

APPENDIX 2**Responses to draft Building Alterations and Extensions SPD consultation**

Respondent No. and Name	Draft SPD Para number	Respondent comment	Council response
1 Bailey	Annex 1 1.7	Support conservation intentions.	Noted.
1b	3.15 & 3.16	Support approach on side extensions but with heritage assets the text should refer to / be clearer on single storey side extensions.	Accepted. Text has been amended.
2 Burrill	n/a	Fully support the proposed changes.	Noted.
2b	4.24	Dormers would be better with two windows rather than one for symmetry and internal layouts.	Accepted. Text has been amended.
2c	4.23	remove ' <i>Full mansards are unlikely to be acceptable where they would disturb the group value of properties</i> '	Accepted. Text has been amended.
3 Judge	n/a	Fully support the proposed changes.	Noted.

b	4.24	Dormers would be better with two windows rather than one for symmetry and internal layouts.	Accepted. Text has been amended.
3c	4.23	remove <i>'Full mansards are unlikely to be acceptable where they would disturb the group value of properties'</i>	Accepted. Text has been amended.
4 Harris	n/a	Fully support the proposed changes.	Noted.
4b	4.24	Dormers would be better with two windows rather than one for symmetry and internal layouts.	Accepted. Text has been amended.
4c	4.23	remove <i>'Full mansards are unlikely to be acceptable where they would disturb the group value of properties'</i>	Accepted. Text has been amended.
5 Sherard	n/a	Sought clarification	Clarification provided by e-mail.
6 Lawrenson	n/a	Fully support the proposed changes.	Noted.
6b	4.24	Dormers would be better with two windows rather than one for symmetry and internal layouts.	Accepted. Text has been amended.
6c	4.23	remove <i>'Full mansards are unlikely to be acceptable where they would disturb the group value of properties'</i>	Accepted. Text has been amended.
7 Burrill	n/a	Fully support the proposed changes.	Noted.
7b	4.24	Dormers would be better with two windows rather than one for symmetry and internal layouts.	Accepted. Text has been amended.
7c	4.23	remove <i>'Full mansards are unlikely to be acceptable where they would disturb the group value of properties'</i>	Accepted. Text has been amended.

8 Brockwell	n/a	Fully support the proposed changes.	Noted.
8b	4.24	Dormers would be better with two windows rather than one for symmetry and internal layouts.	Accepted. Text has been amended.
9c	4.23	remove ' <i>Full mansards are unlikely to be acceptable where they would disturb the group value of properties</i> '	Accepted. Text has been amended.
10 Met Police	2.8	<p>To mitigate this particular crime trend, I would recommend that this SPD specifically refers to minimum standards of security for new door-sets and windows fitted. It is normally possible to source new windows and doors that meet Conservation and Secured by design standards however, if this is not possible or the units are to be refurbished, the minimum levels of security shown in the document above should be incorporated.</p> <p>I would request specific reference to security and /or reference to the Supplementary Guidance document covering it. Basically, I would recommend that a clear reference is made to encourage applicants to fit security rated products if at all possible.</p>	Accepted. Text had been amended.
11 Besley	n/a	Conservation Area controls are too strict.	Not accepted. The controls accord with established best practice.
12 Gorokhovich	n/a	Supports document.	Noted.
12b	4.20	Support approach to rear mansards.	Noted.

13	n/a	Supports the document.	Noted.
14 buttery	n/a	welcome the Draft SPD	Noted.
14a	4.22	Support approach.	Noted.
14b	4.23	Suggests re-wording;- “Full Mansards are unlikely to be acceptable where they would disturb the group value of properties. Similarly they will be resisted on heritage assets where they would lead to the loss of important established roof forms”.	Part accepted. This text has been revisited and amended to address the concern.
14c	4.24	Object to one window limit on front of mansards	Accepted. Text had been amended.
14d	4.24	A rear view of a mansard terrace would be useful.	Accepted. Rear illustration has been provided.
15 Glendall Residents	n/a	Support.	Noted.
15b	4.23	Suggests re-wording of first sentence.	Accepted. Text had been amended.
15c	4.24	Object to one window limit on front of mansards.	Accepted. Text had been amended.
15d	4.24	A rear view of a mansard terrace would be useful.	Accepted. Rear illustration has been provided.

16 Presh	n/a	Support.	Noted.
16b	4.20	Please support L shaped dormers.	Not accepted. This matter was considered when the draft document was prepared. L shaped dormers – those extending out over a rear return - are not considered appropriate forms of development because of their discordant appearance.
17 Sandor	n/a	Support.	Noted.
17b	4.23	Suggests re-wording of first sentence.	Accepted. Text has been amended.
17c	4.24	Object to one window limit on front of mansards.	Accepted. Text has been amended.
18 Meehan	4.16	Support approach to extensions roof additions.	Noted.
18b	4.30	A more flexible approach to roof terraces is required.	Not accepted. A more flexible approach is not considered appropriate on amenity grounds.
19 Mowbray	4.16	Support this para.	Noted.
19b	4.23	First sentence needs to be re-visited.	Accepted. Text has been amended.
19c	4.24	Object to one window limit on front of mansards.	Accepted. Text has been amended.

20 Harris	n/a	Support.	Noted.
20b	4.23	First sentence needs to be re-visited.	Accepted. Text has been amended.
20c	4.24	Object to one window limit on front of mansards.	Accepted. Text has been amended.
21 Neill	n/a	Support.	Noted.
21b	4.23	First sentence needs to be re-visited	Accepted. Text has been amended.
21c	4.24	Object to one window limit on front of mansards.	Accepted. Text has been amended.
22 Roberts	n/a	Support.	Noted.
23 Thompson	n/a	Support.	Noted.
23b	4.23	First sentence needs to be re-visited.	Accepted. Text has been amended.
23c	4.24	Object to one window limit on front of mansards.	Accepted. Text has been amended.
24 Sutcliffe	4.16	Larger roof extensions should be allowed in conservation areas.	Not accepted. The approach set out accords with established best practice. Larger roof extensions are considered unacceptable because of the harm they would cause to historic roofscapes.

