

CONSERVATION TEAM CONSULTATION APPLICATION RESPONSE

APPLICATION REF:	25/01581/FPH & 25/01582/LBC
CASE OFFICER:	VW
APPLICATION SITE:	188 Park Lane, Old Knebworth, Knebworth, Hertfordshire SG3 6PS
DESCRIPTION OF WORKS:	Replacement rear French doors. Single storey extension to existing detached garden room to facilitate office space. Replacement rear French doors and internal alterations.

RECOMMENDATION:
Await clarification regarding corner stack and potential changes to side-light proposal.
Before giving a recommendation.

SHORT SUMMARY:

Impact on listed building's special character and its setting

The internal and external alterations will have a small impact upon the building's special character.

Impact on character or appearance of the Old Knebworth Conservation Area.

The extension to the existing detached garden room will have a small impact upon the CA's appearance.

Harm, preserve or enhance.

The sidelights and truncating the corner stack will have a mildly erosive impact on the building's special character.

SITE CONTEXT:

Nos.188 and 190 Park Lane are grade II listed and are located within the Old Knebworth Conservation Area. The building and the area are Designated Heritage Assets for the purpose of applying the aims of Section 16 of the NPPF. The building was added to the Statutory List of Buildings of Special Architectural or Historic Interest on 14 January 1977, and the list entry is at the following link whilst the photo below was taken in 1988:

<https://historicengland.org.uk/listing/the-list/list-entry/1102729?section=official-list-entry>



As noted in the list entry, this pair of cottages was designed by Sir Edwin Lutyens for the Earl of Lytton. The submitted Design and Access Statement says:

"The internal wall between the kitchen and lounge is loadbearing. A steel beam will be installed to support the above structure" and "The internal wall removal retains the majority of the original layout and character. No harm will be caused to historic fabric."

The Arrangements for handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England)

Direction 2021 requires notification to Historic England and National Amenity Societies in certain cases (see link below):

https://assets.publishing.service.gov.uk/media/60803b93d3bf7f01357512ac/Arrangements_for_handling_heritage_direction_2021.pdf

Notice of applications for listed building consent and of the decisions taken by local planning authorities must be given to Historic England in the case of **relevant works** in respect of any grade II (unstarred) listed building - see 4(a)(ii) and to the National Amenity Societies for works for the alteration of a listed building which comprise or include the **demolition of any part of that building** – see 4(b)(bb). Relevant works include:

*(iii) works for the alteration of any principal building which comprise or include the demolition of all or a **substantial part of the interior of the principal building**.*

For the purposes of sub-paragraph (iii) the following applies:

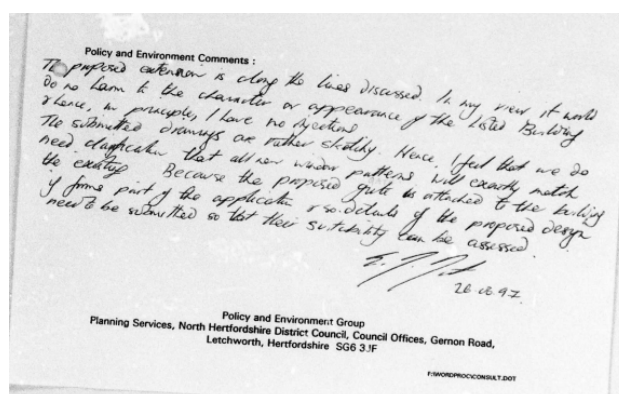
*(b) a proposal to demolish any principal internal element of the structure including any staircase, **load-bearing wall**, floor structure or roof structure is treated as a proposal for the demolition of a **substantial part of the interior**.*

In my view, Historic England and the National Amenity Societies ought to have been consulted and considering that the building is also designed by Sir Edwin Lutyens for the former Earl of Lytton, I also consider that The Lutyens Trust should probably have been consulted also.

DETAILED ANALYSIS AND CONSIDERATIONS:

Replacement rear French doors.

The single-storey, rear extension was granted consent/permission under application refs: 97/00601/1LB and 97/00664/1HH (see approved drawing below). The doors were afforded the same detailing as the host building with the Principal Conservation Officer at the time stating that *'all new window patterns will exactly match existing'*.

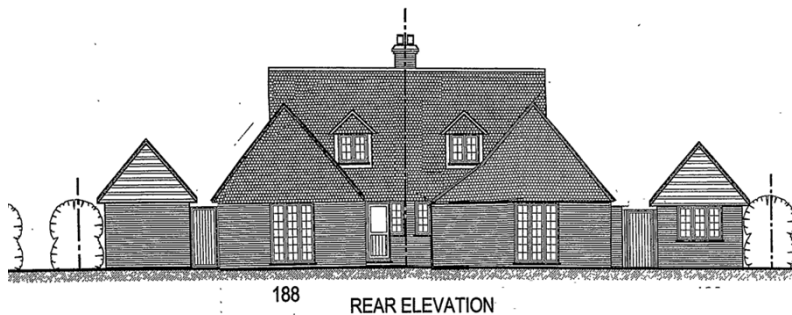


What currently exists is either what was originally implemented, thus not in accordance with the approved plans or these doors are plain glazed replacements without the benefit of listed building consent.



