appropriate, but it should not be an absolute requirement.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
LBL Development Management	34	4.5.4	Be clear that lower heights may be required if circumstances require e.g. ground level differences.	X			Make change	
Blackheath Society	35	4.5 Fig 4.11	Corrections: 'adversely', 'neighbour's', 'windows'			X	Make change	
Blackheath Society	36	4.5.9	Should be 'are maintained'			X	Make change	
Blackheath Society	37	4.5.8	3rd bullet point: Replace 'p.21' with 'p.23'			X	No Action	The page reference was removed.
Conibere Phillips Architects	37	4.5.8 Fig. 4.14	Figure 4.14: Seems that this should be clearer. It looks like 1 has a big glass wall to the neighbours. Once you assume this is a mistake, it really isn't that different to 3 in planning terms. I suggest these diagrams should be done as an Axonometric project rather than perspective because it makes identifying subtle differences all the more tricky. Given the guidance and even reading the notes here, I cannot see what			X	Make change	

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			specifically is the problem with 3 compared to 1. They are virtually identical as far as the neighbours are concerned apart from 1 being mostly transparent. What you appear to be encouraging is a huge glass box which is highly unsustainable, impractical and expensive. It will be a struggle to get it to comply with building regs and the quality of the internal space will be dubious.				
Blackheath Society	38	4.6	The excavation of basements is an increasingly important issue and requires policies that are clear and rigorously enforced. There could be a case for having a separate SPD on basements. Absent that, the decision to include them in the current SPD on extensions is reasonable provided the guidance is clear, comprehensive and consistent with the Validation requirements. The content of Section 4.6 is acceptable as far as it goes but needs, in our view, to go considerably further.	X			No Action  More information on basements can be found in the Planning Portal. This information is too specific to be provided in great detail within this SPD.
Blackheath Society	38	4.6	The current HD validation requirement is for a Structural Survey ' <i>for all applications where the proposal includes a basement or the development affects the foundations</i> '. It goes on to state that the survey: ' <i>...should fully address the impact of the proposal on structural stability including potential impacts on adjacent/nearby properties</i> '. This statement alone is inadequate and the SPD should introduce a requirement for a comprehensive Basement Impact Assessment (supplemented in sensitive cases with a borehole report) to accompany applications to excavate basements. The Basement Impact Survey needs to contain sufficient detail to enable officers to assess the impact of the proposed	X			No Action  More information on basements can be found in the Planning Portal. This information is too specific to be provided in great detail within this SPD.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE
			basement development on the dwelling involved, neighbouring properties and the environment.				
Blackheath Society	38	4.6	<p>The SPD should include a clear statement that ‘Lewisham will not permit any development which would damage the built or natural environment’ and should require any Basement Impact Survey to have regard to the following:</p> <p>1. For detached houses on level sites with no ground water complications or clay component in the soil, a basement extension is unlikely to cause structural problems, and the BIA could be brief. However a sloping site, clay, groundwater flow, development below the water table or any combination of these is a very different matter and the BIA and/or structural survey should demonstrate that the proposal will maintain the structural stability of the host building and neighbouring properties. Inherently unstable ground may require neighbouring buildings to be protected by underpinning. (All this is touched on in 4.6.2, but inadequately.)</p> <p>2. The BIA should demonstrate that the residential amenity of neighbours will be respected, especially during the construction process, and illustrate how noise, vibration and other disruption will be minimised</p> <p>3. Consideration of development in flood zones - The Government does not permit basements in Flood Zone 3 and does not normally permit them in Flood Zone 2 and this needs to be explicitly recognized in both validation requirements and any BIA</p> <p>4. The relationship between permitted</p>	X			<p>No Action</p> <p>More information on basements can be found in the Planning Portal. This information is too specific to be provided in great detail within this SPD.</p>



ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			development (basement not extending beyond footprint of existing building) and requirement that excavation to enable that permitted development has since December 2016 required planning consent. 5. The need for any habitable basement accommodation to have means of escape in event of fire, as well as daylight and sunlight. (The draft omits fire escape and mentions natural light rather than daylight and sunlight.					
Brockley Society	38	4.6.4	4.6 Basements - para 4.6.4 - give examples - eg Arbuthnot Road	X			No Action	More information on basements can be found in the Planning Portal. This information is too specific to be provided in great detail within this SPD.
Blackheath Society	38	4.6.4	We think we agree with the point made in para 4.6.4 about 'vertical hierarchy'. If this means that windows in basement extensions should be aligned with the existing ones on upper floors and should be of similar materials and appearance, this should be stated explicitly			X	No Action	The existing comment is clear.
CitizenSpace	38	4.6	The section about basements could do with more guidance for those properties that already have basements and people may want to extend their living space more discreetly than a	X			No Action	This guidance would fall within the guidance already provided.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			loft conversion especially if no light wells are allowed which is fine, what other options advised.					
Blackheath Society	38	4.6	The section on Basements (4.6) needs to be greatly expanded to require the submission of Basement Impact Surveys.	X			No Action	This is not a planning consideration and cannot be addressed within this SPD.
Brockley Society	38	4.6.5	para 4.6.5 - add bullet point re need to comply with Party Wall, etc Act, 1996	X			No Action	This is not a planning consideration and cannot be addressed within this SPD.
Blackheath Society	38	4.6.11	Replace 'useable' with 'usable'			X	Make change	
Blackheath Society	38	4.6.4	Replace 'Many' with 'Much'. Close up space in 'Borough's'. Replace 'its' with 'their'			X	Make change	
Blackheath Society	38	4.6.5	Reformat: 'Basement developments must <ul style="list-style-type: none"> <li>· retain ...</li> <li>· not extend ...</li> <li>· presume to retain trees and hedges</li> </ul>			X	Make change	
Conibere Phillips Architects	38	4.6.5	4.6.5: - I think you should just say they must be compliant with building regs and work must not be started until the works and a construction method statement has been agreed or some such statement. There is significant overstep here. You are not experts in structural stability or ground conditions and you never will be.			X	Make change	
Historic England	38	4.6	We also welcome the reference to the potential effects on archaeology of basement extensions. We would however suggest that it would be helpful to be clear to potential applicants that they may, in certain circumstances, require	X			Make Change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			further specialist advice when considering relevant development in the parts of the Borough covered by Archaeological Priority Areas (APAs). Depending on location and scale of works proposed, a condition requiring a programme of archaeological work may be attached to planning permissions for basement extensions in APAs. To help ensure applicants get the advice they need, we recommend you include a link to a map of the APAs and reference to the Greater London Archaeological Advisory Service (GLAA) – this could be done by signposting the relevant contact information ( <a href="http://www.historicengland.org.uk/services-skills/our-planning-services/greater-London-archaeology-advisory-service/contact/">www.historicengland.org.uk/services-skills/our-planning-services/greater-London-archaeology-advisory-service/contact/</a> ).					
LBL Conservation	38	4.6.11	If a lightwell is proposed that is visible from the public realm...,	X			Make Change	
LBL Conservation	38	4.6.4	Much of the Borough's housing stock is Victorian and these properties have a clear vertical hierarchy which contributes to their character. Basement extensions can successfully create new accommodation without impacting on the external appearance. Careful consideration will need to be given to the impact that the external expression of the basement would have, particularly in conservation areas, including lightwells, pavement lights and railings in front gardens and loss of soft landscaping.	X			Make Change	
LBL Urban Design	38	4.6.11	4.6.11 If a basement surround is proposed, careful consideration should be given to its visual impact and to avoid impacting on the street scene. We will resist lightwells with railing that add clutter to the streetscene.	X			Make change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			We are talking about front lightwells. it should be clarified					
LBL Development Management	38	4.6.2	Do we want to open ourselves to considering these non-planning matters that we are not qualified to judge?		X		make change	
Thames Water (C/O Savills)	38	4.6.5	Thames Water requests that all basement development incorporates a positive pumped device or other suitable flood prevention device to avoid the risk of sewage backflow causing sewer flooding. This is because the wastewater network may surcharge to ground level during storm conditions. Such measures are required in order to comply with the NPPF which highlights the need to avoid flooding and also in the interests of good building practise as recognised in Part H of the Building Regulations.	X			Make Change	
CitizenSpace	38	4.6.9	50% of front gardens or no front garden developments at all, - I'm not clear about that			X	No Action	
LBL Development Management	38	4.6.9	A well design lightwell that is no deeper than 1m and follows the line of a bay window above would be acceptable? Should be accompanied by retention or planting of soft landscaping as a screen			X	No Action	
Brockley Society	39	4.6 Fig. 4.15	Fig 4.15 - cross refer to 3.5.8 on Daylight & Sunlight			X	No Action	This comment is addressed elsewhere in the document.
Conibere Phillips Architects	39	4.6.14	4.6.14: Again, this is overstep. How a building is ventilated is not a planning consideration. Highly sustainable buildings require mechanical systems.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Conibere Phillips Architects	39	4.6.15	4.6.15: This is legitimate though because the equipment could be noisy. It should be enough to condition an approval with a requirement to			X	No Action	Whilst the comment is noted, the Council

