Statement of Case

For the Appeal against the decision of refusal by Letchworth Garden City Heritage Foundation for the:

Replacement roof, front two and rear single storey extension including external cladding and replacement windows at:

34 Pasture Road, Letchworth Garden City



Job No. 3195 Date. July 2023 Revision. B

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1.0 Introduction

- 1. The description of the development to which this assessment is made is detailed at the head of this paper and is taken from the application that was submitted to Letchworth Garden City Heritage Foundation (LGCHF) on the 27th October 2022, and given the application no. 39536.
- It is recognised that consent is required under a Scheme of Management, which means that most homes - freehold and leasehold - require its written approval by Letchworth Garden City Heritage Foundation before any external changes are made.
- 3. The Letchworth Garden City Heritage Foundation Scheme of Management has helped preserve the character of Letchworth by protecting the key features of individual houses and their setting.
- 4. A previous scheme, submitted on the 13th November 2018, application no. 34364 approved on the Will be cited regularly for comparison purposes in this Statement of Case.
- 5. As also required, a Planning application, made to the Local Authority was submitted (application no. 22/02791/FPH) and subsequently approved on the 27th February 2023 with no amendments.

The application will also be regularly cited throughout this Statement of Case, the Officers' report of which can be read under Appendix B.

- 6. The decision to refuse this development was made on 31st January 2023, when the Foundation advised that it was considered by the Heritage Advice Service team, after consideration the decision was to refuse consent for the proposal on the 31st January 2023,see <u>Appendix C</u>, for the following reasons:
- Changes to the style and height of the roof are not supported as the principle contravenes the Design Principles;
- Proposals for front additions will not be supported unless it can be demonstrated that they will not cause harm to the appearance of the existing property or its group. In this instance, the proposed front extensions would create an overbearing and unrelated mass compared to the host, plot and street scene, therefore contrary to the Design Principles;
- An over proliferation of rooflights resulting in cluttered and unbalanced roof pitches, contrary to the Design Principles.
- 7. This conclusion and reasons for refusal are in stark contrast to the District Council's assessment of the style and height of the roof, the front extensions and the rooflights.

The case officer's assessment of the development on behalf of the Council has been a robust and thorough examination of each element and judged them against the prevailing character and appearance of No 34 Pasture Road and the area in which it is located.

- 8. Following the refusal on the 31st January 2023 by LGCHF, it was requested that the Advisory Management Committee review the decision, the decision was upheld.
- 9. A subsequent request was made for the Householders Application Committee who also upheld the decision (Appendix D).
- 10.The decision has therefore been made to appeal via an Independent Inspector to review the documents, including the Design Principles
- 11. This Statement of Case sets out in detail our full reasons for the support of this appeal and has been preon behalf of Road in suppet a to the Independent Inspector in respect of the refusal of the Scheme of Management Consent by the Letchworth Garden City Heritage Foundation that was originally submitted on the 27th October 2022.



 As previously mentioned, there are three separate reasons cited and upheld, following review, by Letchworth Garden City Heritage Foundation.

They have been detailed thus:-

- Changes to the style and height of the roof are not supported as the principle contravenes the Design Principles;
- Proposals for front additions will not be supported unless it can be demonstrated that they will not cause harm to the appearance of the existing property or its group. In this instance, the proposed front extensions would create an overbearing and unrelated mass compared to the host, plot and street scene, therefore contrary to the Design Principles;
- An over proliferation of rooflights resulting in cluttered and unbalanced roof pitches, contrary to the Design Principles.
- The reasons for refusal will be discussed in greater length within this statement of appeal in relation with the Design Guidance for Modern Character Areas which acts as a "guide to altering your home" in such an area.
- 3. Taken from the Design Guide itself, we note the wording "The principles generally indicate what is and is not acceptable ... However, each case will be considered on its own merits assessing the impact of the proposals on the character and quality of the property and its context".
- 4. It is this objective and holistic approach that the high quality of this design has been conceived.

Modern Character Area

The Design Principles outlined in this publication relate to the Modern Character Area of Letchworth Garden City.

The area includes a wide range of housing styles, with some specific areas having a unique generic style.

Many homes have open frontages set along wide roads.

Using the Design Principles

The Design Principles have been developed to help you plan and implement any external alterations to your home, large or small.

Split into distinct sections, the Principles address a wide range of building changes, from extensions and hard-standings to windows and doors.

If you are contemplating making changes, it is important that you review all the relevant principles, bearing in mind an extension may also need to consider the Design Principles for other features such as windows and doors.

The principles generally indicate what is and is not acceptable when seeking to make alterations. However, each case will be considered on its own merits assessing the impact of proposals on the character and quality of the property and its context.

In all cases a high quality and considered design will be sought.

The Heritage Character Area Design Principles apply to homes in the award-winning Hartington Place and Ralph Swingler Place, developments.

Roof

1. As detailed in the refusal:

Changes to the style and height of the roof are not supported as the principle contravenes the Design Principles;

- 2. On the matter of new roofs the 'principle' starts by stating that the roofs of "Modern Character Area houses use a range of traditional and modern designs and materials" and has three provisions.
- 3. The principle does not prohibit all roof changes, only those that are 'not normal'. It does not qualify what amounts to an abnormal change, but the inference is clear, that a change might actually be supported.
- 4. There does not seem to be any amplification of what harm the changes to the style and height of the roof at No 34 cause to this part of the modern character area, and therefore believed that this point to be found in compliance.
- 5. The Local Authority case officer noted within the planning application that they had no problem with style or height, noting that the ridge line of the dwelling would be increased from 6.9m to 7.8m. In their view, this increase of 0.9m is acceptable, given the spacious plot size and, in reality, the roof pitch would be quite similar to the existing arrangement.
- 6. It is therefore submitted that the second point has been complied with on the understanding that such roof alterations can be found acceptable should the alterations "reflect the original roof design and specification" which, the design does.

Roofs, new roofs, alterations, re-tiling & repairs

The roofs of Modern Character Area houses use a range of traditional and modern designs and materials.

