

**111 Norton Way South
Heritage Assessment**

**RESPONSE TO HERITAGE FOUNDATION
STATEMENT OF CASE**

4th July 2019



RESPONSE TO HERITAGE STATEMENT

The following comments are in response to the Heritage Advisory Statement dated June 2019. The clause numbers refer to those as listed in the document.

5. ISSUES

- 5.1 *There are two main inter-related strands to the refusal. The Design Principles are clear in that the proposed rear extension needs to match the original roof in terms of pitch as well as materials.*

The highlighted statement above is incorrect; the Design Principle gives clear opportunity for alternative options to be put forward as long as they do not damage the character and quality of the existing property and its context (see clause highlighted below)

Roof pitches can have a substantial impact on the appearance of a building and the street scene. Therefore, all proposed roof pitches and the design of the roof and roof line should be consistent with the original roof design of the house, unless it can be demonstrated that the extension does not damage the character and quality of the existing property and its context.

There has been no justification other than not matching the pitch of the original roof that any damage is caused to either the existing property or its context. Furthermore there is no mention or consideration given to the fact that it is not possible to see the rear extension from outside the boundary of the property itself.

- 5.2 *This is an early Garden City House dating from circa 1910 which was converted into Therapy rooms in the Sixties. One of the main characteristics of this property is the strong gable line to the front and rear elevations which has been respected by later extensions.*

Why is this listed as a key issue? There are no alterations proposed to the main gable lines to front and rear elevations. Furthermore from a streetscape perspective the effect on the existing scheme will be zero as it will not be possible to see the proposed extension from the street.

- 5.3 *The original roofing pallet for Letchworth consisted of clay plain tiles or pantiles, a few thatched buildings and flat roofs tucked behind parapets. Slate was not used in the early pioneer years of the Garden City and this tradition has continued. The aim of the Design Principles is to ensure that traditional building materials are used wherever possible. In this case plain tiles are the existing roof material and any addition to the building should respect this material.*

There is no mention or consideration that due to the geometry of the proposed roof pitch that it will be almost impossible to see the tiles proposed, let alone be in a position to identify that an inappropriate material has been used. The proposed tiles offer a close match to the existing and it would be impossible to tell the difference once installed. A decision has been made looking at a product at arms' length, rather than taking into account its final position.

There is also no consideration or mention of the Georgian wired glass roof to the lean-to or the felt roofing to the outside cupboard / pantry. Neither of these products / materials I would consider particularly high quality, however both are present as part of the existing property.

It should be further noted that fact that they have not been noticed or mentioned is significant and a strong argument that the proposed roof tile should be accepted. The main reason why they have not been mentioned or picked up is the simple fact that they are extremely difficult to view and as such have a negligible impact on the property. The same argument should apply to the proposed tile due to the limited oblique angles that it will be viewed from, and not possible to see from either front or rear streets.

It should also be noted that 'mock' lead roofing is not listed as an original roofing material, however this is later listed as being acceptable (refer to items 5.5, 6.5 & 6.19). It should also be considered that if the proposed design with a substituted lead or glass roof would be accepted that the actual material used as the roof covering makes little or no difference to the impact of the quality of the building when the roof itself is difficult to view.

- 5.5 *The proposed location of the extension does not easily facilitate a steep pitched roof as this would conflict with the first-floor window. This is a common issue when extending at ground floor and as such the Team have suggested three alternatives:*
- *A flat roof with a brick on edge with tile creasing parapet with bricks to match. This would also allow a low-profile lantern to allow for light into the property. This could reference the brick mid band that wraps around the rear of the original building between the brick ground floor and rendered first floor.*
 - *Utilise a lead or equivalent roof which can be laid at a shallow pitch.*
 - *A glass roof.*

The Heritage Officer offers 2 alternative materials that would be acceptable (highlighted above) without the need to change roof pitch. How can it be possible that the proposed extension with a tiled roof is rejected, but changing the roofing material would deem it acceptable? Especially when considering that it would be almost impossible to actually see the roof covering once the conservatory has been completed (please refer to 3D views in the statement of case issued). This implies that the proposed pitch of the roof is not harmful to the property and there should be no need to undertake costly alterations. I would suggest that the difference in impact between either false lead or the proposed dark brown tile on the property or the surrounding area would be negligible. I fail to see how one could be approved, but the other rejected. Please also refer to item 6.18 for precedent buildings within 100m of the property that have shallow pitched tiled roofs.

As mentioned in the statement of case. For a person in authority to propose switching a roof covering to glass and induce detrimental knock on effects to the thermal performance is astounding, especially given central governments targets to reduce our impact on the environment. As an experienced Architect I am aware of the consequences of this proposed change and have as such fought to defend the current design, others less knowledgeable of the construction industry may have been misled and followed this recommendation to gain approval.

- 5.6 *Whilst we are not averse to the use of modern materials having approved the use of plastic windows, conservatories and composite doors, the proposed product is not considered to have the character and appearance of a clay or concrete plain tile.*

It is highlighted that plastic windows and conservatories are generally approved. I would like to point out that most 'standard' conservatories have polycarbonate (plastic) roofs. I would also like to point out that most owners of this type of conservatory are now looking to replace the thermally inefficient roof coverings with solid lightweight alternatives. It seems perverse that had I proposed a 'standard' conservatory that would be thermally inefficient, a huge heat loss on the property and only usable for 3/4 of the year, that the application would likely have been approved (please note both adjacent properties have 'standard' conservatories with polycarbonate roofing). However I have been penalised by proposing something that is more thermally efficient and sustainable. Conservatories that utilise new materials to overcome deficiencies in old / outdated designs should be judged against the same standards and not penalised with more onerous unachievable requirements. Unless the design standards are updated and the views of the Heritage Board revised to take this on board, then the Letchworth Heritage Foundation will continue to promote thermally poor designs and penalise those trying to offer greener more thermally efficient solutions. This is extremely backward, unsustainable and in strong contrast of the views promoted by central government.

- 5.7** *The proposed slates are not considered to match the colour, appearance or texture of plain tiles. It is unlikely that these slates would weather to improve their appearance and as such the patina of age which the rest of the building will naturally acquire will not assist with this product.*

The HCA showed no interest in reviewing the proposed tile.
The AMC stated that the tiles were of good quality (however this has not been recorded).
The Heritage Officer rejected the proposed tile even before reviewing samples.

The proposed tiles should be considered against a polycarbonate roof covering of a typical conservatory. If they were assessed against the same review process for a conservatory, I would expect that they would be approved without any issue. The appearance of the proposed tiled roof would be superior in quality to that of a standard conservatory roof. If a polycarbonate roof of a typical conservatory can be deemed acceptable (as per numerous properties throughout Letchworth, including my immediate neighbours), then the proposed roofing system that is of superior quality should also be deemed acceptable. It should also be noted that the proposed roof due to its configuration will be extremely difficult to see. It should also be noted the proposed roof will add no further harm or damage to the building that already has a felt roof and Georgian wired glass roof on the adjacent lean-to and outdoor pantry. The proposed roof covering to the extension would be superior in quality to both these adjacent roofs. It should also be noted that the proposed tile would add no further harm to the building than a 'mock' lead roof (that would be deemed acceptable).

