

## Local Review Body Appeal

### Supporting Statement

Extensions and alterations to:  
8 Newmains Holdings, Athelstaneford, North Berwick, EH39 5BL

Planning reference:  
24/00456/P

4 September 2024



*Cover image - photomontage of proposals from driveway entrance.*

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## 1. Introduction

### **This is exactly the type of development that East Lothian Council should be encouraging**

The applicant and their young family are striving to rehabilitate an existing dwelling as their permanent residence, creating a beautiful and sustainable family home.

The existing dwelling and its similar neighbours are detached bungalows and outbuildings of no particular architectural merit. The surrounding area is characterised by similar dwellings that have all been variously extended and subsumed by large agricultural buildings, creating an incoherent pattern of development.

The proposed development has been meticulously researched and considered, and is entirely appropriate to the context of the existing buildings and surroundings. The designs are of exceptional architectural quality and will create an exemplar for how low-quality mid 20th-century housing stock can be creatively reimaged to create sustainable homes.

- 1.1. WT Architecture have prepared this Supporting Statement on behalf of the applicant.
- 1.2. Having had sight of a draft Report of Handling during the determination period, WT Architecture expressed concerns regarding the quality of the assessment undertaken by ELC. Parts of this supporting statement have been carried over from earlier correspondence petitioning ELC to reconsider. Redacted copies of correspondence are included within Appendix 2.
- 1.3. This Local Review Panel has the advantage of looking at an application with a fresh perspective. It is neither bound by the original decision nor a strict interpretation of planning policy, which, after all provides a framework for decision making not an absolute.
- 1.4. The applicant purchased 8 Newmains Holdings in late 2023 with ambitious plans to revitalise the buildings as a sustainable, joyful, quality family home.
- 1.5. WT Architecture are an award-winning firm of Scottish architects operating for over 20 years. We have delivered numerous acclaimed alterations and extension projects across Scotland including in East Lothian, often working with sensitive Listed Buildings, in Conservation Areas, World Heritage Sites and protected landscapes. Our work is directly cited by the Scottish Government "Creating Places" document as an example of how contemporary designs can be incorporated successfully with historic existing buildings. More locally our work to the B-listed Renton Hall near Haddington has been shortlisted for the RIAS Awards and won the residential award in the Edinburgh Architectural Association Awards in 2024.
- 1.6. Holdings cottages and their outbuildings were built in various parts of Scotland for former servicemen and have historic interest as houses with paired workshops/garages/barns, but the buildings have little architectural merit in themselves and are quite common. They were 'of their time' and have a high capacity for change.
- 1.7. The proposed designs are unapologetically contemporary but reinforce the primacy of the existing buildings, as set out in the Design Statement and the sections below. It is a purposeful and enduring design and we believe it will be an exemplar for adapting mid-20th century properties. The proposals are entirely appropriate to its surroundings and the existing buildings, and will make a substantial positive contribution to the architectural character of the site and surrounding area.

## 2. Site and context

- 2.1. The site is located in an isolated rural location, surrounded mainly by open fields. The nearest settlements, Drem and Athelstaneford, are both approximately 1-mile away measured in a straight-line.
- 2.2. The property and its curtilage are bounded to the north-east by the road of B1337, to the south-east and the south-west by agricultural land and to the north-west by a stable block associated with 7 Newmains Holding.
- 2.3. The site is not within a Special Landscape Area or any other special designation.
- 2.4. There is no relevant planning history for this site.
- 2.5. The site is accessed by directly off the B1337 onto a private driveway area. The original main entrance to the building lies at the north-eastern elevation in the centre of the house, but with no defined access path from the road or driveway. As such the former main entrance has become redundant. The conservatory now acts as the main entrance directly off the driveway and leading into the kitchen.
- 2.6. The property extends to approximately 0.48 acres (1,925m<sup>2</sup>) of land incorporating a mixture of landscaping, of which approximately 0.17 acres (671m<sup>2</sup>) to the south-east retains the formal designation of an agricultural holding, although there is no physical delineation of this designation on site and all the grounds read as forming part of the curtilage of the dwelling.
- 2.7. The existing building is a mid 20th-century detached bungalow with accompanying outbuilding.
- 2.8. 8 Newmains Holdings was built as part of a string of 12 largely identical dwellings along Newmains Holdings, built to provide housing for returning WWII servicemen. All other similar properties have been substantially altered and extended, evolving significantly from their original character. The site at 8 Newmains Holdings is the last of these dwellings to remain largely undeveloped.

*Refer to Appendix 2 for full details of all other similar properties along Newmains Holdings including relevant Planning histories.*

- 2.9. The existing buildings are of no particular architectural merit. The detached bungalow form is not coherent with traditional vernacular buildings in isolated rural locations, but is more readily associated with modern suburban developments. Were this house design proposed for this location today, it would arguably not meet the expectations for design quality set out in local or national policies.
- 2.10. The existing house is significantly smaller than average for a detached rural dwelling, arranged in a plan that creates cramped rooms in a cellular layout.
- 2.11. The existing building has a very poor relationship to its immediate and wider landscape setting.
- 2.12. The house has very poor accessibility:
  - No accessible route to the original main entrance, and then only via steps.
  - No accessible route to the adopted main entrance via the conservatory.
  - No level thresholds.
  - An awkward stepped access via the conservatory into the kitchen.
  - No compliant accessible sanitary accommodation.
  - A significant lack of storage.

- 2.13. The existing dwelling has cement-rendered walls, hipped pitched slate roofs and uPVC windows and conservatory. The house is poorly insulated and heated via an LPG boiler, which makes it unsustainable and costly to run.
- 2.14. The outbuilding is a single-skin brick construction with a partially dilapidated asbestos roof, and is not currently habitable or weathertight.

### 3. Refusal

3.1. The principal objection from East Lothian Council relates to the proposed attached extension to the existing house. The overall reasons given for refusal in the Report of Handling are as follows:

“As the proposed extension would almost double the internal footprint of the existing house and as it would due to its flat roofed architectural form be architecturally different to the existing house, it would not be of a size, form, proportion or scale that would be appropriate to the existing house. Moreover, by its attachment to the outbuilding it would create a large, dominant dwellinghouse which would be visible from the public road that would not be reflective of the architectural character or style of the dwellinghouses at Newmains Holdings. Consequently, the proposed flat roofed extension would be harmful to the character and appearance of the house and to the character and appearance of the area contrary to Policies 14 and 16 of NPF4 and Policy DP5 of the adopted East Lothian Local Development Plan 2018.

3.2. We strongly dispute the reasons for refusal, for the reasons summarised below and expanded on further into this supporting statement:

- 3.2.1. Overall we consider the assessment and determination by ELC to be overly restrictive and too subjective, misrepresenting the character of the existing building and surrounding context, and failing to acknowledge the quality of the proposed scheme.
- 3.2.2. It is our firm position that the proposed development fully complies with - and in fact exceeds the expectations of - policy DP5 of ELC LDP and policies 14 and 16 of NPF4.
- 3.2.3. The proposed scheme is entirely appropriate to the existing buildings and site in terms of size, form, proportions and scale. New elements are obviously visually subservient to the existing buildings. The proposed extension in combination with the works to the outbuilding and alterations to the house create a harmonious design of exceptional architectural quality. The character of the existing buildings and site as a whole will be significantly enhanced by the proposed development.
- 3.2.4. We strongly refute the assertions that the “flat roofed architectural form” would not be appropriate to the existing house. It would be highly inappropriate to suggest that this contemporary form typology is somehow unsuitable in combination with more traditional existing buildings of this type.
- 3.2.5. We do not agree that the development will be harmful to the character and appearance of the wider area.
  - This is a private property in a secluded location.
  - The majority of the proposed extension would be set back substantially and almost entirely behind the principal elevation of the existing building, only partially visible when viewed square-on the driveway entrance. The proposed extensions would be all but invisible from all other public places.
  - The character of all other properties along Newmains Holdings are of substantially-altered and extended domestic properties, none of which represent any particular architectural merit, and interspersed with poorly-coordinated developments of large agricultural buildings.

- This proposed scheme represents the most high-quality, contextual and sensitive architectural intervention ever put forward for any of the properties along Newmains Holdings, and will significantly enhance the character of the existing buildings and area.

3.3. The proposed development delivers on all relevant aspects of the “Six Qualities of Successful Places”:

**Healthy Places:** Designing for accessibility and “lifelong wellbeing” means creating buildings that can adapt to changing life circumstances, particularly for a young and growing family. The existing house at 8 Newmains Holdings is small, poorly accessible and inflexible. The proposed development will substantially improve the accessibility and adaptability of the dwelling, and improve the health and wellbeing of the occupants.

**Pleasant Places:** The proposed design will refurbish and enhance a poor-quality post-war bungalow with a scheme of exceptional architectural merit. This scheme represents the first time any of the dwellings along Newmains Holdings have been comprehensively considered

**Connected Places:** While this scheme can’t resolve issues of remote rural connectivity, it does make the site more sustainable by allowing the buildings to adapt to a greater range of uses such as home working.

**Distinctive Places:** The scale of the development is entirely appropriate to the site and has been carefully integrated to be visually subservient to the existing buildings. The type and size of use is appropriate. The whole design ethos was to unite the existing buildings and extensions in a common architectural language, creating a distinctive identity and sense of place. The designs incorporate high-quality crafted detailing using a limited palette of natural materials.