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			submit noise calculations for all external plant. This would apply to all properties and all typologies.					holds a different opinion on this topic.
Blackheath Society	39	4.6.14	Duplication: replace 'an acceptable' with 'a suitable'			X	Make change	
LBL Conservation	39	4.6 Fig. 4.15	could also include front lightwell demonstration with flat/arched railings	X			Make change	
LBL Conservation	39	4.6.13	include requirement for a section to be submitted that demonstrates planting depth on top of basements that extend under rear gardens	X			Make change	
Blackheath Society	40	4.6.16	Replace 'discretely' with 'discreetly'			X	Make change	
LBL Conservation	40	4.6.16	In cases where a modestly proportioned and discretely located light-well may be acceptable, the architectural treatment of the building frontage above should extend fully into the basement area and be designed to reflect the subordination of this floor level.	X			Make Change	
Conibere Phillips Architects	41	4.7.4	4.7.4: <ul style="list-style-type: none"> <li>- Comes back to my earlier points. The various statements are too strong because if the existing building is very poor quality, then distracting / being overbearing of it would likely be a net positive for the street. Rather than saying 'should' it should be replaced with 'should normally' at the very least or as in the paragraph about width, adding a conditional statement (in the majority of cases) after the word 'should'. Or in the case of height, where you have a requirement to demonstrate that no harm is being done.</li> <li>- Overlooking. Again this is a misguided aim</li> </ul>			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

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			generally. What is so wrong with seeing your neighbours. If you don't want to be seen, put up curtains or blinds. If it is about gardens, they are mostly overlooked already.					
Brockley Society	41	4.7	Side Extensions - add bullet point re rooflights/light pollution as para 5.5.3 (p56)	X			No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Blackheath Society	41	4.7.2	Either 'also' or 'too', but not both			X	Make change	
Blackheath Society	41	4.7.4	6th bullet point: Insert 'to' after the second 'harm'			X	Make change	
CitizenSpace	41	4.7	On the side extension point, I don't agree that the massing of a side extension should be set back and down from the host building to necessarily be considered subordinate. In many cases, this can be achieved through a material variation or articulation and very often a new element can be better expressed as a continuation of the mass of the main building.			X	Make change	
LBL Conservation	41	4.7.4	The extension should not project forward of the front façade and should normally be set back by a minimum of 150 mm – or the distance set by good quality local precedent. this helps to make a clear distinction between old and new.	X			Make Change	
Conibere Phillips Architects	42	4.7.5 Fig. 4.16, 4.17	Figures 4.16 and 4.17: These are very poor examples. In many ways I think I prefer the 4.16 example but they are both so abhorrent that if you can't find a good example of something that is actually good then maybe ditch them both. Is the one shown on 4.17 actually an extension? It looks very much like it could have been built at the same time as the rest of the property. Either way, 4.17 is everything that is			X	Make change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			wrong with much of what is built in recent years without a good architect. This should never be anywhere near a 'tick' example in this whole document. It must go.					
Blackheath Society	42	4.7.5	This is largely repetition of what was said on p.41			X	No Action	
Conibere Phillips Architects	43	4.18	Figure 4.18: Is this saying that side extensions must have pitched roofs? One of the 'good' examples should have a flat roof to make it clear this isn't the case.			X	Make change	
LBL Conservation	43	4.7.5 Fig. 4.18	Advice on corner properties – side can be read as a principle elevation, design needs to reflect this. Building line – depending on context may be issues with building line on the side road.			X	Make change	
LBL Conservation	43	4.7.5 Fig. 4.18	Include an example with a 1m side access and include that in the text	X			Make Change	
LBL Development Management	43	Fig. 4.18	Do we want to show a 1m set in on property 1 to allow for side access, or is it a corner property? Do we want advice on corner properties to not extend, or limited extension, beyond the building line of the adjoining street?	X			Make change	
Brockley Society	43	4.7.5 Fig. 4.18	Fig 4.18 - add notes on diagram to make front and back explicitly clear	X			Make Change	
Blackheath Society	44	4.00	There might be a case for providing some guidance on extensions to buildings which do not conform to the typologies currently included in the document (for example detached houses, bungalows, properties higher than two storeys)	X			No Action	This comment does not reflect the purpose of this SPD which is to provide generic information and guidance for the most common typologies and extensions and

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE
							cannot cover all examples.
Blackheath Society	44	4.7.6	1st bullet point: Replace 'and' with 'together with'			X	Make change
LBL Development Management	44	4.7.6	Side extensions of more than one storey can significantly harm the openness that forms the character of much of the borough (see pg 41). Two or more storey side extensions should be set in at least 1m from the boundary and set back at least 1m from the front elevation to reduce this harm. Where it is appropriate to build to the boundary the set back from the front elevation should be at least 2m.  Side extensions should be accessed from the main property and normally should not have an additional front door			X	Make change
Blackheath Society	44	4.00	While we agree that some of the contemporary designs illustrated in the document have considerable merit, there is perhaps too much emphasis on these with insufficient examples of good design involving more traditional approaches	X			Make change
LBL Conservation	44	4.7.6	The guidance for one storey extensions applies to two storey extension, along with the following:	X			Make change
LBL Conservation	44	4.7.7	Many of the conservation areas within the borough contain semi-detached dwellings and groups of terraces with visual breaks between them which allow views into rear gardens and	X			Make Change



ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			beyond. These views add interest to the built form and create a softer sense of enclosure to the street					
Brockley Society	44	4.7.6 Fig. 4.20	Fig 4.20 - give Victorian example	X			No Action	We could not find a Victorian example.
Conibere Phillips Architects	45	4.7.6 Fig. 4.21	4.21: Option 3 actually looks good to me. In many ways it could be a lot better than the other examples given (including in Figure 4.22). It comes down to the architectural resolution of the extension. All the others will result in lots of awkward, problematic flashing and waterproofing problems. Sometimes the most simple approach can and is the right solution. Anyway, at the very least option 3 on 4.21 should be a maybe which could be covered in the text description.			X	Make Change	
Brockley Society	45	4.7.6 Fig 4.21 - 4.22	Figs 4.21 + 4.22 - add notes to make fronts and backs clear	X			Make Change	
Blackheath Society	46	4.8.5	It is not clear to us why Permitted Development Rights have been removed from front and rear gardens in a number of Conservation Areas (para 4.8.5) but not the Blackheath Conservation Area. This should be rectified.	X			No Action	This cannot form part of this SPD.
Brockley Society	46	4.8	section needed on mews & live:work conversions - policy statement needed	X			No Action	This comment does not reflect the purpose of this SPD which is to provide generic information and guidance for the most common typologies and extensions and cannot cover all examples.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
Conibere Phillips Architects	46	4.8	4.8: Why be more restrictive than PD? Just don't do it.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Blackheath Society	46	4.8.5	Replace 'discretely' with 'discreetly'			X	Make change	
LBL Conservation	46	4.8.2	the meaning of this sentence needs clarifying .			X	Make change	
LBL Conservation	46	4.8.4	Where planning permission is required, outbuildings should be subordinate to the host building. It may be possible to erect small detached buildings such as a garden shed or summerhouse in your garden. Building regulations will not normally apply if the floor area of the building is less than 15 square metres and contains no sleeping accommodation. - Does this mean: under pd regs? Or just possible? We aren't consistently referring to Building Regs, so why here?			X	Make change	
LBL Urban Design	46	4.8	detached outbuildings are not extensions - should they not be under a different heading?			X	Make change	
LBL Conservation	46	4.8	Add re materials (e.g. timber cladding) and green roofs to preserve the appearance of gardens; and advice about location and impact on trees – conflict between end of garden locations if this is where most large canopy trees are.	X			Make change	
LBL Tree Officer	46	4.8	Add - Trees contribute significantly to ecosystem services providing benefits such as temperature amelioration, reduction in air pollution, particulates and storm water run-off, habitat for wildlife and improvement to health and wellbeing. Many of Lewisham's large canopied trees which contribute significantly to	X			Make Change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			these benefits are within rear gardens and especially at the ends of gardens. Positioning sheds, summer houses and garden rooms at the end of gardens can conflict directly with retaining these important trees by occupying the space where they are growing. Or indirectly from pressure for nearby trees to be removed from these new garden structures as cause shade and leaf drop. See satellite images below (google maps)					
LBL Development Management	46	4.8.4	The materials used should be appropriate for a garden setting, for example timber cladding.	X			Make change	
Brockley Society	47	4.8.5	re CAs point out that clarity on ownership issues will be needed and freeholders consent will be required.	X			No Action	This is not a planning consideration and cannot be addressed within this SPD.
Conibere Phillips Architects	47	4.9	4.9: The greatest wasted space in London is probably the vast area of roofs that just sit there getting drenched by the rain or baked by the sun. Lets activate them by allowing people to inhabit the space. Just think of all the amenity space that could be freed up by a progressive planning policy that enable people to turn their roofs into useable functioning gardens? Privacy and overlooking is a vastly overused and irrelevant issue. Amenity space and loneliness are far bigger problems in society. Why not actually try to solve these issues through improving our built environment?			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

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LBL Conservation	47	4.9.3	External stairs are unlikely to be supported in conservation areas. Most residential properties in the borough would not historically have had external stairs and their routing can have detrimental impacts on the elevations of historic buildings, and detract from the overall character of Lewisham's conservation areas. Some residential properties in conservation areas have balconies at first floor level and where these are a characteristic of a conservation area their addition on other buildings may be acceptable, subject to design and overlooking issues. Creation of balconies on roofs that were not originally intended for this use may not be acceptable due to the impacts of the required ancillary structures such as doors and railings.	X		X	Make change	
Blackheath Society	47	4.9.3	Replace 'is' with 'these are'. Insert 'the' before 'overall'			X	Make change	
LBL Urban Design	47	4.9.1	are we talking about platforms or balconies/terraces?			X	Make change	
Brockley Society	48		front cover state as Dickenson Road, Hackney N8	X			Make Change	
CitizenSpace	49	5.00	In general it is quite confusing because of the gap between what can be achieved through permitted development and through a normal householder application. The guidance on use of materials is still a little unclear - will the council support the use of contemporary materials and forms for roof additions?			X	No Action	This information can be found in the first chapter.
Conibere Phillips Architects	49	5.1.4	5.1.4: Ridge height. This should not be so restrictive. It must be stated in relation to context. What if the building is the lowest in an entire street? It would surely be reasonable in			X	Make change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			that situation to raise the ridge to match the rest of the neighbours?					
LBL Urban Design	49	5.1.4	It is important to provide a roof form which is appropriate to the building and adjoining <b>building</b> . Change 'building' to 'properties'.			X	Make change	
LBL Urban Design	49	5.2.1	this reads like all Conservation Areas have Article 4 directions.			X	Make change	
Blackheath Society	49	5.00	Section 5 should also include guidance on the solar/thermal panels	X			Make change	
LBL Tree Officer	49	5.00	Add – Green Roof information/Policy - information on the various types of green roofs that should be considered when flat roofs are proposed	X			Make Change	
Brockley Society	49	5.2.1	para 5.2.1 add Brockley CA has its own SPD	X			Make Change	
CitizenSpace	50	5.4 Fig. 5.3	The roof table in fig 5.3 seems a little pointless as is presumably obvious to any architect or experienced designer.		X		No Action	This SPD is meant for both professionals and residents.
Brockley Society	50	5.3	Diagrams must include 'Terraced Crown' and Hipped Crown' roofs for Brockley CA as these are typical	X			Make change	This type of roof was added under Hipped Roofs.
Blackheath Society	50	5.3.1 Diagram A	Caption should be 'London roof 1 (pitched roof)'. Why is this called a London roof? – surely it can be found everywhere.			X	Make change	
Blackheath Society	50	5.3.1 Diagram C	Caption should be 'London roof 2 (butterfly roof)', lower case 'b'			X	Make change	
Conibere Phillips Architects	50	5.3	5.3: Roof type A <b>is not</b> a London Roof. Type C <b>is</b> a London Roof.			X	Make change	
LBL Conservation	50	5.3 Fig. 5.1	Pic – A- this isn't a London Roof – change to pitched roof? And has 2 in pic but 1 in text			X	Make change	

