

CONSERVATION TEAM CONSULTATION APPLICATION RESPONSE

APPLICATION REF:	25/01892/FPH & 25/01893/LBC
CASE OFFICER:	HT
APPLICATION SITE:	190 Park Lane, Old Knebworth, Knebworth, Hertfordshire SG3 6PS
DESCRIPTION OF WORKS:	Replacement of 9 existing timber frame windows with double glazed white flush timber casements.

RECOMMENDATION:

I raise an **OBJECTION** for the following reason (FPH):

Nos.188 and 190 Park Lane are grade II listed and are located within the Old Knebworth Conservation Area. They were built in 1903 by eminent internationally renowned architect Sir Edwin Lutyens for the Earl of Lytton. Several of the original windows are considered repairable or subject to a convincing justification, replaced with well-detailed new windows. Although more thermally efficient, it is considered that by reason of the 28mm double-glazing system and using applied glazing bars with a spacer between and where the internal profile does not match the existing windows, the proposed windows will fail to respect the listed building's special character. Being set back from the road, the replacement windows will have no discernible impact upon the appearance of the Old Knebworth Conservation Area. The proposal will, however, be contrary to the provisions of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed windows will also not satisfy the aims of Section 16 of the NPPF and Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

*** Change Section 66(1) to 16(2) when setting out the R for R for ref: 25/01893/LBC.*

SHORT SUMMARY:

Impact on building's special character

The proposal will have a small impact upon the listed building's special character.

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

The proposal will have a small impact upon OKCA's appearance.

Harm, preserve or enhance.

There would be a small amount of harm occasion to the LB's special character.

SITE CONTEXT:

Nos.188 and 190 are grade II listed and are located within the Old Knebworth Conservation Area (OKCA). Both 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 is as follows:

Semi-detached pair of houses. 1903 by Sir Edwin Lutyens for the Earl of Lytton. M-fronted house. 2 storeys. 2 weatherboarded gable ends, the rest of the house in red brick. Plain tile

steeply pitched roofs with a central red brick chimney stack. 3- light glazing bar casements. Tiled eaves. (Lutyens Arts Council Catalogue, 1981).

DETAILED ANALYSIS AND CONSIDERATIONS:

First and foremost, the replacement windows do not, in my opinion, require householder planning permission and this proposal could have been submitted as an application for LBC only. Next, as stated in the list entry this is a Lutyens-designed building, and it does not appear that The Lutyens Trust has been consulted.

A single-storey extension and garage were granted and implemented under refs: 02/01897/1HH & 03/00167/1LB. The rear of the dwellings was approved as per the image below. In my opinion, this achieved a relatively well-balanced composition with appropriate fenestration.



The rear fenestration of the single-storey rear extension appears to have changed from the small-pane doors as shown on elevations drawings up to 2008, to modern glazed doors with no small-panes as indicated on the proposed part rear elevation submitted in 2009 (see below). The rear elevation of the later rear extension does not, however, form part of this proposal.



Some of the windows are original and I copy the images from the submitted Design, Access and Heritage Statement below.



The HE guidance below describes that assessing the significance of a window and understanding the contribution it makes to the significance of the building is the key first step in deciding the correct approach to any alterations or upgrading. Where historic fenestration survives, HE explains that it is often an irreplaceable resource that should be conserved and repaired wherever possible. It describes how to determine the architectural

and historic significance of windows so that decisions about altering them can be made in an informed way.

Historic England guidance entitled 'Traditional Windows: their care, repair and upgrading' published in 2017.

At page 6 of this guidance it states:

*"The pressures that threaten traditional windows come from many different sources. Probably the most significant of these is the replacement window industry that relies on PVC-u windows for almost all of its business. The industry has invested heavily in marketing over a long period and as a result has persuaded many homeowners that their old timber windows are rotten, draughty, and beyond economic repair, **whereas in most cases minor repairs and some upgrading would have allowed them to remain fit for purpose and serviceable for years to come.**"*

At page 54 of this guidance it states:

"If used in multi-paned windows, IGUs will generally be less efficient than secondary glazing since even the most efficient units will not overcome thermal bridging through the frame and glazing bars....".

Further on, Historic England's general approach to the alteration or replacement of windows is set out below:

1. Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair, they should be replaced with accurate copies.

2. Where historic windows have already been replaced with windows whose design follows historic patterns, these usually make a positive contribution to the significance of listed buildings. When they do, They should therefore be retained and repaired where possible. If beyond repair, they should be replaced with accurate copies.