- 5.8** *A range of light weight roofing materials have been submitted to the Team and the view of the Team has remained consistent. No product submitted to the Team to this point has been able to match the characteristics of a plain tile. The Supalite slate submitted by the appellant did not overcome any of the Team's concerns about the appearance in terms of being an acceptable alternative for a plain tile.*

The refusal of the Heritage Foundation to allow home owners to use these products is appalling and short sighted. In most cases replacing the roof of an existing conservatory with a lightweight thermally efficient product is the only method of refurbishment without completely demolishing the conservatory and starting again (which is obviously an extremely expensive alternative). By taking this stance the Heritage Foundation are forcing those with limited finances to keep their poor performing conservatories, or forcing them to utilise the 'mock leading roofing product (as indicated in appendix E) that may not always be suitable or appropriate. This is not a very green approach and I would hope one that is reviewed and changed as quickly as possible.

- 5.9** *The Team have considered several cases where these or similar products have been proposed. Appendix E sets out case studies.*

None of the examples given are of similar design. The first example given in Appendix E I would consider to be an extremely poor addition to the property. The conservatory looks like it has crudely been bolted on to the side; it pays no resemblance to the roof structure of the existing house. I find it shocking that this has been offered as an example of what to strive for and a benchmark for what would be acceptable. I would go as far as to use this example as a prime example of the 'tick box' criteria employed by the Heritage Foundation with regards to approval. The approved extension may 'tick' all of the boxes; however the resultant design is extremely poor. It is also perverse that the Heritage Foundation on one side are actively promoting the use of 'fake/mock/plastic' lead roofing systems, however have an extremely negative stance with regards to the same systems/materials when applied to tile roofing alternatives. These double standards are not acceptable. I would argue that if 'mock' materials are considered acceptable for one roof covering material, this approach should be applied to all.

6. COMMENTS ON HOMEOWNERS CASE

- 6.3** ***Lack of discussion** – The appellant has had opportunities throughout the consultation process and review process to discuss and put forward his case. He has been advised of the issues surrounding the proposed roof design and material. We have been consistent in our advice throughout this process.*

There has been little to no decision regarding the issues. At the HCA in particular I was given the opportunity to present. However not one comment was made during this presentation, no questions were asked. When I asked if there were any issues the response I was given was 'it was not appropriate to discuss these now and they would be discussed in private'. The only reason why I think that no one wanted to talk about the issues is that they are extremely difficult to justify and there is little to no argument for the application to be refused.

- 6.4** *I carried out a site visit on 14th January. I took the proposals to the Heritage Advice Team meeting on 17th January where it was agreed that: - CP discussed this case.*
- CP shall check whether the property is a HOSI.
 - CP advised of concerns in relation to the proposed artificial slate roof. The team agreed that this should be a parapet or glazed.
 - **The team agreed that a better design is required.**
- The HAT agreed that CP shall discuss further with the applicant/agent.**

The roof covering makes little difference to the overall design; how can the proposal be considered 'bad design' with a tile roof but 'good design' by changing the roof to glass (especially when it is not possible to see the roof covering)? No consideration has been made to the actual composition and geometry of the proposal or the viewing angles of the roof. This is simply a particular dislike to a particular material not an assessment of design. As previously mentioned switching to glass is not an appropriate alternative, to be in a position of refusal against the alternative of adopting inappropriate materials is nonsensical.

- 6.5** *The appellant was written to on 18th January 2019-*
1. *Roof pitches can have a substantial impact on the appearance of a building; therefore proposed roof pitches shall be consistent with the original roof design of the house. The artificial slates are not in keeping with the plain clay tiles on the host building. To replicate the original roofline may be difficult and a flat roof tucked behind a brick parapet with a brick on edge detail may be a more appropriate design or alternatively **a fully glazed roof could be utilised.***

Please see below for copy of email sent to Claire 21st January 2019:

Claire

We have just received your letter regarding the proposed rear extension, with regards to your comments please see below for responses:

1. Roof pitches

- *The proposed roof pitch matches as close as possible the existing pitched roof character of the existing building.*
 - *The proposed artificial slate tiles match closely in appearance the existing clay tiles and have the benefit of being considerably lighter in weight, which allows the fully glazed wall to the rear elevation. From a distance it would be extremely difficult to tell the difference. Please see images below to give a better understanding of the proposed tiles.*
 - *The proposed artificial slate tiles are also extremely energy efficient and provide better thermal properties to the roof, switching to glass as suggested would create a huge demand on our heating system and make it difficult to make the space fully open to the main house internally, as the space would be too cold in the winter.*
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- The alternative suggested flat roof would not match the character and rhythm of pitched roofs evident on the rear facade. Flat roofs also generally create potential weak points for water to leak into the property over time, the proposed pitch roof would mitigate this risk. The flat roof would also not create as interesting rear elevation and would not create the same volumetric experience internally. Both would (in my opinion) be a lost opportunity.

- Further to the above a key point that I believe should be taken into consideration is the fact that the rear elevation of the property is enclosed by a brick wall on all sides and numerous trees and is almost not visible from anywhere other than the garden of the property itself. I therefore do not see how the proposed extension would create any harm to the character of the area. Also please note 111 Norton Way South is not listed as a home of special interest.

- The proposed extension has been reviewed and approved by the local planning department

2. New Windows

- The proposed windows have been designed to match the existing windows with similar sight lines and external glazing bars.

To give you some background on myself, I am an Architect with over 17 years experience having worked for world class design led practices including Sir Norman Foster and I am currently a Senior Design Manager working on the residential tower by Herzog & De Meuron for Canary Wharf Group.

Could I kindly request that you take the above into consideration and reassess the application as it stands, as I strongly believe the current proposal is the best for the property and to switch to glass or flat roof would be a shame and create an extension that I would be disappointed with and I my opinion not as good as the current design.

I welcome your thoughts to the above, I would also be more than happy to meet to talk through the project if this would be of benefit.

Regards

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6.6 I met with the appellant on site on 30th January to discuss the proposals and the material. The case was discussed at the Team meeting, where a sample of the slate was available.

111 Norton Way South (34451) – Ground floor rear extension

CP discussed this case.

- CP advised that the applicant is proposing to install a 'Supalite' roof. The team agreed that this does not match the existing roof and is not of the correct roof pitch.

The HAT agreed that the application shall be refused.

I was given no opportunity to discuss or present to the HAT ahead of the refusal. Again this is a prime example of people behind closed doors making decisions that affect others without giving them the opportunity to put forward their case. This completely goes against all other authorities and positions of power, where these discussions are generally made in public with the opportunity for the applicant to attend.

6.7 The application was refused on 4th February 2019. The reasons for refusal were: Rear extensions should complement the character of the original house, utilising matching materials and detailing and have balanced proportions and scale. Roof pitches can have a substantial impact on the appearance of a building and the street scene; therefore, all proposed roof pitches and design of the roof and roof line should be consistent with the original roof design of the house.

Please refer to the previously issued reports for detailed response to this. However I would like to point out, that I would consider that the proposed design does 'compliment the character of the original house'. For this to be given as a key reason for refusal is very subjective. 'Have balanced proportions and scale' is also stated as a key reason for refusal. However item 5.5 of this report states 'there is no objection to the extension in terms of its proportion and location'; again a key issue given for the refusal is proved to not be of concern. I would also like to point out that there is zero effect on the 'street scene' as it is not possible

to see the proposed extension from either the front or rear street, again stated as a key reason for refusal.

The HAT have obviously taken a dislike to the proposed tile (refer to item 6.6) and are relying on unrelated clauses within the design guide to substantiate the refusal.

6.8 *Following the refusal, the appellant enquired whether a crown roof would be acceptable. At its meeting of 7th February, the HAT considered a crown roof but agreed that the proposed Supalite slates would still not be considered appropriate and an application would not be supported.*

111 Norton Way South (34451) – Ground floor rear extension

CP discussed this case.

- CP advised that following refusal of the application, the applicant has queried whether a crown roof would be acceptable? The team agreed that this would not be suitable with the tiles that were originally proposed.

