



## Planning / Heritage Statement

**WILDWOOD, LOUDWATER HEIGHTS, LOUDWATER, HERTS, WD3**

*Revised Drawings Showing Revised Entrance Canopy And Front Door  
Previous Approval Ref: 21/0829/FUL*

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## Statement

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This statement has been prepared to accompany a planning application for a revised entrance canopy and front door the previously approved scheme ref: 21/0829/FUL.

It is not intended to repeat the contents of the previously approved heritage statement produced by Emma Adams & Partners, which is provided at Appendix 1.

The revised entrance canopy and front door are not considered to materially alter the appearance of the approved extensions / property and will not cause any harm to the street scene or conservation area.



**APPENDIX 1**  
**HERITAGE STATEMENT APPROVED REF: 21/0829/FUL**

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## Heritage Assessment

In respect of:

**Wildwood,  
Loudwater Heights  
Loudwater  
Rickmansworth  
Hertfordshire  
WD3 4AX**

Date:

**March 2021**

Reference:

**EA/AT/2021.008/R001**





# Contents

<b>1.0</b>	<b>Introduction</b>	<b>2</b>
<b>2.0</b>	<b>Context of Assessment and Identification of the Heritage Assets</b>	<b>3</b>
<b>3.0</b>	<b>Relevant Heritage Planning Policies and Guidance</b>	<b>6</b>
<b>4.0</b>	<b>Assessment of Significance</b>	<b>14</b>
<b>5.0</b>	<b>Relationship Between Proposals and Significance</b>	<b>35</b>
<b>6.0</b>	<b>Conclusion</b>	<b>43</b>



## 1.0 Introduction

- 1.1 This Heritage Assessment has been prepared by Emma Adams and Partners Ltd on behalf of Harsha Rupasinghe & Erika Farkas (the 'clients'), to support a planning application for works of extension and alteration at Wildwood, Loudwater Heights, Loudwater, Rickmansworth, Hertfordshire, WD3 4AX.
- 1.2 It was commissioned to support a revised application for the alteration and extension of the property.
- 1.3 The Assessment undertakes an assessment of the proposals in relation to the relevant statutory duties, including the Planning (Listed Buildings and Conservation Areas) Act (1990), the National Planning Policy Framework (NPPF) and relevant local planning policies. This assessment has been prepared to address the requirement as held within the National Planning Policy Framework (NPPF), which outlines that:
- 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.'* (Para 189)**
- 1.4 In addition, this Assessment considers the planning policy and guidance framework under which the application should be considered, it goes on to identify the heritage assets with the potential to be affected by the proposals and their heritage significance and considers the potential effects of the proposals upon this identified significance.



## 2.0 Context of Assessment and Identification of the Heritage Assets

### Site Location

- 2.1 The site sits to the southern side of Loudwater Heights, within the settlement of Loudwater.



Figure 1 –OS Extract from Bing Maps (NTS)

- 2.2 Wildwood is a large two storey detached dwelling located to the southern side of Loudwater Heights, a cul-de-sac within the Loudwater Conservation Area. The Conservation Area and Loudwater Heights itself are characterised by large, detached dwellings set on large plots within a sylvan setting.
- 2.3 The property is situated within enclosed grounds, with access to the north and Loudwater Heights. The boundaries of the site are bounded by mature trees and hedges which sit back from a grassed roadside verge, internally within the site there are substantial Laurels that create strong screening.



- 2.4 Wildwood is a white rendered dwelling with a sloping catslide roof form to one side, and a gabled feature with timber cladding to the front elevation. To the side of the dwelling is an attached single storey element which comprises a triple garage along with various other rooms under a crown roof form.



Figure 2 –Principal Elevation

## Heritage Assets

- 2.5 The NPPF provides a definition of ‘heritage asset’ within its Glossary as:

***‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).’***

## Designated Heritage Assets

### Listed Buildings

- 2.6 The National Heritage List for England was accessed on 3<sup>rd</sup> March 2021 to identify which heritage assets had the potential to be affected by the proposals.
- 2.7 This identified that there are no listed buildings with the potential to be affected by the development proposals.

### Scheduled Ancient Monuments

- 2.8 The National Heritage List for England was accessed on 3<sup>rd</sup> March 2021. This identified that there are no Scheduled Ancient Monuments with the potential to be affected by the proposals.

### Conservation Areas

- 2.9 The building is located within the Loudwater Conservation Area

## Non-Designated Heritage Assets

- 2.10 The proposal does not have the potential to affect any non-designated heritage assets.



## 3.0 Relevant Heritage Planning Policies and Guidance

- 3.1 The application proposals relate to development affecting a conservation area; therefore, they will require consideration against adopted national and local heritage planning policy; this is outlined in brief below.

### Legislative Framework

#### The Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides the overarching statutory framework. The location of the site within a conservation area, and the inclusion of external works leads to Section 72 of the Act being relevant, this states:

*'In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'*

### Relevant National Guidance

#### National Planning Policy Framework 2019

- 3.3 The National Planning Policy Framework (the Framework) was published on 27<sup>th</sup> March 2012 and replaced all Planning Policy Statements and Planning Policy Guidance notes. It was further updated, and a new version published on 24<sup>th</sup> July 2018 and further revised in February 2019.



3.4 The three key dimensions to sustainable development as stated in the Framework are economic, social and environmental. The planning system's purpose is to contribute to these sustainable development aims, and each dimension should be sought jointly and simultaneous through the planning system to achieve sustainable development.

3.5 Importantly the NPPF sets out the level of information that would be required in support of applications affecting heritage assets. **Paragraph 189** states:

*'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.'*

3.6 **Paragraph 190** then sets out the assessment that a Local Planning Authority (LPA) (or in this case that Secretary of State) should undertake when determining applications affecting heritage assets, and states:

*'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.'*

3.7 **Paragraph 192** then confirms the issues that the LPA should take account of when determining such applications; and states:

*'In determining planning applications, local planning authorities should take account of:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.'*

3.8 With regard to applications affecting designated heritage assets, **Paragraph 193** states:

*'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

3.9 **Paragraphs 194-196** then go on to discuss the process to consider applications when it is concluded that harm is caused.

3.10 **Paragraph 200** identifies the opportunity that exists for development within Conservation Areas and World Heritage Sites and/or the setting of heritage assets to enhance or better reveal that setting, it states:

*'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'*



3.11 **Paragraph 201** notes that;

***‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance...’***

## **Local Planning Policies**

3.12 **Section 38 (6)** of the Town and Compulsory Purchase Act 2004 requires that decisions made on planning applications are based on the Development Plan unless material planning considerations indicate otherwise.