- · Changes to the style and height of a roof will not normally be acceptable
- Roof alterations shall reflect the original roof design and specifications
- Materials shall normally relate to the original style of the existing house

New Lean-to Roof on Extensions

Where the top line of lean-to roofs abut the wall, there shall be no cut-outs under windows

Re-roofing of Conservatories

 Any proposal that alters an existing conservatory leading it to fall outside the definition for a conservatory (see Glossary), shall comply with the requirements for extensions included in this document. Imitation roof tiles on existing conservatories will not be accepted where they do not match the style and pitch of the existing house, although a lead or imitation lead treatment may be acceptable, where it respects the profiling of the existing conservatory

- 7. While it is noted that the Local Authority Case Officer considers applications through different Design Principles, we refer again to the fact that North Herts Council Policy D1 d requires the Case Officer to have "regard to the Letchworth Garden City Design Principles contained in Appendix 5" which they no doubt considered as part of the assessment.
- 8. The roof pitch is increased as part of these design proposals. Since the first approved application (dated: 13th November 2018 Ref: 34364) the client has had a change of requirements for their home and since not implemented the originally approved application.
- The requirements of the design therefore are that room is accommodated within the roof space. Increasing the roof pitch enables this additional accommodation.
- 10.It is therefore re-affirmed that the second point has been complied with on the understanding that the such roof alterations can be found acceptable should the alterations "reflect the original roof design and specification" which, the design does.
- 11.Equally important in the context of the Foundation's second principle relating to roof changes, in that what is proposed here actually reflects the existing roof design and specification closely.

- 12.Pasture Road is truly representative of houses within the modern character area, in that the roofs comprise a range of traditional and modern designs and materials. There is no cohesion or uniformity of height, shape, style or roof materials.
 - No one style predominates, as the supporting statement submitted to the AMC has already discussed and demonstrated.
- 13. The remaining points do not relate to this application and it is therefore submitted that the Roofing elements, within this application therefore comply, in full, with the requirements of the Design Guide.
- 14.The remaining point seeks to request that materials relate to the original style of the existing house. It is again noted that this is a "normal" requirement, and while the design does, in fact, seek to retain similar materiality, the normality is not an unwavering requirement.



Above Top: As previously Approved

Above Bottom: As proposed

- It is believed that the intention of Design Guide, when referencing extensions and modification to existing buildings, is to retain a modest pallet of materials, maintaining a relationship between the existing and new elements within the building.
- 15.In the case of this design proposal, it was decided that the existing roof material would not be appropriate to the proposed scheme, as such, the roof tiles are to be replaced in totality to bring the scheme together.

This is considered to be a completely acceptable approach in ensuring a holistic design, particularly when considering the context of Letchworth Garden City and the main aim of the Design Principles that "high quality and considered design will be sought".



Above Top: As existing

Above Middle: As previously Approved

Above Bottom: As proposed

Front Extension

1. As detailed in the refusal:

Proposals for front additions will not be supported unless it can be demonstrated that they will not cause harm to the appearance of the existing property or its group. In this instance, the proposed front extensions would create an overbearing and unrelated mass compared to the host, plot and street scene, therefore contrary to the Design Principles;

- 2. The Design Principle for front extensions opens by stating that "Modern Character Area homes were designed in a range of styles and varied design details, but the majority retained the Garden City ethos of space and green vistas."
- 3. In relation to front extensions the principles are that they will not be supported unless it can be demonstrated that they will not cause harm to the appearance of the existing property or its group.
 - It is submitted that in this case the front extensions will not harm the appearance of No 34 or its 'group'.
- 4. The design guide makes reference to front extensions having "particular" regard to terraced and semi-detached houses, which we note this property is not.

We would characterise the property as being detached on a corner plot within Pasture Road with no street grouping as it is the side elevation which fronts the main street frontage.

Front extensions

Modern Character Area homes were designed in a range of styles and varied design details, but the majority retained the Garden City ethos of space and green vistas.

The quality of the original design of these houses contributes to the special Letchworth Garden City street scene.

Adding elements, including extensions, to these façades can have an impact on these attractive street scenes, particularly on terraced and semi-detached houses. These proposals will therefore be carefully considered as they can detract from the architectural value of the original and alter the relationship within a group of houses by:

- Creating an unsightly or unduly prominent form of development;
 - · Disrupting the uniformity of the front building line;
 - Disrupting the coherence of a group of semidetached or terraced houses;
 - Diluting the 'group value' of a run or cluster of houses

This is particularly the case with first floor extensions, which can have a serious impact on the original character of the house and the street scene.

Front extensions are discouraged

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It is preferable for extensions to be on the rear of the property as these normally have a reduced impact on the character of the property and its context; therefore, rear additions shall be explored in the first instance.

Proposals for front additions will not be supported unless it can be demonstrated that they will not cause harm to the appearance of the existing property or its group. In the rare circumstance that this type of extension is permitted, the following principles will apply:

- Front extensions shall be consistent with the character of the original house, utilising the detailing and matching materials, 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 shall be consistent with the original roof design of the house

Design shall respond to and harmonise with the individual qualities of the host building and its setting. Therefore, in all cases high quality design will be encouraged, while poor design will be rejected, and alternative solutions will need to be submitted.

All Dwellings

- The area and volume of the proposed extension shall be subservient and in proportion with the host building, plot and street scene
 - The design of front extensions shall relate well with the original and neighbouring houses and their setting
- Front extensions will not normally be acceptable if the existing frontage is less than 5 metres deep
- Extensions shall respect the balance and symmetry of a pair or group of houses
- Semi-Detached Dwellings
- Extensions that upset the balance or symmetry of a pair or group of houses are unlikely to be acceptable

Terraced Dwellings

 Front extensions will not normally be permitted unless it can be demonstrated that they will not damage the group value of the existing terrace and its overall setting

Bungalows

 Front extensions will be accepted only when they are of modest proportions and sympathetic to the appearance of the existing property and its setting

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- 5. Running through the bullet point criteria, it is submitted that:
- 6. (A) It is believed strongly that the proposals and extension are a creative and harmonised solution, and are coherent within the context of the dwelling.
- 7. (B) The originally approved plans, under application no. 34364 Found it acceptable to extend forward and therefore the same building line as proposed should be found acceptable once again.
- 8. (C) This next point is not applicable as it does not relate to a detached property.
- 9. (D) This point is not applicable as, previously mentioned, the dwelling does not relate specifically to a "group value" or run of properties in the local area.
- 10. The first floor forward extension is subservient to the existing property and does not detract from the original character of the property.
- 11.(E) While it is noted that front extensions are "discouraged", it does not state that they are impossible. The document states a preference for extensions to be at the rear, though rear garden space is a premium in the context of this property.
- 12.The Design Guide does go on to say that there are "rare circumstances that this type of extension [can be] permitted" at which point the "following principles will apply:"
- 13.(F) It is reiterated that the forward extensions sit well within the design philosophy of the proposals and the existing character of the house. The scales and proportions of which are balanced.