The HAT agreed that CP shall discuss further with the applicant/agent.

Please see copy of email sent 4th February. There is no mention of a 'crown roof' there appears to be confusion between my application and another being reviewed. This is a prime example where 'closed door' discussions and decisions are being made against incorrect information or worse still even against the wrong application:

Claire

I am disappointed that the proposed extension is still considered unacceptable. I still can not see how the proposal will damage the heritage character of the area (it is not possible to see the rear of the property outside from the garden itself) or detrimentally affect the property (see attached sketch).

I am trying to create a perfect home for my family and create an enjoyable space that we can live in for years to come. I was not expecting the heritage process to be the main hurdle preventing me from doing this.

The proposed extension is far superior in quality than a cheap plastic conservatory with glass roof (that I get the impression would be approved).

The refusal will ultimately stop us from being able to undertake the extension works without significant further cost, delay and compromise to the design.

Please add me to the upcoming AMC and advise what I need to submit / application process etc.

Do you still have the tile samples?

Regards

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6.9 *The appellant asked the AMC to review the application at their meeting of 7th March 2019. The appellant submitted a Heritage Summary Report and a Heritage Assessment Report. The AMC met with the appellant, spending approximately half an hour on site. The AMC viewed the tiles and assessed the site. The AMC listened to the appellant's case.*

At the AMC meeting it was agreed by all parties that the proposed extension is an improvement on the existing. This has not been recorded anywhere other than my notes and has not been taken into account with regards to the approval. Obviously something that is an improvement does not cause any harm or damage. If there is no damage caused by the proposal then this is in accordance with the requirements of the design standards and should be approved.

6.11 *It is contended that the appellant was provided with ample opportunities to discuss his proposals with the Heritage Foundation.*

When asking the AMC if the application would be granted approval there was a reluctance to enter a discussion and I was told that *'further discussion was required in private before a decision would be made'*. I have no idea what was discussed in private and was given no opportunity to respond to any of the issues raised and discussed.

6.12 ***Modern Man-Made Materials** - The appellant asserts that the Team has a prejudice against man-made materials. The Heritage Foundation do allow modern man-made materials, but these materials need to be of a sufficient quality to match the materials they are purporting to be.*

This is in direct conflict with the comments made under item 5.8 stating *'No product submitted to the Team to this point has been able to match the characteristics of a plain tile.'* If no products to date have been approved how is it possible to state that you are open to approving them?

6.13 *The Team are not averse to modern materials where they are considered to respect the appearance and characteristics of the built heritage.*

There is no mention or consideration where or how particular materials are seen. Why is the same emphasis given to items that are not seen as those that are. Surely it should be considered that items that are not visible or only partly visible should not be given the same hierarchy and requirements to those that form the main facade elements.

6.14 *The proposed extension fails to respect the traditional steeply pitched roofline of the host building. This is compounded by a plastic roofing material. The combination takes away from the integrity of the host building and fails to complement the built fabric. With all design, we aim for any works to these buildings to be sympathetic and in keeping with the host structure.*

This contradicts item 5.5. How can the same design with a subtle change of roof material go from something that is considered in conflict with the integrity of the host building to something that could be approved? These are two extremes; it cannot be possible that such a subtle change could be the difference between the two extremes. I would suggest that there has not been a consistent holistic review of the design. To avoid the tile material being the only issue the roof pitch has also been called into question. Man-made materials are barely covered under the standards and it would be difficult to refuse the application on this alone. On numerous occasions it has been made clear that a simple change in roof covering material and the roof pitch would be acceptable. There is no way that a simple change in roof covering would be the difference between whether the design takes away from the integrity of the host building or not (especially as the roof covering in question is not visible). Please also see comments to 6.9 where it was agreed with the AMC that the rear elevation was an improvement, an improvement is the opposite from something that takes away from the integrity of the host building. Even the comments within this one document are in conflict with each other. Similar to the 'tick box' exercise for the approval the same individual forming of argument against each point has been made to defend the refusal. A holistic review of the proposal is required.

I would also suggest that the exemplar precedents given in Appendix E are *'not sympathetic and in keeping with the host structure'*

6.16 *The same criteria and thought are invested in other proposed materials for extensions. The Team have considered a number of warm roof slate systems for conservatories and for use on extensions and to date none of these have been considered to match a plain tile.*

New innovative materials for new conservatory systems should be compared against other already approved conservatory systems (namely polycarbonate). This lack of openness to new building systems and the more onerous comparison against 'traditional' building methods ultimately make it impossible for any of them to be approved. It would appear that while old /

outdated conservatories with poor thermal performance and poor quality roofing materials will continue to be approved those which embrace newer and greener technologies will continue to be refused. This is a very backward stance employed by the Heritage Foundation and ultimately one that will limit home owners' ability to invest in their properties, as people are starting to become aware of heating demands of particular building typologies and often striving for greener solutions. This as a long term situation will obviously be detrimental to the building stock and the attractiveness of Letchworth as a place to live, with only poor quality thermally inefficient conservatories being approved and therefore only this typology being built.

6.17 *The Team has consented to the use of a false lead roof as an alternative. As lead is traditionally utilised for its ability to protect and cover shallow or flat roofs such as orangeries, bay windows and flat roofed dormers, it is considered to be a sensible alternative with historic precedent.*

It appears strange that 'false' lead roofs are considered acceptable, however 'false' tile roofs are not. The issue is not whether tile is the appropriate roof covering (I am sure had traditional tiles been proposed then the application would have been approved). This issue is simply a reluctance of the Heritage Foundation to approve a 'false' tile. The main reason a 'false' tile has been chosen is weight, being 7 times lighter than a traditional tile allows it to be supported off the uPVC frame of the glazing below (in a similar manner to a standard conservatory roof).

It would appear if the current 'false' tile was substituted with a 'false' lead covering that the application would be approved. What is not taken into account is that the tile is part of a building system, that has been tested and BBA certified. It is not possible to substitute and replace elements from a certified build up without invalidating the warranties and performance associated with it.

Furthermore due to the angle and positioning of the roof once constructed it would be almost impossible to ascertain whether a 'false' lead roof or a 'false' tile roof has been installed due to the oblique viewing angles. This is such a minor issue and should not be considered sufficient to be the main determining factor in deciding if the application should be approved or refused.

6.18 ***Roof design** – The appellant contends that the pitch of the roof is a secondary and therefore minor point. The two elements are integral to each other. By wishing to use a product that purports to be a plain tile, it fundamentally needs to be utilised on a steep pitch roof. This is a fundamental point that the Design Principles have made clear. If the appellant wishes to utilise a plain tile solution, it will require a traditional steep roof pitch.*

Please refer to item 5.5 where substituting the proposed tile with a glass roof would be deemed acceptable. Please also refer to 6.17 where substituting the proposed tile with a false lead roof would also be deemed acceptable. How can it be that a simple substitution of material makes the difference as to whether the roof pitch is considered to harm or damage the existing property? Either the proposed roof pitch and composition is acceptable or it is not. Especially when considering it is not easy to view the roof covering. It should also be noted that the roof covering in no way forms a major element with regard to the overall appearance of the proposal, it is not even possible to see the roof covering on either the hand drawn sketch or the rear elevation, furthermore it is not possible to see the roof covering from various other positions in the garden (refer to 3D views in report) and impossible to see from outside the property itself. So much importance has been assigned to an element that is ultimately not possible to see. This is very much the result of a tick box assessment not taking into account the actual situation it will be employed. No consideration has been given to the fact that it will almost be impossible to see the roof covering.