Had it not been for the fact that the host building is Lutyens-designed I may have been slightly less concerned with the proposed sidelights, but it is important that alterations / additions are sympathetic and maintain the quality of Lutyens' work.

A further confusion arises when looking at the rear elevation of a drawing prepared for 190 Park Lane under ref: **03/00167/1LB - Single storey rear extension following demolition of existing lean-to extension and detached store. Detached garage to side of dwelling (as amended by plan nos. CM 190/4 and 6 received 29/08/2003 and plan nos. 5A, 7A and 8 received 25/09/2003)**. I can only assume that this was not an accurate depiction of no.188 at the time otherwise the existing French doors certainly post-date 2003.



Although the proposal will not result in the loss of historic fabric, the opening-up of this aperture with wide sidelights will, in my opinion, have a mildly erosive impact on the listed building. A far better arrangement and a good compromise that would allow more natural light, would be to reinstate French doors with glazing bars and perhaps narrower, half-height sidelights with window sills.



3.3.1 - Rear Doors - External View



Internal alterations

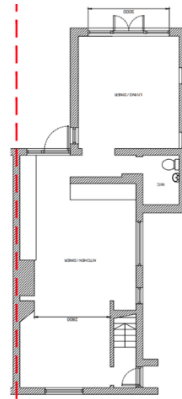
I note that the wall proposed to be removed is a load bearing one and forms part of the building's original construction.



3.2.1 - Internal View from Kitchen



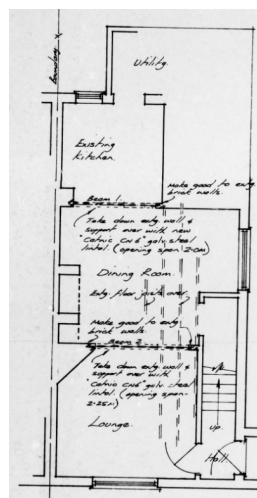
3.2.2 - Internal View from Lounge



The wall in question is one of the two internal walls that was granted listed building consent in 1985 (see below) and if a material start was made to that consented scheme, then procedurally it may be concluded that this opening-up work has the benefit of an extant consent.

- **85/00922/1LB - Removal of two internal walls.**
CON 24.07.1985

The following is noted in the Conservation Officer's comments below:



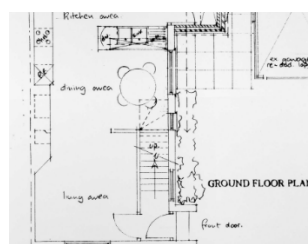
DEVELOPMENT CONTROL	
TO: Graham Haerle	FROM: M.K. MILLER
COPIES:	DATE: 25th June 1985
YOUR REF:	MY REF: MCM/EIR/M.1/10 1/922/85(657)LB
SUBJECT: Proposed internal alterations at 188 Park Lane, Knebworth	

This property is one half of a semi-detached pair designed by Sir Edwin Lutyens in 1903. Essentially this and its fellow is a simple estate cottage with a conventional plan with small square rooms on the ground and first floor. The kitchen appears to be part of an extension made by the Knebworth Estates about 30 years ago.

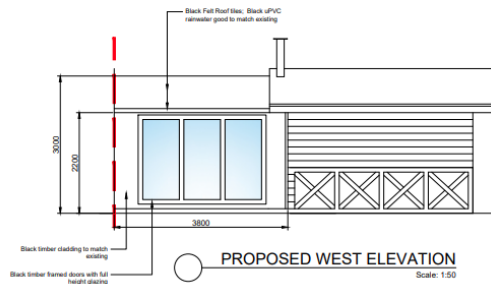
The character of this pair of cottages essentially rests with its exterior. The plan is conventional and shows none of the architectural ingenuity which Lutyens manifested on his larger commissions. Nevertheless since the character of such an estate cottage is partly derived from its small cellular rooms listed building consent is, in my opinion, necessary for the opening out of the ground floor. I cannot see any objection to consent being granted and in my opinion the taking down of the existing walls is allied to the alteration of the building and does not constitute demolition of any significance.

M.K. Miller
M.K. Miller

Although the loadbearing wall was consented to be removed in 1985, the corner stack remained intact on the ground floor. In the 1997 scheme the corner stack is shown truncated, and a material start was made to that consented scheme so works to the stack are consented. If the stack remains intact and considering that I have not been to site or seen a photo of the corner stack I am currently unable to say whether harm would be occasioned to this listed building.



Single storey extension to existing detached garden room to facilitate office space.
This is considered unobjectionable.



HERITAGE POLICY ASSESSMENT:

Planning (Listed Building and Conservation Areas) Act 1990:
Sections 16(2) (LBC only), 66(1) (FPH only) and 72(1) (both)

North Hertfordshire Local Plan 2011-2031:
Policy HE1

NPPF (December 2024):

The following paragraphs are relevant:

- **135 c)** (*sympathetic to local character and history, including the surrounding built environment*),
- **207** (*local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting*)
- **210** (*desirability of new development making a positive contribution to local character and distinctiveness*),
- **212** (*great weight should be given to the asset's conservation*),
- **213** (*clear and convincing justification*), and
- **215** (*harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*).

CONCLUSION:

Seek alterations, particular to rear elevation of 1997 addition.

OFFICER: Mark Simmons

DATE: 26/08/2025