

**APPENDIX D**  
**Results of public consultation**  
**(4 February to 4 March 2011)**





HERTFORDSHIRE CHAMBER  
OF COMMERCE & INDUSTRY

Mark Simmons  
Senior Conservation Officer  
North Herts District Council  
Gernon Road  
Letchworth Garden City  
Hertfordshire  
SG6 3JF

11<sup>th</sup> February 2011

Dear Mr Simmons,

### **Knebworth Conservation Area**

I write concerning the proposed amendments to the Knebworth Conservation Area and, in particular, to express my concerns about the impact they will have on the business operation at Knebworth House. Whilst accepting the need to protect the area for future generations I believe the impact of the measures being proposed not only exceed what is required but are also likely to introduce unintended consequences if implemented.

As you know the Lytton-Cobbold family have done a tremendous amount to retain the house and park for the benefit of future generations as well as contributing in many other ways to the wellbeing of the locality. With the best will in the world little of what they have achieved would have been possible without them being able to run a successful business which largely, although not exclusively, revolves around the Barns.

In the current economic climate, and in the face of ever increasing challenges, it is essential that businesses are not weighed down by regulation that only serves to be time consuming and expensive. I respectfully suggest that the proposals as they affect the Barns compound and car park and an area around St Mary's church which includes trees at the top of the entrance avenue fall into this category.

The impact on the business of these proposals will undoubtedly be significant as it seeks to combat the above challenges. Indeed, the resultant costs and demands upon management time each time they need to react to prevailing circumstances will only serve to be an unnecessary barrier to business survival. The unintended consequences will therefore inevitably impact on its ability to increase employment and to retain the income needed to maintain the fabric of the House and Park.

Given the families record in conserving the amenity of the area I am of the view that the risks arising from the proposals as they stand far outweigh the level of protection they offer and accordingly would ask that they be reconsidered.

Yours sincerely,

Tim Hutchings  
**Chief Executive**

**N:H:D:C.**

**15 FEB 2011**





# KNEBWORTH ESTATES

KNEBWORTH HOUSE, KNEBWORTH,  
HERTFORDSHIRE, SG3 6PY

Tel: 01438 - 812661 Fax: 01438 - 811908

E-mail: [info@knebworthhouse.com](mailto:info@knebworthhouse.com) Web Site: [www.knebworthhouse.com](http://www.knebworthhouse.com)

Mark Simmons  
Senior Conservation Officer  
North Herts District Council  
Gernon Road  
Letchworth Garden City  
Hertfordshire SG6 3JF

14<sup>th</sup> February 2011

Dear Mark,

Thank you for your letter of 27 January 2011.

Firstly I apologise for my use of the word "wrong" in my letter of 15 December 2010 – I appreciate that there is a level of subjectivity in these considerations.

Old Nursery School Play Area and Car Park: I raised the issue of the Old Nursery tarmac car park and disused play area because in the boundary changes proposed by officers in 2008 it had been excluded. I am disappointed to see it back in. The former school does indeed "present an attractive frontage" but the disused play area is some distance away, out of village sightlines, and no longer associated with the building. This orphaned area needs a sustainable use rather than conservation.

St Mary's Churchyard: You acknowledge that the closed churchyard is a "robust" boundary, but suggest you have chosen our park road as providing a more rational boundary when considered with the inclusion of the Barns car park. I do not see this – when there is such a short distance from the road to the churchyard fence at the north-west corner of the graveyard (we have a low fence joining the two). However, if we can reason with you to exclude the Barns and its car park, I trust this will remove your rationale.

In regard to the trees of our Entrance Avenue that the new *proposed* boundary dissects. You say "there are no specific policies covering work to the trees" in this area. We disagree. This was a core argument of the debate for the exclusion of Knebworth Park, for which we received a number of letters of support (as a reminder, I attach a selection of these). The Park carries a heavy burden of regulatory policies in its day-to-day business, not least of which are your council's Health and Safety policies, which in our case directly apply to the Park's trees. Time-sensitive and valuable event licences have been withheld pending tree work from unforeseeable last minute issues. This happened notably during our Robbie Williams weekend in 2003, and has happened at a number of events since, including the Red Bull Soap Box Challenge and the Renaissance Festivals.



Also, as part of our relationship with English Heritage – and obligations based on past grants and our inclusion on the Register of Historic Parks and Gardens – we have a Conservation Plan, a copy of which is lodged at NHDC, which spells out our commitment to our trees and avenues.