The building is not a listed building, it is not even listed as a home of special importance in Letchworth. However the assessor has taken the stance that would usually only apply to a grade II listed property and has enforced an extremely restrictive use of materials. This goes

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above and beyond what is stated in the design standards and goes above and beyond the remit of the assessor.

I would like to point out that within the immediate context of the property (less than 100m) there are two buildings that have a shallow pitch tiled roof, Watermill Bears shop and the Fenners Building:



The above photos are of Watermill Bears Shop, the dotted red line shown on the photo to the left is the proposed roof pitch to the extension at 111 Norton Way South. As you can see this is almost exactly the same as that to the shop.



The photo to the left of Watermill Bear Shop indicates the tiled roof. The shallow pitch makes it hard to view the tiles and this is read as more of a surface. The image below highlights the fact that both roof pitches are identical



The Fenners Building which is opposite the Watermill Bear shop has almost the same shallow roof pitch again almost identical to the proposed roof pitch for the extension at 111 Norton Way South (which is located the other side of the car park in close proximity).

The viewpoint of the case officer that it would be against the Design Principles to have a shallow pitched tile roof is extreme. Please advise where in the Design Principles it states that only steep pitched tiled roofs are acceptable? The Independent Inspector should also take into consideration the precedence of these 2 buildings in close proximity of the proposed extension (and form the surrounding context), both buildings have shallow pitched tiled roofs. If anything matching this style harmonises with the immediate context rather than harming it. Had these adjacent buildings with shallow pitch tiled roofs (that form the immediate context) been taken into account by the case officer, the following statement would no longer apply 'By wishing to use a product that purports to be a plain tile, it fundamentally needs to be utilised on a steep pitch roof.'

Extract below taken from following website: <https://digswellarts.org/studios/>

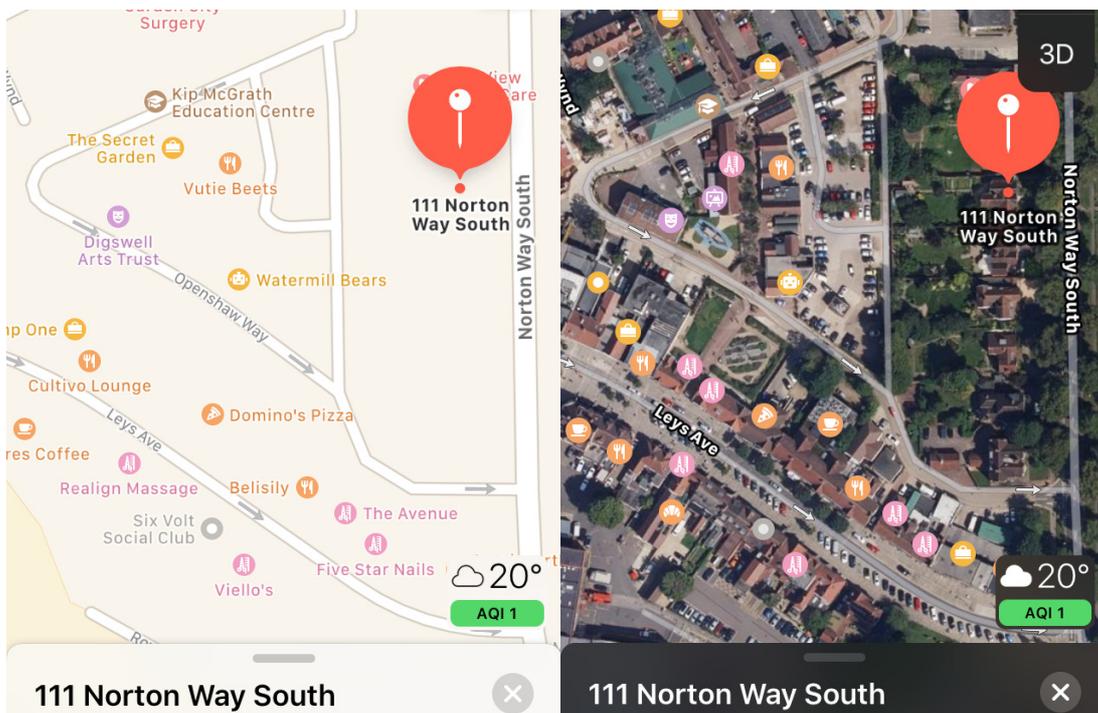


Letchworth, The Fenners building

*The Fenners building is a former light industrial building located near the centre of Letchworth Garden City. It has recently been converted into artists' studios with the support of the **Letchworth Heritage Foundation**. The building has 17 studios and specialist equipment includes a multipurpose room suitable as both a teaching area and exhibition space, as well as kilns.*

I would also like to highlight the fact that the Fenners building was converted with support from the Letchworth Heritage Foundation and has a shallow pitch tiled roof (almost the same pitch as that proposed for the extension at 111 Norton Way South). This should be sufficient justification that a shallow pitched tiled roof is acceptable to the Heritage Foundation.

As you can see from the maps below both the Watermill Bears shop and the Fenners Building (labelled Digswell Arts Trust) are in close proximity to 111 Norton Way South and among the closest buildings to the rear of the property.



I would suggest that the shallow pitch tiled roof is successful in both of these examples, the Fenners building especially is of architectural merit.

Again this is evidence of the 'tick box' review done by the case officer with no regard for the immediate context. There has been no holistic impact assessment made and the immediate surrounding area has not been taken into consideration.

6.19 *If the appellant chooses to utilise a different material, such as lead, there is opportunity for a shallower pitch than the host building.*

This confirms that the roof pitch is not an issue. It is simply the view of the assessor that it is not appropriate to use tile on a shallow pitch roof. I would suggest that the pitch of the roof is sufficient to utilise tile as an appropriate material, (refer to 6.18 for local precedent of shallow pitch tiled roofs). I would question where in the design standards it limits the use of tile to steep pitch roofs. I would also question what harm or damage is caused to the host building by using tile in this location. I would also like to point out that no consideration has been made for the viewing angles involved and the limited possibilities of actually viewing the roof covering (none from beyond the boundary of the property).

6.20 *If the appellant utilised a glass roof, again this would be acceptable at a lower pitch although this may not be the most appropriate solution in terms of energy efficiency.*

This is totally inappropriate and simply identifies the short comings and lack of building and construction knowledge of the assessor for this to have been recommended as an alternative to achieve approval.

6.21 *The suggestions of a flat roof with a brick parapet with brick on edge detail and a tile creasing, is a traditional design which is commonly featured within the Heritage Character Area. It is a device to allow a single storey extension without conflicting with first floor windows. This also could reference back to the brick band detail on the original building.*

This is another prime example where poor construction alternatives have been recommended with no consideration for the maintenance and risk of leakages inherent in traditional flat roofs with parapet construction.

6.22 ***The Design Principles Stifle Good Design** – The appellant's case also centres around the use of the Design Principles and the stifling of good design.*

The point here is that the assessor has recommended totally inappropriate alternatives to overcome a 'tick box' assessment, to ensure that all items are met to the letter. There has been no holistic informed review of the proposal. I can see no value in the recommendations put forward, in fact the opposite, with serious detrimental knock on effects if they were to be adopted. I have also yet to receive any reasoned and informed justification as to why the proposed roof covering, that is not seen, causes any harm to the building or the surrounding context.

6.23 *The appellant argues that his design almost complies with the Design Principles and as such it should be granted consent. He is of the view that these are minor issues and that the overall design should be allowed.*

The fact that the design complies with the vast majority of the design principles is agreed and uncontested.