- Front extensions shall be consistent with the character of the original house, utilising the detailing and matching materials, 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 shall be consistent with the original roof design of the house
- 14.(G) The roof pitches are in keeping with the design of the main roof element and in keeping and consistent with the original roof design of the house, as well as within the design philosophy of the proposals.
- 15.The design of the proposals are of high quality and therefore felt that they harmonise with the "individual qualities of the host building".
- 16.The Design Guide requires certain criteria for "All Dwellings" to comply which we respond as follows:
- 17.(H) The forward extension remains subservient with the host building, the plot and the street scene.
- 18.(i) The design of the forward extension relates very well with the design philosophy of the original dwelling and neighbouring properties, it is submitted, are not relatable in this context, though arguable within the context of Pasture Road, relate in any respect
- 19.(J) The existing Frontage is greater than 5 meters deep, therefore being allowable under this assessment.

- 20.(K) There is no grouping of housing from which to relate symmetry.
- 21.(L) & (M) The remaining criteria do not apply due to the nature of the property.
- 22.From the citing above in this category for refusal, it is hoped that the assessment is found that, in fact, the forward extension is in complete compliance of the requirements as set out within the Design Guide, this element therefore being approvable.





Above Top: As proposed

Roof Lights

1. As detailed in the refusal:

An over proliferation of rooflights resulting in cluttered and unbalanced roof pitches, contrary to the Design Principles.

- 2. The Design Principle for rooflights is that in most cases they shall be to the rear. Those proposed in this development are almost all to the rear.
- 3. It is agreed that the introduction of any dormer windows, rooflights and sun tunnels impact on the character and neighbouring properties. It is therefore noted the careful nature through which the choice was made when incorporating roof lights into the design.
- 4. It is believed that the design philosophy of the property is such that the simplicity and neutrality of roof lights would be best suited when incorporating such windows into the design.
- It was also a design choice to ensure roof lights were incorporated within the rear elevation.
- 6. It is noted that a group of 3 roof lights sit on the front face of the proposal, reflecting the fenestration detail of the front entrance door and window over, bringing notice to the positioning of the front door.
- 7. It is strongly believed that this design would be found to be perfectly acceptable in incorporating such design ideals.

Loft conversions, dormer windows, rooflights & sun tunnels

Many Modern Character Area homes retain the open characteristic of the Garden City including examples of sweeping access roads, in cul-de-sacs and around common open spaces.

This element will need careful consideration, as the addition of dormers, roof lights and roof alterations can have an impact on neighbours and the original character of the house.

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A loft conversion is generally acceptable provided it does not alter the original roof design and ridge height. Roof lights can improve natural light and ventilation. However, any dormers and/or roof lights can have a significant visual impact and will be carefully considered.

 Loft conversions in bungalows shall normally be designed with all windows to the rear, as the street scene will be particularly sensitive to roofscape alterations Dormers and roof lights in most cases shall be to the rear but might be permitted on the front elevation if they are an existing characteristic of the original dwelling and street scene. All dormers and rooflights shall meet the following requirements:

- An unacceptable increase in the number of dormer windows and/or rooflights; dimension appropriate
- Dormers shall reflect the style and appearance of the house and its context;
- Dormers shall be modest in relation to the area and slope of the roof and their scale shall not dominate or upset the balance of any building elevations or the street scene:
- Materials for dormer windows shall preferably match the original materials of the house. However, other materials may be acceptable if in keeping with the style of the property;
- Small openings for roof lights that do not negatively affect the overall composition of the building will normally be acceptable;
- Lantern type roof lights in flat roofs shall be a size that is proportionate to the roof area
- New dormers on the front of existing bungalows shall be avoided





- 8. The Design Guide finds "loft conversions" to be generally acceptable.
- 9. It was felt, just as the Guide also notes, that dormers would have an impact on the design which would sit outside of the general philosophy of the proposals and therefore did not form part of the design
- 10.The Design Guide also requires that "in most cases" roof lights shall be to the rear. It is emphasised, again, "most" and believed those used on the front elevation can be found acceptable in their form.
 - It is submitted that there is general compliance with this requirement.
- 11. The Guide becomes a little more specific in its requirements, which is explored thus:
- 12.The Guide does not give a quantitive figure at which point the increase of roof lights becomes "unacceptable". It is felt that the dimensions are entirely appropriate. The roof lights are not excessive in number given their use within the overall proposal.
- 13. However, when making comparison of houses on Pasture Road which have previously been approved, it is noticeable that roof lights have previously been found acceptable under the same Design Guide Principles.
- 14.No dormers are proposed, any roof lines are reflective of the style and appearance of the property.
- 15. The openings made for the roof lights are in compliance with the overall composition of the proposals. As such, as per the noted point, the reference to "normal" acceptability is made.

16.As can be seen, two examples of Pasture Road properties showcase front elevational roof lights.

This statement does not aim to critique the design philosophy of the properties, but it is noted that the roof lights have been incorporated into that design philosophy aiming to supplement the architectural styling.

17.For completeness under this reason for refusal, it is also noted that those roof pitches proposed are to be equal in pitch, and therefore would be found to be 'balanced' and not in any way 'cluttered'

18.It is submitted that the roof lights proposed do not negatively affect the overall composition of the building.

The roof lights are intended to supplement the design and make improvements internally to light and wellbeing as a result. The roof lights are of the type that would be found normally acceptable within the LGCHF design criteria.