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LBL Conservation	51	5.3.4	I consider symmetry to be important outside CAs as well as in – it's a general response to our earlier design guidance. But acceptable if both halves of the pair do it.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Blackheath Society	51	5.3.7	Replace 'They comprise' with 'It comprises'			X	Make change	
Conibere Phillips Architects	51	5.3.6	5.3.6: A 'protected view': if someone told me this I would think they were joking. These roofs are extremely prone to failure and while they are part of our built heritage, views of them are typically limited to a few neighbouring properties across back gardens. It is daft enough that views of St Paul's is protected from Hampstead Heath (if you can see it without binoculars). To say that this is a protected view is beyond unreasonable. If they are to be protected, make it them a conservation area. If they are not a conservation area then they are not.			X	Make change	
LBL Urban Design	51	5.3.7	wrong numbering			X	Make change	
LBL Conservation	51	5.3.5	The front parapet forms a uniform cornice line on the street frontage behind which no roofslopes are visible, which is an important townscape feature of Georgian and early Victorian Streets.	X			Make Change	
LBL Conservation	51	5.3.7	This is the most common form of roof. They comprise a front pitch and a rear pitch. The end of terrace dwellings generally have gabled ends but may also have hipped roofs.	X			Make Change	
LBL Urban Design	51	5.3.4	We acknowledge that hipped roofs are not found in semi-detached pairs only, but then we give advice only for this occasion.	X			Make change	

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LBL Conservation	52	5.3.11	This type of roof has the form of two parallel pitched roofs resting on three bearing walls, which support the three feet of the 'M'. The ridges of the roof are usually parallel to the building's facades although some may be perpendicular. The gable ends are generally left exposed.	X			Make Change	
LBL Conservation	52	5.3.12	The intention of a traditional mansard roof was to provide accommodation at attic level, without having a significant impact on the appearance of the classical façade below. Front and rear faces had two pitches, the upper at a lesser pitch than the lower, which created a recessive form. Dormers were inserted in the lower roof slope, partially hidden behind the continuous parapet wall with one less dormer than windows on the elevation below.	X			Make Change	
Brockley Society	53	5.3.15	G Mansards - add new para as 5.3.16 to advise that paired or grouped schemes will be preferred rather than individual	X			No Action	The Council cannot take action towards this.
Conibere Phillips Architects	53		Part G (mansard): Would it not be acceptable to follow the approach taken historically and provide additional housing capacity by engaging with residents to develop and agreed mansard design for a street or group of adjacent houses? If it worked before, why not do it now? That would apply to conservation areas as well as non-conservation areas. We must upgrade our housing stock to meet modern standards of living and sustainability (in every sense).	X			No Action	The Council cannot take action towards this.
CitizenSpace	53	5.3.14	5.3.14 is not considered an accurate statement. What is the evidence for this? There are a great many instances of mansard roofs having been implemented in a piecemeal way throughout London, and that this was done many decades			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			ago. These 'changed' examples would be considered significant heritage assets, the same as unaltered properties.					
LBL Conservation	53	5.3.14	G – replace picture with a traditional mansard roof , e.g. Montpelier row because this section relates to existing roof forms.			X	Make Change	
LBL Urban Design	53	5.3.15	change from: If the roof does not already have them, it could be possible to add dormer windows. To: Dormer windows would be the only acceptable alteration to a mansard roof, if not already in place.			X	Make change	
LBL Conservation	53	5.3.14	Traditional mansard roofs were implemented on whole terraces to create a coherent street frontage and were not subdivided by party walls rising above the roofslope.	X			Make Change	
Blackheath Society	54	5.4	Section 5.4 outlines the most common roof structures and finishes. The SPD should also provide guidance on the use of green/living roofs on extensions	X			No Action	This information can be found elsewhere in the document.
Brockley Society	54		add diagrams for Crown Roofs	X			No Action	This type of roof would fall under Hipped Roofs.
Conibere Phillips Architects	54	5.4. 5.5	5.4 & 5.5: Please refer to earlier comments about not being more restrictive than PD. This entire section is pointless unless this problem is understood and dealt with.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
LBL Conservation	54	5.2	8: shows a butterfly roof but without the expressed V at the rear.			X	No Action	
Brockley Society	55		complete table with Crown Roofs added	X			No Action	This type of roof would fall under Hipped Roofs.
Blackheath Society	55	5.4 Table	Roof descriptions do not match p.50, and use of upper case is inconsistent.			X	Make change	