3. Where historic windows or replacement windows of historic pattern survive without historic glass it may be possible to introduce slim-profile double-glazing without harming the significance of the listed building. *There are compatibility issues to consider as the introduction of double-glazing can require the renewal of the window frame to accommodate thicker glazing, thereby harming significance. These issues are covered in Section 4 of this guidance.*

4. Where historic windows have been replaced with ones whose design does not follow historic patterns, these are unlikely to contribute to the significance of listed buildings. Replacing such windows with new windows of a sympathetic historic pattern, whether single-glazed or incorporating slim-profile double-glazing, may cause no additional harm. *It also provides an opportunity to enhance the significance of the building, which is the desired outcome under national policy.*

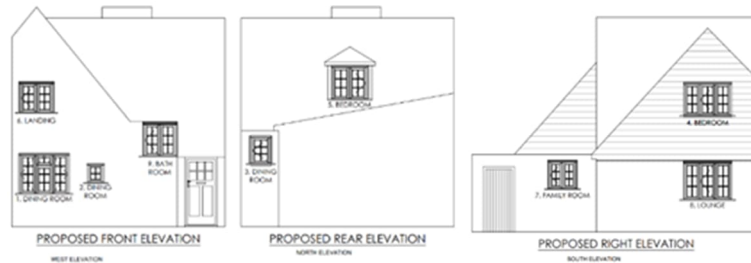
5. Where a new window or re-glazing is agreed, the reflective properties of secondary and double-glazing as compared to modern, polished single-glazing, do not usually harm the significance of the building. But when new multi-paned windows are proposed, the desirability of reproducing broken reflections by individually glazing each pane should be considered. Where the aesthetic value of the building is high, then the impact on the whole of the relevant elevation should be considered, including the desirability of accurately matching other windows.

**Guidance on Alterations to Listed Buildings
IHBC Toolbox Guidance Note GN2021/1 - January 2021**

At 4.3.5 it states: **"Applied glazing bars to the surface of windows or sandwiched between panes of double-glazing are generally inappropriate. Secondary glazing may be acceptable**

subject to careful location of the framing elements so as not to be disruptive to the visual appearance when seen from the exterior."

I met with the applicant on site on 1 October to assess the quality of the existing joinery and ironmongery. As noted on the proposed elevations below, there are 3no. 3-light windows, 4no. double-casements, 1no. 6-pane casement and 1no. quarter-pane casement.



In my opinion, all but windows 1 and 7 are original to Lutyens design with extruded sash ovolo type internal glazing bars and black monkey-tail latches. Please note the following:

- I raise no objection to the replacement of windows W1 and W7 (which are later replacements) with well-detailed slimlite windows.
- The design of replacement window 1 could be improved by omitting the top-hung light.
- It would appear that the annotation for windows 6 and 9 on the Proposed Elevation drawing are the wrong way round.
- Window 3 is a 9-pane as shown on the Existing Elevation whilst on the Proposed Rear Elevation it shown as a 6-pane window. I don't think the applicant was intending changing the size of this opening and the 6-pane proposal may be an error.
- There is not a particularly well-justified case for replacing original windows 2, 3, 4, 5, 6 (bathroom not landing), 8 & 9 (landing not bathroom). As I see it, window 2 (quarter-pane to dining), 3 (9-pane to kitchen) and 9 (landing) could readily remain

in-situ and I am unconvinced that double-glazing these windows will significantly impact upon the building's ability to retain heat and should not have a particularly significant impact upon living conditions.

- The question is whether there is a case to replace original windows 4, 5, 6 (bathroom) and 8 to habitable rooms? Subject to an improved detailed-design I may be prepared to look at this further although the applicant has said that the internal shutters to window 8 do have heat-retaining properties.

The proposed windows have what I would regard as industry-standard 28mm wide dgu's and applied or bonded glazing bars with a spacer bar between. In other words, these would not be slimlite glazed windows with 'through' glazing bars. These two aspects of window design would occasion harm to the listed building's special interest.

HERITAGE POLICY ASSESSMENT:

Planning (Listed Building and Conservation Areas) Act 1990:

Sections 16(2), 66(1) and 72(1)

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:

In my opinion, these are the options available:

- Refuse Householder Planning Permission and Listed Building Consent leaving the applicant with the option to appeal (having met with applicant I was under the impression that there would not be an appetite to challenge at appeal, but this could change).
- Seek withdrawal of both applications.
- Where necessary consider repairing windows 2, 3, 4, 5, 6, 8, and 9 then supplementing these with secondary glazing (not requiring LBC).
- Encourage the applicant to resubmit an application for LBC for better-detailed windows excluding windows 2, 3 and 9 and if successful, perhaps implementing these in a phased approach allowing for any budget implications due to the increased cost of bespoke timber joinery with individually glazed panes.

OFFICER: Mark Simmons

DATE: 01/10/2025