3.0 Local Authorities (Favourable) Decision

- 1. In its consideration of the planning application and applying local and national planning policies, North Herts District Council has granted planning permission for the development. In that consideration the case officer (the Planning Officer) assessed the various issues, amongst which was the design of the proposed extensions, which can be read in more detail in Appendix B.
- 2. The Local Plan Policy situation cited by the case officer was:
 - Policy D1 of the Local Plan states that planning permission will be granted provided that development responds positively to the site's local context in addition to other criteria. Policy D2 of the Local Plan states that planning permission for house extensions will be granted if the extension is sympathetic to the existing house in height, form, proportions, roof type, window details, materials; the orientation of the main dwelling and if it does not dominate adjoining properties. These considerations are echoed in Section 12 of the NPPF.
- 3. The Design Principles of LGCHF (equivalent to Appendix 5 of the Council's Local Plan) provide guidance on design requirements for the character area under which the property falls. In this case Pasture Road falls within the Modern Character Area, which includes a wide range of housing styles, with some specific areas having a unique generic style.
- 4. Interestingly in the context of new development in Letchworth Policy D1 d) was not mentioned but it states that:
- 5. Within Letchworth Garden City new development shall have regard to the Letchworth Garden City Design Principles contained in Appendix 5;

- Appendix 5 opens with the statement that for development proposals in Letchworth, their overall layout and design should, as far as practicable, reflect 'Garden City' layout and design principles. The Council was satisfied that this was the case at No 34.
- 7. The case officer went on to assess the design principles in this planning application as follows:

The proposed development seeks to significantly alter the external scale and appearance of the host property, through various extensions, fenestration changes and choice of materials. The most significant alteration to the property is the increased height and replacement roof, which will increase the ridge line of the dwelling from 6.9m to 7.8m. In my view, this increase of 0.9m is acceptable, given the spacious plot size and in reality, the roof pitch will be quite similar to the existing arrangement.

The other significant elements are the proposed two-storey front extensions, one of which is to house a single garage and first floor bathroom, and the other is to house the staircase. In my view, the wider two-storey element to serve the garage/bathroom, which measures approx. 5.8m deep, 5.6m wide and exhibits a gabled dual pitched roof measuring approx. 3.1m to eaves and 5.3m to ridge, is acceptable in design terms, as it is subservient to the host dwelling through its substantially lower ridge/eave lines and is probably a better front arrangement when compared to that approved under 18/02651/FPH.

The other two-storey element to house the stairs, which measures approx. 1.1m deep, 4.2m wide and exhibits a gabled dual pitched roof measuring approx. 5.6m to eaves and 7.4m to ridge, is also acceptable in my view, as this has taken cues from the existing two-storey element that serves the stairs in form and proportions, which is appropriate in this context. The final less significant elements include a single storey rear extension, alterations to fenestration, and a Juliette balcony.

The single storey rear element is proposed at an angle from the rear elevation, measuring approx. 4.0m deep, 12.7m wide and 2.6m to eaves. These elements are unobjectionable in my view, given their modest nature, scale and permitted development fallback position.

8. The case officer then went on to consider the proposed materials, commenting that:

The external materials are proposed to change across the entire dwelling. The existing dwelling has yellow buff brickwork/plain brown clay tiles to the external walls, plain clay tiles on the roof, and white uPVC windows and doors. The proposal seeks to incorporate yellow buff facing brick work to the ground floor, with grey powdered aluminium cladding and white render to the first floor and front extensions external walls. The roof is proposed with grey concrete tiles and the windows/doors with powder coated aluminium frames. In my view, this is a substantial alteration to the external appearance of the property, which will have an impact upon the character of the street scene. However, there is a wider variety of architectural styles and materials on this street scene and as a result, it is not considered reasonable to object on this basis. As such, the proposed external alterations are considered acceptable on balance, and will not result in material harm to the character and appearance of the street scene.

3.0 Local Authorities (Favourable) Decision

9. The case officer concluded that:

The proposal is therefore deemed acceptable in design terms and in accordance with Policies D1 and D2 of the Local Plan and Section 12 of the NPPF.

- 10.In this conclusion it must be assumed that the development does not conflict with the design provisions within Appendix 5 of the Local Plan that deals with Letchworth Garden City Design Principles.
- 11.It is acknowledged that the case officer mentions that the Heritage Foundation has objected to some elements of the development and that it had stricter controls, but it is a fact that the Council did not agree with the concerns of the Foundation from a design point of view, otherwise planning permission would not be granted





Above Top: As proposed, Visual

Above Bottom: As previously approved, visual

4.0 Pasture Road

- 1. Pasture Road can be defined as a collection of unique detached homes on differing sized, and shaped housing plots.
- 2. Each house has been uniquely designed in this modern character area, as defined by the Heritage Foundation.
- 3. As such with point 4.2, it is considered quite importantly (on the basis of analysing the Design Guide against the proposals) that the properties are not interpreted as "normal", but each one unique and having their own design merit
- 4. The houses share very little commonality in terms of façade; brickwork colour, tone, style.
- Cladding varies from building to building;
 There are examples of dark cladding; both
 decorated and un-decorated. There are
 examples of rendered properties on the street
 and also simply facing brickwork.

The images below also show, quite demonstrably, that there are varying styles of properties throughout Pasture Road, which is in contrast to the comments made by the Case Officer under <u>Appendix A</u>, defending a consistent appearance between buildings, which simply is not the case.

- 6. Roof shapes and style vary between properties.
- 7. Some properties forward outlook is not onto Pasture Road itself.
- 8. Four buildings below are selected in order to share the varying styles on Pasture Road, from modern roof shape and structure, to the cladding colouration which has lead to the refusal.
- 9. Other properties demonstrate that roof lights on the front elevation have previously been found acceptable.
- 10.It is summarised that the Pasture Road celebrates 'modern character', in an "eclectic" manner, as defined by the original Case Officer (Appendix A). As this statement has continually demonstrated, this form can be found acceptable as it has done, from previously approved properties which individually showcase successful application of the Heritage Foundation's Design Guide Principles.