25 Brigstocke	n/a	Support approach on wrap-around extensions	Noted.
26 Broomfield	n/a	Support.	Noted.
26b	4.24	Object to one window limit on front of mansards	Accepted. The text has been amended.
27 Montemurro	n/a	Support.	Noted.
28 Blount	n/a	Support.	Noted.
28b	4.23	Suggests re-wording of first sentence.	Accepted. The text has been amended.
28c	4.24	Object to one window limit on front of mansards.	Accepted. The text has been amended.
28d	4.24	A rear view of a mansard terrace would be useful.	Accepted. Rear illustration has been provided.
29 Perucha	4.16	Support approach to lofts.	Noted.
30 Pitman	n/a	Support.	Noted.
30b	Fig 10	L shaped dormers should also be permitted	Not accepted. This matter was considered when the draft document was prepared. L shaped dormers – those extending out over a rear return - are not considered appropriate forms of development because of their discordant

			appearance.
31 Hankins	n/a	Support.	Noted.
31b	4.23	Suggests re-wording of first sentence	Accepted. The text has been amended.
31c	4.24	Object to one window limit on front of mansards	Accepted. The text has been amended.
32 Hibbins	n/a	Support.	Noted.
32b	4.23	Suggests re-wording of first sentence	Accepted. The text has been amended.
32c	4.24	Object to one window limit on front of mansards	Accepted. The text has been amended.
33 Annis	n/a	Support.	Noted.
33b	4.23	Suggests re-wording of first sentence	Accepted. The text has been amended.
33c	4.24	Object to one window limit on front of mansards	Accepted. The text has been amended.
34 cheyne	n/a	Support.	Noted.
34b	4.23	Suggests re-wording of first sentence	Accepted. The text has been amended.

34c	4.24	Object to one window limit on front of mansards	Accepted. The text has been amended.
35 chetwynd	n/a	Support.	Noted.
35b	4.23	Suggests re-wording of first sentence	Accepted. The text has been amended.
35c	4.24	Object to one window limit on front of mansards	Accepted. The text has been amended.
36 loannides	4.16	Top floor flats in converted houses should be afforded the same extension rights as single dwelling houses.	Not accepted. Permitted development rights produce visually discordant roofscapes. The proposed approach to rear mansard and full mansard additions will allow extensions in a more ordered way.
36b	Section 4	There should be no floor space limits on loft conversions	Not accepted. The SPD does not contain floorspace limits.
37 Evans	n/a	Support.	Noted.
37b	4.24	Object to one window limit on front of mansards	Accepted. The text has been amended.
38 woods	n/a	Support.	Noted.
38b	4.23	Suggests re-wording of first sentence	Accepted. The text has been amended.
38c	4.24	Object to one window limit on front of mansards	Accepted. The text has been amended.

39 Graham	n/a	Support.	Noted.
40 Pearson	4.6	The current proposed plan to allow linked Dormer windows in lofts will not create a usable room that will allow families to stay in the area in the longer term, the space it creates will not be big enough to comply with either good building practise or the minimum permitted bedroom size allowed in Social Housing.	Not accepted. The linked dormer approach will provide improved headroom when compared to the Council's previous approach. The comparison with social housing is not considered relevant.
40b	4.6	The legal minimum ceiling height has now been removed from the Building Regulations, but good building practise stipulates that at least 50% of the floor area should have a floor to ceiling height of at least 2.1m.	Noted.
40c	4.6	The minimum size of a single bedroom permitted in Social Housing is 6.5m ²	Noted.
40d	4.6	Current planning regulations on the Hyde Farm Estate permit 2 dormers of approximately 1 x 2m to be built, one of these has to be used to create a new staircase. This means the other dormer creates just 2m ² - the only area in the loft except for the apex of the roof - with a standing height of 1.9m. This is only 5% of the total loft area (just one tenth of the 50% it should be) and creates a room with a usable area only one third the size of the smallest single bedroom permitted in Social Housing.	Noted.
40e	4.6	By allowing a link between the two dormers set back one third of their projection as proposed will only add a further 2.6m ² of space with a head height of 1.9m. This will create a total usable area of only 4.6m ² , which at 12.3% of the floor area is still four fifths short of the 50% of floor area it should be and creates a	Noted. The social housing comparison is not considered relevant.

		room one third smaller than the minimum permitted single bedroom size in Social Housing.	
40f	4.6	By allowing a link between the two dormers set back one third of their projection as proposed will only add a further 2.6m ² of space with a head height of 1.9m. This will create a total usable area of only 4.6m ² , which at 12.3% of the floor area is still four fifths short of the 50% of floor area it should be and creates a room one third smaller than the the minimum permitted single bedroom size in Social Housing.	Noted. The social housing comparison is not considered relevant.
40 g	4.6	A full Mansard development would create 18.5m ² (50% of the floor area) at a height of 1.9m. This would be compliant with good building practise and create a room with a usable area compliant with the minimum size of a double bedroom permitted in Social Housing. This would be a proper, usable, additional room. Furthermore, as pressure on the limited property in London increases it is likely that all the upstairs flats would have a rear Mansard development (this is certainly the case in the houses immediately outside the Conservation Area). This would mean that there would once again be a continuous roofline replacing the current mix, which would serve to improve the Conservation Area by returning it a unified appearance as they did when first built.	Noted. The social housing comparison is not considered relevant. Full mansard additions are not considered appropriate in conservation areas because they result in loss of historic roof forms and roofscape character.
41 Bull	n/a	Support.	Noted.
41b	4.10	Having looked at this document: http://www.lambeth.gov.uk/sites/default/files/pl-local-plan-draft-SPD-appendix-two.pdf , I noticed that with	Accepted. Text has been amended.