3.13 The Three Rivers Development Plan consists of the following documents, Core Strategy (2011), Development Management Policies Local Development Document (2013) and Site Allocations Local Development Document (2014).

3.14 The Council is preparing a new Local Plan for Three Rivers which will provide the planning policies and proposals for future sustainable growth in the District up to 2036, this document is presently at the comparatively early consultation stage, with the Publication Stage not expected until November/December 2021.

### **Core Strategy (October 2011)**

3.15 Strategic **Policy CP1** provides an overarching policy on sustainable development, with specific relevance to the historic environment it notes;

***‘All development in Three Rivers will contribute to the sustainability of the District. This means taking into account the need to:***

***f) Protect and enhance our natural, built and historic environments from inappropriate development and improve the diversity of wildlife and habitats...'***

3.16 Strategic **Policy CP12** relates to the design of development noting;

***'In seeking a high standard of design, the Council will expect all development proposals to:***

***a) Have regard to the local context and conserve or enhance the character, amenities and quality of an area***

***b) Conserve and enhance natural and heritage assets***

***c) Protect residential amenities by taking into account the need for adequate levels and disposition of privacy, prospect, amenity and garden space***

***d) Make efficient use of land whilst respecting the distinctiveness of the surrounding area in terms of density, character, layout and spacing, amenity, scale, height, massing and use of materials...***

***i) Incorporate visually attractive frontages to adjoining streets and public spaces***

***j) Ensure all appropriate frontages contain windows and doors that assist informal surveillance of the public realm.***

***k) Use high standards of building materials, finishes and landscaping; also provide/contribute towards street furniture and public art where appropriate***



***l) Ensure the development is adequately landscaped and is designed to retain, enhance or improve important existing natural features; landscaping should reflect the surrounding landscape of the area and where appropriate integrate with adjoining networks of green open spaces..'***

#### **Development Management Policies Local Development Document (July 2013)**

- 3.17 The Development Management Policies Local Development Document (LDD) sets out the criteria against which all planning applications in the District will be considered.
- 3.18 **Policy DM1** notes that applications should comply with the design criteria set out in Appendix 2 to the document. The Appendix notes that extensions should not be excessively prominent in relation to adjacent properties and to the general streetscene and should respect character of the streetscene and property.
- 3.19 **Policy DM3** relates to the historic environment, its relevant elements noting;

***'a) When assessing applications for development, there will be a presumption in favour of the retention and enhancement of heritage assets and to putting heritage assets to viable and appropriate uses to secure their future protection. Applications will only be supported where they sustain, conserve and where appropriate enhance the significance, character and setting of the asset itself and the surrounding historic environment.***

#### **c) Conservation Areas**

***Within Conservation Areas development will only be permitted if the proposal:***

***i) Is of a design and scale that preserves or enhances the character or appearance of the area***

***ii) Uses building materials, finishes, including those for features such as walls, railings, gates and hard surfacing, that are appropriate to the local context***

***iii) Retains historically significant boundaries, important open spaces and other elements of the area's established pattern of development, character and historic value, including gardens, roadside banks and verges...***

***v) Does not harm important views into, out of or within the Conservation area***

***vi) Protects trees, hedgerows and other significant landscape features and incorporates landscaping appropriate to the character and appearance of the Conservation Area'***

## **Other Material Considerations**

### **Conservation Principles (English Heritage 2008)**

- 3.20 This document provides a useful basis for completing an assessment on heritage significance and thus attaching value to the significance of a heritage asset. These are based around an understanding of an asset's evidential, historical, aesthetic, or communal value. The aim of this document is to:

***'Set out a logical approach to making decisions and offering guidance about all aspects of the historic environment, and for reconciling its protection with the economic and social needs and aspirations of the people who live in it.'***



- 3.21 According to the document, the value of a place/asset should be assessed according to these four values. These are not discrete, self-contained concepts but overlap and interact to some extent. The assessment will therefore utilise these values when assessing significance within this document.

### **Loudwater Conservation Area Appraisal (June 2013)**

- 3.22 This document provides an overview of the history and significance of the Loudwater Conservation Area.

## 4.0 Assessment of Significance

- 4.1 Within this section of the Assessment, we undertake an assessment of the heritage asset with the potential to be affected by the proposals.
- 4.2 In undertaking this assessment, we utilise Historic England guidance documents relating to Conservation Principles<sup>1</sup> which provides a tested and nationally adopted framework within which to assess the significance of an asset.
- 4.3 In April 2008, English Heritage published '*Conservation Principles*', which sets out policies and guidance for the sustainable management of the historic environment. According to the document, the value of a place/asset should be assessed according to four values. As already noted, these are not discrete, but overlap and interact. These values, which have been adopted for the purpose of assessment as best practice, are:
- Evidential;
  - Historical;
  - Aesthetic/Architectural; and
  - Communal.

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<sup>1</sup> English Heritage (2008), *Conservation Principles*

## Loudwater Conservation Area Appraisal

- 4.4 The Council have adopted a Conservation Area Appraisal which dates from 2013, in summary it states with regards to the character and appearance of the conservation area;

*'The Conservation Area comprises an extensive area of low density properties in large individual plots within a sylvan, woodland setting.*

*A prevailing feature of the Conservation Area is the existence of open boundary treatments with some comprising mature hedging and open driveways. Despite this, some gates are present and most are of a rural farm-like style, with wooden five-bar gates.*

*The Conservation Area contains many features of special interest, most notably that of the McNamara thatch houses, which are spread throughout the area, chimneys and multi-pane leaded windows.*

*The Conservation Area can be divided into 3 character areas, comprising a central location around the River Chess with an east bank and a west bank. The 3 character areas are considered in turn in this appraisal. The central area around the River Chess is very much the historic core of the Conservation Area, where the two Listed Buildings are found as well as Loudwater House. The eastern area is characterised by its steeply sloping bank which rises from the River Chess to Sarratt Lane. There is great contrast within this eastern region, which contains thatched show-homes of the McNamara era in addition to modern additions at Loudwater Heights.'*

- 4.5 Considering the very general information noted above, we now complete our own assessment of significance, concentrating on the contribution made by both Wildwood and the wider group of properties on Loudwater Heights.



