

Heritage Statement in support of Listed Building Consent for UPVC Windows at Keepers Cottage, 2A Orchard Way, Breachwood Green.

A) Section 1 consideration of Statutory Listing Criteria

A.1) The formal Historic England listing for Keepers Cottage.

Heritage Category: Listed Building

Grade: II

List Entry Number: 1102442

Date first listed: 08-Feb-1988

Date of most recent amendment: 07-Nov-2023

List Entry Name: Keeper's Cottage

Statutory Address 1: Keeper's Cottage, 2a Orchard Way, Breachwood Green, Hitchin, SG4 8NT

Reasons for Designation

Keeper's Cottage is listed at Grade II for the following principal reasons:

Architectural interest:

* for the architectural quality of this vernacular cottage, built in the C17 or earlier; * for the high proportion of survival of the historic plan form and historic fabric, sensitively extended in the late C19 and C20, and renovated in the late C20 prior to listing.

Historic interest:

* for the historic role this former game keeper's cottage played in supporting the historic deerpark of Kingswalden Park, around 730m to the north-east.

Group value:

* it forms an important historic group with nearby listed buildings of the same period, including Hillside Farmhouse, Old Hill Farm, and 11 and 13 Lower Road (each listed at Grade II).

History

Keeper's Cottage was constructed in the C17 or earlier, as is evidenced by its historic planform, timber-framed structure and brick chimney stacks. It is located around 730m south-west of the historic deer park of Kingswalden Park, a well-timbered former deer park of around 190 acres. The name of the cottage and its close proximity to the historic park suggest it played a support function for the estate, likely as a game keeper's house. Most of the cottages in the parish belonged to the estate and housed its many workers; several cottages still retain the professions of their occupants in their name, such as Buffer's Cottage, Laundry Cottage, The Bothy and Keeper's Cottage. At one time there were as many as eight game keepers tending the pheasants and other wildlife on the estate. The 1851, 1861 and 1881 censuses document game keepers living at Breachwood Green, possibly at Keeper's Cottage.

Keeper's Cottage may have originated as a two-unit cross passage house, with a heated room to the south-west side, a stair winding around the fireplace, and an unheated room to the north-east side to which a subsidiary fireplace was later added (no longer present). Its roof was likely originally thatched, as evidenced by the brick spurs of the chimneystack and exposed rafter ends to the rear. The footprint of the building is shown on the 1881 Ordnance Survey map, rectangular on plan with a single-bay projection to the rear (what is now the pantry). By the time of the 1898 OS map the rear projection appears to have been extended to its north-east side with a two-storey extension (now the breakfast room and bathroom over). It was extended again to the east side around 1910 with a single-storey lean-to (now containing the kitchen, utility room and WC), and this extension is depicted on the 1924 OS map. The cottage underwent some renovation in the late 1970s, and the western gable was underpinned at that time. A single-storey porch was added to the front of the cottage around 1979, and the cottage was listed at Grade II in 1988. A single-storey garage was added to the south-west side in 1989, and this was converted to living accommodation in 1997 (both with planning permission and listed building consent).

A.2) Discussion of Details of The formal Historic England listing for Keepers Cottage.

Cottage, built in the C17 or earlier, extended around 1890, 1910, 1979, and 1989.

MATERIALS: the roofs of the cottage and extensions have a red plain-tile covering, and the timber-framed walls are faced in brick and roughcast.

PLAN: the house is roughly rectangular on plan, aligned north-east to south-west, and faces south-east to Lower Road. Extensions were added to the north-east side of the rear elevation around 1890, to the north-east side around 1910, to the front around 1979 and to the south-west side around 1989.