		<p>regard to loft conversions, there's no explicit mention of whether or not you endorse Velux cabrio style windows. http://www.velux.co.uk/products/roof-windows/balcony-and-terrace/cabrio-balcony I'd like to suggest that you consider allowing them, as they are unobtrusive from the street, but for a couple of days each year when we have some sunshine, it allows the residents of flats to enjoy the sunshine and have a tiny amount of temporary outside space, just to sit in a chair and read a book in the sun.</p>	
41c	4.18	<p>With regard to your guidance, it suggests that converting the loft space above a rear return in the kind of Victorian terrace properties pictured in Fig 4 is likely to be resisted, "especially in groups where there is some uniformity". It's quite common on Wandsworth to be able to do this kind of conversion, so I wonder why the decision against it has been made in Lambeth? Given it's not been allowed up until now, it's going to be very hard for any residents to be able to overcome the hurdle of 'uniformity' on their street, as by definition no one else will have done it. But were it to be allowed, you would no doubt quickly see the option taken up by many, which would create a new kind of uniformity. It would be great if Lambeth residents could make the most out of their properties in the same way that Wandsworth residents can. Given how much house prices have gone, being able to gain the most space from the property you live in (if you have a growing family for example), without having to move out of the area you've lived in happily, would be a real benefit.</p>	<p>Not accepted. This matter was considered when the draft document was prepared. L shaped dormers – those extending out over a rear return - are not considered appropriate forms of development because of their discordant appearance.</p>

41d	4.30	With regard to roof terraces, section 4.3-4.5 of your 2008 document http://www.lambeth.gov.uk/sites/default/files/pl-adopted-residential-alterationsand-extensions-spd_1.pdf was quite clear on roof terraces, but there wasn't as much clarity in section 2.14 of your new document. Could I ask you to expand a little in your proposed document on the guidelines around roof terraces (aside from those over shop roofs). I'd very much like to be able to have a roof terrace above my rear return (i.e. on the third storey), even if it's only half the size of the room below.	Not accepted. There was further guidance on roof terraces in para. 4.30 of the draft SPD. It remains in the final version A more flexible approach is not considered appropriate on amenity grounds.
42 Ings	n/a	Support.	Noted.
42 b	2.2	Point 1: The Paragraph 2.2 has a fundamental error in stating that the Lambeth building stock performs well. I have lived in a Lambeth terraced house that falls within the category described for many years and consider it to be fairly typical. The house performs particularly poorly in the aspect of water penetration from the butterfly roof, damp through the floor and walls and thermal performance is extremely poor throughout. The wording "performs well" should be deleted or expanded to explain to what performance criteria the comment relates.	Not accepted. The survival of so much of Lambeth's historic building stock is considered a testimony to its good performance.
42c	4.23	Point 2: The Paragraph 4.23 should be deleted. You will be aware of the pent up demand for mansard development. It would seem both unfair and unsustainable to hold the stated position on non-heritage assets. It would take one successful appeal decision from an independent Inspector who agrees	Accepted. The text has been amended.

		with the vast majority of residents rather than Lambeth local authority to completely undermine the position of “group value”. Heritage assets are protected comprehensively elsewhere in the document.	
43 Garcia	n/a	Support.	Noted.
43b	4.22	I feel that when looking at mansard extensions there should be allowance to allow for 2 windows in the mansards, to give the property symmetry and allow for stud walls to be correctly fitted within the interior of the extension.	Accepted. The text has been amended.
43c	4.23	I also feel that the statement in 4.23 needs to be amended by removing 'Full mansards are unlikely to be acceptable where they would disturb the group value of properties' as it could cause confusion going forward	Accepted. The text has been amended.
44 Nepomnyashchiy	n/a	Support. The proposed document strikes the right balance between preserving neighbourhood feel and allowing for reasonable expansion of living space. It also strives to bring Lambeth in line with other boroughs thus inviting residents who are keen to invest in their property and their neighborhood - certainly a worthy goal for a borough.	Noted.
45 Schamroth & Harriss Architects	n/a	This is a clear and concise document and appears a lot less prescriptive than some other planning policy produced in the past.	Noted.
45b	3.8	p10, para 3.8: '... end extensions & wraparounds are best treated in the same material as the main return.'	Accepted. The text has been amended.

		This is not necessarily the case, especially if the aim is to achieve subordination and/or transparency.	
45c	3.23	p14, para 3.23 The apparent presumption against timber cladding & render is unnecessary. Render is often an integral element in the Lambeth built environment and future maintenance should not be an overriding planning issue; this would also apply to timber windows, which elsewhere are preferred.	Not accepted. The Lambeth Local Distinctiveness Study (2012) illustrates how render and timber perform poorly as external wall finishes.
45d	4.5	p17, para 4.5 Dormers the directions on cill & ceiling heights are overly prescriptive	Not accepted. These are considered necessary in order to ensure subordination.
45e	4.5	p17, para 4.5 Dormers casements are often a better window type at dormer level than sashes, even if the latter are prevalent below: the photos on p18 show a very successful casement dormer and a sash dormer that would have looked much better with casements	Accepted. Text has been amended.
	4.5	lining up dormers with windows below: this is by no means the rule on existing heritage assets, so it seems unnecessary to make it one for alterations - a case-by-case assessment is far more sensible	Not accepted. As a general rule the alignment of dormers is considered necessary.
	6.7	p27, para 6.7 '... 70% of a rear garden to be left undeveloped.' If this is to be generally applied, it is a significant change to the present presumption of 50%, which is also enshrined in the Permitted Development regulations. In small inner city gardens, an extension with good links to the garden often provides more amenity value than retaining the open space it is built on.	Not accepted. The 70% comes from the draft Local Plan and therefore can not be changed in the SPD.
46 Brixton Society	n/a	The SPD remains fixated on pre-1860 buildings, but Brixton has a wide range of property built in the following hundred years where guidance is also needed.	Not accepted.