You refer to the control imposed on works to trees as being “substantially less than that previously under consideration”. Quantity is not the issue. Trees that directly affect our visiting public are our health and safety concern – and we need to be able to address issues promptly or risk damage to our business and our business’s reputation. Trees are not predictable. It only takes one unsafe tree for a 125,000 capacity rock concert license to be withheld.

You refer to the fact that we have not objected to the avenue in Jubilee Park being included in the Old Knebworth Conservation Area. The reasons for this are twofold:

Firstly, we appreciate that this is the one – and only – area of the Park that visually affects Old Knebworth village, and could be argued to be part of the village-scape, despite there being no buildings within this aspect.

Secondly, whereas virtually all of Knebworth Park’s 160,000 annual visitors pass between the trees of our Entrance Avenue, which runs to the edge of the churchyard, virtually none pass between the trees of the avenue extending north of Jubilee Lodges. We do not use Jubilee Gate as a regular public access and this area of Jubilee Park is a deer sanctuary for most of our “open” season. Consequently NHDC licencing officers are significantly less concerned by the condition of these trees (on which, incidentally, we spent over £10,000 on maintenance surgery in 2010).

In conclusion, the boundary around St Mary’s at our self-constructed road, as proposed, is not as robust as the “closed churchyard” boundary, dissects our Entrance Avenue, and adds unnecessary burden to our management, maintenance and preservation of the Park. Please consider revising your proposal to follow the robust “closed churchyard” boundary and to exclude trees from our Entrance Avenue.

Knebworth Park Barns, Compound and Car Park: In 2008/9 we argued successfully that it was unnecessary for buildings within the Park (buildings, for instance, like the Mausoleum, clearly of historical interest) to be included within the village Conservation Area because they already enjoy robust protection, not least in their listed status. The two historic Barns are not only already listed, they are in Greenbelt, they are part of an English Heritage registered Historic Park, they are in an area of Archaeological significance, they are fully licensed and constantly regulated for a number of commercial activities – no material public benefit is to be gained by adding yet another layer of regulation.

The Barns were never part of the Gardens or the environs of Knebworth House. They were moved to this area to be the catering outlet for Knebworth Park, not to improve the setting of Knebworth House, as you suggest. Attached to this letter is an aerial photograph that shows the layout of the site on which they were developed – it illustrates not only that it was very much an area of the Park, but also that it was chosen, purposefully, as an area shielded from the House by the tall trees that line that edge of the Garden. The Barns face inwards, into the Park. Their deliveries courtyard backs onto the Gardens border, where a high wall has been in place since 1970, as a further shield



and forming an even more robust boundary for the Gardens. The Barns do not form part of the village-scape, and are an unnecessary addition to the Old Knebworth Conservation Area.

Even less relevant to the Old Knebworth Conservation Area are the Barns extensions, compound and car park. These areas could not be more clearly part of the commercial operation of Knebworth Park, and for all the reasons detailed in the numerous letters we received in support of our objection to the Park's inclusion, we feel very strongly that they too should not be included in the village Conservation Area.

Our resolve in this matter is even greater than when I wrote my previous letter in December. It is possible that Mary or John has mentioned the bureaucratic nightmare we have suffered over our Barns extension project in this very area – the Barns Compound – over the last two months. Officers at North Herts have been very helpful – it was County officers who threatened this project – but the fact remains that Knebworth Park is already over regulated and that every extra level of regulation adds another threat to our ability to manage and preserve it, through extra costs, inflexibility, and delays. The facts of this case are so pertinent to our argument that I spell them out here in full:

- 1) It is the nature of our weather-dictated Tourism and Leisure business that we have only a short window of opportunity to decide if we can afford to make improvements to our visitor experience. If the weather is bad over the summer, as it has been in recent years, the Park is prone to make a loss. By September/October, we know if the Park has taken enough money during the summer season for us to be able to reinvest in its infrastructure, however we need to be able to make these improvement before we get busy again the following spring.
- 2) Last October, thanks to a well-managed year and a successful Sonisphere festival, we were presented with a short window of opportunity to build in the Barns compound the new Gift Shop and Conference Extension for which we were granted planning permission in 2001. (Our Gift Shop has been housed in a Portacabin during the phased work.)
- 3) This required a minor functional amendment to the approved plan which, if accepted after the statutory consultation period – by Christmas – would have allowed us to complete the work on the Gift Shop before our opening in March, and the Conference Extension before the height of our trading period in July and August. If not, the project would have to wait until next winter, by which time – with building costs rising approximately £50,000 a year and other factors mentioned below – it would have become prohibitively expensive, and the opportunity to make the improvements would be lost.
- 4) In a difficult financial climate we were able to negotiate a mortgage we could afford and, significantly, a one-off loan easement from our contract caterers worth a sixth of the building cost, and based on projected trading commencing within the 2011 Season.
- 5) The statutory consultation period ended with John Chapman having received no objections to the amendment, however the day after – December 23rd – a conditional request arrived from HCC regarding the archaeological designation that extends over this area of the Park.