EXTERIOR: the two-storey three-bay cottage has a pitched plain-tile roof with a pair of tall, diagonal, red-brick axial chimneys slightly left of centre, having brick spurs to their bases and corbelled caps. The front slope has a lower red brick internal chimney to its north-east end. The walls are constructed of brick and roughcast over a timber frame. The first floor has three bays of recessed, wooden two-light casement windows, each of four panes, and the ground floor has two bays of two-light casement windows, each of nine panes, the ground floor window openings being segmental arched. The sills are of timber applied over brick. A single-storey gabled porch was added to the central bay around 1979, built of red brick with a plain-tile roof, and contains a six-panel door with glazing to the two top panels, and a glazed four-paned window to each side of the porch. A two-bay single-storey garage extension was added to the south-west side around 1989 and converted to living accommodation around 1997. The north-east side of the cottage has a single-storey lean-to extension, added around 1910, with a plain-tile roof, roughcast walls and casement windows. The north-east side of the rear elevation has a two-storey gabled extension, added around 1890, with two-light casement windows to the first floor, each of eight panes, and a row of three casements to the ground floor, each of four panes. A single-storey lean-to projects from the centre of the rear elevation with a plain-tile roof; it has a four-paned casement on its south-west side, now inside the lean-to sunroom which was added in the late C20 and extended to connect to the garage around 1997. Over the sunroom, the first floor of the cottage has a small four-paned casement window. The wooden casements of the extensions imitate those of the earlier cottage.

INTERIOR: the interior of the cottage likely had a two-unit cross passage plan, and was later altered and extended. The lobby has applied joists over the entrance (nailed into place), and has a straight stair rising along the north-east side of the axial chimneystack to the first floor. The door surround from the lobby shows evidence of reuse from elsewhere, including an empty brace socket on its north side. To the north of the door opening, the stair rises past a blocked pointed-arched door opening with plain chamfered spandrels, indicating reconfiguration of the stair.

South-west of the lobby, the sitting room has a substantial chamfered beam with a lamb's tongue moulded stop over the fireplace. The joists are exposed with carpenters' marks and lamb's tongue stops; some of the joists appear to be machine-cut later replacements. A large inglenook fireplace occupies the centre of the north-east wall, with a chamfered wooden bressummer over and a stop on the south end. The fireplace is rendered and contains two slate-covered benches.

North-east of the lobby, the dining room has an exposed beam, chamfered on its south side; empty sockets and plug holes on its downward face suggest it has potentially been reused from elsewhere. The exposed joists are hand cut. Brick infill to the south side of the doorway appears to be of late C20 construction or reconstruction.

To the rear, the breakfast room likely constructed around 1890 retains a wooden door surround to the former single-bay rear projection (now the pantry). The single-storey extension to the north-east added around 1910 was renovated in the late 1970s to provide a kitchen, utility room and WC.

From the lobby the straight stair rises alongside the north-east side of the chimneystack, the brickwork of which appears to have been reconstructed in the late C20. At the top of the stair, exposed wooden partitioning to the north-east side appears to have been reused from elsewhere. The south-west bedroom retains exposed box framing, likely originally open to the roof and with a ceiling inserted in the late C20. The timber framing on the north-east wall looks most recent, and retains carpenters marks. The walk-in wardrobe off the north-east side has exposed timber framing on its north-east wall. The north-east bedroom has a central chamfered beam and the south-west end rests on a jowl post which shows evidence of reuse or reworking. The north-east wall retains two inbuilt cupboards. The late-C19 extension to the rear does not retain any historic features of interest. A high proportion of ledged wooden doors survive throughout the interior and are likely of late C19 or early C20 date."

Our case for UPVC double glazing at Keepers Cottage.

1) The current windows play no part in the essential criteria for listing of Historical interest or architectural interest quoted above in the formal Historic England listing.

Architectural interest:

* for the architectural quality of this vernacular cottage, built in the C17 or earlier; * for the high proportion of survival of the historic plan form and historic fabric, sensitively extended in the late C19 and C20, and renovated in the late C20 prior to listing.

Windows having been replaced during the renovation paid for under a renovation grant by NHDC in 1978 are not original fabric, therefore replacing these windows will have no impact on the Architectural Historic fabric of the building.

Historic interest:

* for the historic role this former game keeper's cottage played in supporting the historic deerpark of Kingswalden Park, around 730m to the north-east.

In addition the listing criteria have changed

The principles of selection for Listed Buildings were updated on 30th January 2025. Section 16 provides the statutory criteria:

"16. The Secretary of State uses the following criteria when assessing whether a building is of special architectural or historic interest and therefore should be added to the statutory list:

Architectural interest:

To be of special architectural interest, a building must be important in its design, decoration, or craftsmanship. Special interest may also apply to particularly significant examples of building types or techniques (e.g., buildings displaying technological innovation or virtuosity) and significant plan forms. Engineering and technological interest can be an important consideration for some buildings. For more recent buildings, particularly, the functioning of the building (to the extent that this reflects its original design and planned use, where known) will also be a consideration. Artistic distinction can also be relevant to the architectural interest of buildings and objects and structures fixed to them.