		For properties built within the past hundred years, the advice in the draft SPD is often ambiguous and sometimes counter-productive, but the need for clear and practical guidance is growing.	
46b	n/a	Overall, the SPD is over-prescriptive about works at the rear of properties but sometimes too weak in safeguarding features on street frontages, where most of the distinctive character of Victorian and Edwardian buildings tends to reside.	Not accepted.
46d	n/a	Terms like “traditional” or “period” should be used with great caution. There are fundamental differences in proportions and techniques between buildings from say the late 18 th century and the late 19 th century, but householder applicants may not realise this.	Noted.
46e	n/a	Guidance should be consistent across all building uses, and there is no benefit in imposing petty restrictions on one property which the neighbours can ignore because theirs is a single-family house.	Not accepted. The policy of the Local Plan and associated guidance in the SPD are not considered to be petty.
46f	2.4 – 2.10	Setting-back the window frame from the face of the wall by half a brick was the norm between 1774 and 1894, and helped protect timber frames from deterioration. This feature should be maintained on properties in this age range. (Bullet 1 in para 2.8 strangely refers to reveal depth <i>above</i> windows.)	Accepted. The text has been amended.
46g	2.4 – 2.10	Where casements with thin frames are replaced with chunkier frames in upvc or aluminium, the results can be unsightly if the original opening pattern is slavishly followed, because the glazed area is noticeably reduced, making the frames more prominent. Modifying the opening pattern may enable a similar	Noted.

		glass/frame ratio to be maintained.	
46h	2.4 – 2.10	Our preferred solution for mid-20 th century properties is to retain or match the original frame type and fit secondary glazing internally to provide the desired thermal or acoustic insulation.	Noted.
46i	2.4 – 2.10	We see no reason for a blanket ban on trickle vents on “heritage assets”, since your broad definition of these could include any 20 th century property within a CA (Bullet 5 in para 2.8).	Not accepted. Trickle vents are not characteristic of windows in Lambeth’s heritage assets.
46j	2.11	Translucent or obscured glazing should be acceptable for balconies, to provide privacy with minimal loss of daylight (para 2.12). Opaque screening may lead to objections from neighbours over loss of daylight or sunlight.	Accepted. The text has been amended.
46k	2.14	Shopfronts which project forward from the facade of residential upper floors present good opportunities to provide roof terraces or balconies for the benefit of residents, with less risk of overlooking neighbours than if similar provision is made at the rear. Advice should be included on acceptable balustrade treatments. See <i>also our comments on para 4.30 below</i> .	Not accepted. The amenity issues outlined in the SPD are considered sufficient to justify the Council’s approach.
46l	2.17	We cannot accept a general prohibition on rendering walls. It is a long-established solution where brickwork is poor or vulnerable to driving rain. In most cases rendering would be acceptable at the rear of properties, though we prefer to retain good facing brickwork on street frontages. Our preferred technique is a through-coloured render	Not accepted. The Lambeth Local Distinctiveness Study (2012) illustrates how render perform poorly as external wall finishes.

		<p>applied over external insulation with a fibreglass mesh reinforcement to reduce the risk of cracking.</p> <p><i>(See also comments on Section 5 below)</i></p>	
46m	2.18	<p>Revisions introduced in the Lambeth Local Plan increased the minimum threshold size for conversion of houses. However, rather than ensuring family use, this only encourages more sharing by adult tenants (creating informal HMOs). Poorly-regulated multiple-occupation accelerated the deterioration of large old houses around Brixton in the 1960s, leading to housing stress and expensive redevelopment, and we fear a repeat of this process.</p> <p>The additional restriction on conversions beyond 50% of properties in a street is a crude control which fails to address variations in property size, layout and location. Again this tends to increase the extent of house-sharing and HMOs.</p> <p>It would be more sensible to focus on protecting the houses that have adequate gardens suitable for family use. Large houses on main road frontages are less attractive to families, but can work better when converted into flats, particularly where close to public transport, which can reduce their parking demand.</p>	Not accepted. These matters are within the Local Plan not the SPD.
46n	2.18 - 23	<p>There is a need for more guidance or examples of good practice, especially how to deal with former shop-fronts, to respond to the steady closure of Victorian corner shops and local parades over the past 50 years. Many of these have had only interim works</p>	Accepted. The text has been amended.

		<p>and there is increasing interest in more substantial changes.</p> <p>There are also issues where shops remain in commercial use. Within Brixton's town centre (and possibly others), former residential space above shops is still often vacant and neglected because traders are focussed on their main business. Re-use of residential space above shops needs to be encouraged, including provision of independent access.</p> <p><i>See also our comments below on paras 2.29 and 4.30.</i></p>	
46o	2.28	Para 2.28 on satellite dishes is welcomed.	Noted.
46p	2.29	<p>Where restaurant, bar or take-away uses remain on the ground floor, we prefer extract ventilation ducts to be carried up above the windows of any flats on the upper floors. Outlets within or directly above shop-fronts are not acceptable, because of the risk of offensive smells entering the residential accommodation.</p> <p>Duct casings should preferably be finished in matt pastel colours, rather than galvanised or metallic finishes. The imitation brick pattern illustrated directly above para 2.29 is NOT acceptable.</p>	Accepted. Text has been amended.
46q		As noted in our Overview, the SPD has a negative tendency to promote "tidying-up" at the rear of properties, which loses the original informal character of these spaces.	Not accepted. The SPD approach recognises the common repetition of house types in many parts of the borough and offers extension options for these types.