## Wildwood

### Background/Context

- 4.6 Wildwood is situated within the Loudwater Estate, this was developed in the early part of the 20<sup>th</sup> century following the sale of Loudwater House and the subdivision of the land surrounding the house into building plots.
- 4.7 Whilst the core of what is now the conservation area dates from the 1920's & 1930's (centred on Troutstream Way and Trout Rise), Loudwater Heights, on which Wildwood is located, dates from an expansion of the estate in the 1950's being located on land to the north of Trout Rise. Thus, Wildwood does not form part of the original historic estate, instead being a much later addition.
- 4.8 Loudwater Heights has a different composition to the earlier parts of the estate with large, detached houses set either side of the road and spherically around the roundabout at the northern end of the cul-de-sac. Most of the houses in Loudwater Heights are the full width of the plots.
- 4.9 Wildwood has more limited street presence being a corner plot with strong boundary treatment. The house is set some 15m back from the front hedge with glimpsed views in through the gate entrance.
- 4.10 It would appear that the planning permission relating to the erection of Wildwood dates from 1950<sup>2</sup> (W/358/50), whilst it broadly follows overarching details of the Arts and Crafts style, thus reflecting the character of many of the 1920's buildings which form the core of the conservation area, the architecture in this case is simpler which

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<sup>2</sup> Taken from the planning history section of the Planning Officers report relating to the refused application.

is typical of post war properties and this reflects its later date.

- 4.11 As originally constructed Wildwood incorporated a centrally placed hip roof stair core, with an off-centre main entrance incorporating a porch. At this stage it also incorporated a porch with a similarly detailed cat slide roof.
- 4.12 Following its original construction, the building has been subject to certain extensions, these have changed its character to a degree albeit of its arts and crafts inspired character and form remain visible.
- 4.13 The development of the site and its relationship to the wider estate can be seen through a process of historic map regression as shown below.



*Figure 3 – 1881 1:2500 OS Plan*

- 4.14 The map of 1881 shows the site before the wider Loudwater Estate was developed; it illustrates that the area was formed of open fields within interspersed areas of woodland.





Figure 4 – 1937 1:2500 OS Plan

- 4.15 Moving to 1937 it is clear by that date that the original nucleus of the Loudwater Estate has been developed to the south of the site now occupied by Wildwood, whilst what is now Loudwater Heights appears as a route on this plan it is unclear at this date whether the road existed or whether it is just an aspirational line on the plan.
- 4.16 The existence of Chateau Tranquil on this plan, which dates around 15 years before the development of the site of Wildwood illustrates the piecemeal development of Loudwater Heights as illustrated by the limited cohesion in architectural forms as encountered in this part of the conservation area, contrasting strongly with that found to the south along Trout Rise.





*Figure 5 – 1961 1:2500 OS Plan*

- 4.17 By 1961 what is now Wildwood (its name is unclear on the plan) appears on the plan, this reflects its 1950's construction and illustrates that by the 1960's the estate around Loudwater Heights had developed broadly along the lines as now encountered. Comparing the 1937 and 1961 plans allows an appreciation and analysis of the differing periods of development encountered within the conservation area and the relationships (or not) between Wildwood, its neighbours and the wider area.
- 4.18 The property now encountered, whilst subject to some later changes still retains elements of its original Arts and Crafts inspired architecture and detail. Whilst it is difficult to obtain an overall illustration of the front elevation due to the strong boundary treatment and the tree within the frontal curtilage area, the photographs below give some illustration.



Figure 6 – Principal Elevation 1



Figure 7 – Principal Elevation 2

- 4.19 The principal elevation incorporates catslide roofs and a centred hipped stair, the overarching palette of materials being render under a tile roof. The arrangement is not helped by the later small flat roofed front extension along with the substantial garage extension to the left hand side, this rather upsets the proportion of the elevation, albeit due to the screening of the site and the very limited wider visibility the impact upon the conservation area is limited.
- 4.20 To the rear, whilst the general Arts and Crafts detail as noted above is apparent, the architecture to this garden elevation eludes more to the property's later construction date -1950's, with a substantial single storey flat roofed extension with balcony that stretches almost the entire width of the elevation.
- 4.21 There is an earlier planning consent for a two-storey extension over the garage area creating a "gap toothed" frontage with little or no coherence to the architectural origins of the property.





*Figure 8 – Rear Elevation*

- 4.22 As noted above, it is also important to note the limited contribution that Wildwood makes to the overall aesthetic and thus by extension character of the conservation area, due to its strong frontal boundary treatments along with the tight sylvan nature of Loudwater Heights, the property has limited visibility from the highway and thus public locations. The property is set back from the front hedged boundary by approximately 15m.



*Figure 9 – Entrance*



*Figure 10 –View along Loudwater Heights*

- 4.23 It is therefore concluded that Wildwood broadly reinforces the character of Loudwater Heights by way of its siting and overall character being a large, detached



property within a substantial plot. However, it rather differs from its neighbours (as noted below) due to the rather more enclosed nature of its frontal boundary which in turn limits its aesthetic and visual integration with the wider streetscape.

### **Loudwater Conservation Area**

- 4.24 The estate is based upon what was previously lands associated with Loudwater Farm which records date from the 15<sup>th</sup> century, by the 17<sup>th</sup> century it had become a mixed farm growing corn and hops as well as raising cattle, it was finally sold in the early 19<sup>th</sup> century the land forming the basis for the development of Loudwater House and its associated estate.
- 4.25 Thus, the site at this stage formed part of the land associated with the Loudwater Estate (as shown in Figure 3 above), however a substantial change occurred in the 1920's when Loudwater House and its estate were sold off and the land surrounding were laid out as building plots.
- 4.26 By 1939, Loudwater House had been converted into flats and approximately one half of the building plots had been sold off and developed with houses. By 1959, approximately 80% of the Loudwater Estate known today had been completed, including the initial development of Wildwood, this development pattern is reflected within the modern days.
- 4.27 However, it is important to note that there are distinct characteristics which relate to certain parts of the area, and thus differing areas hold differing levels of significance and thus contribute differing amounts to the overall significance of the Loudwater Conservation Area.
- 4.28 The heart of the Estate is centred around Troutstream Way and Trout Rise, in this area of initial development examples of the architecture of the McNamara family can be

found, a social relationship that makes a strong social and historical contribution to the overall significance of the asset.

- 4.29 Ethel Clara McNamara was an architect and indeed one of the first women to be recognised as such in England in the 1920's, and it was her husband, Sidney Belkinga McNamara who was the builder of these properties. Gertrude Fransiska McNamara was Sidney's sister and probably the legal administrator, which would explain why she is often the witness signatory to Cameron Jeffs on deeds of Land & Estates Ltd. Gertrude Fransiska McNamara bought the house known as the Rose Garden from Cameron Jeffs in 1930.
- 4.30 It was Jeffs who pioneered the acquisition and apportionment of the estate and division of Plots and commissioning of sales. The first "auction" of Plots was arranged for 17<sup>th</sup> May 1922 however the response was poor and only a few wanted to purchase land and be left to their own devices.
- 4.31 In response to this slow start the McNamara's designed and constructed two show-houses, Ringway (now Kingfisher Cottage) and Chauminette, both on Trout Rise and typically comprising thatched roofs. At their time of construction, these properties stood prominently on this side of the Chess Valley for prospective landowners to view. Little Thatch and the run of houses either side on the north side of Trout Rise were the first plots sold.
- 4.32 McNamara dwellings are generally characterised by a rustic style, with roofs being either thatched in Norfolk reed or covered in hand-made, sand-faced antique tiles with elevations faced in good quality bricks or coloured cement rendering. These houses are believed to be unique to the district, although the McNamaras are known to have designed and built houses elsewhere in the area, for example at Moor Park.



