



M G Bacchus MA FCA FRSA MInstD
92, Jerningham Road,
Telegraph Hill,
London. SE14 5NW

Tel / Fax: (020)-7635 9421
E-mail: ths@baccma.co.uk

The Telegraph Hill Society

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

7 November 2022

Dear Sir

Application DC/22/128692

Construction of a single storey extension to the rear elevation and the installation of timber windows to the front elevation of the basement at 34 Erlanger Road, SE14.

1. Single storey rear and side extension

There is doubt in our minds as to whether the Supplementary Planning Document on Extensions and Alterations can effectively override Council policy as regards design as it appears to do with regard to DM policies 30, 31 and 36 (quoted in more detail below). We accept, however, that this is not the view of the Council where modern designs, no matter how incongruous we feel they might be, appear to be preferable to those which integrate seamlessly with the existing property.

We make the following comments, in this section 1, therefore as information to the planning department in deciding the case. Should the planning department believe, despite our strong views to the contrary, that the extension fully complies with Council policies we would not seek to take the issue to Committee since it is clear that recent Committee decisions have supported the views provided by the planning department in these matters rather than our interpretation. We would hope however that the planning department would re-examine their interpretation of the policies and support the preservation of Conservation Areas as a whole.

General principles, and effect of destruction of original features

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 accept that this application will not be visible from the public realm. It will nonetheless 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.

As well as the use of inappropriate materials, which we note below, the applicant is proposing to destroy the side bay window which, as we have remarked in other applications, is an unusual feature of these properties. This is

the second application that we have dealt with this week in Erlanger Road which proposes the removal of this feature.

We note that the Council's view is that these should be retained where they are visible from the public realm but that their destruction can be permitted where they are not so visible. The justification for this appears to be that where they are not visible from the public realm no harm is created and therefore the continuing removal of more and more of features cannot be said to create harm. We disagree. The removal of a few examples of a feature may not create harm, that does not mean they can be continue to be removed until only a few (or none) remain.

If the cumulative effect of rear extensions is not taken into account, even where these are not visible from the public realm, we run the significant risk of finishing up with a Conservation Area where "facadism" rules and we are living in what is effectively no more than a film lot of historical frontages. That is not conservation.

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 continue to 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.

Precedents

The applicant notes in their Design and Access and Heritage Statement of some precedent in the area. In general each application must be decided on its own merit and therefore previous developments elsewhere cannot be taken as what should be allowed in this instance.

However what the examples clearly show is that the point is being reached whereby cumulative damage to the area must be considered in accordance with DM policy 36.4b.

The examples given by the applicant do not justify more destruction of the original heritage of the area, they provide evidence that it should stop.

Side elevation

Given that the proposed wall is to full height permitted, we are concerned over the poor design of it next to the neighbouring property: it presents a stark, unneighbourly and uninviting appearance to that property. We would suggest that the Council should look at this aspect of the design in more detail, and possibly require some alleviating features, should it consider approval of the application.

Design

The extension is square and blocky. It incorporates large full length windows with metal surrounds to the rear and a long window in the side extension. There is no congruity with the existing building in terms of style, window size and design or placement. We believe that the design 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,*
- 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. (The materials used in the Conservation Area are stock brick, wood and slate.)*

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

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 and 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.

2. Height

We note that the extension meets the 45° test outlined in the SDP. We have concerns though over the height of the extension, which is considerably higher than the typical 2m/2.5m fence which would normally separate the two properties, even accounting for the fact that the extension is 0.9m from the boundary. Had the extension reached the boundary, it would certainly have failed the test in SDP paragraph 4.2.3. It is possible that the extension would, in the words of SDP paragraph 4.2.3, “*overlook or have an overbearing or enclosing effect*” on the adjacent property and therefore would not be granted. Again, we make this as an observation, rather than as an objection, and ask the planning department to consider the point in deciding whether the application conforms with Council policy and should be allowed.

3. Skylight in the side extension and impact on the neighbouring property

The proposal includes huge areas of skylight over almost the entire side extension. The light from this will shine up directly into the rooms of the neighbouring property.

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.

4. Design - objection

We note that that the drawing and Heritage Statement refers to the extension being constructed in brick “to match existing”. The rendered drawings in the Heritage Statements shows this brickwork in Flemish Bond, but the drawings show stretcher bond. We have consistently objected to the use of stretcher bond in extensions and the Council has invariably made the use of Flemish Bond a condition. Given the amount of side wall which will be visible to the neighbouring property, this is even more important in this case, than it might be in others. Regardless of any decision as to the application design in general, we therefore object to this element of the proposal.

Should the Council be minded to grant the application, we would request, as is usual practice, that Flemish Bond brickwork is made a condition the grant.

Yours faithfully



M G Bacchus
Chairman, Telegraph Hill Society.