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LBL Urban Design	55	5.4 Fig 5.3	change: 'Conversion' to 'Roof lights' (most of them are actually conversions) add numbers as per previous page			X	Make change	
LBL Conservation	56	5.5.2	re space in lofts – add in amount needed for insulation	X			No Action	This is not a planning consideration and cannot be addressed within this SPD.
Brockley Society	56	5.5.3	add to 5.5.3 extra bullet point to add that 'front slope rooflights are not allowed in Brockley CA'	X			Make change	
LBL Conservation	56	5.5.3	They should also be avoided on the steep slopes of traditional mansard roofs as their appearance here is incongruous. Does this mean the lower slope? I would have suggested that a rooflight was acceptable on the lower slope ( e.g. one that would light a staircase) but not on the upper slope)			X	No Action	
Brockley Society	57	5.5.3 Fig. 5.6	make clear in Fig 5.6 notes that 'front slope rooflights are not allowed in Brockley CA'	X			No Action	This information is too specific for this document.
LBL Development Management	58	5.5.4	Add after ...evenly spaced: "Or in line with fenestration below"	X			Make change	
Brockley Society	59	5.6.4	front dormers - add to 5.6.4 bullet point 2 at end '...and not compromise fire stopping.'	X			No Action	This is not a planning consideration and cannot be addressed within this SPD.
Conibere Phillips Architects	59	5.6, 5.7	Figure 5.6 & 5.7: Might as well remove this because rooflights are covered by PD so who would follow such restrictions when every other aspect of the roof extension section is also more restrictive than PD? If there were some sort of carrot to encourage engagement with the planning process then having a few 'you must also do this if you want the carrot' items would make sense. Still, there is nothing		X		No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			stopping someone from doing the option 4 rooflight arrangement under PD even if the rest of the scheme is dealt with via planning. So why have it?					
Conibere Phillips Architects	60	5.7.2	<p>5.7.2: Setting in the sides by 300mm will just create a slot (assuming adjacent properties do the same thing) that is impossible to maintain. BY FAR the best way to delivery roof dormer extensions is to require the building up of the party wall to create a durable and consistent side to the roof extension. Perhaps offer an option ie:</p> <p>1- “Set in from the party wall on each side by at least 0.5m” (this would allow enough space to maintain two adjacent extensions)</p> <p>OR</p> <p>2- “build up the party walls to match the existing (ie if brick, use matching brick) to form the side walls”. This approach would be accepting that the overwhelming movement is towards all properties extending upwards. Accepting that this is the case, providing a robust and coherent framework for these extensions would be highly preferable to lots of inconsistently proportioned dormers tacked on to the backs of roofs.</p>			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
Conibere Phillips Architects	60	5.7.2	5.7.2: There is no conceivable public benefit to requiring the height of the roof extension to be 300mm lower than the existing ridge or 300mm back from the eaves. No one will be able to appreciate the ridge line requirement. All it will do is make it more difficult to build useable roof extensions. A reduction in height of 300mm could make roof extensions unworkable or downright unpleasant spaces across almost the entire borough. What you are saying is that if you want a space that is actually usable, you MUST use PD. This is simply irresponsible. Similar with the eaves requirement. Maintaining 200mm (via PD) or 300mm via this guidance just results in horrible weathering details and unnecessarily complex structural solution. Why? Having a thin sliver of old roof left just looks utterly ridiculous and is burdening your residents with properties that are more difficult to maintain and smaller than they might otherwise be. It is illogical.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
LBL Conservation	60	5.7.3	Set in from the party wall on each side by at least 0.3m, a minimum of 0.3m below the ridge line, 0.3m from the edge of any hip and at least 0.3m above the existing eaves line			X	Make Change	
LBL Conservation	60	5.7.2	Dormer windows to the rear should either be of traditional form to relate sensitively to the host building or, if a contemporary approach is taken, they should demonstrate exceptional architectural quality.	X			Make Change	
LBL Conservation	61	Fig. 5.15	e.g. 5 cockpit terraces in combination with dormers – need to say something about railings	X			No Action	This is too specific for the purpose of this SPD.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
LBL Conservation	61	5.14	example 3 is preferable in a CA than 5.16 example 1 – yes the first is 'not acceptable in a CA' and the latter 'is acceptable in a CA'. I would suggest that 5.16 is an overlarge dormer window and wouldn't be acceptable under the dormer guidance – so how is it acceptable as a roof extension?			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
LBL Conservation	62	5.8.3	CA advice - A modern, high quality design is generally more successful when considering a large rear roof extension. The contemporary design is more likely to contrast with the property and maintain the original integrity of the dwelling. If we've said previously that dormers should be subordinate – how can we then say that large roof extensions are acceptable? This should be more strongly stated here that they will be unlikely to be acceptable in CAs, unless....			X	No Action	This is generic advice and each case will be assessed on its own merits.
Brockley Society	62	5.8.2	rear roof extensions para 5.8.2 - add to bullet point 8 '...and set back from rear roof house wall.'	X			No Action	This is too specific for the purpose of this SPD.
LBL Conservation	62	5.8.2	A modern, high quality design is generally more successful when considering a large rear roof extension. The contemporary design is more likely to contrast with the property and maintain the original integrity of the dwelling. - This doesn't make sense or address the issue . Contrast is unlikely to retain integrity – where it's the form of the roof that's in question.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
CitizenSpace	62	5.8	5.8 guidance is more onerous than permitted development options. Does this not simply encourage PD schemes? If applicants feel they can get more of what they want with PD they will tend to do this. If they can achieve the same spatial / volume outcomes with a scheme through the planning process it would allow a			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			dialogue with the authority and the encouragement of better design.					
LBL Urban Design	62	5.8.2	change from: The arrangement of windows within the rear of dormer should relate to the arrangement on lower floors. To: The arrangement of windows within the rear of the extension should relate to the arrangement on lower floors.			X	Make change	
LBL Development Management	62	5.8.3	add at the end of the first paragraph: and where the dormer is no wider than 2/3 the width of the original, unextended roof.	X			Make change	
LBL Conservation	63	Fig. 5.17	the image doesn't show how this respects the architectural character of the building. Its also on a stone building so clearly not in Lewisham – we've got examples of this now built out in Lewisham (Lee Manor CA) so if we want to show this specific design it would be preferable to use a pic of one of those			X	No Action	An additional example from Lee Manor Conservation Area has been added.
Conibere Phillips Architects	63	5.8.2 Fig 5.16	Figure 5.16: Option 4 but with the height limited to the ridgeline is, if designed well, potentially the least offensive of the lot if compared to a PD style roof extension for Options 1 or 2. Or Option 3 but with party walls built up and height matching the ridge. To reiterate, there is no conceivable reason to limit the height to 300mm below the ridge.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Conibere Phillips Architects	63	5.8.2 Fig 5.17, 5.18	Figures 5.17 and 5.18: Agree that 5.17 is better than 5.18 but this has nothing to do with the massing and everything to do with 5.18 being a PD style roof extension on a horrible building (and a terrible photo) whereas 5.17 is a high quality design on a nice building (and is a good			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			photo). The important thing is the quality of the architecture, not the massing per se.					
Resident	63	General comment	Some properties have loft conversions which have been constructed by raising the party and rear walls to support a flat roof at the back (fig 5.16 – example 3, pg63). The guidance makes it near impossible for neighbours to build a similar extension, and were they to, maintenance would be at least difficult.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Resident	63	General comment	Examples 3 and 4 of fig 5.16 have no adverse effect on appearance, as the angle of the front roof is the same as those adjacent. These extensions should be allowed as they give enough space for a sensible double bedroom with en-suite facilities to comfortably accommodate a couple. Further the raising of the party wall allows neighbours to follow suit; over time the entire terrace could become uniform. Examples 1 and 3 of fig 5.16 would not only restrict families to the cramped conditions of the poor quality, but also they would have adverse effects on the structural integrity of roofs.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Resident	63	General comment	Pushing innovative designs in the loft isn't a good idea. On the ground floor really only the owner sees it, at the loft floor it creates mismatched roof designs across a terrace.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Resident	63	General comment	Insulation requirements are strict now and a lot of space is lost at the sides to work around chimney breasts and insulation needed, as well as stairwell. Forcing extensions to come in further may make them unviable for narrower houses, including most of Barriedale, where back rooms can't even fit a double bed length.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
Resident	63	General comment	The main argument is around good quality construction as opposed to preventing vertical rear extensions at the party line. For the latter, other boroughs in London are actually encouraging them, for home expansion, including allowing mansard extensions above flat roofed homes which go up to the party wall.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Resident	63	General comment	The internal height is determined by the steel that is now required to be placed in the loft and insulation and these are checked by building control officers. For Barriedale, we just about can get a full vertical extension without having to lower ceilings below. People otherwise need to lower all first floor ceilings. The steel now required for lofts is extensive and bears all of the structural load from the loft extension onto the perimeter walls of the house. It definitely helps with structural integrity of the house and also negates the need for roof supports etc.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Resident	63	General comment	On the party walls for a vertical extension, this is done in agreement with adjoining neighbours. Usual practice until now has been to build a single wall within your own side of the party wall, in a way that your neighbour could build an adjoining wall if they wish to extend. Theoretically each house is responsible for their own side of the wall and paying for it. It is also good practice to have a raised parapet either side to create a fire breaker across roof tops.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
Resident	63	General comment	As Barriedale has been specifically designated as a family dwelling street, applications to convert to flats have been repeatedly denied. Great for us owner occupiers of course, but restrictive nonetheless compared to neighbouring streets. It would therefore be overly restrictive to Barriedale owners if they			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			couldn't do a vertical loft extension that has a viable width. We are also limited in ground and first floor rear extension allowed, whereas comparable Victorian houses have had full rear extensions done over years.					
LBL Development Management	63	Fig. 5.18	An image of a traditional rear dormer in period design that complements the original dwelling	X			No Action	
Conibere Phillips Architects	64	5.9 Fig 5.19, 5.20	Figure 5.19 & 5.20: No idea why these are examples. Neither are showing anything good.			X	No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.
LBL Conservation	66	5.10.2	I consider that retaining the symmetry of a semi-d pair IS important outside a CA.			X	No Action	
Blackheath Society	68	5.11.2	2nd bullet point: Delete 'overly', insert 'should' before 'be' to avoid 'not' applying to both parts			X	Make change	
Conibere Phillips Architects	68	5.11.2 Fig 5.28	Figure 5.28: while not being an example of high quality design, it is substantially better than many of the 'good' examples that have been used elsewhere. And far better than what is normally built under PD.			X	Make Change	
LBL Conservation	68	Fig. 5.28	is the cause of its dominance that it rises up above the ridge line? Otherwise the design and detailing is acceptable I would say. Better to be specific in our image caption.			X	Make Change	
LBL Development Management	68	5.11.1	add at the end: For instance where they are common within the immediate street	X			Make change	
Conibere Phillips Architects	69	Fig. 5.29	Figure 5.29: Property 2 I cannot see why this would be of concern compared to property 1. It would have very little additional impact on the neighbour and as long as it is designed well, could look excellent.			X	Make Change	



ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
Conibere Phillips Architects	70	5.12.4	5.12.4: You should look to work with residents to come up with acceptable designs consistent for entire streets so that those with London roofs in conservation areas are able to extend their homes in a sympathetic and appropriate way			X	No Action	The Council cannot take action towards this.
LBL Conservation	70	5.12.3	Floor to ceiling heights should be kept to a minimum. - Can we expand on this as the need for roof insulation will push them higher till they don't appear as traditional roof forms.			X	No Action	This is not a planning consideration and cannot be addressed within this SPD.
Blackheath Society	70	5.12 Fig 5.31	Insert semicolon after 'resisted'			X	Make change	
Blackheath Society	70	5.12.3	Replace 'compliment' with 'complement'			X	Make change	
Conibere Phillips Architects	70	5.12	5.12: Mansard diagrams 5.30 and 5.31 are wrong.			X	Make change	
LBL Conservation	70	Fig. 5.30 + 5.31	Images are wrong – 1st should have 4 pitches not 3, 2nd should have identical front and rear pitches.			X	Make change	
CitizenSpace	70	Fig. 5.30, 5.31	Fig. 5.30 and 5.31 are very poor diagrams and bear no resemblance to any known mansard roof designs. These are very unhelpful and will only mislead.			X	Make change	
LBL Conservation	70	5.12.1	This roof type can be added to a building with a shallow pitched roof form as an extension where it has been established that is acceptable in principle.	X			Make Change	
LBL Conservation	70	5.12.4	Where an accepted, prevailing, precedent of a sympathetic, traditional style mansard has been established within the street then future traditional style m mansard proposals will be considered.	X			Make Change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE
Conibere Phillips Architects	70	5.12.3	5.12.3: Floor to ceiling heights should be kept to a minimum. Really? Are you seriously saying to residents, please build as poor quality spaces as possible? What nonsense. You should be basing it on the housing space standards that call for 2.5m if achievable. Given 2.1m is an absolute minimum to be able to actually use a space, the difference in planning terms on say being 300-400mm higher is unlikely to be significant but the impact on the useable internal space will be huge.		X		Make change
Blackheath Society	72	Whole section	Make clearer that this refers to London roofs 2 (butterfly roofs), and decide whether it is 'butterfly' or 'Butterfly'			X	Make change
LBL Conservation	72	5.12.6	The front parapet wall and any decorative coping must be preserved and the extension should appear subservient behind this. It should be set back by 0.25m from the front parapet Wall, behind a gutter running parallel, which should drain to the rear or the end of a group – additional downpipes should not be added to the front elevation - Does this mean changes to the rear elevation i.,e. the V shape? Otherwise doesn't make sense.			X	Make Change
LBL Conservation	72	5.12.7	Reads differently to the section above on 5.12.4 and they should be the same, e.g.: Where the roofscape of a street is consistent and not interrupted by alterations then a new mansard extension would be resisted; Where an accepted, prevailing, precedent of a sympathetic, traditional style mansard has been established within the street then future traditional sty mansard proposals will be considered.			X	Make change

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
Brockley Society	72	5.12.6	para 5.12.6 - to bullet point 1 add after '...from the front parapet wall' a phrase to say '...and align with its neighbours re profile and materials.'	X			Make change	
LBL Conservation	72	5.12.5	A mansard roof can be introduced to a building with a London (butterfly) roof if the following design principles are considered.	X			Make Change	
LBL Conservation	72		Changes to the rear roofs slopes in combination are unlikely to be supported. Seek pre-application advice in such cases.	X			Make Change	
LBL Urban Design	72	5.12.7	Careful consideration needs to be given to the routing of drainage and rainwater goods. The siting of rainwater goods and drainage to a front elevation which is uncluttered or has no evidence of this treatment to support a mansard roof will not normally be supported.' shouldn't this apply everywhere?	X			Make change	
LBL Conservation	72	Fig. 5.36	Doesn't show a butterfly roof form, it shows pitched rear extensions. Also, they're svp pipes rather than drain pipes I suspect. Change caption			X	Make change	
LBL Conservation	73	Fig. 5.38	why would anyone do this? Unnecessary – shouldn't include it, and certainly not in a CA.			X	No Action	
Blackheath Society	74	5.13.2	1st bullet point: Delete brackets and move 'or fewer' to the end of the sentence			X	Make change	
LBL Conservation	74	5.13.3	Traditional dormer windows were smaller in size and fewer in number than the windows on the elevations below and thereby reflected the hierarchy between floors.	X			Make Change	
LBL Urban Design	74	5.13.3	Dormer windows should be modest in size and of simple, complementary design remaining subordinate to the building and windows below. - shouldn't this apply everywhere?	X			Make change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
LBL Conservation	75	5.14.2	There are two possible acceptable approaches to this kind of extension: - A subservient and lightweight additional storey (suitably set back from all sides). - The addition of terraces around these extensions is not usually acceptable and is discouraged - really? why? - Creating an extension with exceptional architectural merit which would enhance the appearance of the existing building. - Surely this is not a separate option to no. 1 – I think we need to be more specific. Or give an illustrative example - Alternative approach could be two options - One that reads as a roof storey – could be set back, recessive, different materials, different approach to fenestration; One that reads as an extension of the elevation – in line with elevation below, same or complementary materials as below, similar approach to fenestration			X	Make change	5.14.3 in both cases it should be of exceptional architectural quality and needs to relate to the building proportions in terms of mass and proportion
Brockley Society	75	5.14 Fig 5.39	fig 5.39 - better domestic example needed			X	Make change	
Blackheath Society	75	5.14.1	I think it should be 'roof type F'			X	Make change	
Blackheath Society	76	5.15	Guidance on roof level balconies should also be included, perhaps in the section on roof terraces (5.14)	X			No Action	This is addressed elsewhere in the document.
LBL Conservation	76	5.15	should we cross reference to cockpit terraces in combination with dormers here – these can be useful and have minimal impact at high level.	X			No Action	This is too specific for the purpose of this SPD.
Conibere Phillips Architects	76	5.15	5.15: See earlier points about making use of London's roof spaces. There is enormous potential to provide vast areas of amenity space and help to improve social cohesion and reduce		X		No Action	Whilst the comment is noted, the Council holds a different opinion on this topic.