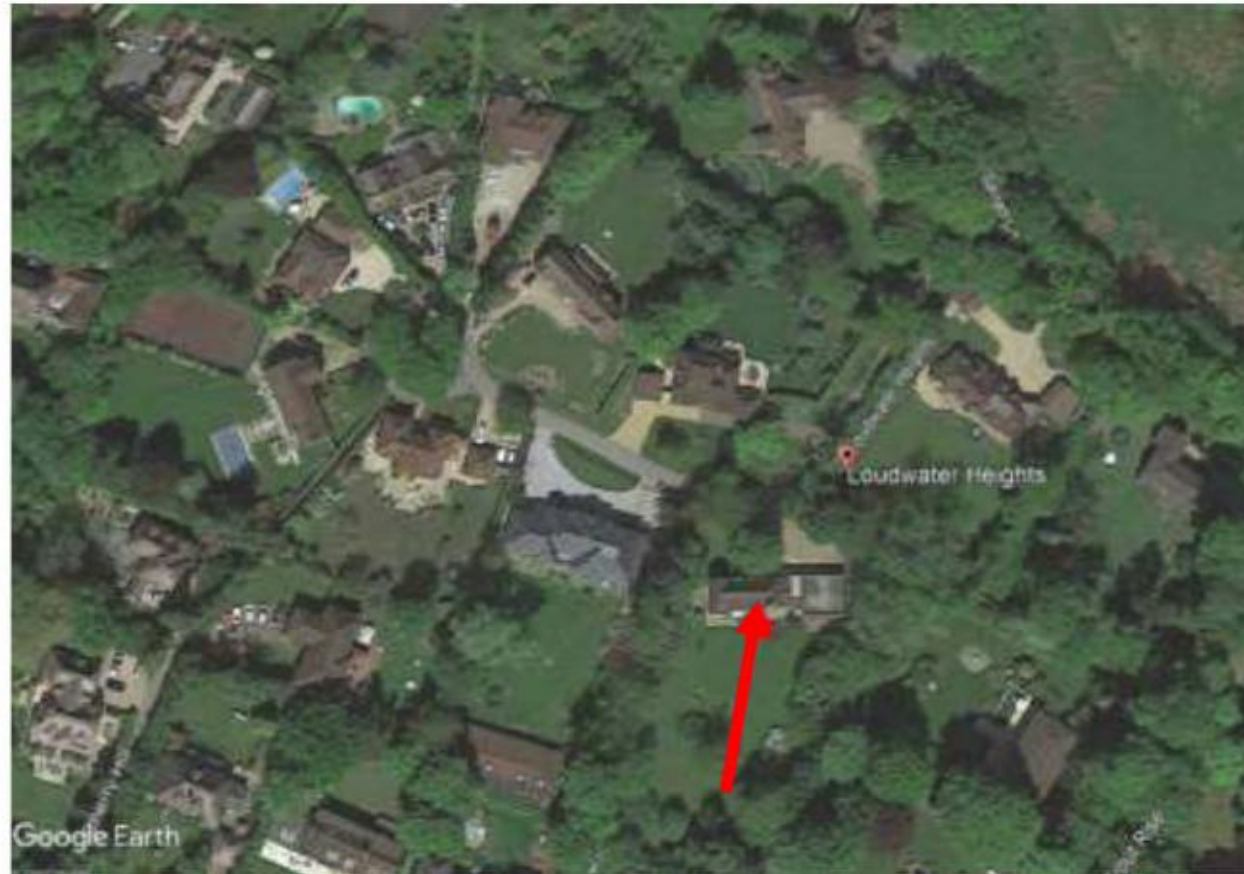
- 4.33 Thus, the Loudwater Estate developed from these early 20<sup>th</sup> century foundations, the core of the estate, and thus the element contributing most to its significance, being located to the south of Wildwood.

### **Loudwater Heights**

- 4.34 Loudwater Heights, within which Wildwood is sited, has a character which is rather contrary to that as experienced in much of the more historic areas of the conservation area.
- 4.35 As noted above, Loudwater Heights is a 1950's development beyond the historic core of the conservation area located in the north-western corner of the Loudwater Conservation Area and is accessed from Sarratt Lane. It is a cul-de-sac characterised by large, two storey detached dwellings of varied designs on substantial plots.
- 4.36 The overarching townscape characteristic encountered is that of a low-density suburban development. The cul-de-sac is uniformly level and there is an absence of the undulating vegetation found elsewhere on the Estate, albeit the open boundary treatments found elsewhere (and noted as being significant within the Conservation Area Appraisal) are not encountered in this location, the properties being located behind hedges with limited visibility, giving Loudwater Heights a rather trunnel like feel when passing along the highway.
- 4.37 It is thus the case that the modernity of the houses encountered within this part of the conservation area rather contrasts with the overall character and thus by extension significance of the wider area.
- 4.38 In order to consider the contribution Wildwood and its neighbours along with the wider streetscape of Loudwater Heights make to the overall significance we will also consider the group of properties within which it is sited, this will in turn allow an



analysis of what is the character of the conservation area in the context of the application site rather than just depending upon an analysis of overall character, this reflects what is noted in paragraph 201 of the NPPF noting that not all parts of a conservation area contribute to its significance.



*Figure 11 –Aerial Image of Loudwater Heights With the Location of Wildwood Starred.<sup>3</sup>*

- 4.39 The most striking property within the context of Wildwood is that to its immediate west, Mulberry House. The property is much more conspicuous within the streetscape due to its linear form parallel to the road as well as the lack of any mature boundary treatment albeit it shares certain characteristics with Wildwood in terms of its general design and materiality, however, it is striking to note that Mulberry House has been subject to a substantial extension in recent times, which hold some key areas of commonality with this proposal.
- 4.40 It should be noted that Wildwoods already has a single storey extension to the area proposed for alteration, it also has a previous planning consent for a two-storey extension to the east. The proposed width of the property remains similar to the

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<sup>3</sup> Google Earth



current footprint but with the elongated single storey extension enhanced by a coherent design that responds to the Arts and Crafts character of this 1950s house.