**Sustainable Places:** NPF4 actively encourages retrofit and reuse projects. The proposed development should be lauded for its ambitious sustainability credentials, which will transform an inefficient 20th-century building into a sustainable home. The high-efficiency of the proposed extension alongside the retrofit fabric improvements will allow the site to fully transition away from fossil fuel use. The extension has been carefully positioned with its footprint on the least valuable areas of site landscaping, and the proposed wildflower roof will make a substantial biodiversity gain for the site. The adapted dwelling will allow for and encourage working-from-home.

**Adaptable Places:** NPF4 emphasises the importance of *“investing in the long-term value of building, streets and spaces by allowing flexibility so that they can meet the changing needs of and accommodate different uses over time”*. The applicant recognised that this building had great potential, and is committed to making a substantial investment to its improvement. As we reiterate several times throughout this document - the proposed scheme will be one of exceptional design and construction quality, making it adaptable, easily maintainable and resilient.

3.4. This supporting statement focuses on the proposed extensions to the existing house, since the proposed alterations to the adjacent outbuilding were deemed acceptable. However, it should be noted that the whole of the scheme has been designed to form a cohesive whole, so the designs of the outbuilding works and alterations to the house should be taken into consideration alongside the extension.

3.5. The planning officer found that the proposals were in compliance with LDP policy DP5 with respect to respecting the amenity and privacy of neighbours. The proposed development has no impact on neighbours.

- 3.6. The planning officer found that the alterations to the outbuilding including the heightening of its roof were acceptable.
- 3.7. The planning officer found that the proposed new air source heat pumps were acceptable.
- 3.8. The planning officer found that the proposed removal of one stag horn shrub and a small section of hedging were not significant losses and therefore acceptable.
- 3.9. Environmental Health were consulted and responded with no comment.
- 3.10. Road Services were consulted and responded with no objection, but suggested a condition be made to restrict the outbuilding from being used for commercial or business purposes.
- 3.11. No public letters of objection were lodged against the application.



## 4. Siting, scale and proportion

- 4.1. This section addresses NPF4 policies 14 and 16, and LDP policy DP5 in respect of siting, scale and proportion of the development.

We submit that contrary to assertions from East Lothian Council planners, the proposed designs are subservient to the existing buildings in all respects of siting, scale and proportion, as well as form and character.

A meticulous design process was undertaken to develop a highly contextual response to the site, observing the historic development pattern and existing building forms, topography, vegetation cover and landscape setting, arrival routes and views.

The designs create a practical family home that is not disproportionately large either compared to typical rural homes or to the immediate neighbouring properties.

- 4.2. As explained in the Design Statement, an extensive design process was conducted to identify suitable areas for development on the site. Some of these options are illustrated in the Design Statements as examples, but the design process considered many other possibilities.
- 4.3. The siting of the extension has been carefully considered and is entirely appropriate to the site, as it constrains new development between the existing house and outbuilding, on ground that is currently predominantly a driveway and the footprint of the existing conservatory. This maintains all other areas of the site as open garden space to preserve the character of the site in the open landscape. This is in contrast to many other developments of similar properties along Newmains Holdings, which have been characterised by sprawling extensions, new outbuildings, hard landscaping and enclosures, and large agricultural buildings.
- 4.4. The siting of the proposed extension positions it as far to the rear of the site as possible. The majority of the extension, those parts that are overtly expressed with new materials and forms, are set back from the principal elevation frontage by over 6.5m, almost sitting fully behind the rear wall of the existing building. This positions the main parts of the extension more than 20m from the edge of the public road.
- 4.5. The siting, layout and form of the extension is designed to create a welcoming and distinctive sense of place for the driveway and arrival areas, and creating an obvious visual subservience to the existing buildings.
- 4.6. The existing building including attached conservatory has a gross internal floor area (GIFA) of 86m<sup>2</sup> of which approximately 10m<sup>2</sup> is the conservatory.
- 4.7. The proposed extension has a GIFA of 89m<sup>2</sup> equating to nominally a doubling of the existing internal floor area. However, this includes parts of the extension which will sit on the footprint of the existing conservatory. Therefore the net increase in new floor area on the site compared with the existing condition is only 79m<sup>2</sup> equating to an 89% increase (0.89 x the existing floor area).
- 4.8. Taking the existing outbuilding into account, the extension will increase the net floor area on the site by approximately 58%. Especially given the large curtilage of the dwelling and its setting in a wide open landscape, the total proposed scale of development is entirely appropriate and does not represent over-development.



4.9. Calculating floor areas in isolation provides an incomplete basis to assess the impact of any development. There is no national or local policy or guidance that states an absolute floor area percentage increase which all extensions must respect. Designs must be judged holistically on the merits of all the other aspects of siting, proportion, form and character. The siting and proportion have been substantially addressed in the application and reinforced in this statement as being appropriate to the site and existing buildings. The form and character are discussed further in section 5 of this statement.

4.10. The planning officer's report of handling casts the scale and proportion of the building in a highly negative light:

*"It would transform a modest 3 bedroomed house into a large 4 bedroomed house with the living room, kitchen and dining room together with the shower room, ensuite, utility room, hallway and store all being within the new extension and only the 4 bedrooms and snug being within the existing house."*

While the house does fit within the Scottish Government's definition of "modest", at less than 90m<sup>2</sup> including conservatory the existing building is very small and impractical for a young family in this rural location. According to Scottish Government data, an average detached house in Scotland is 139m<sup>2</sup>. The proposed altered and extended dwelling will be a total of 165m<sup>2</sup>, only 15% larger than average. We submit that the proposed altered and extended would therefore not be unduly large in terms of its footprint, and can be easily accommodated on the large plot without negatively impacting on the landscape setting.

We again observe that several of the similar properties along Newmains Holdings have been variously extended to far greater proportions than that proposed at 8 Newmains Holdings - see appendix 2.

4.11. The proposed extension is more obvious and forms a longer continuous elevation when viewed from the rear. However, this is still in the context of the heavy massing of the existing house and enlarged outbuilding, which are clearly visually dominant owing to their height, materiality and forms. It is entirely typical for extensions to dwellings to be located at the rear of properties and be more visible at the rear elevation.

The majority of this elevation is floor-to-ceiling glazing broken up by structural timber framing, which further emphasises a visual lightness and lack of heavy massing. The proposed extension does not cover any parts of the rear elevation except a very small overlap of less than 1m. Furthermore, this rear elevation is not visible from any public place.

## 5. Form and character

- 5.1. This section addresses NPF4 policies 14 and 16, and LDP policy DP5 in respect of the form and character of the proposed development.

The proposed extensions are quantitatively and qualitatively subservient to the existing buildings in terms of siting, form, scale, proportion, materiality and character.

The entire scheme has been designed to unite the building groups with a clear design approach, avoiding a cumbersome pastiche of forms and styles.

The unashamedly contemporary extension has been designed as a lightweight, flat-roofed structure explicitly to reinforce the dominant massing of the taller, pitched-roofed existing buildings. This is reinforced by the material treatment of all the buildings, with the existing buildings clearly distinguished and given stronger visual presence by enhancing the existing render finishes.

- 5.2. The planning officer's report of handling refers to the connection of the proposed covered external area to the adjacent existing outbuilding in a highly negative light:

*"...as it would due to its flat roofed architectural form be architecturally different to the existing house, it would not be of a size, form, proportion or scale that would be appropriate to the existing house. Moreover by its attachment to the outbuilding it would create a large, dominant dwellinghouse which would be visible from the public road that would not be reflective of the architectural character or style of the dwellinghouses at Newmains Holdings."*

- 5.3. We strongly refute the suggestion that the proposals will create a "large, dominant dwellinghouse" for all of the reasons set out in this supporting statement. The proposals maintain and enhance the proportions and character of the existing house and outbuilding, ensuring that all new elements are obviously visually subservient in form, character and materiality.
- 5.4. The existing house - as with all other similar properties along Newmains Holdings - is already clearly visible from the public road. As the submitted drawings, Design Statement and this supporting statement make clear, the majority of the proposed extension is set back almost entirely behind the principle elevation of the existing house, some 20m from the edge of the public road - this is illustrated on the plans.
- 5.5. All parts of the extension have been designed to be as low-lying and visually subservient as possible. Whether viewed from the principal elevation or the rear elevation, the main architectural design feature is the low flat-roof plane, which has been carefully positioned to sit below the existing eaves lines of the house. The overhang roof areas provide practical sheltered areas, but also serve to set back the walls of the house and reduce the apparent massing - this is illustrated on the plans, elevations and rendered photomontages within the design statement.
- 5.6. All elements that sit below the flat roof plane are either glazed or timber-clad walls, which emphasise a lightness of structure that is clearly distinct from and subservient to the heavy massing of the house and outbuilding. Along the principal elevation, slatted timber screens create a visual layering to the building and further reduce the sense of solid mass.
- 5.7. Single-storey flat-roofed forms are entirely ubiquitous and uncontroversial within contemporary architecture, and are a widely-accepted typology for domestic extensions in particular. This form:

- Minimises the massing of the extension especially in contrast to the taller pitched-roof forms. The existing building can then remain visually dominant.
- Emphasises horizontality over verticality, which is particularly relevant to this open landscape setting.
- Allows for the creation of overhangs to shelter external space, providing practicality for the inhabitants and reducing the apparent massing of the walls/glazing surfaces.
- Allows the use of innovative green roof construction to reduce surface water flooding and significantly boost biodiversity on the site.