Below Top: Pasture Road, showing dark cladding

Below Middle: Pasture Road, showing forward roof lights

Below Bottom: Pasture Road, showing light cladding









5.0 Consistence of Wording

- The design guide regularly makes use of the wording "preferably" and "normally" or "not normally". This is consistent between the various headings and notably be during conversations of what and what might be considered acceptable 'development' on front elevations.
- 2. While understood Sustainable technologies are not in discussion, it should be pointed out, by way of precedent of wording that properties on Pasture Road have been permitted to develop on frontages where the Design Guide would note a preference for rear development and that it would otherwise be "not normal" to exceed a criterion.
- 3. The allowance of these items supporting our view that Pasture Road can attract decisions beyond the normal Guidance. And therefore be found acceptable.





Sustainable technologies & wind turbines

One of Letchworth Garden City's aims was to establish a harmonious relationship between the built environment and nature.

While we are generally supportive of residents' wishes to adapt their homes to help offset climate changes, we also need to protect the built environment.

The challenge is to balance the aesthetic needs of the domestic environment with the need to reduce consumption of unsustainable energy resources.

In most cases, the installation of solar panels/ PV cells is usually acceptable if the following criteria are met:

- Panels shall preferably be on rear roof slopes; where this is not possible they shall be as inconspicuous as possible, and the panel size must not dominate the building or its context;
- Solar hot water panel installation shall not normally exceed 6 square metres in area;
- Installations shall not be located on the front roofs of single storey or chalet style dwellings;
- PV and solar panels shall cover no more than 90% of the roof plane area and shall be 0.6 metres from the edge of the roof plane and 0.3m from the ridge. The arrangement shall be rectangular to avoid fragmented edges;
- Solar/PV panels may be more acceptable if placed on the roofs of detached garages, sheds or outbuildings. Alternatively, a free-standing array could be mounted in the rear garden;
- Metal reflector paint behind vacuum tubes is not acceptable;
- Wall mounted panels are not acceptable on elevations visible from the street

Solar technology is evolving all the time and we will consider applications for new solutions of the technology based on the principles outlined in this section.

 Electric vehicle charging points are encouraged but shall be installed to be as inconspicuous as possible

Letchworth Garden City was founded on the idea of urban living in the peacefulness of a natural environment.

The streets of the Heritage Character Area reflect this balance with buildings set in gardens with mature planting and calm atmosphere.

The roof line is characteristically punctuated by original chimneys designed to complement the house. The introduction of foreign elements may unbalance the symmetry of the roof lines.

Wind turbines are generally not appropriate but will be considered in suitable locations, where there is proof of wind speeds, acceptable acoustics and negligible impact on the street scene and the host building.

Important notice

Domestic wind turbines on buildings or on free standing posts range in rotor size from 1 metre to 11 metres in diameter. To be most effective the turbines shall be higher and clear of any obstructions less than 20 metres away.

As most houses in Letchworth Garden City are within this vicinity and their roof is at least 8 metres in height; to be efficient the turbines would have to be fixed at a considerable height (minimum 15 metres). This arrangement could have a major impact on the street scene and visual amenity of the neighbouring properties.

5.0 Consistence of Wording

- 4. Also notable within this section, specifically, are words noting what would "not [be] acceptable".
 - Words noting such a direct requirement are rarely found throughout the Guidance and it is felt that this should be considered with significant weight when considering a scheme whereby the proposals are considered against 'optional' criterion.
- 5. Throughout the Design Guide, the modal verbs allowing a Case officer to consider their own subjective opinions provides significant freedom in making decisions on many design aspects of proposals set in front of them.
- 6. In a contrasting note there are few occasions where the Case Officer (and Applicant) can categorically understand what will or will not be allowable under the description.
- 7. As such, it is submitted that in those instances where an Officer can use their own judgement, the proposals as a whole should be taken into consideration, including a historical and design understanding of the scheme.
- 8. It is believed, from the wording of the refusal that this holistic approach has not been taken forward. The wording has not been taken from the Design Guide and singular points have been extracted and cited as reasons for refusal.

- 9. As a pretext to what will be discussed in greater length later in this document, it should also be noted that there is 'in-consistence of consideration', particularly when examining the Design Guide and properties on the Pasture Road which have received permission from the Letchworth Garden City Heritage Foundation.
- 10. This is particularly notable in such properties as no. and no. Pasture Road, where the proposals made considerable alterations to the form, appearance and aesthetic of the properties, but were found acceptable against the same criteria.
- 11.It is therefore submitted that the interpretation can be found acceptable in the context of individual, detached properties which sit in their own context.
- 12.In the specific context of refusal point 2, where "rare circumstances" are required for permission, it is sincerely asked what conditions must be met for the rarity of that decision to be acceptable?

It is, through principle that the rare circumstance is considered using the points raised under this category; page 10 of the Design Guide. The points of which have previously been argued ,in this Statement of Case, that the criteria is met, therefore these proposals must be found acceptable.





Above Top: No. Pasture Road

Above Bottom: No. Pasture Road

No. Pasture Road

- 1. Pentangle Design have been involved in multiple projects on the Pasture Road which therefore makes The Practice uniquely qualified in having continued conversations with the Heritage Foundation throughout the years in understanding the Design Guide Principles as well as Officer's thoughts on the development of the street and the properties within in.
- 2. To the right we demonstrate this property which has been extensively extended and altered on the street frontage.
- 3. The same design principles we are discussing within this document were used to the success of this project and it is felt a useful gage to understanding what design solutions are acceptable within a Modern Character Area.





No. Pasture Road

- 4. Similarly, this property has been extensively altered and would be considered unrecognisable from the previous property.
- 5. While it is recognised that the application, on this occasion, was to remove the property for replacement, the Design Principles remain applicable between both applications.
 - The replacement dwelling, as much the case with this example, use the same Design Guide references and it is submitted that the same balanced consideration applies.
- 6. Materiality was sought and approved which were also extensively changed from that of the original dwelling.
- 7. The roof height and style was increased substantially as part of the proposals, and found acceptable by LGCHF.
- 8. The number of roof lights also increased.
- 9. The design and extensive alterations of the street frontage also found to be acceptable.
- 10.It is believed that, with the above points and this comparable Pasture Road property in mind, the deliberation and conclusions of design interpretation for all matters discussed within this statement therefore must identical and that both (and all) properties in this area must each be considered on the basis of furthering their uniqueness with the Design Guide in mind, but certainly not stinted.