- 4.41 The proposal for this property rationalised an already extended property, it emulates with the architectural style/form of the original build however with the strong boundary vegetation there remain limited views of the property and the front elevation can only be viewed as glimpsed views from the road.



*Figure 12 – Mulberry House (from Loudwater Heights)*

- 4.42 Mulberry House was extended under consent ref 11/2220/FUL granted by the Council in 2011. This increased the overall frontage of the property significantly and is extremely prominent within both the streetscape and the context of Wildwood, creating a townscape arrangement against which significance in this area must be tested.
- 4.43 The below drawing extracts taken from the application compare what was existing and what was approved;



Figure 13 – Existing (application 11/2220/FUL)



Figure 14 – Approved (application 11/2220/FUL)

- 4.44 It is therefore the case that the adjacent property has been extended substantially and now stands as an extremely prominent feature in the streetscape.
- 4.45 Standing broadly opposite the site is Corner Croft<sup>4</sup>, like Mulberry House this property does not benefit from enclosure to the front elevation and thus is extremely prominent in the streetscape.



Figure 15 – Corner Croft (from Loudwater Heights)

<sup>4</sup> Approval has previously been granted for the following extensions at Corner Croft Two storey side extension and single storey replacement garage (00/01392/FUL), Two storey side extension (04/0753/FUL), Single storey rear extension (06/0966/FUL)



- 4.46 Corner Croft retains an Arts and Crafts inspired design and detail and thus contrasts very strongly with the substantially extended Mulberry House opposite.
- 4.47 It is clear that Loudwater Heights has a more individual character to the rest of the Loudwater Estate, the key differences to this location are the visibility of the property from the road, with some very prominent houses openly addressing the road and others like Wildwoods with limited road frontage and mature boundaries creating glimpsed views in to substantial houses set back from the road with mature vegetation as a strong characteristic.
- 4.48 Moving further along Loudwater Heights the turning circle at its north western ends contains arrangement of buildings as indicated in the photographs below, again these tend to strongly contrast with Wildwood insofar as they are much more visible within the streetscape and again rather contrast with the scale of properties found elsewhere in the conservation area.
- 4.49 Standing adjacent to Corner Croft is Rosegarth<sup>5</sup>, again this follows the Arts and Crafts inspired architectural trend, albeit once again unlike Wildwood it is extremely prominent in the streetscape.



*Figure 16 – Rosegarth (from Loudwater Heights)*



*Figure 17 – Stafford House (from Loudwater Heights)*

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<sup>5</sup> Approval has previously been granted for the following extensions at Rosegarth - Single storey rear extension, first floor side extension, conversion of garage into habitable accommodation including insertion of bay window to front elevation, alterations to fenestration and extension of existing driveway and implementation of new access to create carriage drive (14/1182/FUL)



- 4.50 Stafford House rather differs insofar as it is well set back and enclosed with a tight frontal boundary treatment reflecting what is experienced at Wildwood, the property appears comparatively modern from the limited inspection available and a review of the online planning history suggests that it was granted a consent for a demolition of existing and new build in 2004/2005, which would reflect what is now encountered.
- 4.51 Mayfield<sup>6</sup> broadly follows the trend of Arts and Crafts architecture, but again is rather set back and screened from the highway, adjacent to this is the much more visible Lady Mead.



*Figure 18 – Mayfield (from Loudwater Heights)*



*Figure 19 – Lady Mead (from Loudwater Heights)*

- 4.52 Lady Mead<sup>7</sup> once again broadly follows the overarching design themes of its neighbours, although once again the property is extremely visible in the streetscape and been subject to extension and alteration, incorporating a substantial crown roof.

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<sup>6</sup> Approval has previously been granted for the following extensions at Mayfield - First floor side and rear extensions (02/00286/FUL)

<sup>7</sup> Approval has previously been granted for the following extensions at Lady Mead - Two storey rear extension (01/01424/FUL), demolition of existing conservatory/kitchen extension and construction of a two storey side extension and single storey rear extension to garage and conversion of garage loft, porch extension, first floor front extension and loft conversion (16/1336/FUL)





Figure 20 – Highacre (from Loudwater Heights)



Figure 21 – Cherry Trees (from Loudwater Heights)

- 4.53 Highacre once again broadly follows the overarching design themes of its neighbours, although once again the property is extremely visible in the streetscape. Similarly, the neighbouring Cherry Trees<sup>8</sup> is also prominent within the streetscape.

## Discussion

- 4.54 Having undertaken this review it is clear that the streetscape, architecture and spatial form of Loudwater Heights is varied and in many areas does not follow the characteristics of the wider conservation area including the historic nucleus which is sited on the road to the south of this 1950's extension to the estate.
- 4.55 The Councils own Conservation Area Appraisal of 2013 draws the following conclusions regarding Loudwater Heights;

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<sup>8</sup> Approval has previously been granted for the following extensions at Cherry Trees since 2000 - Two storey side extension and erection of a detached garage (01/01484), Single storey front extension (02/00400/FUL), Replacement detached garage with room over and front dormer window (04/1428/FUL), Single storey side extension (15/0476/FUL), Single storey side extension (15/2296/FUL).

***'6.24 Loudwater Heights comprises 1950s development and is located in the north-western corner of the Conservation Area and is accessed from Sarratt Lane. The cul-de-sac is characterised by large, two storey detached dwellings of varied designs on substantial plots.'***

***6.25 Loudwater Heights is a pleasant example of low-density suburban development. The cul-de-sac is uniformly level and there is an absence of the undulating vegetation found elsewhere on the Estate.'***

***6.26 This cul-de-sac is essentially a sub-area of the western region, given the relative modernity and style of the houses.'***

***6.27 Despite these dwellings being a relatively modern addition to the Conservation Area, they possess characteristics that are identifiable with the Loudwater Estate, such as the expansive plots and wide, open frontages within a sylvan setting.'***

- 4.56 On consideration, we would broadly concur with much of what the Council themselves say, the estate is comparatively modern in its overarching architecture (albeit reflecting the earlier properties) and position within the timeline of the development of the Loudwater estate, in addition to which the overarching built-form is substantial houses on detached plots.
- 4.57 We note and welcome the reference to suburban development, as this is in many ways an area whereby Loudwater Heights differs substantially from the character of the wider estate, having a more suburban form more typical of the townscape development one would expect from the mid-20<sup>th</sup> century.