5.8. The roof form is one of the most important visual components of the whole scheme, uniting the house and outbuilding with a common architectural device. If the extension roof were to simply stop at the western end of the extension, this would create an incongruous relationship between the extension and outbuilding that does not address the context, as it would emphasise the visual massing of the extension by exposing its gable.

5.9. The external walls of the extension are offset from the outbuilding by a clear gap approximately 2.3m wide. The new extension roof overhead spans across to shelter this external zone and abut the outbuilding. The outbuilding roof is being raised as part of the development, making the eaves approximately 300mm above the top of the extension flat roof, maintaining the visual dominance of the outbuilding as a 'book end' to the north of the site.

5.10. The new flat roof will incorporate approximately 70m<sup>2</sup> of native wildflower planting. The purpose of this planting is not only to add a significant biodiversity gain to the site, but to further soften the massing of the house when viewed from a distance, allowing it to bed down into its rural context.

5.11. With specific reference to the elevations visible from the public road the submitted Design Statement explains:

*"A more solid extension form extends the massing of the existing house at the north-west corner, containing the utility room, shower room, ensuite and plant space. The wall heads of this part align precisely [SIC] with the existing building, giving the impression that the corner of the house has been extruded outwards. This intervention at the north-west corner broadly replaces the footprint of the conservatory, as well as a small portion of lowered roof from the existing house."*



Extract showing proposed north-east elevation (not to scale) that faces the public road. The strong massing forms of the existing house and outbuilding are clearly visible with the extension as a low subservient form. The rendered portion of the extension reads as belonging to the massing of the house, making the timber-clad areas of extension under the expressed flat roof appear much smaller.

5.12. The parts of the extension described above constitute approximately 40% of the length of the extensions along the principal north-east elevations visible from the public road. The report of

handling does not adequately interpret the different areas of massing, form and materiality in the proposed scheme, and how they contribute to a cohesive set of interventions. The explicit purpose of breaking up the form and materiality of the proposed design into distinct zones is to minimise the apparent massing and maintain the visual dominance of the existing house. The remaining parts of the extension visible from the public road make up approximately 8.4m in length and are obviously subservient to the 16.4m length of the existing building and rendered extension portion.

- 5.13. As part of the development it is proposed to clad the exterior of the existing house in external insulation and new lime render. Although the report of handling refers to these works as not requiring permission, it does not acknowledge how these interventions relate importantly to the proposed extension. The parts of the extension referred to above, which are designed as a seamless extrusion of the existing building walls, are integrated the old and new by using the same external finishes.

## 6. Sustainability

- 6.1. This section addresses relevant policies within NPF4 and LDP policy in respect of sustainability and climate response.

The proposed development will substantially improve the overall sustainability of this existing building, reducing its energy demand, transitioning the site away from fossil fuels and securing the longevity of the building for generations to come.

The project will be an exemplar for how poor-quality mid 20th-century building stock can be revitalised to create sustainable family homes, encouraging improvement and refurbishment over rebuilding.

- 6.2. East Lothian Council did not refer to any aspect of sustainability in their assessment of the application despite this being a fundamental to the applicant's approach to the project, and a core tenet of NPF4.
- 6.3. NPF4 policy 1 gives significant weight to the global climate and nature crisis. Indeed achieving the UN's Sustainable Development Goals was a foundational principle for NPF4. The stated intent of this policy is: "To encourage, promote and facilitate development that addresses the global climate emergency and nature crisis."
- 6.4. The stated intent of NPF4 policy 2 is to: "encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change."
- 6.5. NPF4 policy 12 encourages and supports development which minimise waste through "re-use existing buildings and infrastructure".
- 6.6. The proposals have been designed to align with the aspirations of East Lothians Councils "Climate Change Strategy 2020-2025", which has a core aim and vision for a carbon neutral East Lothian.
- 6.7. WT Architecture are members of the Scottish Ecological Design Association (SEDA) and seek to align all projects to the stringent standards of the RIBA Sustainable Outcomes and RIBA 2030 Climate Challenge.
- 6.8. The existing building is poorly insulated with minimal cavity wall insulation. The proposed external wall insulation to the existing building should improve the thermal performance of the existing walls by approximately 800% (assumed cavity wall u-value 1.6W/mK with improvement to 0.19W/mK).
- 6.9. The existing building features low-quality uPVC windows. Although double-glazed, they feature large frame profiles and numerous astragals which reduce their performance. Some glazing panes are failing. The proposed development includes upgrading all existing windows to high-performance triple glazed units, which
- 6.10. Heating and hot water is currently provided by an LPG boiler. The site will be transitioned away from fossil fuel use by removing the gas boiler and installing air source heat pumps.
- 6.11. The proposed development will use natural building materials such as timber, natural and non-toxic insulation products and breathable lime renders to maximise the health and wellbeing of the inhabitants.

## 7. Conclusion

- 7.1. The proposed development is entirely appropriate and complimentary to the setting and character of the existing building and its wider context. All aspects of the siting, size, proportion, form and materiality are complimentary to the existing buildings and their surroundings.
- 7.2. The proposed extensions do not overdevelop the site or dominate the existing buildings. The scale of proposed development is equal or less than many of the other developments to similar properties along Newmains Holdings. As well as being quantitatively smaller in net floor area than the existing buildings, the proposed extension design is obviously visually subservient to the existing buildings.
- 7.3. The proposed development delivers on all relevant aspects of the Six Qualities of Successful Places within NPF4. The development will contribute a scheme of exceptional architectural quality and sustainability, enhancing the character of the existing building and the wider rural area, especially in the context of the similar properties along the same road.
- 7.4. The proposed development will adapt and revitalise a group of unsustainable existing buildings, significantly reducing their environmental impact and extending their lifespans, creating a quality home for a young family.
- 7.5. We submit that the proposals fully comply with and exceed the expectations of Policy DP5 of the adopted East Lothian Local Development Plan 2018 and policies 14 and 16 of NPF4.
- 7.6. We believe the merits of this application are clear and believe that the application is not merely acceptable, but should be actively supported and praised as an exemplary architectural addition to this part of East Lothian.
- 7.7. On behalf to the applicant, we respectfully request that the Local Review Body consider this appeal favourably and move to grant planning permission for the proposed development at 8 Newmains holdings.**



## Appendix 1

**Supplementary site and context photographs.  
Supplementary photomontage images.**



Figure 1 - Existing view approximately 100m north along the B1337 looking south towards site. 8 Newmains Holdings is barely visible from this highpoint on the public road. No parts of the extension would be visible from here.



Figure 2 - Existing view approximately 75m north of the site along the B1337 looking south. 8 Newmains Holdings is not visible.





Figure 3 - Existing view just north-east of the site from the B1337. The polytunnel on the application site is visible. Were the polytunnel to be removed, the existing outbuilding would obscure the remainder of the site.



Figure 4 - Existing view just north of the driveway entrance to 8 Newmains Holdings. The property is almost entirely hidden.





Figure 5 - Existing view of site from B1337 looking north. House visible to left, outbuilding visible to right behind tree. Even when the hedging is not in foliage the buildings are largely obscured from view and set back from the public road.



Figure 6 - Proposed photomontage. The raised height and finish of the outbuilding is most prominent. The small area of rendered extension reads as part of the house massing. The main expressed flat-roofed extension is well set back and barely visible.





Figure 7 - Existing view of site from B1337 looking directly into driveway entrance.



Figure 8 - Proposed photomontage. This is the only position from which the extension is visible from a public place. The main part of the extension is set back behind the principle elevation and some 20m from the public road. The form and character of the extension part between the house and outbuilding is expressed as a lightweight infill that is subservient to the stronger massing of house and outbuilding. The narrow portions of the extension and glazing on both sides is gives views through to the fields behind and further reduces the massing. The extension design creates a welcoming sense of place and identity to the arrival sequence.





Figure 9 - Existing view towards site from further south along the from B1337, looking north. The house is barely visible.



Figure 10 - Proposed photomontage. Other than indicating the proposed new lime render colours, there are no changes to this view. The extension is not visible from this or another other position along the public road, except from immediately opposite the driveway.



Examples of the existing character of the development patterns along Newmains Holdings. The character is overwhelmingly defined by poorly-planned arrangements of unsightly agricultural buildings and infrastructure, dotted in around the domestic properties. All of the dwellings visible along this section of the B1337 were built to the same designs, but have all be significantly altered and extended - none of of particular architectural merit or quality.



Figure 11 - Buildings south of 7 Newmains Holdings.



Figure 12 - Part of 7 Newmains Holdings



Figure 13 - Building north of 8 Newmains Holdings.



Figure 14 - Looking towards 6 Newmains Holdings



Figure 15 - Looking towards 10 Newmains Holdings



Figure 16 - Buildings around 5 Newmains Holdings





Figure 17 - 6 Newmains Holdings, prominent extensions.



Figure 18 - 6 Newmains Holdings - 1.5 storey alterations visible.



Figure 19 - Outbuilding at 9 Newmains Holdings.



Figure 20 - Looking towards 6 Newmains Holdings



Figure 21 - 4 Newmains Holdings, significant rear extensions



Figure 22 - 2 Newmains Holdings, significantly extended.