46r	3.3	<p>This is not a widespread type in our area, and we consider that the proposed degree of control is only appropriate if:</p> <ul style="list-style-type: none"> - A terrace is listed; - Or in a conservation area, the rear is prominent from the highway or a public open space. 	Noted.
46s	3.3	<p>The historical description in para 3.3 is patently wrong. Basing policies on inaccurate information is unsound.</p> <p>There was a more gradual evolution from the 3 or 4-storey terrace with subordinate closet-size rear returns, to the 2-storey terrace with a 3-storey rear return which typically includes a bathroom and a double-bedroom on each floor.</p> <p>All stages of the process are represented in Brixton, including many surviving examples of terrace houses with semi-basements and substantial 3-storey rear returns.</p>	Not accepted. The description comes from the borough-wide Lambeth Local Distinctiveness Study, 2012, and is considered accurate.
46t	3.7	<p>We have never understood the Council's hostility to "wrap-around" rear extensions (para.3.7).</p> <p>Two-storey infill extensions should be acceptable in terraces of 3 or more storeys, subject to overall subordination (para 3.11). Almost all infill extensions involve some differences in floor levels, so this is scarcely a valid reason for refusal – we just need to encourage designers to do better!</p> <p>In both cases, restrictions would only be appropriate if similar criteria are applied as we suggested on para 3.4 above.</p>	Not accepted. The Council's approach to wrap-around extensions on heritage assets is considered justified.

46u	3.4	<p>We commend the configuration shown in example 3 of Figs.3 & 4, where a light-well is retained between the original ground floor rear window and the new extension. This layout maintains decent day-lighting to the rear room and reduces the need for alterations to existing external pipework and drainage.</p>	Noted.
46v	3.4	<p>Example 6 in Fig.3 was not visible, due to being overlapped by Fig.4, so its relevance is unknown to us and cannot be endorsed.</p>	Accepted. Illustration amended.
46w	3.13	<p>Rather than a blanket ban on conservatories above the ground storey, it would be more constructive to apply similar criteria to those for open balconies or terraces, as a way of protecting neighbours' privacy.</p> <p>This technique has been successfully adopted in enclosing old balconies on 1960s Council blocks, so there are already precedents.</p>	Not accepted. The adverse impacts on amenity from conservatories at higher level are considered adequate justification for the Council's position.
46x	3.15	<p>The illustrations would be more helpful if they showed what was happening on the other side of the flank boundary. Applicants should be reminded to take the adjacent property into account, in case there are day-lighting issues.</p> <p>If the house is flanked by a highway, or by a building with a substantial open area alongside, the Fig.6 extension would be quite acceptable, though we would prefer it with the hipped roof form from fig.7 (or a half-hipped version). In contrast, the stepped side extension in Fig.7 jars visually, but could be made acceptable with a mansard side slope, so that the flank eaves or party wall parapet is at 1st floor level.</p>	Part Accepted. The text has been amended.

46y	3.17	<p>Para 3.17 is one of those which leaves applicants none the wiser. Our view is that 2-storey side extensions can be acceptable, even on “heritage assets”, if they are subordinate to the host building. Taking the form of a coach house or service wing, with a small set-back from the original frontage, will often work well in the street scene. This is preferable to simply extruding the original facade sideways with replica openings.</p>	<p>Not accepted. The advice is general and can not cover every eventuality. However, the starting point that side space is important to heritage assets is considered appropriate.</p>
46z	3.18	<p>This section is of growing importance because rising property values have made it financially viable to enlarge basements or add new ones. This has already been a contentious issue in other boroughs, so we are disappointed that this topic has not been covered more fully.</p> <p>As a minimum, the Council should alert applicants to the need to negotiate with adjoining owners under the Party Wall Act whenever foundations are to be underpinned or otherwise deepened, which will almost always be the case with basement works.</p>	<p>Noted.</p>
46a1	3.19	<p>Railings and steps (para 3.19) are traditional features of light-wells to 19th century semi-basements, and should be encouraged if sympathetic to the host building. Surface grilles and pavement lights are less satisfactory in providing occupants with an outlook or daylight, and should only be accepted if there are limiting circumstances, such as a need to maintain ground-level access or forecourt space for bins or cycles.</p>	<p>Noted.</p>

46b1	4.1	<p>“London Roofs” or valley roofs are vulnerable to leakage and decay if the valley gutter fails, so owners are not keen to retain them.</p> <p>The traditional form of extension to these is an attic storey or mansard set back behind the front parapet. This helps reduce the apparent bulk of an extra storey when seen from street level. Versions where the front is set back further to provide a balcony are even less obtrusive, and therefore welcome (Fig.11, cases 2 & 3).</p> <p>Full mansard roofs, with the eaves exposed on the street frontage, are less common, though there are local examples from the 1860s and around 1930.</p> <p>We would not encourage this form on the street elevation of an extension, but it is a welcome treatment at the rear.</p>	Not accepted. The Council considers that uniformity should be the key consideration with mansard additions to properties in groups.
46c1	Fig 11	However, fig.11 is poorly drawn, so applicants may fail to distinguish between the parapet and eaves gutter configurations.	Accepted. The illustration has been amended
47d1	4.21	<p>Hipped roofs, typically with plain clay tiles, are a widespread suburban type in the southern half of the borough, but the SPD offers little guidance beyond a passing reference in para 4.21. Other boroughs (e.g. Bromley, Lewisham) have issued more guidance on these types.</p> <p>Hip to gable conversions would normally be acceptable, and would be more welcome on pre-1914 buildings, where brick gables are more common.</p>	Not accepted. The advice provided is considered adequate.