- 4.58 One area whereby Wildwood and some of its neighbours differ from the description prepared by the Council is by way of their relationships to the characteristic of the wider estate. Whilst the sylvan setting can be identified along Loudwater Heights, Wildwood does not display a wide open frontage, being instead rather self-contained and introspective in its engagement with the streetscape. The majority of the interface with the streetscape is significant large hedging and due to the corner location and the 15m+ setback from the hedge line the interaction of Wildwood with the streetscape is limited when compared to some of the other properties within Loudwater Heights.
- 4.59 A further element of the character of the conservation area within the context of the application site and Wildwood is the extensive amount of extension and demolition/rebuild which has been approved within the immediate and wider context of Wildwood. This evolving change to the conservation area illustrates the fact that unlike the more historic parts to the south, this part of the conservation area is both comparatively modern and ever evolving with multiple periods of development overlapped within the wider townscape.

## **Assessment of Significance**

- 4.60 When considering significance of the Loudwater Conservation Area, it is considered that the process should be completed in two parts, firstly the significance of the conservation area as a whole and secondly the contribution that Wildwood specifically makes to the significance of the conservation area.
- 4.61 It is important to note that neither Wildwood nor any of the properties located upon Loudwater Heights are identified by the Council as being 'important' buildings within the Loudwater Conservation Area Appraisal.



<b>Evidential Significance</b>	<p>The Loudwater Estate stands as evidence of a fine example of an exclusive estate set within a setting which makes full use of the topography and surrounding vegetation to better integrate itself into an interesting and attractive landscape.</p> <p>The historic nucleus of the estate, to the south of Loudwater Heights, was laid out to provide substantial building plots for private development (albeit with a degree of co-ordinated design and architecture in parts) and have a sinuous and organic streetscape form of a loop of highway with properties facing the highway.</p> <p>The relationship between the original McNamara cottages with their more rusticated and rural forms when compared with the more mannered and designed Arts and Crafts properties forms much of the evidential significance of the conservation area, illustrating the way varying architectural types and scales have been incorporated to present the present environment.</p> <p>Again, however it is important to note that in the context of Wildwood and Loudwater Heights this area of the conservation area has been subject to substantial change with alterations and alterations proliferating leaving a transitional area of change and later alteration.</p>
<b>Evidential Contribution of Wildwood</b>	<p>Wildwood provides evidence of a 1950's development using broadly imposed Arts and Crafts principles, albeit subject to later change and alteration. Whilst it forms part of the 1950's development of the Loudwater Estate it is concluded that Wildwood makes a very limited contribution to the evidential significance of the conservation area.</p>
<b>Historical Significance</b>	<p>The Loudwater Estate stands as evidence of a fine example of an exclusive estate set within a setting which makes full use of the topography and surrounding vegetation to better integrate itself into an interesting and attractive landscape.</p> <p>It has historical significance due to its relationship to the original Loudwater House Estate along with its later development for private dwellings often completed on a piecemeal basis.</p> <p>Finally, there is some historical association with architects such as McNamara and those associated with the commercial processes in purchasing parcelling and then selling the land for development, such processes being comparatively common in the early/mid-20<sup>th</sup> century.</p>
<b>Historical Contribution of Wildwood</b>	<p>Wildwood makes a very limited contribution to the historical significance of the estate, merely being one of the much later develop properties with little evidence of any historical linkages to its design, development or occupation. It is concluded that Wildwood makes a very limited contribution to the historical significance of the conservation area.</p>
<b>Aesthetic/Architectural Significance</b>	<p>Many of the buildings within the conservation area hold aesthetic/architectural significance in several ways. They incorporate elements of various architectural styles/forms/details combining to provide a cohesive form which is pleasing on the eye as an example of an early/mid-20<sup>th</sup> century exclusive state. These elements combine to create an interesting aesthetic centred within the nucleus of the estate.</p>
<b>Aesthetic/Architectural Contribution of Wildwood</b>	<p>As noted above Wildwood is of limited aesthetic or architectural significance being a later (and altered) property showing limited aesthetic cohesions with the properties to the south. The limited significance of Loudwater Height is emphasised by the extensive alterations and extensions already approved in this location.</p>



	It is concluded that Wildwood makes a very limited contribution to the aesthetic/architectural significance of the conservation area.
<b>Communal Significance</b>	The conservation area has communal significance as a group of properties with some design cohesion being laid out in an attractive landscaped form, the interplays between the architecture, the sylvan highways layout and the wider topography and landscaping combine to provide an interesting and attractive historic environment.
<b>Communal Contribution of Wildwood</b>	<p>Wildwood forms part of the later 1950's development of the estate and thus its principal communal relationships are to its neighbours. As noted above Loudwater Heights has been subject to substantial changes and alteration and thus whilst there remains some communal significance it differs from what was originally encountered. Added to this, compared with many of the properties within Loudwater Heights Wildwood is comparatively self-enclosed and inward looking, having a limited engagement with its neighbours, this relationship now being dominated by the scale and visibility of Mulberry House.</p> <p>It is concluded that Wildwood makes a very limited contribution to the communal significance of the conservation area.</p>
<b>Summary of Significance</b>	<p>As noted earlier within this Assessment we broadly agree with the summary of significance as held in the Councils own Conservation Area Appraisal in that the overall significance of the Loudwater Conservation Area relates to the collection of low density properties in large individual plots within a sylvan, woodland setting.</p> <p>A prevailing feature of the Conservation Area is the existence of open boundary treatments with some comprising mature hedging and open driveways. The Conservation Area contains many features of special interest, most notably that of the McNamara thatch houses, which are spread throughout the area, chimneys and multi-pane leaded windows.</p> <p>The Conservation Area can be divided into 3 character areas, comprising a central location around the River Chess with an east bank and a west bank. The 3 character areas are considered in turn in this appraisal. The central area around the River Chess is very much the historic core of the Conservation Area, where the two Listed Buildings are found as well as Loudwater House. The eastern area is characterised by its steeply sloping bank which rises from the River Chess to Sarratt Lane. There is great contrast within this eastern region, which contains thatched show-homes of the McNamara era in addition to modern additions at Loudwater Heights.</p>
<b>Overall Contribution of Wildwood</b>	<p>Wildwood and its neighbouring properties make a very limited contribution to the overall significance as noted above and as identified by the Council within their Appraisal.</p> <p>The property is an example of low density estate housing within a sylvan woodland setting, however, the property is comparatively hidden within the streetscape whilst it sits in a later extension to the estate with architecture of limited merit which, like its immediate and wider neighbours, has been subject to later alteration and extension leaving a streetscape with only limited cohesion to the nucleus of the estate to the south.</p> <p>Overall, it is considered tat Wildwood makes a very limited contribution to the overall significance of the Loudwater Conservation Area.</p>



## 5.0 Relationship Between Proposals and Significance

- 5.1 The report will now consider the works proposed to be undertaken at Wildwood, the description of development is as follows;

***Extension to the rear of Wildwood with a first-floor extension to the garage area and roof alterations.***

- 5.2 The scheme represents an amended proposal to that previously refused by the Council, changes have been made to the form and scale of the development seeking to address many of the concerns raised by Council Officers in relation to the previous scheme.