- 6) There had been no contact or site visit by HCC. There did not appear to be recognition that the site has been consistently disturbed for the last 40 years – with a Railway station and museum, a large pond and fountain with accompanying electrical earthworks, not to mention 40 years of picnics and fizzy drink cans – and that NHDC had already determined that an archaeological condition was not necessary when the planning permission was granted in 2001. Nothing of archaeological interest has ever been found in this area – and if it had or was to be, it is the nature of our business that we would be the first to seek to conserve and interpret it for the public benefit.
- 7) The facts mentioned in point 6) are perhaps pertinent to current Conservation Area considerations, but are not the point in this case – we appreciate we must respond to the regulations required by our designations, whether or not we agree with them. Immediately, on the same day, we submitted suggested conditions to officers at HCC – but we received no response before Christmas. We tried again in the week between Christmas and New Year – again nothing.
- 8) It wasn't until late in the afternoon of 13<sup>th</sup> January – after much chasing by John Chapman – that we finally got a response. This came too late for the NHDC Committee meeting that evening, therefore a resolution would have had to wait until the next Committee meeting in February. This would have meant that we would have had to cancel the project.
- 9) Mary Caldwell stepped in at this point and organised an emergency meeting with the officers from HCC. The result of this meeting was that we got approval for our amendment a few days later, and the project was able to commence – a month behind schedule.
- 10) This month's delay means that the new Gift Shop will not be finished before Easter, a key trading time, and the Conference Extension will not be finished before July and the Sonisphere festival. This delay will cost us tens of thousands of pounds. Had Mary not stepped in, the cancellation would have cost us hundreds of thousands of pounds.

The case mentioned above relates to the very area of Knebworth Park – the Barn Compound – that is now proposed to be included in a further regulatory designation. As a small business we cannot afford these levels of delay and bureaucracy. Every extra layer of regulation increases the danger of a situation as described above. This is why I request you reconsider – especially at a time when Central Government is promising new legislation to cut back on the bureaucracy that stifles small businesses, and English Heritage is striving to promote more straightforward interpretation, and more support for heritage management business.

Officers at NHDC were very helpful in resolving our recent problem, but designations such as Areas of Archaeological Importance and Conservation Areas extend beyond the terms of councils and the careers of individual officers. Legislation changes – and yet designations remain.

In April 2008, NHDC's Cabinet determined as follows: "Cabinet Members were not convinced of the additional benefits to the Knebworth Estate should the additional protection offered by



Conservation Area status be approved. Members felt that the existing controls in the Historic Parkland area were sufficient".

I hope I have given sufficient argument why the proposed extension of the Old Knebworth Conservation Area into Knebworth Park at the Barns area, and the retention of an area of the Conservation Area within Knebworth Park beyond St Mary's "closed churchyard" are not necessary.

Knebworth Park's best chance of survival, conservation, and the retention of public access is a healthy and adaptable Tourism and Leisure business, not extra layers of unnecessary regulation that is a "disbenefit", as discussed in the attached CLA letter and other letters from heritage experts and associations attached. Tim Hutchings, Chief Executive of the Hertfordshire Chamber of Commerce and Industry, has written you direct this week in support of this view.

Martha and I ask that you please reconsider your proposed boundary at the northern edge, along the lines suggested in blue on the attached map. If there is any further information or explanation that we can provide please allow us to supply it. As before, we would welcome the opportunity to meet with you – on site, if it helps – to discuss our position further.

