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## **The Telegraph Hill Society**

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

24 August 2022

Dear Sir

### **Application DC/22/127799**

#### **Construction of a single storey rear and side extension at 41 Drakefell Road, SE14**

We note that this is a new application following the refusal of DC/22/126503 for a similar extension to the same property.

The Society objects to this application which continues to present an aspect to the Telegraph Hill Park and will permanently alter the way that Telegraph Hill Park, against which it abuts, appears to those entering and leaving the park and will add an highly incongruous element into the Victorian heritage of the area.

We note that the applicant states that the extension would not be visible from the front elevation. The applicant however fails to note that the property adjoins an entrance to Telegraph Hill Park and this extension would therefore be visible to the public both from the street at from the side and from the park path. Because of its location and prominence with respect to the park, and the message any development will send both to users of the park and developers of other properties across the Conservation Area, this is a hugely important site and exceptional care must be taken over any development.

The applicant states that the modern design “keeps the new works discernible to the casual observer.” In our view that is precisely the reason why this should be rejected. In this location any addition should blend in with its surroundings and not be discernible to the casual, or indeed, the non-casual, observer. Other developments across the hill, such as at the Jerningham Road/Arbuthnot Road junction or 1 Pepys Road, have taken great pains to ensure that they do not stick out like a blot on the landscape. There is absolutely no reason why, in this case, an extension could not be built which blends in, conforms to Council policy and reflects the architectural heritage of the area.

Details objections with reference to Council development policies are set out below. We do not believe that this proposal meets any of the necessary criteria for such a development and should be rejected.

### **DM Policy 31.1**

*Development proposals for alterations and extensions, including roof extensions will be required to be of a high, site specific, and sensitive design quality, and respect and/or complement the form, setting, period, architectural characteristics, and detailing of the original buildings, including external features such as chimneys, and porches.*

The Alterations and Extensions SPD further states that alterations within conservation areas should be of the “highest quality” not merely “high quality” and that rear extensions should “respect the original design and architecture features of the existing building.”

The Heritage Statement provided by the applicant makes no real attempt to justify the design used nor explain how it respects or complements the architecture of the area, as policy requires - undoubtedly because it is impossible to do.

The design as it presents to the park entrance has a square dormer window and a large plate glass ground floor window. The window extends from floor to ceiling and combined with the dormer reaches to the roof (something which would not be allowed in a roof extension). There are no window cills or lintels and no ornamentation surrounding the windows. This is wholly unlike anything in the existing original property or the remainder of the Conservation Area. Far from adding a modern contemporary element it merely adds incongruous one.

The ornamental detail of red diamond brickwork does not reflect the original brick styling of the property or of the area, which uses red stringer courses within the yellow London Stock brick primary courses.

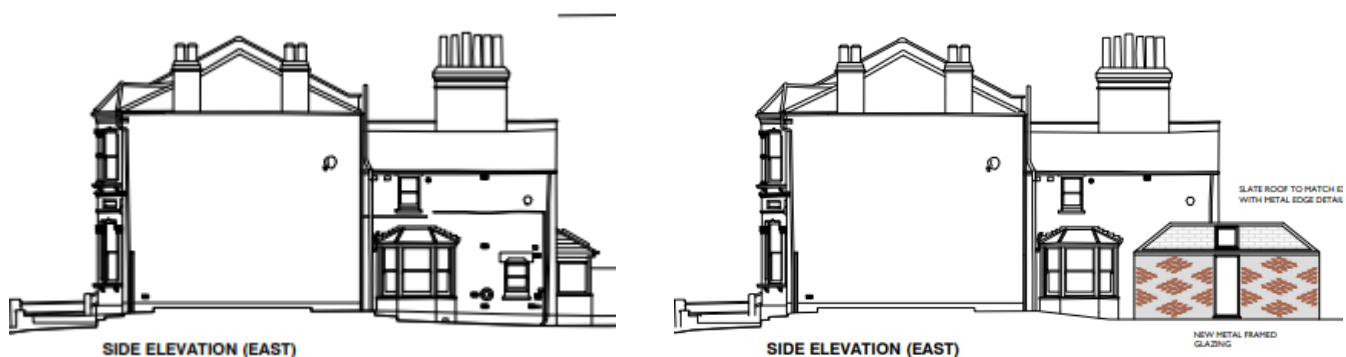
In addition the large plate glass bi-fold doors/windows in the rear elevation are wholly out of keeping with the architectural character of the area.

It is possible to design a rear extension which presents itself to the views from the park as a Victorian outbuilding (in which case the windows would match the existing property) or as conservatory (see below) but neither is achieved by this application which finishes up as a poor pastiche.

### DM Policy 31.2d

*Additional or enlarged windows, doors and other openings, should be in keeping with the original pattern*

As clearly shown in the drawings (reproduced below), this policy has not been adhered to with respect to the window facing the park path, which as noted above, has no relation in size or design to the existing windows in the property.



The materials used in the windows (see DM Policy 36.4a quoted below) are metal, whereas all existing windows in the property are wooden sash.

Turning to the rear elevation, as illustrated to the right, the proposed bi-fold full-length windows cannot be said to be in keeping with the original pattern of either this or other Victorian properties. It is suggested, in the Heritage Statement, that is “conservatory style”. Whilst a Victorian Conservatory style extension might be appropriate, such extensions would not have had full length metal windows but would have had wooden framed windows with stall risers.



### DM Policy 31.3

*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*

The proposed extension, as a result of the mis-matched features, would add a highly incongruous addition both in respect of the semi-detached property itself and in the context of the Conservation Area as a whole. The illustrations of the views from the side rear, shown above, which would be visible from the park, clearly show this.

We would draw your attention to the Telegraph Hill Conservation Area Character Appraisal which makes particular reference to the rear of properties in the Conservation Area being as uniform as the front and a distinguishing and important feature of area which should be conserved.

We note that the Alterations and Extensions SPD does state that a modern, high quality design can be successful in achieving a clear distinction between the new and the old. However 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 4.2.4). This is clearly the case here, where homogeneity of style is a critical feature of the Conservation Area and therefore, applying the SPD, a traditional approach should be used.

### **DM Policy 36.1**

*For development proposals affecting heritage assets the Council will require a statement that describes the significance of the asset and its setting, and an assessment of the impact on that significance.*

As we have indicated above the Design and Heritage statement fails to mention the fact that the development is adjacent to the park entrance and highly visible, nor does it include an assessment of the impact it will have on that. In our view the application should not have been accepted as validated as it does not meet these requirements.

### **DM Policy 36.4**

*The Council, having paid special attention to the special interest of its Conservation Areas, and the desirability of preserving or enhancing their character or appearance, will not grant planning permission where:*

- a. new development or alterations and extensions to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials*
- b. 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.*

We have outlined above the areas in which the extension as proposed is incompatible with the special characteristics of the area, its buildings, setting, scale form and materials.

We consider this development, on its own, would lead to substantial harm to the area and adversely affect the character and appearance of the conservation area.

### **CONCLUSION**

As stated, and for all the reasons given above, we object to this application, the granting of which would create significant damage to appearance of the Conservation Area, and we would request that it is refused permission.

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  
Chair, Telegraph Hill Society.