## Appendix 2

### **Development and planning histories for surrounding developments.**

There are understood to be a total of 12 homes along Newmains Holdings which were all built to the same designs. Of these, the proposed application site of 8 Newmains Holdings is the only one to remain largely undeveloped. All other buildings matching the design of 8 Newmains Holdings have therefore changed substantially in character, and many have been surrounded by additional development in the form of large agricultural buildings.

All of the developments below relate to dwellings with the same original design as 8 Newmains Holdings.

Aerial mapping images are provided at the end of this appendix (not to scale) highlighting the original dwellings and outbuildings (green), later extensions and outbuildings (red), and separate agricultural buildings (blue).

#### **1 Newmains Holdings**

Judging based on aerial imagery, this property has been variously extended to the front and rear, though no planning records are available for this site via the online portal.

#### **2 Newmains Holdings**

This property has implemented various developments including 00/00821/FUL and 04/00166/FUL which in total appear to have added extensions to the side and rear totalling in excess of 120m<sup>2</sup>. In addition, approved and implemented application 19/01124/P added a ~54m<sup>2</sup> double garage to the site, in addition to the original outbuilding which was retained.

#### **3 Newmains Holdings**

Based on aerial photographs and views from the public road, this property appears to have been extended to the side and rear, the original outbuilding has been extended to the side, and several other large outbuildings erected. There are no planning records available for this site via the online portal.

#### **4 Newmains Holdings**

Based on aerial photographs and views from the public road, this property appears to have been substantially extended to the rear, and partly to the front with a conservatory. The outbuilding appears to also have been extended at the rear. There are no planning records available for these developments, though drawings submitted as part of approved application 13/00491/P provide some understanding of the extensions.

#### **5 Newmains Holdings**

This property, which had already been extended to the side and rear (no records available), received approval under 02/01256/FUL and implemented designs for multiple alterations and extensions which substantially altered the character of the building.

A circa 35m<sup>2</sup> conservatory extension was added wrapping around the front and side, replacing and enlarging an older lean-to extension. A further extension of circa 60m<sup>2</sup> was added to the opposing side and rear, part of which encompassed an attached garage. However, as part of this larger extension the attic of the existing house was also converted and extended to create substantial first floor accommodation. The roof scape of the building was substantially altered, including forming rendered gables at the principal and rear elevations and a roof dormer. The combined alterations were of no high architectural merit, and the conservatory subsumed the most visible corner of the property with a bulky uPVC glazing.



## **6 Newmains Holdings**

This property was substantially extended to the rear under approved application 00/00964/FUL. Detailed approved plans are not available via the online portal.

## **7 Newmains Holdings**

This property, directly opposite the application site, was substantially extended under approved application 03/01317/FUL with a circa 85m<sup>2</sup> extension to the side and rear.

Since that time a circa 12m<sup>2</sup> conservatory was approved for the principal elevation under application 14/00420/P.

Finally, works approved and implemented under application 18/00023/P have added a circa 70m<sup>2</sup> detached building for use as ancillary residential accommodation.

In total this neighbouring dwelling has received approval for extensions totalling approximately 167m<sup>2</sup> of additional residential accommodation. None of the interventions are of particularly high architectural merit.

## **9 Newmains Holdings**

The report of handling for the application at 8 Newmains Holdings makes reference to application 05/00832/FUL, which was for a large extension that was approved but not implemented. This application sought a substantial extension which would have stretched across the site, bridging between the house and outbuilding. The report of handling deemed these proposals to be acceptable, stating:

*“By its infill form, the proposed link extension would have the effect of pulling together the original house and its outbuilding to create a larger house. However, it would not substantially add to the size of the footprint of the existing house and outbuilding. The ridge height of the proposed link extension would be 1m lower than the ridge height of the existing house and outbuilding. Much of its front and rear building lines would be recessed back from the front and rear building lines of both the existing house and outbuilding. Part of its length would be a replacement for the existing flat roofed extension. In these respects the proposed link extension, despite its own length, would be subservient to the house and outbuilding. Accordingly, it would not engulf or mask the physical form and character of those structures, which remain distinctive features of the new whole. The proposed link would be of similar architectural style and proportions to the house and outbuilding. The resultant larger house would not in its countryside location beside the nearby public road appear inappropriate to its surroundings.”*

The report of handling for the application at 8 Newmains Holdings dismisses the relevance of this approved application, on the basis that it was assessed against superseded policies. However, while the policies may have changed, the essential character of the buildings and area have not. Whether or not current policies might approve or refuse this development today is has no bearing on whether the character of the buildings might be impacted by a development of this design and scale, which bridging between the original house and outbuilding. Issues such as the concepts of visual subservience, elevation setback, lower roof heights, distinctiveness remain relevant, as does the countryside location.

Despite this historic application being approved, we would note that the designs were of no particular architectural merit. Unlike the proposed development at 8 Newmains Holdings, this design would have create a continuous mass of mostly solid walls and pitched roofs. The siting, massing, proportion, form and materiality would all have been substantially more impactful than the proposed development at 8 Newmains Holdings, for the reasons discussed earlier in this document.

A later application 12/00754/FUL was approved and implemented, comprising a ~80m<sup>2</sup> extension to the side and rear of the property. This development substantially increases the visual massing of the property, with a design of no particular architectural merit, extending the length of the principal elevation walls and roof scape.

Approved and implemented works under 21/00055/P have converted the existing outbuilding of this property into ancillary residential accommodation, including converting the roof space to turn the building into a 1.5-storey building.

### **11 Newmains Holdings**

Approved and implemented under application 18/00069/P, two separate extensions totalling some 60m<sup>2</sup> were added. These extensions were in addition to another extension to the original building already in place. This scheme was of no particular architectural merit or quality, creating a sprawling mass of building wings in different directions with complex pitched roof shapes.

### **12 Newmains Holdings**

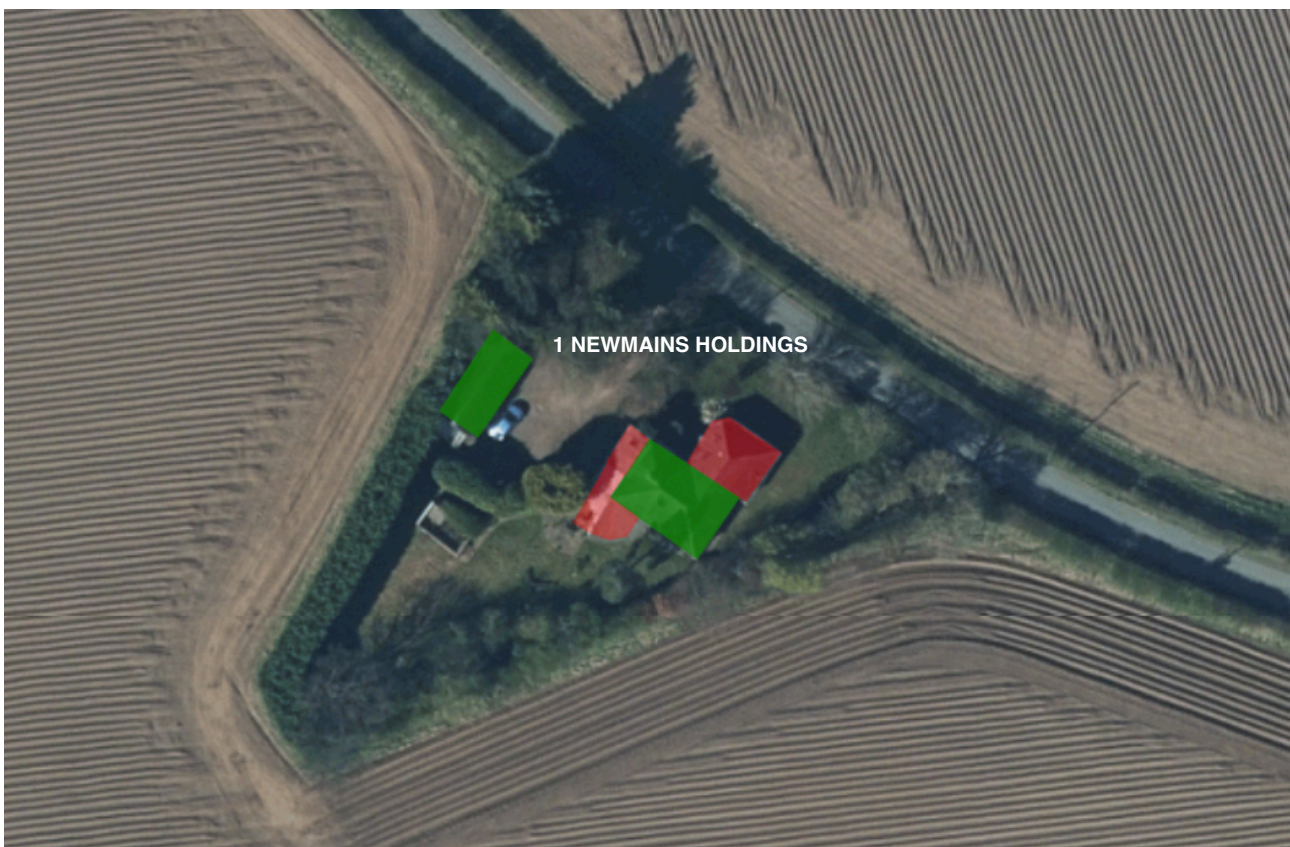
This approved and implemented application 12/00431/FUL was for a single large extension measuring some 87m<sup>2</sup> that constituted approximately 92% of the existing building floor area. Again, this design was of no architectural merit, with a rudimentary extrusion of the existing mass to create a bulky and complicated set of pitched roof forms.