No. Pasture Road

- 10. This property was subject to a forward dormer and side extension.
- 11.Roof lines were approved which had similarities to the existing property, however, again, as previously noted, street frontage adjustments were found acceptable by LGCHF.





No. Pasture Road

- 12. This property, as can be seen in the before and after photos, has undergone extensive alterations, specifically to the street frontage.
- 13. Notably the most comparable to the proposals for no. 34 Pasture Road in that the character and appearance of property is altered as a result of the design changes being proposed.
- 14. The extensions are visible from the main street scene and, incidentally over the road from the application site of which this appeal relates.
 - It should be noted that this property, for comparison purposes, has been drawn into the long section within the original proposal documents.
- 15.The extensions include extensive side and forward garage extension.
- 16.It is noted that the roof lines were altered as a result of the extension and that the main architectural characteristics were changed as a result of the extension and proposals.
- 17.The proposals were found acceptable by the Heritage Foundation utilising the same Design Principles as outlined extensively throughout this document.





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7.0 Conclusion and Summary

- 1. It is in our belief that the decision made by Letchworth Garden City Heritage Foundation to refuse Scheme of Management Consent for no. 34 Pasture Road is not consistent within the reading of the Modern Character Design Principles and therefore unjustified as a result.
- 2. The proposals are for alterations and extensions to an existing property, on a large scale plot with little to no grouped neighbours meaning that the nature of development should not be considered inappropriate.
- 3. These proposals are already similar to those previously approved.
- 4. The Pasture Road, as described in this Statement, has a wide variety of dwellings which presents "eclectic" styles of dwellings.
 - These proposals are similar to those styles found already on the Pasture Road which have previously been found acceptable, and approved by the LGCHF.
- 5. Therefore, in the same manner and requirements set out and decided upon for those properties previously approved (such as those previously discussed with emphasis on no. and and Pasture Road) it is requested that he pro osals in this application are considered in the context of the individual detached properties, the eclectic, unique and modern Character of Pasture Road.

- 6. It is requested that the proposals are considered based on their own high quality design and on the basis that proposals are in no way different to those having previously been approved, it must be found there is no justification for refusal.
- 7. The proposals have already been found acceptable by North Herts Council as part of their independent consideration, including policies relating to design and those for the Letchworth Garden City area.
- 8. While this Statement of Case has been thorough in it's rebuttal of the refusal; making detailed explanation of why each point should be found acceptable against these proposals in relation to the 3 refusal reasons. It is noted that we believe each section should be read as a whole when critiquing design choice and philosophy.
- It is submitted that there is therefore no justification for the refusal of these proposals as outlined previously throughout this statement.

We therefore respectfully invite the Independent Inspector to overturn the decision made originally by LGCHF and subsequently upheld by the AMC and HAC.

Appendix **A**

From: Roderick McDonald <Roderick.McDonald@letchworth.com>

Sent: 30 November 2022 10:55

To:

Subject: Application: 39536 - 34 Pasture Road, Letchworth Garden City

Application: 39536 - 34 Pasture Road, Letchworth Garden City

Proposal: Replacement roof, front two and rear single storey extension including external cladding and replacement windows

Dear I

Thank you for your recent application to the Heritage Foundation. With regards to the above reference, the proposed alterations at 34 Pasture Road, Letchworth Garden City, the Heritage Advisory Service have considered the application and have the following commentary:

- The proposed alterations to the roof, as to create a substantially raised ridge to facilitate accommodation in
 the roof would not be supported. Given the topography and highly visible and prominent location of the
 site, the raising of the ridge would seek to dominate the vicinity. Related to this, proposed roof lights to the
 north pitch would not be supported. This is a consistent approach following the approval of application
 34364 in February 2019.
- In direct relation to proposed raised ridge, the increased hight and form of the stairwell addition and
 excessive number of roof lights to the rear pitch would also not be supported.
- The increase for the first-floor level with inclusion of the gabled pitch perpendicular to the host, to the proposed front, garage addition would not be supported. The raising of this element, above and beyond the approved scheme of 34364 would seek to substantially increase the massing of this element producing an actual and perceived bulk to the front boundary. One of the identified characteristics of the street scene and grain of Pasture Road is that the properties are set back from the highway thus allowing for a lower density. This is reaffirmed from the February 2019 approval where the increased footprint was accepted based upon the recessive approach to the roof pitch, being that of a de facto catslide with a sympathetic dormer window.
- There are no overriding concerns with regards to the proposed single storey addition to the rear with
 projects at an angle. Although the need for 3no. roof lights is questioned, a single larger rooflight would
 allow for greater nature light to enter, resulting in a less cluttered roof pitch.
- There are concerns, however, over the proposed material and colour pallet. Pasture Road is eclectic in form,
 material and hues, however there is a relatively consistent approach to the appearance of the buildings
 being of predominantly reds, browns muted tones with other colours being of a secondary nature. The
 proposed monochromatic white render and black/grey cladding and tiles would create an prominent, alien
 appearance within the street scene being more reminiscent of a barn style structure.
- As it stands, the proposals are contrary to the adopted policy set out in the Modern Character Area Design
 Principles, seeking to harm the character and appearance of the area. Therefore the application would be
 refused by the Heritage Foundation.
- Whilst there may be scope for alterations beyond the February 2019 approval it would be advised to withdraw the application and seek pre-app advice for the level of acceptable change.

Kind regards

Roderick McDonald | Design Development Officer

Letchworth Garden City Heritage Foundation, One Garden City, Broadway, Letchworth Garden City, Hertfordshire, SG6 3BF

Appendix **B**

DELEGATED FILE NOTE

CASE OFFICER: ...Alex Howard.....

APPLICATION **BRIEF DESCRIPTION OF** APPLICATION SITE REFERENCE DEVELOPMENT 34 Pasture Road 22/02791/FPH Replacement roof incorporating raising height of roof and addition of front and Letchworth Garden City rear roof lights to facilitate the addition of 2nd floor accommodation. Two Hertfordshire storey front extension incorporating SG6 3LS single garage and single storey rear extension, external cladding, repositioned front door, alterations to fenestration including first floor side 'Juliette' balcony and alterations to existing pedestrian access.