47e1	4.15	<p>We are alarmed at the disappearance of original dormers from existing roofs in favour of roof-windows, particularly on front roof-slopes. This may be due to the Council being over-prescriptive about dormer designs, whilst there is less control over roof-windows.</p> <p>No guidance or encouragement is offered to restore front dormers.</p>	Accepted. Text has been amended.
47f1	4.5	<p>In para 4.5, bullet 2, Building Regulations dictate the acceptable range of cill heights if a window may be used for rescue by the fire brigade. They similarly prescribe acceptable distances from the eaves to a dormer or roof window.</p> <p>In Permitted Development, the distance from eaves to dormer (measured along the roof slope) must be at least 200mm.</p>	Noted.
47g1	4.24	In bullet 4, it is not clear why timber fascias should be avoided generally, so we must object. Stylistically, they will chime better with some building styles or periods than others.	Not accepted. On traditional mansards timber fascias are not considered acceptable.
47h1	Fig 9	<p>Once again, the illustrations are unduly concerned with rear roof slopes.</p> <p>The caption to Fig.9 makes no sense – no dormers are shown.</p> <p>We find fault with the two photos at the foot of page 18:</p> <p>On the left, the caption is too obscure and should say “too bulky for a front roof slope and the window proportions contrast with the windows below”.</p>	Part accepted. Caption has been amended.

		On the right, it is difficult to see the context, but similar dormer extensions would be acceptable on interwar houses where tiled roofs are a dominant element.	
47i1	4.15	We welcome the endorsement of Sunpipes and similar light tubes in para 4.15. These can restore natural light to internal spaces and reduce dependence on electric lighting, assisting with sustainability objectives.	Noted.
47j1	4.25	The SPD is over-prescriptive about raising existing chimneys, though we would encourage owners to retain internal chimney breasts to avoid weakening the structure.	Not accepted. The extension of chimney stacks is considered important in order to secure attractive roofscapes.
47k1	4.25	On heritage assets, parapet copings should match the original pattern as far as possible. Your original wording prohibiting saddle copings discriminates unfairly against Edwardian properties, such as the Leigham Court Estate CA.	Not accepted. The advice is general. Given their conservation area status the Council would support the installation of mansard additions on the Leigham Court Estate.
47l1	4.30	These should be welcome on street frontages if: <ul style="list-style-type: none"> - They are provided above projecting shopfronts; or - They are set behind an original parapet to a former "London" roof; or - They are above a subordinate side extension, provided there are adequate measures to limit overlooking of flanking property. 	Not accepted. The amenity of adjoining residents needs to remain a key consideration.
47m1	4.30	Past policies have been very restrictive on allowing outdoor roof terraces or balconies for flats in conversions – they should be more supportive. A fundamental weakness of the Council's existing suite of policies is a failure to specify acceptable	Not accepted. The amenity of adjoining residents needs to remain a key consideration. Given the general nature of the advice in an SPD and the wide variety of circumstances it must cover it is impossible to specify distances.

		overlooking distances or angles. As a result, individual cases are largely determined at the whim of individual planning officers, without consistency. It would be far better to provide householders and developers with some certainty as to whether their proposals will be acceptable	
47n1	5.3	In most cases, we would be sympathetic to external insulation on rear walls, subject to resolving guttering and external pipework details. Good-quality render will usually be preferred to brick slips as the external finish.	Noted.
47o1	5.7	We welcome the support for clothes drying, though this needs to be followed through in a more positive approach to providing balconies.	Noted.
47p1	6.3	It is difficult to discourage the use of front gardens for parking when residents feel that the Council is simply defending its vested interest in maintaining income from parking charges and fines. The SPD needs to put some positive arguments in favour of alternative approaches to forecourt parking.	Not accepted.
47q1		The SPD seems to have overlooked that a common form of improvement is converting an integral garage into a habitable room. Incentives are stronger in pre-1939 houses where the garage (or access to it) may now be too small for a typical modern car. This is often accepted as Permitted Development but some practical advice on window and facade treatments would be helpful.	Accepted. Reference has been made to garage conversions. See para 2.19 of final SPD.
47r1	6.5	Owners need to be reminded that, even for permitted development, paving of front gardens must be of a permeable nature to avoid rapid run-off of rainwater	Accepted. Text amended.

		<p>overloading the drains.</p> <p>Large areas of loose gravel are impractical because the material tends to spread into adjacent areas. It may be acceptable in smaller areas, such as the central band of a parking bay, where loose pebbles can be contained within kerbs.</p>	
47s1	6.7	<p>It is increasingly common for cycle stores of different styles to spring up in front gardens. We understand that any structure more than 1m high in front of a house should require planning permission, and certainly full-height sheds should be discouraged.</p> <p>We object to the policy of siting minor structures 1m from boundaries. In the average domestic front garden this places them more prominently in the centre of the space. In general, it is far better to place them along boundaries, where they can be at least partly screened by existing fences and hedges.</p>	Part accepted. Text amended.
47t1	7	This is broadly supported.	Noted.
48 Evans	2.8	Add in that where appropriate modern alternative materials may be proposed, providing they are in keeping with the features of the traditional methods and offer an advantage over traditional methods/materials.	Not accepted. On heritage assets the historic window material is considered essential.
48b	2.11	Ballustrades should be in keeping with the period of the property	Accepted. Text has been amended.
48c	2.12	Consider giving balustrades a minimum and maximum height to prevent very high ones blocking views/daylight	Not accepted. This is addressed in Building Regulations.