### **Aerial mapping images of all relevant properties (not to scale)**

Green = original dwellinghouse and outbuilding

Red = dwelling extensions and new outbuildings in the curtilage of the dwelling.

Blue = agricultural buildings, sometimes linked directly with the relevant dwelling.







2 NEWMAINS HOLDINGS

12 NEWMAINS HOLDINGS

11 NEWMAINS HOLDINGS



3 NEWMAINS HOLDINGS





4 NEWMAINS HOLDINGS



5b NEWMAINS HOLDINGS

5 NEWMAINS HOLDINGS









6 NEWMAINS HOLDINGS

9 NEWMAINS HOLDINGS

Previous approved scheme  
dashed in red.

## Appendix 3

### Correspondence (redacted) between ELC and WT Architecture during the determination period.

Email correspondence from planning officer to agent, 10th July 2024. The planner confirms the intention for refusal. Reference to policy DP2 was shown to be irrelevant to this application.

#### **RE: 24/00456/P - 8 Newmains Holding**

From: Smith, Amelia [REDACTED]  
To: Thomas Fitzgerald [REDACTED]  
Cc: Mikele Perez-Jamieson [REDACTED]  
Date: 10/07/2024 3:59 PM

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Good Afternoon Thomas,

In relation to the above application for the 'extension to house, alterations and extension to outbuilding to form ancillary accommodation and installation of air source heat pumps', I wish to provide you with notice of my intention to refuse this application for planning permission.

The grounds for refusal are detailed below:

The proposal as a whole would be inappropriate in terms of their scale, proportion and siting and would therefore be contrary to policies 14 and 16 of NPF4 and Policy DP2 and DP5 of the adopted East Lothian Local Development Plan 2018. No material considerations outweigh this conflict with the development plan.

Should you wish to withdraw this application and resubmit a revised scheme, please do let me know before end of play tomorrow (11<sup>th</sup> July) and I will get the application withdrawn for you.

Alternatively, you can proceed with the determination of the application as a refusal and submit an appeal to East Lothian Council's Local Review Body within 3 months of the decision being issued.

I appreciate that this may not be the news you expected, however, I would be happy to provide you with my report which may assist in shaping a revised proposal, should you wish to submit a revised scheme.

Either way, please do let me know.

Kind regards,

Amelia Louise Smith

Planning Officer | Development Management | East Lothian Council | John Muir House | Haddington | EH41 3HA | T: 01620 827686 | E: [environment@eastlothian.gov.uk](mailto:environment@eastlothian.gov.uk)



Email reply correspondence from agent to planning officer, 10th July 2024. 14 day extension was granted.

## Re: 24/00456/P - 8 Newmains Holding

From: Thomas Fitzgerald [REDACTED]  
To: Smith, Amelia [REDACTED]  
Cc: Mikele Perez-Jamieson [REDACTED]  
Date: 10/07/2024 4:38 PM

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Dear Amelia,

We are very disappointed and surprised to receive your email notifying of an intention to refuse.

In particular, we believe it is unreasonable for you to demand a decision by our applicant to withdraw with less than 24 hours notice, and without offering any opportunity to discuss the application. We request reasonable time to discuss this with the applicant, and also an opportunity to discuss the application with you. We would expect a reasonable period to be not less than 14 days from your notification, which may need to be extended depending on the timing and nature of our discussion with you. Please confirm by return.

Regards,

Thomas Fitzgerald  
Senior Associate

WT ARCHITECTURE  
[www.wtarchitecture.com](http://www.wtarchitecture.com)

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Email correspondence from agent to planning officer, 18th July 2024. As referenced in the correspondence, WT Architecture prepared a detailed response letter having had sight of the planning officer's draft report. Copies of the draft report and WT Architecture are included separately alongside this supporting statement.

## **Re: 24/00456/P - 8 Newmains Holding**

From: Thomas Fitzgerald [REDACTED]  
To: Smith, Amelia [REDACTED]  
Cc: Mikele Perez-Jamieson [REDACTED]  
Date: 18/07/2024 11:16 AM

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Dear Amelia,

Please find enclosed with this email a letter responding to your intention to refuse.

Having reviewed the draft report of handling and reasons for refusal, we are not satisfied that this application has received an appropriate or fair assessment.

We ask that you and senior colleagues within development management carefully review our attached letter, and we urge a re-assessment of the proposed development. The applicant is willing to grant a reasonable further extension to the determination period to allow time for East Lothian Council to reconsider the assessment of this application.

Please confirm receipt of this email.

Regards,

Thomas Fitzgerald  
Senior Associate

WT ARCHITECTURE  
[www.wtarchitecture.com](http://www.wtarchitecture.com)

WT Architecture Ltd . Registered in Scotland No SC493881. Registered Office: 4-6 Gote Lane, South Queensferry, Edinburgh, EH30 9PS

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Email reply correspondence from planning officer to agent, 18th July 2024.

## **RE: 24/00456/P - 8 Newmains Holding**

From: Smith, Amelia [REDACTED]  
To: Thomas Fitzgerald [REDACTED]  
Cc: Mikele Perez-Jamieson [REDACTED]  
Date: 18/07/2024 12:38 PM

---

Good Afternoon Thomas,

Thank you for your email.

Whilst I appreciate the points raised within the attached letter of correspondence, it remains our intention to refuse this application on the grounds stipulated within the draft report provided. For information, this stance has been agreed by senior colleagues and was discussed at the Development Management team meeting.

Accordingly, please advise if you wish to withdraw this application by the Wednesday 24<sup>th</sup> July. Should I not hear from you by this date, this application will be determined accordingly. Should you be aggrieved by the decision, you are welcome to appeal against the decision to East Lothian Council's Local Review Body.

Kind regards,

Amelia Louise Smith

Planning Officer | Development Management | East Lothian Council | John Muir House | Haddington |  
EH41 3HA | T: 01620 827686 | E: [environment@eastlothian.gov.uk](mailto:environment@eastlothian.gov.uk)

Email reply correspondence from agent to planning officer, 19th July 2024.

## Re: 24/00456/P - 8 Newmains Holding

From: Thomas Fitzgerald <thomas@wtarchitecture.com>  
To: Smith, Amelia <asmith7@eastlothian.gov.uk>  
Cc: Mikele Perez-Jamieson <mikele@wtarchitecture.com>  
Date: 19/07/2024 11:02 AM

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Dear Amelia,

Having spoken to the applicants, we confirm they have no intention of withdrawing the application. The application should proceed to determination.

We must take an opportunity to express that we and our clients are aggrieved not only with the decision, but how this application has been assessed. We do not believe that this application has been handled fairly or competently. The assessment contains significant inaccuracies and inadequacies, and misrepresents the proposed scheme. After spending several days composing a very detailed response to challenge these issues, our letter was dismissed barely 1hr after receipt. With respect, you have not appreciated any of the points raised in our letter.

This is precisely the sort of high-quality, sustainable development that East Lothian Council should be actively supporting, renovating an existing building with zero architectural merit to create a home for a young family.

The applicant fully intends to appeal the refusal.

Regards,

Thomas Fitzgerald  
Senior Associate

WT ARCHITECTURE  
[www.wtarchitecture.com](http://www.wtarchitecture.com)

WT Architecture Ltd . Registered in Scotland No SC493881 . Registered Office: 4-6 Gote Lane, South Queensferry, Edinburgh, EH30 9PS

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F.A.O. Amelia Louise Smith  
Development Management  
East Lothian Council  
John Muir House  
Haddington  
EH41 3HA

Thursday, 18 July 2024

**Re: 24/00456/P, 8 Newmains Holdings, EH39 5BL**

Dear Amelia,

We write in connection with the above-reference application for alterations and extensions at 8 Newmains Holdings, EH39 5BL.

We refer to your email correspondence of 10th July 2024 and draft report of handling dated 12th July 2024, in which you confirm your intention to refuse this planning application. The reason for refusal provided in the report is:

*“Overall and based on the whole scheme of development as proposed, proposals would be inappropriate in terms of their scale, proportion and siting and would therefore be contrary to policies 14 and 16 of NPF4 and Policy DP2 and DP5 of the adopted East Lothian Local Development Plan 2018.”*

We strongly disagree with this determination and the manner the application has been assessed. Set out in this letter is an expanded response to the draft report of handling and the issues raised therein.

This response letter focuses on the proposed extensions to the existing house, since the proposed alterations to the adjacent outbuilding were deemed acceptable. However, it should be noted that the whole of the scheme has been designed to form a cohesive whole, so the designs of the outbuilding works should be taken into consideration alongside the extension.

This letter should be read in conjunction with all drawings, reports and Design Statement submitted with the application.

## 1. Context

The site is located in an isolated rural location, surrounded mainly by open fields. The nearest settlements, Drem and Athelstaneford, are both approximately 1-mile away measured in a straight-line. The site is not within a Special Landscape Area or any other special designation.