Submitted Plan Nos

3195/01 3195/04 3195/71A 3195/73A

1.0 Policies

D1 Sustainable design

D2 House exts, replcmnt dwellings outbuild

D3 Protecting living conditions

T2 Parking

SECN12 Achieving well-designed places

2.0 Site History

2.1 18/02651/FPH - Two storey front extension, repositioning of side boundary garden fence to encompass garden from local amenity to private amenity space, with associated ancillary works. Alterations to vehicular access onto Pasture Road to replace existing driveway.

Conditional Permission

2.2 15/02316/1HH - Two storey front extension incorporating garage at ground floor and first floor front dormer window, single storey rear extension, external cladding, re-positioned front door with porch canopy and alterations to doors and windows including first floor side 'Juliette' style balcony. Removal of part of in/out driveway and hardstanding extension in frontage. (Amended description). (Amended plans received 18/11/15).

Conditional Permission

3.0 Representations

3.1 Site Notice and Neighbour Consultation – Comment received from No.53 Pasture Road (summary):

Sought clarification over the increased ridge height, whether public areas would be encroached upon, and if skylights would allow overlooking to neighbouring properties.

- 3.2 Letchworth Heritage Foundation "The Heritage Foundation have considered the application and can advise the following:
 - The proposed alterations to the roof, as to create a substantially raised ridge to facilitate accommodation in the roof would not be supported. Given the topography and highly visible and prominent location of the site, the raising of the ridge would seek to dominate the vicinity. Related to this, proposed roof lights to the north pitch would not be supported. This is a consistent approach following the approval of Heritage Foundation application 34364 in February 2019.
 - In direct relation to proposed raised ridge, the increased hight and form of the stairwell addition and excessive number of roof lights to the rear pitch would also not be supported.
 - The increase for the first-floor level with inclusion of the gabled pitch perpendicular to the host, to the proposed front, garage addition would not be supported. The raising of this element, above and beyond the approved scheme of 34364 would seek to substantially increase the massing of this element producing an actual and perceived bulk to the front boundary. One of the identified characteristics of the street scene and grain of Pasture Road is that the properties are set back from the highway thus allowing for a lower density. This is reaffirmed from the February 2019 approval where the increased footprint was accepted based upon the recessive approach to the roof pitch, being that of a de facto catslide with a sympathetic dormer window.
 - There are no overriding concerns with regards to the proposed single storey addition to the rear with projects at an angle. Although the need for 3no. roof lights is questioned, a single larger rooflight would allow for greater nature light to enter, resulting in a less cluttered roof pitch.
 - There are concerns, however, over the proposed material and colour pallet. Pasture
 Road is eclectic in form, material and hues, however there is a relatively consistent
 approach to the appearance of the buildings being of predominantly reds, browns –
 muted tones with other colours being of a secondary nature. The proposed
 monochromatic white render and black/grey cladding and tiles would create a prominent,
 alien appearance within the street scene being more reminiscent of a barn style
 structure.
 - As it stands, the proposals are contrary to the adopted policy set out in the Modern Character Area Design Principles, seeking to harm the character and appearance of the area. Therefore, the application would be refused by the Heritage Foundation.
 - Whilst there may be scope for alterations beyond the February 2019 approval it would be advised to withdraw the application and seek pre-app advice for the level of acceptable change.
- 3.3 Hertfordshire Highways No objections.
- 4.0 Planning Considerations
- 4.1 Site and Surroundings
- 4.1.1 The site is a large, detached property on a corner plot on Pasture Road, Letchworth.
- 4.2 Proposal
- 4.2.1 Planning permission is sought for a replacement roof incorporating raising height of roof and addition of front and rear roof lights to facilitate the addition of 2nd floor

accommodation. Two storey front extension incorporating single garage and single storey rear extension, external cladding, repositioned front door, alterations to fenestration including first floor side 'Juliette' balcony and alterations to existing pedestrian access.

4.3 Key Issues

4.3.1 The key considerations are design and the impact on the amenities of neighbouring properties.

Design

- 4.3.2 Policy D1 of the Local Plan states that planning permission will be granted provided that development responds positively to the site's local context in addition to other criteria. Policy D2 of the Local Plan states that planning permission for house extensions will be granted if the extension is sympathetic to the existing house in height, form, proportions, roof type, window details, materials; the orientation of the main dwelling and if it does not dominate adjoining properties. These considerations are echoed in Section 12 of the NPPF.
- 4.3.3 The proposed development seeks to significantly alter the external scale and appearance of the host property, through various extensions, fenestration changes and choice of materials. The most significant alteration to the property is the increased height and replacement roof, which will increase the ridge line of the dwelling from 6.9m to 7.8m. In my view, this increase of 0.9m is acceptable, given the spacious plot size and in reality, the roof pitch will be guite similar to the existing arrangement. The other significant elements are the proposed two-storey front extensions, one of which is to house a single garage and first floor bathroom, and the other is to house the staircase. In my view, the wider two-storey element to serve the garage/bathroom, which measures approx. 5.8m deep, 5.6m wide and exhibits a gabled dual pitched roof measuring approx. 3.1m to eaves and 5.3m to ridge, is acceptable in design terms, as it is subservient to the host dwelling through its substantially lower ridge/eave lines and is probably a better front arrangement when compared to that approved under 18/02651/FPH. The other two-storey element to house the stairs, which measures approx. 1.1m deep, 4.2m wide and exhibits a gabled dual pitched roof measuring approx. 5.6m to eaves and 7.4m to ridge, is also acceptable in my view, as this has taken cues from the existing two-storey element that serves the stairs in form and proportions, which is appropriate in this context. The final less significant elements include a single storey rear extension, alterations to fenestration, and a Juliette balcony. The single storey rear element is proposed at an angle from the rear elevation, measuring approx. 4.0m deep, 12.7m wide and 2.6m to eaves. These elements are unobjectionable in my view, given their modest nature, scale and permitted development fallback position. It is noted that the Heritage Foundation have concerns over some of the development elements, but they consider design under their own guidance and the applicant will require both approvals before this proposal can be built. Notwithstanding this, it is my view that the proposed development is acceptable in form and proportions.
- 4.3.4 The external materials are proposed to change across the entire dwelling. The existing dwelling has yellow buff brickwork/plain brown clay tiles to the external walls, plain clay tiles on the roof, and white uPVC windows and doors. The proposal seeks to incorporate yellow buff facing brick work to the ground floor, with grey powdered aluminium cladding

and white render to the first floor and front extensions external walls. The roof is proposed with grey concrete tiles and the windows/doors with powder coated aluminium frames. In my view, this is a substantial alteration to the external appearance of the property, which will have an impact upon the character of the street scene. However, there is a wider variety of architectural styles and materials on this street scene and as a result, it is not considered reasonable to object on this basis. It is noted that the Heritage Foundation have concerns over the materials chosen, but they have separate, stricter design guides compared to the LPA. As such, the proposed external alterations are considered acceptable on balance, and will not result in material harm to the character and appearance of the street scene.