6.24 *The Heritage Foundation are of the view that the proposed extension lacks flare and imagination and has been designed from the inside out. It is argued that the design is pedestrian and fails to respect the host building.*

I am yet to be convinced that the assessor is sufficiently experienced and qualified to make the above statement. Especially given the inappropriateness of proposing a glass roof (item 5.5) and the poor quality of the example conservatory given in Appendix E

6.25 *It is the contention of the Heritage Foundation that the Design Principles have been well thought out and are an extremely helpful document in assisting agents and applicants to understand the requirements of the Heritage Foundation in terms of altering the external appearance of their properties. It is far from a tick list process.*

There is no issue or concern with the Design Principles themselves. They are a useful tool in achieving a level of quality and uniformity of design. The issue here is that they have been used as a 'tick box' exercise with regards to approval.

It looks as though the assessor has simply gone through the list of items in the design guide and reviewed if the proposed extension complies 100% or doesn't. In the areas where 100% conformity is not achieved the application has been refused. There has been no understanding that these are a guide applicable to hundreds / thousands of houses and not all clauses are appropriate in all cases to all properties. There should have been an overall assessment of the proposed extension against the main principles within the guide and assessed the impact of the extension accordingly. This has not been the case.

The two main issues raised roof pitch and roof covering material, I would suggest are open to interpretation within the guide and suggest that on these issues the proposal is compliant. I would also highlight that had an assessment taken place to understand the impact of these items it would have been concluded that the impact is negligible and the application approved. Namely as the roof covering which seems to be the main issue of contention is not visible.

6.26 *The principle of the extension has been accepted but the proposed roof treatment in terms of the pitch and the material are not accepted. It is argued that **these two elements are fundamental** to the overall design and the essence of the issue is the failure to respect the host building with **a poorly designed roof**.*

On numerous occasions it has been mentioned that changing the material to the roof covering alone would be acceptable with no further alteration required to the pitch itself. How can the roof pitch be stated as a fundamental issue and highlighted as being poorly designed if simply changing the material would be acceptable?

This again highlights a contradiction within the assessment and a lack of understanding of the impact of the proposed design. The roof covering is not visible; however such emphasis has been given on this. The impact of changing the roof covering material (as it is not visible) is negligible and should not be a determining factor with regards to approval.

The AMC themselves agreed that the proposed rear elevation was an improvement on the existing property. Yet here the assessor is stating the roof pitch as a fundamental issue. I would suggest that it is only the roof covering material that is of contention. However to strengthen the argument the roof pitch has also been highlighted as an issue.

Had these items been discussed at the HAC or the AMC reviews at the property it would have been very easy to point how the roof would be pitched and walk round the garden and the street beyond to highlight it would not be seen and alleviate these concerns. Instead they have been discussed behind closed doors with the roof covering being assessed out of context and with little to no appreciation of how difficult it would be to see the roof covering once installed.

6.27 *The minutes for the AMC meeting are attached at Appendix C. At no point do the AMC agree with the comments made by the homeowner at this stage.*

I disagree with the minutes. These are not an accurate reflection of what was discussed. I have requested copies of the minutes and confirmation of the outcome on numerous

occasions and been told that these are internal and private. This is the first time I have seen the minutes. Please refer to summary report dated 18th March that was written to respond to comments raised and a record of my reflection of the meeting.

Also please refer to email dated 11th March asking for feedback from the AMC review:

Claire

Are you able to advise whether they are going to support the application or maintain the refusal?

They mentioned they had further discussions before finalising at the meeting last week.

Regards

■

Email response from CP dated 11th March:

Dear ■

Sorry I'm unable to disclose that information.

Regards

Claire

At no point did the AMC mention that the proposal did not compliment the character of the host building (otherwise this would have been addressed in the follow up summary report that was compiled to respond to their additional concerns). In fact the opposite and the AMC agreed that the proposed rear elevation was an improvement (just that it didn't comply with the guide). Their main concern was compliance with the guide rather than concern for the design.

Also as you can see from the email dated 11th March. I was left unclear which way the AMC would vote. This is not how the minutes read, they give the impression that a clear decision to refuse was unanimous and the design does not compliment the character of the host building. This was in no way what was discussed in my presence. I can only assume these minutes also record what was discussed behind closed doors.

The lack of transparency with regards to what is discussed behind closed doors is astounding. The fact that minutes are not shared for months then manipulated to record one side of the argument is unacceptable and would not be tolerated in the professional world. Officials in a public office making decisions that affect the general public should act to the same level of professionalism expected by those in private industry.

My notes from the meeting (p2 Summary Report):

3.1 The following comments were raised at the AMC review 7th March 2019:

- Roof pitch does not match original roof and flat roof should be considered*
- Roof tile material does not comply with the design principles, however the proposed tile does look ok*

It should be noted that it was generally accepted that the proposed design looks fine and is an improvement on the current house and will create a nice space for us as a family. It was just highlighted that there are 2 minor points (roof pitch and tile material) that are not 100% in alignment with the design principles. Further to the points raised earlier it should be considered that the impact of not complying 100% with these 2 items does not harm the property or surrounding area and the design as it stands should be approved.

Please note the report including notes from the AMC meeting were issued to CP 19th March. At no point until now has it been suggested that the report I compiled and submitted was inaccurate. The difference between the two sets of notes is so extreme that they are almost reflect two separate meetings.

I would also like to point out that the formatting and wording of the extract from the minutes under item 6.27 is different from the minutes in Appendix C.

6.28 *It is considered that the two points of concern cannot be considered to be minor. The roof is one of the most important and integral parts of the design and it is a fundamental need to ensure that this is well designed and complements the host building.*

The impact on the surrounding area is zero, as it is not possible to view the extension due to the high brickwork wall to the rear of the garden. It is also not possible to see the proposed rear extension from outside the front of the property. Therefore any impact on street scene or affecting the historic qualities of the surrounding area is negligible.

I would have assumed that maintaining the heritage character of the area was the most important aspect of the Design Principles. Ultimately the main aim of any design guide is to harmonise individual buildings with their context. As the proposed extension has no impact on the surrounding area I would suggest that any subsequent issues are thereby inherently minor.

As it is not possible to see the proposed extension from outside the boundary of the property the only impact is on the property itself. The house is not listed as a home of special interest, this would imply that any impact on the property (as long as it does not impact on its context) would thereby be considered minor. Furthermore the fact that it is difficult to see the roof covering of the proposed extension from even within the rear garden of the property would also imply that this is a minor issue.

I would also like to point out that on several occasions it has been highlighted that a simple change in roof covering material and the proposed extension would be permitted. This again would suggest that this is a minor point. If these were major issues such a subtle change could not be deemed sufficient.

The fact that the assessor continually refers to these two items (roof pitch and material) as major fundamental issues is a clear sign that there has not been a holistic overall assessment with regards to the impact of the design on either the host building or surrounding context. These are both extremely minor points and in no way will have a major impact on the host building or surrounding area should the proposed extension be permitted.

6.29 *It is regrettable that the pre-application process was not taken up by the applicant. This would have allowed for a collaborative approach and advice on materials and roof designs that would be considered to be acceptable and in line with the Design Principles*

There have been several discussions post submission and ahead of the initial refusal. None of the suggestions made to alter the design have been constructive (change the roof to glass as an example). These conversations and suggested alterations I assume would have been exactly the same during the pre-application process. Please refer to email dated 21st January (see item 6.5 for details).

The design is one that I feel adds the most value and benefit to us the home owners. None of the comments made (in my opinion) improve the design or add any value or benefit. In fact the opposite, all of the proposed alterations would add considerable cost and result in loss of enjoyment of the space; switching to glass roof for example would make the space unusable for ¼ of the year.