The existing building is a mid 20th-century detached bungalow with accompanying outbuilding, built as part of a string of 12 largely-identical dwellings along Newmains Holdings, built to provide housing for returning WWII servicemen. The site at 8 Newmains Holdings is the last of these dwellings to remain largely undeveloped.

The existing dwelling is a simple bungalow with cement-rendered walls, hipped pitched slate roofs and uPVC windows. The existing buildings are of no particular architectural merit. The house is constructed from simple materials, arranged in a plan that creates small rooms in a cellular layout. The house has poor accessibility, is inefficient and unsustainable to run. The outbuilding is not habitable or weathertight, and features an asbestos roof.

## 2. Siting, scale and proportion

We note that East Lothian Council have referred to adopted LDP Policy DP2 in their reasons for refusal. This policy does not apply to alterations and extensions.

*"Policy DP2: The design of all new development, with the exception of changes of use and alterations and extensions to existing buildings, must:" ...*

Nevertheless, for the reasons set out in the Design Statement and reiterated in this letter, the proposed development does in fact comply with each of the relevant policy requirements of DP2:

1. It is appropriate to its location in terms of position, size, form, massing, proportion and scale and use of a limited palette of materials and colours that complement its surroundings.
2. By its siting, density and design, it creates a coherent structure of development that respects and complements the site's context, and create a sense of identity.
3. Passive overlooking is not relevant to this type of development, but the design does create high quality architectural and treatment to create a sense of welcome, safety and security.
4. The design maintains the existing access and parking arrangements. The report of handling notes that Roads Services were consulted and found that the proposals comply with Policy T2 of the ELLDP 2018.
5. The development maintains the clear distinction between public and private space.
6. The design ensures privacy and amenity, with particular regard to levels of sunlight, daylight and overlooking, including for the occupants of neighbouring properties.
7. The development retains physical and natural features that are important to the site and amenity of the area. The extension parts occupy the areas of the site with the lowest quality of natural character, comprising predominantly a gravel driveway and existing conservatory footprint. The report of handling acknowledges that the proposed removal of one shrub and part of some hedging will not be a significant loss, and are therefore compliant with Policy 6 of NPF4 and Policy NH8 of the ELLDP 2018.
8. The development does not impact existing access or servicing arrangements for the site.

As explained in the Design Statement, an extensive design process was conducted to identify suitable areas for development on the site. Some of these options are illustrated in the Design Statements as examples, but the design process considered many other possibilities. The siting of the proposed extension positions it as far to the rear of the site as possible. The majority of the extension, those parts that overtly expressed with new materials and forms, are set back from the principal elevation frontage by over 6.5m, almost sitting fully behind the rear wall of the existing building. This positions the main parts of the extension more than 20m from the edge of the public road. The siting, layout and form of the extension is designed to create a welcoming and distinctive sense of place for the driveway and arrival areas, and creating an obvious visual subservience to the existing buildings.

The siting of the extension is entirely appropriate to the site, as it constrains new development between the existing house and outbuilding, over ground that is predominantly a driveway and the footprint of the existing conservatory. This maintains all other areas of the site as open garden space to preserve the character of the site in the open landscape.

The substantive reason for refusal appears to rest on a judgement regarding the scale and proportion of the proposed development. The report of handling states:

*“The extension proposed would also be of a greater scale than the existing dwellinghouse with the proposed footprint of the extension being more than double the internal footprint of the existing dwellinghouse and as such, the extension would not form as a subservient or a well-integrated addition.”*

The proposed extension will not be “more than double the internal footprint of the existing building”. The existing building including conservatory has a gross internal floor area (GIFA) of 86m<sup>2</sup> of which approximately 10m<sup>2</sup> is the conservatory. According to the wording of the report of handling, the proposed extension should have a GIFA of at least 172m<sup>2</sup>, which it does not. Viewing this charitably, this is perhaps an error in wording and the report intended to communicate that the extension will ‘more than double’ the existing footprint.

The proposed extension has a GIFA of 89m<sup>2</sup> equating to nominally a doubling of the existing internal floor area. However, this includes parts of the extension which will sit on the footprint of the existing conservatory. Therefore the net increase in new floor area on the site compared with the existing condition is only 79m<sup>2</sup> equating to an 89% increase (0.89x the existing floor area) and not a doubling. Taking the existing outbuilding into account, the extension will increase the net floor area on the site by approximately 58%.

The above figures are presented to provide some additional context and correct errors in East Lothian Council's report of handling. However, calculating floor areas in isolation provides an incomplete basis to assess the impact of any development. There is no national or local East Lothian Council policy or guidance that states an absolute floor area percentage increase which all extensions must respect. Designs must be judged holistically on the merits of all the other aspects of siting, form and materiality.



All parts of the extension have been designed to be as low-lying and visually subservient as possible. Whether viewed from the principal elevation or the rear elevation, the main architectural design feature is the low flat-roof plane, which has been carefully positioned to sit below the existing eaves lines of the house. The overhang roof areas provide practical sheltered areas, but also serve to set back the walls of the house and reduce the apparent massing. All elements that sit below the flat roof plane are either glazed or timber-clad walls, which emphasise a lightness of structure that is clearly distinct from and subservient to the heavy massing of the house and outbuilding. Along the principal elevation, slatted timber screens create a visual layering to the building and further reduce the sense of solid mass.

With specific reference to the elevations visible from the public road the submitted Design Statement explains:

*“A more solid extension form extends the massing of the existing house at the north-west corner, containing the utility room, shower room, ensuite and plant space. The wall heads of this part align precisely [SIC] with the existing building, giving the impression that the corner of the house has been extruded outwards. This intervention at the north-west corner broadly replaces the footprint of the conservatory, as well as a small portion of lowered roof from the existing house.”*

The parts of the extension described above constitute approximately 40% of the length of the extensions along the principal north-east elevations visible from the public road. The report of handling makes no mention of the different areas of massing, form and materiality in the proposed scheme, and how they contribute to a cohesive set of interventions. The explicit purpose of breaking up the massing and materiality of the proposed design into distinct zones, is to minimise the apparent massing and maintain the visual dominance of the existing house. The remaining parts of the extension visible from the public road make up approximately 8.4m in length and are obviously subservient to the 16.4m length of the existing building and rendered extension portion.

As part of the development, it is proposed to clad the exterior of the existing house in external insulation and new lime render. Although the report of handling refers to these works as not requiring permission, it does not acknowledge how these interventions relate to the proposed extension. The parts of the extension referred to above, which are designed as a seamless extrusion of the existing building walls, are integrated the old and new by using the same external finishes.

The proposed extension is more obvious and forms a longer continuous elevation when viewed from the rear. However, this is still in the context of the heavy massing of the existing house and enlarged outbuilding, which are clearly visually dominant owing to their height, materiality and forms. The majority of this elevation is floor-to-ceiling glazing broken up by structural timber framing, which further emphasises a visual lightness and lack of heavy massing. The proposed extension does not cover any parts of the rear elevation except a very small overlap of less than 1m. Furthermore, this rear elevation is not visible from any public place, and so cannot be considered to have any material impact on the character of the existing building or wider landscape setting. It is entirely typical for extensions to dwellings to be located at the rear of properties and be more visible at the rear elevation.

### **3. Form and character**

In the draft report of handling, East Lothian Council provide no assessment of the architectural merit of the existing buildings, or lack thereof. To reiterate, the existing dwelling is a post-war building of little to no architectural merit in itself.

The report of handling correctly identifies that the proposed extension, or at least parts of it, would be “somewhat architecturally different from character of the existing house and other houses within the surrounding area”. The report does not discuss these differences or acknowledge the high architectural merit of the proposed scheme. The report does not provide any detailed assessment of the proposed scheme - such as siting massing, roof heights, composition, fenestration or materiality. Despite this, the report of handling goes on to dismiss the scheme as “dominant and incongruous”.

As shown in the detailed elevational drawings provided in the submission and explained in the Design Statement, the scheme for the whole site has been carefully designed together, to create a uniting scheme of forms and a limited palette of natural materials, as opposed to a patchwork of visually discordant interventions. This design approach will substantially enhance the character of the existing site and buildings.

The report of handling refers to the adjoining of roof parts to the outbuilding as being “architecturally different to the character and form of existing built development within the surrounding area”. No explanation is provided as to why this perceived difference is harmful, merely that it exists. The external walls of the extension are offset from the outbuilding by a clear gap approximately 2.3m wide. The new extension roof overhead spans across to shelter this external zone and abut the outbuilding. The outbuilding roof is being raised as part of the development, making the eaves approximately 300mm above the top of the extension flat roof, maintaining the visual dominance of the outbuilding as a ‘book end’ to the north of the site.

The roof form is one of the most important visual components of the whole scheme, uniting the house and outbuilding with a common architectural device. If the extension roof were to simply stop at the western end of the extension, this would create an incongruous relationship between the extension and outbuilding that does not address its context, as it would emphasise the visual massing of the extension by exposing its gable.

The new flat roof will incorporate approximately 70m<sup>2</sup> of native wildflower planting. The purpose of this planting is not only to add a significant biodiversity gain to the site, but to further soften the massing of the house when viewed from a distance, allowing it to bed down into its rural context.

Finally, the report of handling also states that the proposed flue serving a wood-burning stove in the extension would be “harmful to the character and appearance of the house and the immediate area.” We strongly dispute that a circa 150mm diameter flue, situated some 24m from the edge of the public road and screened by large mature trees, and in the context of a ~32m long set of building elevations, will have any visual impact on the character of the house whatsoever, and certainly not of the immediate area.