4.3.5 The proposal is therefore deemed acceptable in design terms and in accordance with Policies D1 and D2 of the Local Plan and Section 12 of the NPPF.

Impact on Neighbours

- 4.3.6 Policy D3 of the Local Plan states that planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions.
- 4.3.7 The neighbour across the road due north is approx. 35m away and the neighbour due east is screened by dense landscaping. Therefore, it is considered unlikely that the proposed development would result in any material harm to the reasonable living conditions and well-being of the neighbour's due north and east.
- 4.3.8 However, due to the spacious nature of this plot and its isolated position, the property only has one immediate neighbour due south east at No.32. Therefore, there is a potential for this proposal to have an impact upon this neighbour. The increased height of the property and the insertion of rooflights on the rear elevation would be the most noticeable from this neighbour, but is it not considered that this will occasion material harm. This is because the increased height is 0.9mvwhich is deemed fairly modest compared to the existing, and the roof lights are high level which should not allow for increased overlooking/loss of privacy. The other elements of this proposal are located on elevations/roof slopes that would not be visible from this neighbour, which means they will not have an impact on this select property.
- 4.3.9 As such, the proposal will not cause unacceptable harm to living conditions, in line with Policy D3 of the Local Plan.

Parking

4.3.10 The proposed development will increase the number of bedrooms in the property from 5 to 6, which requires at least 2 parking spaces under Policy T2 of the Local Plan and The Vehicle Parking at New Developments SPD. The dwelling has a sizable front driveway proposed which can hold at least 4 vehicles, which exceeds this requirement in my opinion.

4.4 Conclusion

4.4.1 The proposal is considered acceptable in planning terms and in accordance with Policies D1, D2, D3 and T2 of the Local Plan, as well as Section 12 of the NPPF.

- 4.5 Alternative Options
- 4.5.1 N/A
- 4.6 Pre-Commencement Conditions
- 4.6.1 N/A
- 5.0 Recommendation
- 5.1 That planning permission be GRANTED subject to the following conditions:
- The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

The development hereby permitted shall be carried out wholly in accordance with the details specified in the application and supporting approved documents and plans listed above.

Reason: To ensure the development is carried out in accordance with details which form the basis of this grant of permission.

 The development hereby permitted shall only be finished in the materials as stated on the application form and on drawing number 3195/73A and thereafter shall be retained as such, unless otherwise agreed in writing by the LPA.

Reason: To ensure that the development is in-keeping with the character of the area and to protect the visual amenities of the locality.

Proactive Statement:

Planning permission has been granted for this proposal. Discussion with the applicant to seek an acceptable solution was not necessary in this instance. The Council has therefore acted proactively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Appendix **C**

Our Ref: 39536

Date: 31st January 2023

Letchworth Garden City Heritage Foundation

34 Pasture Road Letchworth Garden City Hertfordshire SG6 3LS

Dear

Replacement roof, front two and rear single storey extension including external cladding and replacement windows

34 Pasture Road, Letchworth Garden City

The application for the above proposal was considered by the Heritage Advice Service team who considered all the issues raised and after careful consideration the decision was to refuse consent for the proposal, for the following reasons:

- Changes to the style and height of the roof are not supported as the principle contravenes the Design Principles;
- Proposals for front additions will not be supported unless it can be demonstrated that
 they will not cause harm to the appearance of the existing property or its group. In this
 instance, the proposed front extensions would create an overbearing and unrelated
 mass compared to the host, plot and street scene, therefore contrary to the Design
 Principles:
- An over proliferation of rooflights resulting in cluttered and unbalanced roof pitches, contrary to the Design Principles.

I know this decision is disappointing, therefore, we would be more than happy to discuss alternatives, to achieve a proposal acceptable to both parties.

Should you not agree with this decision, you may request that your application is reviewed by the Advisory Management Committee, who will report their findings to the Trustees. Should you wish to proceed with this, please ensure that we receive your written confirmation within 6 months of the date of this letter. You may also wish to provide a written statement in support of the review.

Please refer to our website for further information:

letchworth.com/your-home/application-process

Should you have any further queries, would like to discuss the decision, or amend your proposal please contact us on the number below.

Yours sincerely

Claire Pudney

2.5-

Heritage Advice Service Manager

home@letchworth.com / Tel: 01462 530335

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Appendix **D**

Letchworth Garden City Heritage Foundation

Our Ref: 39536

Date: 20th June 2023

34 Pasture Road Letchworth Garden City Hertfordshire SG6 3LS

Dear I

Replacement Roof, Front Two And Rear Single Storey Extension Including External Cladding And Replacement Windows, 34 Pasture Road, Letchworth Garden City

I refer to the above application.

I can confirm that at the review by the Advisory Management Committee (AMC), the Committee agreed with the Heritage Advice Service's decision to refuse your application for the above proposal.

The Householder Applications Committee (HAC) has now had an opportunity to consider the AMC's recommendation.

After carefully considering the information submitted and the views of the AMC, the HAC supports the original decision to refuse consent for the proposal, as set out in our letter dated 31st January 2023.

We would be pleased to discuss alternatives to this proposal, if you so wish.

We do have an Independent Inspector process which you may wish to consider, please refer to our website for further information:

letchworth.com/your-home/application-process

Should you have any further queries or wish to amend your proposal please contact Christopher Shipman on the number below.

Yours sincerely

3.00

Claire Pudney Heritage Advice Service Manager

home@letchworth.com Tel: 01462 530335

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