- 5.3 The plans below detail the proposals and compare what is proposed with what is existing (pink), what is already approved (red) and what was recently refused (dashed green).



Figure 22 – Front Elevation (to Loudwater Heights)

- 5.4 The above illustrates that the elevation to Loudwater Heights (the only elevation publicly visible in the context of the streetscape and Loudwater Conservation Area.
- 5.5 It illustrates that whilst the ridge at its highest point remains the same, this height extends over a considerably smaller length than previously proposed reducing mass



and scale, this created an articulation to the built form. The side extension broadly reflects the proportions of what has already been approved on the site, albeit bringing this element into the overall elevation to increase architectural cohesion within this elevation.

- 5.6 The distinctive feature of the chimney is retained, whilst the width of the elevation as an overall proportion is retained as existing.



*Figure 23 – Rear Elevation (to garden and not to public view)*

- 5.7 The rear elevation is shown above, this again is considerably smaller in scale and mass when compared with what was previously proposed, with again the side extension broadly reflecting the envelop/proportions of what has already been approved. This elevation incorporates dormers designed to provide aesthetic cohesion to the overall architectural composition, lighting the roofspace, again it is emphasised that whilst such features are common in Arts and Crafts properties int this case they are limited to the non-visible rear elevation.
- 5.8 The elevation is also further simplified by way of the removal of the proposed Juliet Balconies in this location to maintain amenity and prevent any potential neighbouring issues. The proposed side elevations are shown in the illustration below.
- 5.9 Once again, the scale and mass, when compared with the refused scheme has been reduced to address the issues raised by Council Officers, as with the rear elevation,



due to the enclosed nature of the site, the surrounding landscape features and the scale of the plot upon which the property is sited these elevations are not within public viewpoints in terms of the conservation area.

## Discussion

- 5.10 The proposals have been very carefully revised to reflect and respect the existing building, meet the client's objectives and aspirations whilst also addressing the concerns raised in Officers comments relating to the earlier application.
- 5.11 It is therefore a useful starting point to consider the comments received regarding the previous application proposals and the extent to which the proposals address those concerns. These comments were summarised in the consultation response to the Case Officer dated 30<sup>th</sup> December 2020.

Comment	Response
1. The unsympathetic appearance of the proposal	<p>The design of the revised proposal has been altered to better reflect the Arts and Crafts influences of the architecture of the original (albeit extended) building. The proposals retain degrees of asymmetry with hipped gables, whilst the detail and materiality reflect the existing.</p> <p>The proposal achieves the remodelling of the presently poor quality garage extension providing an integrated garage with accommodation above, reflecting what is already approved on the site. It is noted within the Councils own Conservation Area Appraisal that Loudwater Heights includes a range of styles and architectural forms, the proposal merely reflects this to preserve the character as identified.</p> <p>The proposals maintain the existing width and thus the existing relationships to neighbouring properties, thus there is no detriment to neighbouring amenity and the sylvan sense as noted as a characteristic of the conservation area is maintained, it is noted that Appendix 2 of the Development Management Policies contains certain guidance regarding acceptable flank distances, the retained distances are well in excess of that suggested by the Councils document.</p>
2. Dominant form and scale of the extensions which undermines the existing property	<p>The revised plans are for extensions which reflect the existing and what is already approved and ensure a degree of subservience to the existing property. The Loudwater Estate is characterised by large, detached properties a characteristic that is readily encountered already within Loudwater Heights most markedly in terms of Wildwoods immediate neighbour which is considerably more prominent and visual in the conservation area, the proposals at Wildwood reflect this overarching</p>



Comment	Response
	<p>characteristic.</p> <p>The extensions keep the existing frontage width unaltered, whilst the increase in height is minimal with the features of the existing roof form being reflected in the revised proposals, the side extension reflects what is already approved and incorporates it into a cohesive replacing the rather strange arrangement previously approved by the Council, due to the siting of the building within the plot this part of the elevation is barely visible from the highway.</p> <p>Whilst we accept that all applications should be considered on their own merit, it is noted that application 11/2220/FUL approved on the adjacent Mulberry House approved the extension of that frontage by around 50% in width, this is the spatial, visual and contextual basis within which the present application which does not widen the frontage must be considered, likewise the application (19/2069/FUL) at Willow Tern<sup>9</sup> elsewhere within the Conservation Area approved arear extension that nearly doubled the size of the host property with the Officer noting <i>'The proposed extension would be set in from the common boundaries and as such would have a limited impact on the open and sylvan character of the conservation area'</i>.</p> <p>Its is therefore the case that it has been established previously that the substantial plots within the Loudwater Conservation Area can accommodate and sustain extension and enlargement without causing detriment to the character and by extension significance of the conservation area. The proposed extensions respect the scale and detail of the principal building including articulation to elevation and roof to provide further interest in form.</p>
<p>3. Unacceptable crown roof form</p>	<p>We note that the Councils Design Criteria (appendix 2 of the DMP document) discourages crown roofs, however we also note from both site inspection and review of aerial photographs that such features appear regularly within the Loudwater Conservation Area, setting a precedent in planning and design terms. There is a crown roof to both adjacent properties as well as the property opposite.</p> <p>Examples include Tara on Trout Rise, where application reference 14/2072/FUL included a revision to the roof form which raised the ridge by nearly a metre and included a crown 56m2 in area, it is noted that this post dated the adoption of the Councils Design Criteria (appendix 2 of the DMP document) and was not deemed to cause detriment to the significance of the conservation area, other examples can be found at Tanglewood, Dorney, Wood Court, Heathwood House, Coachman's House, Troutstream Lodge and High End, the last four being within the more historic/significant areas of the conservation area on Trout Rise and Troutstream Way.</p> <p>More specifically to Wildwood, crown roofs have been approved at several locations upon Loudwater Heights, the adjacent, and considerably more visually prominent, Mulberry House includes such a feature as do Corner Croft and Ladymead (16/1336/FUL).</p> <p>The predominance of crown roofs on Loudwater Heights (50% of the</p>

<sup>9</sup> Sited on Overstream a cul-de-sac which contains many of the McNamara dwellings noted as being of special interest by the Conservation Area Appraisal.