The existing house already features 2 masonry chimneys measuring 1.2m and 0.8m long respectively. The proposed flue would be ~1.2m lower than these existing chimneys and not higher than the ridge of the existing house. The stove flue is positioned in the middle of the extension so does not compete visually with the existing buildings. A black colour has been proposed, to avoid the surface material being too bright and visible from a distance.

#### **4. Surrounding development**

There are understood to be a total of 12 homes along Newmains Holdings which were all built to the same designs. Of these, the proposed application site of 8 Newmains Holdings is the only one to remain largely undeveloped. All other buildings matching the design of 8 Newmains Holdings have therefore changed substantially in character, and many have been surrounded by additional development in the form of large agricultural buildings. All of the developments below relate to dwellings of precisely the same original design and setting of 8 Newmains Holdings:

##### 1 Newmains Holdings

Based on aerial imagery, this property has been variously extended to the front and rear, though no planning records are available for this site via the online portal.

##### 2 Newmains Holdings

This property has implemented various developments including 00/00821/FUL and 04/00166/FUL which in total appear to have added extensions to the side and rear totally in excess of 120m<sup>2</sup>. In addition, approved and implemented application 19/01124/P added a ~54m<sup>2</sup> double garage to the site, in addition to the original outbuilding which was retained.

##### 3 Newmains Holdings

Based on aerial photographs and views from the public road, this property appears to have been extended to the side and rear, the original outbuilding has been extended to the side, and several other large outbuildings erected. There are no planning records available for this site via the online portal.

##### 4 Newmains Holdings

Based on aerial photographs and views from the public road, this property appears to have been substantially extended to the rear, and partly to the front with a conservatory. The outbuilding appears to also have been extended at the rear. There are no planning records available for these developments, though drawings submitted as part of approved application 13/00491/P provide some understanding of the extensions.

##### 5 Newmains Holdings

This property, which had already been extended to the side and rear (no records available), received approval under 02/01256/FUL and implemented designs for multiple alterations and extensions which substantially altered the character of the building.

A circa 35m<sup>2</sup> conservatory extension was added wrapping around the front and side, replacing and enlarging an older lean-to extension. A further extension of circa 60m<sup>2</sup> was added to the opposing side and rear, part of which encompassed an attached garage. However, as part of this larger extension the attic of the existing house was also converted and extended to create

substantial first floor accommodation. The roof scape of the building was substantially altered, including forming rendered gables at the principal and rear elevations and a roof dormer. The combined alterations were of no high architectural merit, and the conservatory subsumed the most visible corner of the property with a bulky uPVC glazing.

#### 6 Newmains Holdings

This property was substantially extended to the rear under approved application 00/00964/FUL. Detailed approved plans are not available via the online portal.

#### 7 Newmains Holdings

This property, directly opposite the application site, was substantially extended under approved application 03/01317/FUL with a circa 85m<sup>2</sup> extension to the side and rear.

Since that time a circa 12m<sup>2</sup> conservatory was approved for the principal elevation under application 14/00420/P.

Finally, works approved and implemented under application 18/00023/P have added a circa 70m<sup>2</sup> detached building for use as ancillary residential accommodation.

In total this neighbouring dwelling has received approval for extensions totalling approximately 167m<sup>2</sup> of additional residential accommodation. None of the interventions are of particularly high architectural merit.

#### 9 Newmains Holdings

The report of handling for the application at 8 Newmains Holdings makes reference to application 05/00832/FUL, which was for a large extension that was approved but not implemented. This application sought a substantial extension which would have stretched across the site, bridging between the house and outbuilding. The report of handling deemed these proposals to be acceptable, stating:

*“By its infill form, the proposed link extension would have the effect of pulling together the original house and its outbuilding to create a larger house. However, it would not substantially add to the size of the footprint of the existing house and outbuilding. The ridge height of the proposed link extension would be 1m lower than the ridge height of the existing house and outbuilding. Much of its front and rear building lines would be recessed back from the front and rear building lines of both the existing house and outbuilding. Part of its length would be a replacement for the existing flat roofed extension. In these respects the proposed link extension, despite its own length, would be subservient to the house and outbuilding. Accordingly, it would not engulf or mask the physical form and character of those structures, which remain distinctive features of the new whole. The proposed link would be of similar architectural style and proportions to the house and outbuilding. The resultant larger house would not in its countryside location beside the nearby public road appear inappropriate to its surroundings.”*

The report of handling for the application at 8 Newmains Holdings dismisses the relevance of this approved application, on the basis that it was assessed against superseded policies. However,

while the policies may have changed, the essential character of the buildings and area have not. Whether or not current policies might approve or refuse this development today is has no bearing on whether the *character* of the buildings might be impacted by a development of this design and scale, which bridging between the original house and outbuilding. Issues such as the concepts of visual subservience, elevation setback, lower roof heights, distinctiveness remain relevant, as does the countryside location.

Despite this historic application being approved, we would note that the designs were of no particular architectural merit. Unlike the proposed development at 8 Newmains Holdings, this design would have create a continuous mass of mostly solid walls and pitched roofs. The siting, massing, proportion, form and materiality would all have been substantially more impactful than the proposed development at 8 Newmains Holdings, for the reasons discussed earlier in this document.

A later application 12/00754/FUL was approved and implemented, comprising a ~80m<sup>2</sup> extension to the side and rear of the property. This development substantially increases the visual massing of the property, with a design of no particular architectural merit, extending the length of the principal elevation walls and roof scape.

Approved and implemented works under 21/00055/P have converted the existing outbuilding of this property into ancillary residential accommodation, including converting the roof space to turn the building into a 1.5-storey building. It should be noted that the executed works have deviated from the approved plans by increasing the steepness of the roof pitch and changing the external finishes.

#### 11 Newmains Holdings

Approved and implemented under application 18/00069/P, two separate extensions totalling 60m<sup>2</sup> were added. These extensions were in addition to another extension to the original building already in place. This scheme was of no particular architectural merit or quality, creating a sprawling mass of building wings in different directions with complex pitched roof shapes.

#### 12 Newmains Holdings

This approved and implemented application 12/00431/FUL was for a single large extension measuring approximately 87m<sup>2</sup> that constituted 92% of the existing building floor area. Again, this design was of no architectural merit, with a rudimentary extrusion of the existing mass to create a bulky and complicated set of pitched roof forms.

### **7. Other considerations**

As is made clear in the Design Statement, the proposed development will substantially improve the overall sustainability of this existing building. The existing building is poorly insulated and with low-quality uPVC windows, constructed with poor airtightness, with heating and hot water provided by an LPG tank. The proposals will substantially upgrade the existing fabric of the buildings, and the new parts will be designed and constructed to exceed current minimum standards. The site will be transitioned away from fossil fuel use by removing the gas boiler and installing air source heat pumps.

## **8. Conclusion**

The proposed development is entirely appropriate and complimentary to the setting and character of the existing building and its wider landscape context. All aspects of the siting, size, proportion, form and materiality are complimentary to the existing buildings and their surroundings.

The proposed extensions do not overdevelop the site or dominate the existing buildings. The scale of proposed development equal or less than many of the other approved developments to similar properties along Newmains Holdings. As well as being quantitatively smaller in net floor area than the existing buildings, the proposed extension design is obviously visually subservient to the existing buildings. The size of proposed development is equal or less than many of the approved and implemented developments to all other similar properties in the area.

The proposed development delivers on all relevant aspects of the *Six Qualities of Successful Places* within NPF4. The development will contribute a scheme of exceptional architectural quality and sustainability, enhancing the character of the existing building and the wider rural area, especially in the context of the similar properties along the same road.

The proposed development will adapt and revitalise a group of unsustainable existing buildings, significantly reducing their environmental impact and extending their lifespans, creating a quality home for a young family.

In conclusion, the proposals fully comply with Policy DP5 of the adopted East Lothian Local Development Plan 2018 and policies 14 and 16 of NPF4. LDP Policy DP2 is not relevant to this development, but the scheme nonetheless broadly complies with this policy.

We urge East Lothian Council to reconsider the assessment of this application and support the proposals for approval.

## SITE CONTEXT

The property to which this application relates is a single storey detached house and its garden ground, at Newmains Holding to the south-east of Drem and to the north-west of Athelstanford. The property is located within a countryside location as defined by Policy DC1 of the adopted East Lothian Local Development Plan 2018 ('ELLDP 2018').

The property and its curtilage are bounded to the north-east by the road of B1337, to the south-east and the south-west by agricultural land and to the north-west by a stable block associated with 7 Newmains Holding.

## PLANNING HISTORY

There is no relevant planning history for this site.

## PROPOSAL

Planning permission is sought for the extension to house, alterations and extension to an existing outbuilding to form ancillary accommodation and the installation of 2x air source heat pumps.

The alterations and extension to the existing outbuilding would consist of:

- i. The building up of the outer walls to create first floor accommodation;
- ii. The installation of a replacement pitched roof which would have a new overall height of some 5.25m at ridge height and some 3.38m at eaves level;
- iii. The infilling of an existing window opening and the part infilling of an existing door opening on the south-east (front) elevation;
- iv. The installation of a narrower door within the partly infilled door opening and the installation of new double doors on the south-east (front) elevation;
- v. The installation of two replacement windows on the north-west (rear) elevation;
- vi. The installation of 2x first floor windows, one on the north-east (side) elevation and one on south-west (side) elevation. The window on the north-east (side) elevation would have a Juliet style balcony; and,
- vii. The installation of 4x roof lights on south-east roof slope and the installation of 4x roof lights on the north-west roof slope.