Unfortunately the suggestions and proposed alterations raised by the case officer would have had a negative impact on the scheme; as such these comments have been reviewed and discounted. We have submitted our preferred design and hoped that during the process common sense would prevail and someone with authority would be able to see that the impact of the proposed extension is negligible and have the power to grant permission.

Unfortunately due to the closed door approval process that I was unaware of at the start, there has been little chance for the initial refusal to be overturned. The case officer appears to have over exaggerated and amplified minor concerns into major fundamental issues to the point that no one wants to be seen to go against these extremely strong unfounded views.

I am now at the mercy of the Inspector to finally make an informed decision as to the true impact of the proposed extension and hopefully grant permission.

6.30 *Unfortunately, the Heritage Foundation cannot consider the financial implications of the proposal and the Heritage Foundation have been clear and consistent in its design advice on this matter.*

It is extremely clear that there has been no regard for costs by any of the suggested alterations. I would have expected that any advice that is given whether this be pre-application or pre-refusal or during the appeal process, would add value or benefit to the scheme, potentially picking up something that has been overlooked or suggesting an alternative that may work better. It should not be the purpose of those in power to induce unnecessary cost with no benefit other than to satisfy a tick box approval process.

7. COMMENTS ON THE HERITAGE ASSESSMENT

7.2 *At 1.3 it can be argued that the Figure 2 emphasises the concerns raised by the Heritage Foundation. A roofline cannot be created from a tenuous reference to the sprocketed eaves line of the gable roofs. The lean-to passage is a lean-to passage which again does not relate to the issues being addressed over the design of the extension. Matching as close as possible is not sufficient in terms of the material choice of the appellant. At 1.7 this argument is reiterated and again, the Heritage Foundation would argue that the external treatment of the proposal is not a good quality design. Unfortunately, the design has been created from the internal needs and aspirations of the appellant with a lack of consideration on its external impact on the host building.*

Switching to glass or false lead as proposed in item 5.5 would make no difference to the rear elevation, the drawing would remain unchanged. The comments in item 7.2 are in direct contraction with item 5.5. Item 7.2 makes no reference to the roofing material, purely the roof pitch. Item 5.5 on the other hand implies the roof pitch would be acceptable if the roof covering was changed.

Either the roof pitch is an issue as indicated in item 7.2 or the roof covering is the main issue as implied in item 5.5 and the roof pitch is acceptable. Both of these statements cannot be correct. I would suggest that it is only the roof covering that is of main concern and the roof pitch would be acceptable subject to change of material (this is recorded in the initial letter dated 18th January).

It is true that the design does take into account the interior as well as the exterior, I am an Architect and this is my home. It is normal for any extension to take into account the interior as that is ultimately what will be used and the purpose of said extension. Every successful building has mutual appreciation for both internal and external qualities. Trophy homes that are designed to be admired from the outside but poorly laid out do not function very well. Ugly homes from the outside that are laid out well may function well but give their owners the perceived lower value of living somewhere undesirable. Both aspects internal and external are equally important. The design for this extension has been based on both with equal emphasis. Fortunately I believe the current design succeeds in both respects and there has been no compromise sort to either the interior or exterior to arrive at the final solution.

Unfortunately every suggestion made by the case officer would have severely compromised the internal qualities of the space. However more importantly in my opinion the proposed alterations offered no benefit to the exterior other than to comply with the finite wording of a particular clause in a generic design guide. To be forced to change the design to simply comply with one person's views and interpretation of the wording of a particular clause

without seeing any true benefit to the design is not something I am prepared to do. I would have to live with the compromise for years to come.

7.3 *1.10 This is the nub of the matter. The proposal is a hybrid and it is the Heritage Foundations view that once a solid roof is added to a design, the proposal automatically needs to be considered as an extension and as such has to comply with the relevant Design Principles.*

This statement is in contradiction with Appendix E where the conservatories here given as examples all have solid roofs and still appear to only comply with the 'conservatory' design principles.

I would like to make it clear I am aiming to build a conservatory off our kitchen using a reputable conservatory company that offers products towards the upper end of the market.

This is the one shortcoming of the Design Principles, the guide takes into account conservatories, knowing that these are common place, desirable and part of the housing stock in general. However the design guide has not stayed abreast of new innovations and shifting views towards greener more thermally efficient properties.

This is where reliance on the case officer to utilise their knowledge of the design guide, understand the key principles it is trying to achieve and make an informed assessment. This has not been the case and is ultimately where I have been penalised, as the case officer has taken the stance that this is no longer a conservatory and applied the more onerous principles of a traditional extension. Even when taking into account these more onerous conditions I would still suggest that the proposed design complies with the design guide and more importantly the proposed design does not damage or harm the host building or surround context.

The fact that the proposed design sits in this 'grey' area not properly covered in the design guide, should highlight the fact that this is a borderline case where the subtlety of definition has been the difference between automatic approval and refusal. This would therefore imply that any of the issues raised that has resulted in the refusal are also minor as with a simple re-classification would be approved. Therefore this would also imply that items 6.14, 6.18, 6.23, 6.24, 6.26, 6.28, 6.31 are all over exaggerations where something that is considered borderline has been amplified into major fundamental issues. Major fundamental issues do not go hand in hand with 'grey' borderline, subjective issues and definitely do not apply to an application which had it been classified as a conservatory would not apply at all.

It should not be the purpose of the design guide or the approval process to penalise someone for using the latest innovative products or selecting a higher quality of system from the market place that has these products available.

I get the impression that had I chosen a poor quality cheap conservatory that approval would have been given. The end result would have looked worse and offered less enjoyment to us the homeowner. However it would have passed the tick box assessment against the design guide. This surely cannot be the preferred outcome by the Heritage Foundation should the refusal stand and a redesign be required? I do not understand why there has been no sensible, informed assessment that would avoid such situations.

7.4 *Once this had been defined, the proposal needs to match the pitch and materials of the host building. Where this cannot be achieved, the homeowners are provided with a range of alternatives that would be considered to comply.*

- If a shallow pitch is required, metal roofs in lead or zinc or their equivalent plastic materials can be utilised.

- A flat roof tucked behind a parapet can be detailed

- In the case of a conservatory, a glass roof can also work at a shallower pitch and would be consistent with the design.

Please confirm where the requirements highlighted under item 7.4 are stated in the Design Principles? These appear to be the personal views of the case officer and go above and beyond those listed.

Please refer to Heritage Assessment report dated 11th February that goes through every applicable clause stated in the Design Principles Heritage Character Area. None of the above items are mentioned. The assessment should be made against published material not personal opinions.

7.5 *At 1.15 the DPs are clear in the need for a use of tile to match the original. The appellant's argument that the Supalite slate is lighter only emphasises one of the key concerns about the lack of solidity of the product.*

The tile is a very close match to the existing tile. No consideration has been given to the oblique views that the roof will be seen from. Once installed, it will be almost impossible for anybody to be able to tell the difference between the two tiles (original & proposed).

The physical weight of a product has no consequence on the physical appearance. Brick slips are often used instead of full bricks to reduce weight, the knock on effect to appearance is zero. I do not understand why the assessor is requesting a heavier building product that will incur the additional hidden structural costs. The lightness of the tile should not be of concern only its appearance. If the main concern is that the tile is weight, this is nonsensical and should be discounted immediately, once installed it will not be possible to ascertain the weight difference between the lightweight plastic tile and the real tile it is designed to mimic.