Historic interest:

To justify special historic interest, a building must illustrate important aspects of the nation's history and/or have closely substantiated historical associations with nationally important individuals, groups, or events; and the building itself, in its current form, will afford a strong connection with the valued aspect of history."

Keepers Cottage does not have historical associations with nationally important individuals, groups, or events. The building itself has been modified significantly since being built in the 1750s, including a full renovation before listing in 1979 with the aid of a local government grant.

Additionally, the *Domestic 1: Vernacular Houses* listing selection guide published on 4th December 2017 (Historic England) supports this view. It defines a cottage as:

"1.6 Other vernacular house types – Cottages. Cottages, the dwellings of some of the poorest in society, are documented throughout the Middle Ages and beyond. Huge numbers were built in the eighteenth and nineteenth centuries as the population grew, notably in villages and on commons and waysides where manorial control was weak (places sometimes called 'open villages'). These were typically of just one or two bays, single-storeyed, perhaps with an end-chimney heating one room, and typically highly vernacular in character, having been constructed on a self-build basis from materials locally to hand."

This clearly supports the view that the windows at Keepers Cottage does not comply with the Architectural criteria of Section 16 of the revised principles of selection for listed buildings, updated on 30th January 2025, due to its lack of architectural interest. The design, decoration, and craftsmanship of the building do not meet the necessary criteria; and, in particular, the windows were not created by the local craftsmen in 1750 and are not original.

The *Domestic 1: Vernacular Houses* listing selection guide continues to state in Section 2.10: “*Historical associations:* By their nature, most vernacular houses have no documented association with well-known historical figures. In a minority of cases, however, such associations do exist. Frequently, they relate to the birthplace of someone who later (usually elsewhere) achieved fame. In such cases, such as Isaac Newton’s birthplace at Woolsthorpe Manor, Lincolnshire (listed Grade I), there is often a powerful contrast (and corresponding emotional charge).”

Based on this description, the windows of Keepers Cottage are not associated with a historically important person and therefore does not comply with the historical criteria of Section 16 of the revised principles of selection for listed buildings, updated on 30th January 2025.

B) Reasons for permitting UPVC windows at Keepers Cottage against the criteria of Settings

The setting of heritage assets provides guidance on:

“This note gives assistance concerning the assessment of the setting of heritage assets, given: the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings, and the policy objectives in the NPPF and the PPG establishing the twin roles of setting: it can contribute to the significance of a heritage asset, and it can allow that significance to be appreciated. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the heritage asset’s conservation, including sustaining significance (NPPF, paragraph 132). This note therefore starts by giving general advice on understanding setting and how it may contribute to the significance of heritage assets, before adding advice on how views play a part in setting; it ends by suggesting a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets (Part 2, paragraphs 17–42).”

Keepers Cottage has been significantly affected by changes to its setting since the listing designation as follows:

1. Decision on 13th October 2023 made by the Parliamentary Under Secretary of State for Local Government and Building Safety, Lee Rowley, on behalf of the Secretary of State for Levelling Up, Housing and Communities, and by Parliamentary Under Secretary of State for Roads and Local Transport, Richard Holden MP, on behalf of the Secretary of State for Transport, to increase the number of permitted flights at London Luton Airport, particularly Section 19, which states: “Taking all of these considerations into account, the Secretaries of State conclude that noise generated by the proposal would cause moderate harm to the quality of life of people in the area around London Luton Airport.”
2. Decision by NHDC to approve planning permission at the adjoining property to the West of Keepers Cottage at 30 Lower Road, without consultation with the adjacent owners of Keepers Cottage (see letter from NHDC, Ref 8).
3. Decision by North Herts District Council that the boundary/curtilage fence owned by Settle, a social housing organization, between Keepers Cottage and the adjacent boundary, did not need to be maintained and was not a planning issue (see Ref 9 and photo 4).
4. Decision by SoS for DFT to permit the next round of expansion of Luton Airport on 4th April 2025 overriding the objections of the Planning Inspectorate.

