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The Telegraph Hill Society

Planning Service
London Borough of Lewisham
Laurence House
1 Catford Road
London SE6 4SW

31 August 2022

Dear Sir

Application DC/22/127795

Construction of a single storey rear extension, single storey side extension, and the replacement of windows with matching double-glazed timber painted window at 70 Jerningham Road, SE14

We have no objection in principle a side extension on this property as it does not extend to the boundary of the property. We further have no objection to the replacement windows.

We object however to the specific changes on the rear of the property for the reasons are set out below.

We note that there is also an application (DC/22/127795) to make other substantive changes to the rear of the property and when considering the overall impact on the heritage, the two will need to be taken in conjunction as well as individually.

Loss of rear bay

The applicant is proposing to destroy the bay window and replace it with a modern extension in a different style, thereby compromising the architectural integrity of the building contrary to policies DM31 and DM36.

The removal of this original feature which, once removed, would never be replaced would be extremely regrettable.

We are greatly concerned by the significant number of applications for extensions which destroy the original fabric of the buildings within the Conservation Area as regards the preservation of the area as a whole.

The Telegraph Hill Conservation Area Character appraisal makes particular reference to the rear of properties in the Conservation Area being as uniform as the front and, although inappropriate development has, in part, eroded this feature, the increase in applications for such rear extensions is of increasing concern.

More generally still, we have deep and continuing concern that such extensions, especially when inappropriately designed (and for our comments on this design see below), even where they are not visible in any part from the public realm, are contributing to the destruction of the Conservation Area. If such developments are allowed to continue we will finish up with a Conservation Area which is no more than the preservation of facades. This must not be permitted to happen.

We are unclear as to whether this extension will be visible from Arbutnot Road as there are currently trees in leaf obscuring any possible view. The Council should require clarity on this before considering the application further as there are precedents for refusing of removal of bay windows in such cases which may need to be factored into consideration.

Notwithstanding whether the alteration will be visible from the public realm, it will be visible from neighbouring properties and inappropriately designed extensions visible from those properties reduce the attractiveness of those properties to both existing and potential future residents. In this way, such extensions degrade the Conservation Area and, ultimately, can cumulatively threaten its continued existence.

We would draw the Council's attention to DM policy 36.4b which states that development within a Conservation Area will be refused if that development, which in isolation would lead to less than substantial harm to the building or area, but cumulatively would adversely affect the character and appearance of the Conservation Area. The policy applies generally and not only to those parts of the property visible from the public realm.

We believe that the significant destruction of the original fabric creates both substantial harm to the building in its own right and contributes cumulatively to substantial harm to the character of the Conservation Area and is therefore contrary to DM policy 36.4b.

The design is, as the Design and Access Statement admits, contemporary in appearance with modern aluminium window frames and timber construction. There is no congruity with the existing building in terms of style, materials, window size and design or placement and the proposal therefore conflicts with the following policies:

- DM Policy 31.2d: *additional or enlarged windows, doors and other openings, should be in keeping with the original pattern*, (the main effect of the extension is the enlargement of the window to the rear, rather than creating space; the new proposed door is not in keeping with the original pattern)
- DM policy 31.3f: *Extensions will not be permitted where they would adversely affect the architectural integrity of a group of buildings as a whole or cause an incongruous element in terms of the important features of a character area*, and
- DM policy 36.4a: *new development or alterations and extensions to existing buildings [will not be permitted where it] is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials* (materials in the area are London stock brick, slates and wood, not aluminium and timber).

Again these policies apply generally and not only to those parts visible from the public realm.

The "Heritage" statement gives no justification for destruction of the bay, the design nor the materials used.

Whilst we accept that the SPD states that a modern, high quality design can be successful in achieving a clear distinction between old and new (although we dispute whether this is something that should be sought), it also states that "*a traditional approach can be a more sensitive response to a historic building, particularly where homogeneity of groups of buildings is part of their special character*" (para 4.2.5). Clearly, given the reference in the Telegraph Hill Conservation Area Character Appraisal to the uniformity of the rear of the properties, this is a case where homogeneity is important, a traditional approach should be required and a modern design rejected.

The SPD further states that extensions in the Conservation Area should "*respect the original design and architecture features of the existing building*" (para 4.2.4). The proposed design, for the reasons set out above, does not.

In summary, the extension created by the loss of the bay, whilst distracting from appearance of the property and the heritage of the area, adds little to the amount of living accommodation in the property. The duty and the presumptive desirability of preserving the character and appearance of the Conservation Area clearly outweighs any benefits of the proposal.

Skylight in the side extension and impact on the neighbouring property at no 68

The proposal includes huge areas of skylight over almost the entire side extension. As this will be main kitchen area it will, we presume, be in general use. The light from that over the side extension will shine up directly into the rooms of 68 Jerningham Road.

The quantity of skylight is unneighbourly and will have a significant adverse effect on the amenity of the adjoining property contrary DM Policy 27.

The excess light caused by such skylights is an increasing source of complaint by residents in other areas and a number of Councils have made specific planning policies against such rooflights although we believe DM policies 27, 30 and 31.2c are sufficiently generally worded to deal with this situation.

Yours faithfully

A handwritten signature in black ink, appearing to read 'M G Bacchus', with a long horizontal line extending to the right from the end of the signature.

M G Bacchus
Chairman, Telegraph Hill Society.