7.7 *2.0 It is argued that the proposed photographs submitted by the homeowner, only assist in proving the inadequacy of the product in visual terms. It is a poor pastiche that lacks the finesse and richness of traditional plain tiles.*

The HAC showed no interest in the physical sample during their visit and have based their decision on the photos submitted, the quality of which is dictated by the quality of the printer used or the screen on which viewed. This is not an adequate assessment and should not form the main reason for refusal.

Furthermore there is no consideration given that the roof covering of the proposed extension (due to its configuration) is almost impossible to see.

7.8 *In 3.0 the appellant emphasises the design path that he has taken. It is unfortunate that there was a lack of engagement with the Foundation prior to submitting the application. A range of products and alternative designs could have been forthcoming, and a truly interesting and sensitive extension could have been borne out of these discussions.*

The comments received to date do little to imply that a better solution could have been achieved with further dialogue with the case officer. The examples given as exemplar alternatives in Appendix E are poor.

7.9 *In 4.0 the surrounding context is considered which shows a mix of residential and commercial properties as well as the car park. The historic core buildings at the heart of Letchworth utilise plain tiles and steep pitched roofs. The desire to ensure the integrity of the host building reflects the already existing historic values of the built heritage.*

No consideration has been made for the 2 buildings in the immediate area that have shallow pitched tiled roofs. The assessor is making generic statements with regards to context that apply to Letchworth as a whole, but has made no localised, specific assessment to gauge the actual impact on the immediate context (refer to item 6.18 for details).

There is also no consideration given for the fact that the proposed extension is not visible from the surrounding area.

I am also shocked that given the extremely poor quality of the office building that is 2 doors down as a neighbour that it could possibly be entertained that the proposed extension to 111 Norton Way South will harm the heritage quality of the area.

The impact of the office building is extremely detrimental to the quality of the area and should never have been allowed (in its current form). The impact by comparison of our proposed extension given this context is negligible.



I would like to point out that the office building has a flat roof, strongly being advocated by the case officer as the most sensitive and best possible solution. It is true as stated in the Design Principles '*roof pitches can have a substantial impact on the appearance of a building*', I would suggest in this case a more interesting roof design could have added a bit of richness and quality to this building, setting up the classical '*top, middle, base*' tripartite composition found in most classical buildings and could have saved it from the mundane, boring building it has ultimately become.

It should not be the position of those in power to persecute the householder while letting businesses destroy our townscape. The centre of Letchworth also has numerous buildings of questionable quality.

As an experienced Architect and working for a developer in London I am able to recognise the quality of the built environment around me. My role for my employer (Canary Wharf Group) is to ensure that the quality aspirations of the company are maintained. It should be taken as granted that I would take these aspirations and apply them to my own property. I can not understand why it has been assumed and ultimately the application refused that any person on the Heritage Board would consider that I would ever want to do a poor quality extension to my own property. I had hoped that by sharing my CV and experience that this would have alleviated concerns.

In comparison to the nearby office building the proposed extension at 111 Norton Way South is at the other end of the spectrum. This is a positive addition to a family home, by a very experienced design orientated Architect. The office building is a blur on the townscape.

I am yet to receive any reasoned argument that the current proposal other than not complying 100% with the design guide causes any harm to the area or building.

7.12 *At 5.1 There is no objection to an extension to the property. It is unfortunate that it has been designed from within with little consideration of its external impact on the host building.*

This is the personal opinion of the case officer not shared by the AMC.

7.13 *The Heritage Foundation wish to see a better designed roof, more in keeping with the host building. An extension that adds to the history and development of the building rather than a mediocre poor-quality addition that would cause harm to the host building.*

This seems to be a repeat and is again in contraction with earlier statements. I do not understand how the case officer can refer to the proposed design for 111 Norton Way South as mediocre poor-quality design and offer up the following as an exemplar precedent in Appendix E:



The photo to the top left is taken from Appendix E and given with the following statement 'The mock lead finish was felt to be in keeping with the shallower pitch which worked well with the asymmetrical roof pitches of the original building'.

The photo to the bottom left is an artistic sketch of the proposed extension. The case officer would argue that the top example 'works well with the original building' and that the proposed is 'mediocre poor-quality addition that would cause harm to the host building'.



In my architectural opinion I would strongly disagree with this assessment, in fact I would go as far to say the opposite. I do not believe the example given is a successful sympathetic addition and I am surprised that this has been given as an example of what to strive to achieve. In my opinion the proposed design is already of superior quality to the example given.

7.14 *The works and refurbishment of the house is welcomed and appreciated.*

Further works are now on hold due to the drawn out protracted approval process for the conservatory causing 6 months delay. There appears to be little urgency to get these issues resolved.

8. CONCLUSIONS

- 8.1 *The Heritage Foundation appreciate the desire of the homeowner to accommodate his family but remain concerned about the impact of the extension and **the precedent this may set.***

Knowing the importance of precedent I have tried to find precedent to add weight to my case, please refer to email dated 6th February:

Claire

The website link you have sent is for current applications.

I would like access to see what has been approved. Is this possible?

Are you able to return the tile samples? I would like these to show these to the AMC.

Also please note, 111 is not listed as a house of special interest. So I do not understand why 'protecting' the original character of the house is so important, considering the property has been reviewed and assessed as not of importance to the character of the area.

I assume you will be compiling a report that you give to the AMC recommending that they continue to refuse the application. Can I ask that all of my correspondence is taken into account when putting forward your recommendation.

Regards

■

This was the response I received from CP dated 6th February:

Hi ■

Unfortunately due to GDPR we do not keep applications on the website following a decision.

I'm out on site tomorrow so will pop the tiles back to you then, if that's ok, I'll leave them along the side of the building.

Although its not a HSI, we still consider the treatment of all elevations in terms of alterations to the property.

In my report, I include any comments from yourself that has come out of during the process.

Kind regards

Claire

Knowing that it is not possible to access previously approved applications on the Heritage Foundation website, please advise how it would be possible for any future applicant to access the application for 111 Norton Way South to use as precedent (should the application be granted approval) and no longer be recorded on the website? I have tried, the only applications that are available are those that have just been submitted (yet to be reviewed) and those that are at appeal.

Considering it is almost impossible to source information to use as precedent to then use this as reason for not granting approval is extreme.

- 8.2 *It is our view that the homeowner can achieve his aspirations for an additional ground floor room as well as respect the external appearance of 111 Norton Way South.*

All of the suggested alterations have significant financial implications, compromise the internal qualities of the space and offer no benefit to the scheme (other than seeking compliance with the Design Principles).

The application should be refused due to the impact on the property and the surrounding area, not because it is thought a slightly better design can be achieved. Please note all suggested alterations have been thoroughly reviewed, had any of them made any sense they would have been adopted to avoid this lengthily protracted appeal process that is ultimately stopping further works to the property progressing.

8.3 *Overall, it is our view that the application represents a clear breach of the Design Principles, which have been carefully formulated to avoid this type of alteration. The application fails to preserve the character and appearance of the existing property and the Heritage Character Area. This particularly relates to the design of the roof and the choice of material which are both contrary to the Design Principles.*

It has been established that this is a border line case that if it had been classified as a conservatory would have been approved. How can this possible be labelled as 'representing a clear breach of the Design Principles'?

To imply the proposed extension, that is not seen from anywhere outside the boundary of the property, 'fails to preserve the heritage character of the area' is absolutely unfounded, completely unsubstantiated and goes to prove the lack of holistic assessment of this case.

Please refer to meeting notes Householder Applications Committee dated 26th April 2019, where it states 'The proposal is not visible from the road and would not impact on neighbouring properties'. If there is no impact on neighbouring properties how can the proposed extension fail to preserve the heritage character of the area? There is no impact.