Previous impacts on the setting of Keepers Cottage that were not considered in the previous decision to retain Keepers Cottage on the Listed Buildings list:

1. Keepers Cottage has been surrounded by developments since the 1960s. The original address was 20 Lower Road, but there is no direct access from Lower Road. A new road, Orchard Way, was formed in the 1960s, which lies to the south and west of the property, but again with buildings between Keepers Cottage and Orchard Way (see photos below).

- Photo 1: View of Keepers Cottage from Orchard Way from the west.



- Photo 2: View of Keepers Cottage from the south/west on Orchard Way. It appears that the solar panels on 2B Orchard Way are attached to Keepers Cottage.



Photo 3: View of Keepers Cottage from the south of Orchard Way.



C) Relevant Local Decisions

Demolition of Winch Hill Farmhouse, NHDC LBC 18/03263/LBC. The viability report states: “The overriding issue with any such re-use is the challenge of being so close to the airport. This impacts the desirability of the property and therefore its viability, particularly through noise issues.” The owner, LLAOL, an organization with significant turnover, was granted permission to demolish the property. Historic England supported the demolition (see 18/03263/LBC | Demolition of Winch Hill Farmhouse).

D) By default NHDC have permitted other listed buildings in Breacjwood Green to be fitted with UPVC double glazing.

D.1) NHDC have been advised of, and provided photographs of, and documentation pointing towards the fitting of UPVC double glazing and other replacement windows without Listed building consent in many Grade II Listed properties in Breachwood Green, but have taken no action. Therefore NHDC planning department have by their lack of action approved other properties having replacement windows. Furthermore, at the Planning Hearing Shaun Greaves is on record as stating that he would prefer UPVC double glazing to be installed at Keepers Cottage, rather than the property falling to disuse.

E) Mitigating Factors

E.1) Keepers Cottage was selected by Luton Airport, which is approved by the DFT as the competent body to monitor noise and create noise profile maps, for the installation of noise insulation in March 2022, in accordance with the noise levels agreed with the Planning Inspectorate

as being harmful. This significantly affects the setting of the property both during the day and at night (see letter from Luton Airport dated 15th March 2022, Ref 5).

E.2) NHDC is a member of the London Luton Airport Consultative Committee who chose the property for noise insulation and who specify the work. The Airport have confirmed that under the Noise Insulation scheme no wooden windows have been fitted to any listed buildings, and therefore NHDC is a party to not installing wooden windows to Listed buildings under the scheme to protect its residents.

E.3) Luton Aiport have stated that they treat all properties equally under the noise insulation scheme, irrespective of if they are listed buildings, this is confirmed in a formal response from Luton Airport to our MP on 24 March 2025 letter from Nicole Prior to Alistair Strathearn in which she confirms that the work can only be undertaken by a contractor of the airport under the compensation scheme and that we are directed to apply for Listed building consent to be covered by their scheme which the council have approved and which the Department of Housing and Local Government states Luton Airport is the responsible body for organising.. Clearly as NHDC is a member of the consultative committee that runs the noise insulation scheme, then NHDC agree with this reasoning and have therefore determined that all properties should be treated equally under the noise insulation scheme and therefore should all benefit from UPVC double glazing for noise insulation.

E.4) The SoS confirmed in their Purchase Notice decision that there was no residual beneficial use of Keepers Cottage due to the noise from London Luton Airport (see Ref 6).

E.5)The onerous requirements of the local council make installing timber framed double glazing virtually impossible and certainly unaffordable for a property that the SoS declares to have 'an arguable position as being of zero residual benefit'. The SoS instructed NHDC to issue listed building consent for timber-framed slim-line windows, but NHDC has applied conditions beyond those specified by the SoS (see letter from NHDC, Ref 7); and indeed we have been told that the specifications required by NHDC for Keepers Cottage are well beyond those required for other similar Listed properties in North Hertfordshire. Being overshadowed by the ever expanding airport although based in Luton, less than a mile and a half away, in direct line with the runway makes Listed Buildings in Breachwood Green a special case.