Walls would be finished in new lime render. The replacement roof would be corrugated metal sheeting and would be black in colour. Rainwater goods would be of aluminium construction and would be black in colour. Doors would be finished in a dark grey colour.

A total of two air source heat pumps are proposed to be located on the north-west (rear) elevation of the existing outbuilding. They would be positioned side by side and would measure some 0.6 metres in height and some 0.8 metre in width.

The flat roofed extension proposed as part of this application would be attached to the north-west (side) and part of the south-west (rear) elevation of the existing dwellinghouse. The extension would be some 3m in height, 15.5 metres in length and some 13.4m in width at its widest point. A 2.5m black flue is proposed to be affixed to the flat roof of the extension.

The extension would extend north-west toward the existing outbuilding and an overhung roof component of the extension would adjoin with and attach to the south-east (front) elevation of the outbuilding. There would be one partially glazed door and some 7x floor to ceiling fixed windows, one of which would be partially covered with fixed intermittent timber screening on the south-west (rear) elevation of the proposed extension. There would be some 3x window openings and some 4 fixed windows on the north-east (front) elevations. Some 3 out of the 4 fixed windows on this elevation would be partially covered with intermittent timber screening. 2x glazed openings, a glazed door and an associated fixed window is proposed on the north-west (side) elevation of the extension. One glazed door and 2x fixed floor to ceiling windows are proposed on the south-east (side) elevation. Fixed intermittent timber screening is proposed in front of one of the two fixed windows on this elevation. The extension would have 2x roof lights.

The proposed extension would be finished with a combination of materials inclusive of lime wash render and timber cladding. Fascias would be of pre-weathered steel construction. The doors on the south-west (rear) and south-east (side) elevations would be partially glazed with timber framing and the door on the north-west (side) elevation would be partially glazed with metal framing. The roof would be covered in single ply membrane. The rear component of the roof which covers the kitchen area would form as a wildflower roof, edged with pebbles.

Subsequent to the registration of this application, revised drawings were submitted by the applicant's agent, amending the red line boundary of the application site. The redline boundary previously included an area of agricultural land which also falls under the ownership of the applicant. As it does not form as part of the domestic curtilage, it has since been outlined in blue rather than red. The domestic curtilage is outlined in red.

Demolition works, and alterations to the existing dwellinghouse such as the removal of roof lights, the insulation of external walls, the re rendering of external walls and the formation of paving or planters would not require the grant of planning permission and thus whilst detailed within the application drawings, they do not form as part of this application for planning permission.

#### DEVELOPMENT PLAN

Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended) requires that the application be determined in accordance with the development plan, unless material considerations indicate otherwise.

The development plan is the adopted National Planning Framework 4 ('NPF4') and the adopted East Lothian Local Development Plan 2018 ('ELLDP 2018').

Policies 6 (Forestry, Woodland and Trees), 14 (Design, Quality and Place) and 16 (Quality Homes) of NPF4 and DP2 (Design) and DP5 (Extensions and Alterations to Existing Buildings), T2 (General Transport Impact) and NH8 (Trees and Development) of the adopted ELLDP 2018 are relevant to the determination of this application.

#### REPRESENTATIONS

No public letters of objection have been received in relation to this application.

#### PLANNING ASSESSMENT

Planning permission is sought for the extension to house, alterations and extension to an outbuilding to form ancillary accommodation and the installation of two air source heat pumps.



The property in which this application relates is within a countryside location in East Lothian, and forms as one of a number of agricultural holdings within the surrounding area, known as Newmains Holding. Newmains Holding is generally characterised by low density development within an agricultural setting. Many of these holdings consist of a single storey dwellinghouse with associated ancillary accommodation on generous sized plots. Many of the dwellinghouses and associated outbuildings have been subject to alterations over the years.

Policy 14 of NPF4 states amongst other things that development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.

Policy 16 of NPF4 states that householder development proposals will be supported where they do not have a detrimental impact on the character or environmental quality of the surrounding area in terms of size, design and materials and do not have a detrimental effect on neighbouring properties in terms of physical impact, overshadowing or overlooking. Policy DP2 of the adopted ELLDP 2018, requires that all new development be well designed and integrated into its surroundings.

Policy DP5 of the adopted ELLDP 2018 echoes policies 14 and 16 of NPF 4 and states, amongst other things, that all alterations and extensions to a building must be well integrated into their surroundings and be in keeping with the original building. Accordingly, such development must be of a size, form, proportion and scale appropriate to its surroundings and, where the existing building has architectural merit, be in keeping with that building and it must be finished externally in materials with colours and textures, which complement existing buildings in the locality and the original building.

The conversion of the outbuilding for use as ancillary residential accommodation in association with the applicant's house and the alterations to the building to facilitate that use would not significantly change the character of the building, nor would they significantly alter the character of the area, given the area is generally characterised by low level dwellinghouses with ancillary accommodation.

Whilst the alterations would increase the height of the outbuilding, the ridge height would remain under the ridge height of the original dwellinghouse, such that the outbuilding would still be low lying-in nature and the materials proposed (i.e. render and metal corrugated sheeting) would be that of the existing outbuilding. In addition and owing to the high hedge on much of the frontage of the property, the south-east (front) elevation is generally the only elevation visible from public views via the driveway. Accordingly, alterations to the outbuilding alone, including the heightening of walls, the replacement of its roof and the installation of windows, replacement windows and doors would not be harmful to the character and appearance of the building or harmful to the character and appearance of the area. Furthermore, similar approvals have been given for the conversion of, or erection of outbuildings at Newmains Holdings to form ancillary accommodation with associated alterations (refs 21/00055/P & 18/00023/P).

The proposed air source heat pumps would be installed at a low level on the north-west (side) elevation of the outbuilding. As such, they would be concealed from public view and would not be harmful to the character and appearance of the building, or the wider rural landscape character.

The proposed extension would be visible from the public road and due to its flat roofed form, timber cladding and attachment to the existing outbuilding on-site, it would be somewhat architecturally different from character of the existing house and other houses within the surrounding area, given the properties within the area predominantly have pitched roofs finished in slate and rendered external walls.

The extension proposed would also be of a greater scale than the existing dwellinghouse with the proposed footprint of the extension being more than double the internal footprint of the existing dwellinghouse and as such, the extension would not form as a subservient or a well-integrated addition. Proposals would see the dwellinghouse and ancillary outbuilding joined together which again would also be architecturally different to the character and form of existing built development within the surrounding area. The proposed extension and its proposed attachment to the existing outbuilding would as a result of its scale, proportion and siting, not be a sympathetic and would instead appear as an overly dominant and incongruous addition to existing character of the house, and the surrounding area. Consequently, as dominant and incongruous, the extension and its associated overhang would be harmful to the character and appearance of the house and to the character and appearance of the rural landscape area.

Previous grants of planning permission form as a material consideration in the determination of planning applications. Planning permission was previously obtained for the erection of an extension under (ref: 05/00832/FUL) at 9 Newmains Holding. The proposal has not been implemented. The extension approved formed as development which adjoined the existing house and outbuilding together and was of a similar form to proposals subject to this application. This application does however date back some 20 years ago, where proposals were assessed under a completely different development plan.

The proposed flue would be positioned on the flat roof of the proposed extension and would be some 2.5m in height above the existing extension which would be some 3m in height. The flue would therefore be readily visible from the public road. Owing to its total height and position between two existing buildings, it would appear as a visually intrusive addition. By virtue of its architectural form, size and position, the proposed flue would be harmful to the character and appearance of the house and the immediate area.

The Council's Senior Environmental Health Officer has been consulted on the application and has responded with no comment.

The Council's Road Services advise that whilst the proposal significantly increases the size of the total dwellinghouse, proposals would only result in one additional habitable room. As the driveway is large enough to accommodate two cars as well as turning space, proposals are considered acceptable, subject to the use of the outbuilding remaining ancillary to the domestic dwelling. A condition can therefore be placed on any grant of planning permission restricting the outbuilding from being used for commercial or business purposes. Subject to the imposition of this condition on any grant of planning permission, proposals would be compliant with Policy T2 of the ELLDP 2018.

Policy 6 of NPF4 and Policy NH8 of ELLDP 2018 both have a strong presumption in favour of tree retention. As a result of proposals, a staghorn shrub and some hedging within the curtilage of the property are proposed to be removed. Given the hedging along the boundary of the site and the three mature trees within the driveway area of the curtilage make a greater contribution to the character of the area and these are identified as being retained, the loss of the staghorn shrub and some hedging within the curtilage would not be a significant loss, particularly given additional planting is proposed as part of this application. Proposals are therefore compliant with Policy 6 of NPF4 and Policy NH8 of the ELLDP 2018.

Overall and based on the whole scheme of development as proposed, proposals would be inappropriate in terms of their scale, proportion and siting and would therefore be contrary to

policies 14 and 16 of NPF4 and Policy DP2 and DP5 of the adopted East Lothian Local Development Plan 2018. No material considerations outweigh this conflict with the development plan.