48d	2.21	I feel the design should consider changing the property so it is not obviously apparent what its former use was so it blends in better with the surroundings.	Part accepted. The text has been amended to provide greater clarity.
48e	2.26	Consider banning down pipes from upper floors that pass within the front door recess on period properties.	Not accepted. This is considered too prescriptive.
48f	2.29	Bespoke vents should be avoided as these are costly to replace and hence seldom replaced properly at the end of their life, with alternatives looking bad.	Noted.
48g	3.9	On typical Victorian houses there was always a lean to conservatory off the original dining room, as a result the adjoin properties wall in this location was increased and at an slope down from the house so the height of the flank wall in proposed courtyard is often quite high, and might prevent this space from being user friendly.	Noted.
48h	Fig 5	I feel that the pitch of the new roof should replicate the pitch of the existing roof above, especially on options 1 and 5. In my opinion option 4 should only be allowed with a flat roof or it changes the rear composition too much.	Part accepted. The illustrations are only indicative. Extension roofs need not always match the host building. The illustration has been amended though for greater clarity.
48i	3.13	Light spill should be guarded against so that neighbouring properties are not adversely affected.	Accepted. Text has been amended.
48j	Fig 7.	Consider the allowance of wedge shaped windows facing forwards or backwards on the side elevation. No access to side space on side elevation at the upper level., No protrusions of any kind including (or overhangs) down pipes or vents on the side elevation preventing the neighbour doing a similar extension in the future	Accepted. Text has been amended.
48k	3.19	Light wells should be used to provide an external basement courtyard where possible. This needs to be accessible for maintenance.	Part accepted. Text has been amended.
48l	3.24	Masonry and mortar and bond and finish of mortar must match the original.	Not accepted. This level of detail here is considered unnecessary.

48m	Fig 8	I feel there should be some guidance on dimensions from the ridge line and gutter line.	Not accepted. The guidance has to cover a wide variety of property types and therefore distances are not possible.
48n	5.9	Solar panels should have a maximum offset from the original roof line. This should be as small as reasonable bearing in mind products available.	Part accepted. The text has been amended.
48o		Something should be added about best using amenity and enhancing it where possible.	No accepted. Amenity is adequately covered throughout the document.
49 Kent	3 and 4	<p>The housing market in the UK, and particularly the south east of England, is currently suffering from a structural deficit in supply. The deficit is in large part a result of planning law and policy that restricts new build and limits the ability of the housing market to respond to increased demand. The emphasis on the preservation of the 'green belt' around London in conjunction with increased housing demand in the south east particularly compounds the problem.</p> <p>The result is continued scarcity of housing and rising prices, which particularly impact the younger, those less well off, or first time buyers. A secondary effect is that the continued emphasis on the preservation of the 'green belt' effectively transfers housing market problems to an ever more crowded and expensive urban London.</p> <p>These are national issues and they require action at the national level, most notably through reform of planning law and the designation of more land for development outside London. I do not believe that the answers to these issues lie in amending and relaxing policy on planning permission and permitted developments in Lambeth.</p>	Noted
49b	3 and 4	I am particularly concerned that the present housing market dynamics allied to any relaxation of the planning approach will give rise to incentives for	Noted.

		<p>unsympathetic developments of individual properties that then undermine the character and utility of the conservation area. Given the nature of the issues in the housing market, particularly in London as set out above, I do not believe that Lambeth's approach to planning - ie. a relaxation of the present Building Alterations and Extensions SPD - can solve the underlying problems.</p>	
49c	3 and 4	<p>I would urge Lambeth instead to concentrate its efforts on seeking revisions to planning legislation and approach at a national level, in ways which aim at allowing the housing market to meet the needs of all residents and prospective owners. Only by allowing the housing market to function across the UK can the supply of housing expand to meet demand, current price levels be curtailed and opportunities created for families to move onwards and upwards to properties better suited to their family circumstances.</p>	Noted.
49d	3 and 4	<p>Other piecemeal approaches of the kind Lambeth is proposing through its relaxation of building alterations and extensions SPD instead risk creating incentives to realise windfall gains through unsympathetic and inappropriate property developments on the Hyde Farm estate. This could both intensify over crowding and contribute to undermining the quality of life for all residents.</p>	Noted.
50 ball		<p>It is largely sensible in principle and covers the main issues householders considering works under permitted development will find valid.</p>	Noted.
50 b	3.20	<p>One area which could be strengthened is the section on basements, to make a presumption that any building e.g. without a pre-existing cellar is probably unsuitable, to limit any underground work to the existing footprint, and to stress far more strongly that gardens should not become hard surface roofs for subterranean extensions. What has happened to the</p>	Not accepted. This would go beyond the requirement of policies contained in Policy Q11 (i) of the Local Plan.

		<p>maximum volume allowed in extension of houses? That should be at the start of the guidance, as should an assumption that in for example a terrace of houses none should dominate because of extension.</p>	
51 Clapham Society		Document welcomed. The approach, which at the outset emphasizes conserving local character and has a strong focus on heritage assets, is supported.	Noted.
51b		The green and red diagrams provide clear advice and more use could be made of them. However when illustrating complex roof forms they are sometimes difficult to read and need stronger lines delineating the different roof pitches.	Accepted. Illustrations have been amended.
51c	1.8	Clear reference to heritage assets and the importance of preserving their special interest is good to see at an early stage in the document. Para 1.8: final sentence not complete.	Accepted. Text has been amended.
51d	2.4 - 2.5	Emphasis on repairing first before replacing supported. A link to the recent EH (or Historic England) guidance on windows would be useful.	Accepted. Text has been amended.
51e	2.6 - 2.10	<p>Despite the emphasis on replacement windows matching the originals there is a distinct lack of reference to timber (or metal if that was the original material). The upvc window manufactures will argue that their products do match the originals, and while there may be a similarity in appearance, it is superficial and there is no actual match in terms of material. This may be intentional but we would urge inserting the words timber and metal at suitable points.</p> <p>The use of the word "original" could be clarified. What is there at present may not be original but a replacement; what needs to be copied is the genuine original, and householders should be encouraged to seek that out in the street and copy it.</p>	Not accepted. Matching materials are considered essential for window replacements on heritage assets.