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			loneliness. What is the logic in avoiding these. It could make Lewisham a leader in progressive planning policy and show the rest of London. We really must do better than just saying 'roof terraces and balconies are not allowed'.					
Blackheath Society	76	5.17	Section 5.16 (roof level plant etc) should also mention accessories such as television aerials, satellite dishes and fire and burglar alarm boxes and fittings	X			Make change	
Brockley Society	76	5.15.3	para 5.15.3 - after '...ensure overlooking' add 'and noise transmission...' and also add advice on Green/Living Roofs plus Satellite Dishes and Phone Masts	X			Make change	
LBL Conservation	76	5.15.1	Screening and railings may raise additional concerns due to height, material, and its impact on the scale and character of the property.	X			Make Change	
Brockley Society	77	5.18.5	para 5.18.5 - re alternative roof slates it needs to be emphasised that sources must be from an approved quarry and selected to avoid iron pyrites.			X	No Action	This is too specific for the purpose of this SPD.
LBL Conservation	77	5.18.8	UPVC is an inappropriate modern material not considered suitable for use anywhere in the historic environment and poor precedents do not justify further use of unsympathetic materials.- This in relation to rain water goods, but inconsistent with our approach to windows on rear elevations in CAs.			X	Make change	
Brockley Society	78		cover photo - state location	X			Make Change	
Blackheath Society	78	A. Glossary Conservation area	Insert 'it' after 'which'			X	No Action	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
Blackheath Society	79	6.00	A number of topics seem to be missing from this section, notably changes of use; internal design and changes; and sustainability (which was addressed in the previous SPD (page 7)	X			No Action	These are irrelevant to an Alterations and Extensions SPD or are not planning considerations (internal design).
Blackheath Society	79	6.1	The requirements concerning windows (para 6.1) was actually clearer in the previous SPD (page 28) and the earlier language should be revisited. We would have like to see greater clarity on the use of plastic/PVC for window frames			X	No Action	This comment is addressed in the document.
Conibere Phillips Architects	79	6.1	6.1: One of the best ways to improve quality of windows would be to ban uPVC windows but these are allowable under PD so might as well forget it. Good windows does not necessarily mean 'traditional' though.			X	No Action	This comment is addressed in the document.
CitizenSpace	79	6.00	I think there could also be guidance on issues such a guttering, waste pipes etc where poorly thought through designs detract visually. And, with so many "rubbish" bins being required the whole issue of their storage, access and emptying needs to be addressed. It's no good saying that bins on the pavement are a hazard when it's the Councils contactors who leave them out on the pavement after emptying them.			X	No Action	This is not a planning consideration and cannot be addressed within this SPD.
Brockley Society	79	6.1.2	para 6.1.2 after 'you live in a flat' add 'provided ownership issues are clear re leaseholds and freeholds'	X			No Action	This is not a planning consideration and cannot be addressed within this SPD.
Blackheath Society	79	6.1.2	Incomplete last sentence			X	Make change	
Blackheath Society	79	6.1.3	4th bullet point: Replace ' <i>crittal</i> ' with ' <i>Crittall</i> '			X	Make change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
Brockley Society	79	6.1.3 Fig 6.2	Fig 6.2 - better, clearer example needed			X	Make change	
Blackheath Society	79	6.00	As noted (comments on Section 3) there should be a more explicit reference to the fact that 'other', sometimes apparently minor, alterations such as crossovers may require planning permission, especially in Conservation Areas	X			Make change	
CitizenSpace	79	6.1.2	6.1.2 final sentence is incomplete / does not make sense.	X			Make change	
Blackheath Society	80	6.1.4	para 4: Replace 'Crittal' with 'Crittall' I do not understand 'as mass'			X	Make change	
Brockley Society	80	6.1.4	The position on use of uPVC for rear windows needs to be made explicitly clear re acceptable timber alternatives especially for sash windows, eg VEKA uPVC sash systems			X	Make change	
Blackheath Society	81	6.2	No mention of bi-fold doors			X	No Action	This is addressed elsewhere in the document.
Blackheath Society	81	6.2	Section 6.2 (doors) should provide guidance on bi- or multi-fold doors which are increasingly common	X			No Action	This is addressed elsewhere in the document.
Blackheath Society	81	6.3.6	Para 6.3.6 would seem particularly applicable to timber cladding and we would like to see a specific reference to the limitations of this material	X			No Action	This is too specific for the purpose of this SPD.
Blackheath Society	81	6.3.9	Delete 'can be laid in a way which'			X	Make change	
LBL Urban Design	81	6.2.3	heritage properties' and then we talk about 'historic properties'. It is confusing. What are we referring to?			X	Make change	
LBL Urban Design	81	6.2.4	merge with 6.2.5			X	Make change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
LBL Urban Design	81	6.3.9	remove: 'can be laid in a way which' so that the sentence reads: Imaginatively laid brickwork can add interest to a building façade		X		Make change	
Blackheath Society	82	6.4.2	2nd bullet point: Replace 'storage, Vermin ate' with 'storage. Vermin are'			X	Make change	
LBL Urban Design	82	6.4.3	we are referring to new developments having refuse and recycling management plan, but this SPD is for small householders only. Should these references be removed?		X		Make change	
LBL Tree Officer	83	6.5	6 Bike and Bin Storage Add – support green roof/sedum roofs to bin and bike storage stores,	X			Make Change	
Brockley Society	84	6.6.3	para 6.6.3 - add that Brockley CA SPD makes requirements clear pg. 7	X			No Action	This is too specific for the purpose of this SPD.
LBL Tree Officer	84	6.6	Add that hedges contribute to enclosure of front gardens	X			Make Change	
LBL Development Management	84	6.6.2	Encourage hedges due to their air quality benefits	X			Make change	
Woodland Trust	85	6.7	The Trust welcomes and supports Lewisham's commitment to the protection of trees in the SPD. This could be strengthened by bringing forward the informative section on trees in Chapter 6 into a larger section about trees in the General Principles chapter. There is now a wealth of evidence on the many benefits of high tree canopy cover, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity. Most of these issues are summarised, along with the appropriate references for the background research and evidence, in the Woodland Trust's publication			X	Make change	



ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE	
			Residential Development and Trees. Therefore, I would suggest a new paragraph in an enhanced tree section of the General Principles chapter as follows: "There is now a wealth of evidence on the many benefits of high tree canopy cover, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity. Larger forest type trees provide greater benefits and older trees generally support more biodiversity."					
Blackheath Society	85	6.7	As noted above in connection with para 3.3.5, given the importance of trees to the area, that paragraph and Section 6.7 should be amplified and strengthened	x			Make change	
LBL Development Management	85	6.7.2	Where valuable trees are lost, these should be replaced as part of the works.	X			Make change	
Woodland Trust	86	6.8	Furthermore, you could consider adding a requirement for new cross-overs to include a new street tree if there is space. Certainly where it is agreed that trees may be removed, measures should be taken for their replacement of an appropriate species and size that would replace the volume of lost canopy cover with immediate effect.	X			No Action	The Council cannot take action towards this.
Brockley Society	86	6.8.2	para 6.8.2 - ref to SUDS needed and on LBL approval process (bullet point 4).	X			No Action	This is not a planning consideration and cannot be addressed within this SPD.
Blackheath Society	86	6.8.2	bullet points: Inconsistent grammar – make these all complete sentences			X	Make change	

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE
Woodland Trust	86	6.8.2	<p>“Front Gardens and Forecourt Parking” I would recommend you add street trees into the bullet points of 6.8.2, as follows (additions in red):</p> <ul style="list-style-type: none"> <li>• The creation of a cross-over access often leads to the loss of street trees and/or an on-street parking bay.</li> <li>• Street trees and on-street parking is an are amenities to the whole community. The loss of such parking amenities in order to provide a cross-over for private parking bay in front gardens thus has an adverse impact on the community as a whole.”</li> </ul>	X			Make change
LBL Urban Design	87		add reference to the pic at the bottom also, when we say that if the gf window does not belong to the applicant, then parking space should be 3m, do we mean that its depth should be 3 instead of 6? Because I don't think this is possible from a highways perspective...			X	Make change
Blackheath Society	87	Top caption to diagram	Incomplete			X	Make change
Blackheath Society	89	A. Glossary Character	Replace the first 'and' with a comma			X	Make change
Blackheath Society	89	A. Glossary Cill	OED prefers 'sill'. The definition given seems eccentric. Sills can be stone or metal as well. What does 'toned' mean here?			X	Make change
Blackheath Society	90	Layout	Delete 'in'			X	Make change
Blackheath Society	91	Maisonette	Surely a flat is by definition on one level? Replace 'flat' with 'apartment'			X	Make change

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Brockley Society	94	Appendix B - References	Add new section at p94 to list key references and to include: * list of photos used (without there being a preponderance sourced from Gruff Architecture & Design) * list of local Amenity Societies.	X			Make Change	
Blackheath Society	Various	Bullet points	Inconsistent punctuation – some have full stops, others do not			X	Make change	
Blackheath Society		General comment	The document (as a whole) should provide more explicit/usable links with other elements of planning (for example a link to Conservation Area SPD and appraisals in 2.4 and link to Local Information Requirements in 3.7.2)	X			No Action	Additional information on the Council's conservation areas and their respective appraisals can be found on the Council's website. There is not intention of providing links to the website as these can change.
Environment Agency		General comment	Overall, the SPD does appear to cover the risk to flooding in a reasonable manner and sets out the requirements that someone wishing to undertake a basement development must consider and demonstrate as part of their application. We welcome the Alterations and Extensions SPD and hope it will reflect the national planning policy changes which now emphasise the importance of design standards. The revised NPPF points out that the creation of high-quality buildings and places is 'fundamental' to what the planning and development process should achieve. In particular, councils should try to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made	X			make change	References to the Planning Portal with regards to basements have been added.

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			<p>to the permitted scheme.</p> <p>The document should accord the developers a comprehensive guidance to integrate principles of sustainable development and demonstrate the requirements for sustainable design and how development proposals are in compliance with the borough local plan.</p>				
Blackheath Society		General comment	<p>There are very few or no references to some key issues</p> <ul style="list-style-type: none"> <li>o The need for developers and Lewisham to consult neighbours appropriately</li> <li>o The need for sound construction management plans as an integral part of the planning process</li> <li>o The close but opaque linkages between Planning and Building Control. This is of particular importance in assessing proposed basement developments</li> </ul>	X			<p>No Action</p> <p>These are not planning considerations and cannot be addressed within this SPD in more detail than already provided in the Generic Principles chapter.</p>
Historic England		General comment	<p>we note there is no reference to the current situation with regard to permitted development rights on houses. While this is scheduled to change again on 30 May 2019, we would suggest that the SPD includes some detail of the current situation to offer clarity to applicants. We would also point out that paragraph 6.1.2 appears to have some text missing in the final sentence.</p>	X			<p>No Action</p> <p>This document should not be confused with the Town and Country Planning Order - Permitted Development Rights.</p>

ORGANISATION	PAGE	SECTION	COMMENT	ADDITION	DELETION	REVISION	RESPONSE
Resident		General comment	<ul style="list-style-type: none"> <li>• The approach set out in the draft SPD, of allowing mansard loft extensions on roads that currently have them but stopping them elsewhere, does not make any sense.</li> <li>• We are also concerned about the poor result for the character of the Brookmill Road Conservation Area. If we are left with a situation where certain roads have mansards others do not, this will be highly detrimental to the cohesive character of the Conservation Area. This is especially true for Bolden Street.</li> <li>• In my experience, all of us local residents who are seeking mansards agree that our Victorian streetscapes and details of the houses are beautiful and something we should cherish.</li> <li>• We love the local area and the architecture associated with it. We believe the mansards that have been approved reflect the style of building and are extremely sympathetic to the original buildings. The use of natural slate and timber windows and the set back from the parapet are key design criteria that the council rightly insisted on when they were first approved.</li> <li>• We therefore request that you change the guidelines so as to make mansards permitted on all roads, including in Conservation Areas, providing the high design standards in the SPD are met.</li> </ul>			X	No Action  Whilst the comment is noted, the Council holds a different opinion on this topic.
CitizenSpace		General comment	<ol style="list-style-type: none"> <li>1. 'Minor-Material Amendment' is all too often used by developers to increase a development far beyond what was originally passed. This needs to be prevented.</li> <li>2. Currently, there are several local developers working aggressively in the Brockley Conservation Area to maximize profit. It is open</li> </ol>	X			No Action  Whilst the comment is noted, the Council holds a different opinion on this topic.

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			knowledge that they believe once applications are passed Lewisham do not have the power/money/will to do anything when either what was approved is breached or they use 'minor-material amendment' as a way of significantly increasing the size of what was approved etc.				
Blackheath Society		General comment	We agree that many contemporary design solutions are valid and have a great deal to offer but: <ul style="list-style-type: none"> <li>o The examples place too much emphasis on such solutions. The document would be better balanced if it included more examples of good traditional design</li> <li>o There seems to be an over-emphasis on the work of Gruff Limited</li> <li>o It is not clear that the example shown in Figure 4.9 (p32) conforms with all of the design principles in that section (1m path; respecting the architectural features of the original; subordination) and would therefore seem to be a poor choice of exemplar</li> </ul>			X	Make change
Conibere Phillips Architects		General comment	The document looks like a brochure for Gruff Architects. A wider range of examples must be sourced from other practices otherwise it raises questions of impartiality etc We have an example on Undercliff Road could be used if required.			X	Make change
Conibere Phillips Architects		General comment	Other: <ul style="list-style-type: none"> <li>- All external plumbing and services should not be allowed except for rainwater pipes.</li> </ul>	X			Make change