Comment	Response
	<p>properties have such a feature already) was reflected in the determination of the Ladymead application noted above, the Officer stating; <i>'In addition, other example of crown roof forms are evident within the area.... As such it is considered on balance that the proposed crown roof would not result in significant harm to the character of the host dwelling or wider streetscene to justify refusal of planning permission'</i>.</p> <p>Taking note of the refusal of the previous application, the revised roof form includes a very minimal crown to the roof, considerably smaller than previously proposed, the crown will not be visible within the streetscape and thus the roof will appear as a normal ridge form when viewed within the wider context of the conservation area.</p>
4. Bland appearance of the rear fenestration	Whilst the rear elevation is not subject to any public viewpoints, the fenestration to the rear has been further revised to increase articulation and interest, the window forms reflecting what is encountered elsewhere within the building. Rhythm is incorporated into the arrangements of the windows, whilst the use of glazing bars reflects the wider Arts and Crafts influences incorporated into the architecture of the building.
5. Incongruous balcony to the rear	Wildwood already has a full width balcony to the rear – this is an existing feature to Wildwood not a new feature.
6. The overall design of the proposal which fundamentally alters the appearance of the property	Matters already covered in points 1-5 above.

5.12 The proposals presented take note of the previous comments provided by Council Officers and have been revised to address the concerns raised.

5.13 The revised design is smaller than the previous submission in both height and mass, whilst further articulation and detail has been incorporated to provide interest and the interplay between plane and shadow to further visually break up and articulate the elevations. The materiality proposed reflects the principal building, whilst the overall design better incorporates the overarching design features which characterise the principal.



- 5.14 As noted above, much of the significance of the conservation area relates to the collection of low density properties in large individual plots within a sylvan, woodland setting. In addition, prevailing feature of the Conservation Area is the existence of open boundary treatments with some comprising mature hedging and open driveways. The Conservation Area contains many features of special interest, most notably that of the McNamara thatch houses, which are spread throughout the area, chimneys and multi-pane leaded windows.
- 5.15 However, as emphasised by Paragraph 201 of the NPPF not all elements of a conservation area contribute to its significance equally, it is the case, as noted at length above that Loudwater Heights differs somewhat from the wider conservation area being of later construction date beyond the historic nucleus of the estate.
- 5.16 The Conservation Area can be divided into 3 character areas, there is great contrast within this eastern region, which contains thatched show-homes of the McNamara era in addition to modern additions at Loudwater Heights.
- 5.17 The assessment completed above illustrates that the proposed design sits comfortably within its immediate and wider context in terms of aesthetic, spatial and design criteria to protect what is significant about the Loudwater Conservation Area in the context of Wildwood.
- 5.18 It is therefore concluded that the proposal will preserve the contribution that Wildwood makes to the significance of the conservation area, presenting a sensitive and well-designed proposal. It is therefore considered that the proposal will have a neutral effect upon the significance of the designated heritage asset.
- 5.19 Turning to policy it is noted that the NPPF states at Paragraph 192 that when determining applications decision makers should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to



viable uses consistent with their conservation. In this case the proposals sustain the significance of the Loudwater Conservation Area as a designated heritage asset and thus adhere to policy.

- 5.20 Likewise, in terms of Paragraph 193 of the NPPF the proposal will preserve the significance of the conservation area as a designated heritage asset, this also ensures that the test at Section 72 of the Planning (Listed Buildings and Conservation Areas) Act is addressed.
- 5.21 Turning to local policy considerations the proposal preserves the significance of the conservation area and is of a high quality, proportionate to the host building and its surroundings addressing Policies CP1 & CP12 of the Core Strategy along with DM1 and DM3 (and associated appendices) of the Development Management Policies Local Development Document.
- 5.22 It is noted that the Loudwater Conservation Area Appraisal details certain criterion that development within the conservation area should address (para 10.4);

Requirement	Response
Preserve and reinforce the distinctive open frontages, plot sizes, boundaries and boundary treatments	The proposals relate to a building of no greater footprint than existing after extension, the frontage, boundaries and boundary treatments are retained whilst the plot can easily accommodate the scale of development proposals. It is therefore considered that the proposals address this requirement.
Maintain the rural and sylvan character of the Conservation Area	The proposal needs no increase in footprint whilst the scale and mass reflect what has previously been approved to the west of the building. The frontage vegetation, including the substantial tree is maintained thus the rural and sylvan character of the conservation area is preserved.
Respect the scale and massing of surrounding buildings. It is essential that new development is not out of scale with existing buildings typical of the Conservation Area	<p>The revised plans are for extensions which reflect the existing and what is already approved and ensure a degree of subservience to the existing property. The Loudwater Estate is characterised by large, detached properties a characteristic that is readily encountered already within Loudwater Heights most markedly in terms of Wildwoods immediate neighbour which is considerably more prominent and visual in the conservation area, the proposals at Wildwood reflect this overarching characteristic.</p> <p>The extensions keep the existing frontage width unaltered, whilst the increase in height is minimal with the features of the existing roof form</p>



Requirement	Response
	<p>being reflected in the revised proposals, the side extension reflects what is already approved and incorporates it into a cohesive replacing the rather strange arrangement previously approved by the Council, due to the siting of the building within the plot this part of the elevation is barely visible from the highway.</p> <p>It is therefore the case that it has been established previously that the substantial plots within the Loudwater Conservation Area can accommodate and sustain extension and enlargement without causing detriment to the character and by extension significance of the conservation area. The proposed extensions respect the scale and detail of the principal building including articulation to elevation and roof to provide further interest in form.</p>

- 5.23 In addition, *Conservation Area Designation, Appraisal and Management Historic England Advice Note 1* notes at paragraph 4 that change is inevitable, however, not necessarily harmful and often beneficial and thus the proposal forms part of such a 21<sup>st</sup> century change, reflecting in a sympathetic manner much of the strong and bold architecture which characterises the Loudwater Conservation Area.
- 5.24 In conclusion when this balanced approach is taken and taking full note of the requirements of the NPPF (paragraph 192-200) it is concluded that the proposals will preserve the significance of the heritage asset, thus complying with the requirements of the NPPF (paras193-196) along with locally adopted policies.
- 5.25 A full assessment of the property and the wider conservation area have been carried out, the proposals for this property are commensurate with many other schemes approved in the locality, this property has a more limited role to play in the character of the area due to its corner location and established boundaries.
- 5.26 The proposal has followed the broad principals of this 1950s property that partially emulated the Arts and Crafts period. The proposals rationalise as poor side extension incorporating it into a far more cohesive and rationalised form following the original concept for the building.

## 6.0 Conclusion

- 6.1 This Assessment identifies and assesses the significance of the heritage asset which has the scope to be affected by the development proposal. This process has been undertaken above and the associated impacts of the proposals considered in detail.
- 6.2 The proposal addresses the tests set out in both national and local policies and concludes that the proposal preserves the contribution that the site makes to the overall significance of the Loudwater Conservation Area and is thus fully compliant with adopted national and local policy and should be approved.