51f	2.11	It's difficult to envisage circumstances in which balconies and external staircase would be appropriate on front elevations, so para 2.11 should be amended to clearly state that they would normally not be acceptable.	Not accepted. The text is considered adequate.
51g	2.14	Agree.	Noted.
51h	2.15 - 2.17	Agree. These are important points which need to be made very strongly.	Noted.
51i	2.19	Agree and welcome the reference in para 2.19 to not compromising commercial viability by reducing retail floorspace.	Noted.
51k	2.21	The good and bad examples are useful but some written text of what's good and bad is needed as well. For example encouraging the retention of the shopfront (especially if it's a good one), otherwise advice on design principles(scale and proportion, alignment with windows above, matching materials, correct brick bonding, historic references, etc) would be useful.	Part accepted. The text has been revisited but greater detail is not considered necessary.
51l	2.24	Agree with content of section generally	Noted.
51m	3.3	The principles recommended are supported. Clear illustrations.	Noted.
51n	3.7 - 3.11	Distinction between general housing and heritage assets (3.11), and the different standard expected, is useful, although we feel that the approach for heritage assets should be encouraged for all.	Noted.

51o	Fig 5	If a wrap around extensions is considered inappropriate (no 5), it should be coloured red. The drawing also needs to be extended to illustrate the impact fully.	Not accepted. Wrap-arounds are acceptable for non heritage buildings.
51p	3.11 and Fig 5.	A clear statement supported by an example in red to illustrate the point on why a wrap around extension would not be appropriate, would strengthen the general approach being taken. Property 3 type infill not considered very practical and would not save much light loss.	Part accepted. The illustration has been amended.
51q	3.12	Surely these should simply be unacceptable full stop	Not accepted. The approach taken in considered the most appropriate.
51r	3.13	Delete “....such as conservatories.....” from first line. The advice could also promote traditional materials and discourage upvc.	Part accepted. Text amended. A restriction on UPVC is considered unnecessary on non-heritage property.
51s	3.15 - 3.17	Support para 3.15 and its principles. The importance of scale and proportional relationships between extension and host building need to be considered and explained. Earlier advice concerning suitable (ie matching) materials could be construed as applicable here, when a light touch using modern materials to articulate the difference can often work well.	Part accepted. The text has been amended.
51t	3.18 - 3.21	The policy and guidance towards basement development comes across as very relaxed, particularly when considered in the context of the much stricter basement policies presently being prepared by other central London boroughs. The number of basement extensions in Clapham appears to be increasing rapidly and with it the associated nuisance of construction works to neighbours. More	Not accepted. The guidance accords with Policy Q11 (i).

		<p>stringent controls are needed.</p> <p>We would also welcome clearer resistance to basements which generate rooms which have little or no daylight or ventilation, and are defined as non-habitable rooms such as cinemas or gymnasia, and can clearly be used as spare bedrooms or other habitable spaces.</p>	
51u	3.23 - 3.25	<p>Support the principles of this section. Some additional detail about brick pointing would be useful (mix and style, avoid weather-struck etc), as would references to suitable materials. A couple of examples of good design to show how to do it to counter the how not to examples would be useful.</p>	Accepted. Text has been amended.
51v	4.4 - 4.9	<p>Generally agree with the advice here, although Fig 8 example 2 is open to abuse; the need for a genuine set back between dormers needs to be emphasized. That these examples would not necessarily be appropriate on heritage assets needs to come across more forcefully.</p>	Accepted. The text has been amended.
51w	4.16 - 4.20	<p>The mansard type approach is generally supported. The drawings need to be clearer, particularly the lines between roof planes.</p> <p>Support general statement at para 4.16 that there is little scope for roof additions or mansards on heritage assets.</p>	Accepted. The illustrations have been refined.
51x	4.21	<p>Support statement that they will be resisted on heritage assets.</p>	Noted.
51y	4.22 - 4.27	<p>Support the approach that a properly designed mansard is the only appropriate form of roof addition on London roofed houses and that they will be resisted on heritage assets.</p>	Noted.

51z	5	Support discouraging external insulation cladding, especially on heritage assets, and principles for energy generation equipment especially on heritage assets (5.10)	Noted.
51a1	6.3 - 4	Strongly support approach promoted here.	Noted.
51b1	6.8	Should encourage the removal of existing, redundant bin enclosures which can no longer contain contemporary wheelie bins.	Not accepted. This advice is best placed in the Council's specific guidance on refuse and recycling storage.
51c1	6.9	Doubtful about the approach advocated. Although the garden shed illustrated is very big for the small front garden, the on-street cycle locker illustrated does not exactly enhance the quality of the public realm.	Noted.
51d1	7	Agree	Noted.
51e1	Annex 1	Interesting and useful information to underpin the SPD.	Noted.
51f1	Glossary	A useful section; could do with definitions of technical terms as well, for example 'heritage asset'.	Accepted. Heritage asset has been added.
52 City Planning Limited	n/a	Generally welcome.	Noted.
52b	n/a	Images are useful.	Noted.

52c	4.18	Page 20 sets out advice on rear roof extensions and the change in guidance to allow rear mansards, as shown in images 1 and 2 is particularly welcomed. These types of extensions are attractive and provide good quality living accommodation.	Noted.
52d	Fig. 10	I would urge the LPA to encourage extensions to the rear return y up to 50%, commonly known as top boxes. ... As with rear mansards, they can be designed to high standards, without causing harm to the building or adjoining neighbours. By keeping them to no more that 50% one is ensuring the extensions are subordinate.	Not accepted. This matter was considered when the draft document was prepared. Roof extensions extending out over a rear return - are generally not considered appropriate forms of development because of their discordant appearance.
<p>Circular Letter 68 copies of the same letter requested:</p>			
CL a	n/a	Fully support the changes to planning policy	Noted.
CL b		Request that mansard extensions be allowed two dormers	Accepted. Text has been amended.
CL c	4.23	Ask that the paragraph is amended to avoid confusion.	Accepted. Text had been amended.