8.4 *As such, we do not consider that the application incorporates special circumstances to support the clear breach of the Design Principles*

There have been no clear breaches so special circumstances are not required

8.5 *It is therefore respectfully requested that this appeal is dismissed.*

The overall assessment of this case contradicts itself, takes no consideration for the context within which it will be viewed and makes no holistic assessment with regards to the impact of the proposed extension on either the property or the surrounding area.

The proposed extension cannot be seen from outside the property so the impact on the surrounding area is zero. The roof pitch on numerous occasions has been accepted (subject to a change in material). The case officer appears to be of the opinion that tiles are not appropriate for the pitch of roof proposed. However there are 2 buildings in close proximity that have the same pitch roof as that of the proposed extension and are tiled. Furthermore the roof covering is difficult to view and therefore the impact of the chosen material is negligible.

To date I have not received a reasoned argument why the proposed extension would cause any damage to the host building or the heritage character of the surrounding area. As such there should be no reason to prevent the extension from being built and the application should be approved.

HOUSEHOLDER APPLICATION COMMITTEE 26TH April 2019

Comments to the minutes:

- *CP advised that there have been several similar cases, proposing a similar Supalite product*

The conservatory company that I am using have not undertaken any other projects in the area, there are numerous plastic tiles of varying quality on the market. To be simply categorised as the 'same' as previously seen, gives little or no consideration of the actual product proposed. The product selected is towards the upper end of the market, I have not been made aware what other products have been proposed in the past but it could easily be the case that lesser quality products have been proposed and rejected. Taking cars for example it would not be fair to compare a Ford Fiesta with a Mercedes S class.

- *CP advised that previous cases have been refused and alternative options have been considered and subsequently approved*

There appears to be the misconception that it would be very easy and straightforward to simply amend the product slightly and use an alternative. Most building systems are exactly that, systems that work as a whole. It is not easy within a tested system to simply pick and choose which elements to use.

The examples given in Appendix E look to be a simple replacement of an old roof with a 'mock' lead roof. Not a complete extension. It should not be the opinion that just because once particular product that has been found to be acceptable can easily be substituted into all other scenarios.

- *The Committee questioned whether a suitable alternative product could be publicised, in order to assist with future applications. CP advised that the Design principles have been reviewed and amended and these shall be published shortly.*

It is clear that the Heritage Foundation recognise that these types of products are not documented within the 'current' Design Principles. I am not aware of the wording of the proposed revised version. However given the issues raised with this application I would assume they make it harder to use innovative materials.

I would like to remind the Independent Inspector that my application should be judged on the Design Principles in place at the time of the application (this is standard practice commonly adopted with Building Regulations, which are continually being updated). Unfortunately the impression I get from the case officer is that my application has been judged against the 'new' standards which have not been published rather than the 'current' standards in place.

- *CP advised that there is a suitable lead alternative*

This statement is incorrect and not applicable to my application.

On numerous occasions I been given the impression from the Heritage Foundation that they believe it would be easy to just change the tile and everything would be fine and why am I refusing to do this. The main reason why I have not done this is simple; it is not possible to do within the parameters of the conservatory company and building system they utilise that I have selected and within contract with.

- *It was noted that the applicant has paid a deposit on the proposed product.*

There seems to be little construction knowledge of building systems and the manufacturing process within those that are actually reviewing and approving said systems. There seems to be the misconception that just because once supplier can produce something that all suppliers should be able to. This is not the case each different company develops their own products with their inherent differences within them.

- *AC advised that the AMC felt that the ethos of the Garden city reflected an interest in natural materials, as opposed to plastic.*

I would like to point out that had I proposed a 'traditional' conservatory (similar to those common place throughout Letchworth and present on both the neighbouring properties), this would have had had a 'plastic' polycarbonate roof. I would suggest that a polycarbonate roof would be less appealing from an aesthetic perspective than the proposed tile. However this type of 'plastic' would likely have been approved.

- *The AMC felt the applicant was not willing to discuss alternative materials.*

As previously mentioned this is not an unwillingness to discuss alternative materials simply the constraints within which the conservatory company I have selected can operate. I would like to point out the company I have selected offer an extremely high quality product that is BBA certified. BBA stands for British Board of Agreement and is a certification within the construction industry indicating a high quality experienced and reliable company or product. The ExtraLight tile was awarded BBA approval, inspection, testing & certification via the manufacturers application in November 2017. I would like to point out that most conservatory companies do not offer a BBA certified product. The company I have selected offer a full 10 year insurance backed warranty, again not something offered by most companies. I would be reluctant to use an inferior company / product / building system to simply appease a minor comment regarding a particular material, especially when said material is not visible.

- *CP advised that an imitation lead roof would be an acceptable solution, due to the shallower pitch*

Unfortunately this is not possible within the parameters of the company selected.

If such a subtle change would be the difference between approval / refusal I would suggest that the following statements are all no longer valid, 6.14, 6.18, 6.24, 6.26, 6.28 as these imply there is a fundamental issue with the design, which is clearly not the case if such a minor alteration would gain approval.

- *The Committee agreed that the proposed roof tile is the main concern and agreed the proposed space is acceptable. The proposal is not visible from the road and would not impact on neighbouring properties.*

I would agree with this statement and that it is the roof tile that is the main concern. The case officer however refuses to accept this and has on numerous occasions insisted that the roof pitch is a major issue, items 6.18, 6.24, 6.26, 6.28. All of these statements appear to be singular to the case officer and not shared by the Committee. I would suggest that it should be the views of the Committee that should be taken into account rather than those of the individual. It should therefore be accepted that there is no issue with the roof pitch.

The statement acknowledges that the proposed extension is not visible from the road and would not impact the neighbours. However it does not take into consideration the fact that the roof covering itself will not be seen. This is the key point that has been missed by the assessors / review process and I think fundamental in understanding the true impact of the proposal.

- *The Committee agreed that the drawings demonstrate a proposed extension, as opposed to a conservatory*

The proposed extension will be built by a conservatory manufacturer using the same materials and principles of a conservatory. It is ultimately a conservatory. The examples given in Appendix E that have solid roofs are all referred to as conservatories.

The HAC agreed that the space could be approved in principle.

HERITAGE SUMMARY

It would appear that if the roof covering was changed from plastic tile to fake / plastic 'mock' lead roofing as indicated by the examples in Appendix E that the application would be approved.

I have checked this with the conservatory company and unfortunately as the tile is part of a tested roofing system they are not able to substitute without invalidating warranties.

This is obviously not something that I would like to do.

I would suggest to the Independent Inspector that if it is just this subtle variation that is requested to gain approval that the case is very much on the borderline of approval.

I would ask the Independent Inspector to assess the difference in impact on the host house and the surrounding area the following two proposals

1. current proposed extension with tiled roof
2. proposed extension with 'mock' lead roofing.

I would like to point out the 2 key drawings of the proposed extension, namely rear elevation and artistic sketch would remain unchanged for both options (as on both drawings the roof covering is not visible).



I would also like to highlight that as per the response to item 6.18, there are two buildings in the surrounding context that have shallow pitch tiled roofs. These should also be taken into account and I would ask the Independent Inspector to assess if they agree with the case officer that tiles on a shallow pitch roof are unacceptable, or agree with the applicant that tiles in this location are suitable.

If it is deemed that the impact of this subtle change from tile to 'mock' lead roof covering is negligible, due to fact that it would be almost impossible to see the roof covering once installed, and that tiles to a shallow pitch are totally acceptable (as seen on the Fenner's building and the Watermill Bears shop) I would suggest that the application should be approved as it currently stands.