My very best wishes,



HENRY LYTTON COBBOLD  
Lytton Enterprises / Knebworth Estates  
[henry@knebworthhouse.com](mailto:henry@knebworthhouse.com)  
Direct Telephone: 01438 814150

cc Mary Caldwell – Development and Conservation Manager  
Councillor Jane Gray - Knebworth  
Councillor Alan Bardett – Knebworth  
Councillor Tom Brindley – Codicote

**ATTACHMENTS:**

- 1) Map showing alternative northern boundary to the proposed Conservation Area – in blue – as suggested by Lytton Enterprises and Knebworth Estates.
- 2) Photograph c.1970/1 – showing the early stages of construction of the Barns complex in Knebworth Park.
- 3) Your letter of 27 January 2011 – for the benefit of the cc-ed.

*Letters submitted in 2008/2009 in support of Knebworth Park's exclusion from the Old Knebworth Conservation Area:*

- 4) Letter from Nick Way, Director General, the Historic Houses Association
- 5) Letter from Norman Hudson OBE, Technical Advisor 1977-2005, the Historic Houses Association
- 6) Letter from Keith Brown, Chief Executive, East of England Tourism
- 7) Letter from Jonathan Thompson, Heritage Advisor, the Country Land and Business Association



**NORTH HERTFORDSHIRE DISTRICT COUNCIL**

Correspondence address:

PO Box 480, M33 0DE

Telephone: (01462) 474000

Text Phone: (01462) 474800

RECEIVED 10 JAN 2011



27 January 2011

Knebworth Estates  
Knebworth House  
Knebworth  
Hertfordshire  
SG3 6PY

Our Ref:  
Contact Officer:  
Direct Line:  
E mail :

PN6/6/7Knebworth  
Mr M Simmons  
01462 474685  
[mark.simmons@north-herts.gov.uk](mailto:mark.simmons@north-herts.gov.uk)

Dear Mr Lytton Cobbold,

**REVIEW OF OLD KNEBWORTH CONSERVATION AREA**

Thank you for your letter dated 15 December 2010.

Firstly, it would appear that there is a general consensus on the inclusion of Jubilee Park as an extension to the existing Old Knebworth Conservation Area.

Before commenting on the two main areas where you consider the conservation boundary is 'wrong', I turn to your concern raised over the Old Nursery tarmac car park and disused play area. The reason for including this area is that this land forms part of the existing Old Knebworth Conservation Area and no concerns were raised either at the public consultation into the Conservation Area Review or by Southern Rural Committee & Cabinet. This tranche of land also reads in association with the former school, a Building of Local Interest erected in 1870 with monies from Sir Edward Bulwer Lytton.

The Register of Buildings of Local Interest refers to the former school as having a "*.....prominent position beside the eastern approach to the Old Knebworth Conservation Area and presents an attractive frontage to those arriving in the village along Old Knebworth Lane*". It is proposed, therefore, to leave this part of the proposed conservation area boundary as shown.

Turning to the two main points of concerns, it is acknowledged that the closed churchyard at St Mary's is a 'robust' boundary but then again the existing park road is also a well-defined boundary and provides a more rationale boundary when considered in the context of the proposed boundary running south-west linking with the car park to the north of The Barns. The boundary has been discussed with Ward Members and the Portfolio Holder for Planning, Transport and Economic Development and the view is that the boundary is justified and defensible in conservation terms.

You have mentioned that the proposed boundary unnecessarily includes a couple of trees that '*should be considered under the policies governing the avenue*'. For clarification, there are no specific policies covering works to trees forming this avenue, however, it is fair to assume that works to the small number of trees forming the west part of the avenue would be subject to control imposed by the proposed Conservation Area designation.

- 1 -

North Hertfordshire District Council, Council Offices, Gernon Road, Letchworth Garden City, Hertfordshire, SG6 3JF

John T Campbell  
Chief Executive

[www.north-herts.gov.uk](http://www.north-herts.gov.uk)

 INVESTORS  
IN PEOPLE



The fact that a substantial part of 'Area A' is no longer proposed to be within the conservation area means that the control imposed on works to trees is substantially less than that previously under consideration. As an aside, another avenue of trees extending north from Jubilee Lodges is proposed to remain within the Old Knebworth Conservation Area to which no objections were previously raised.

With regard to your second main concern, Nup End Business Park and The Barns are not considered to be comparable sites. That part of Nup End proposed to be excluded from the conservation area is not considered to possess special architectural or historic interest and its exclusion is justified. On the other hand, and as you rightly point out, The Barns are listed, thereby not only possessing special architectural and historic interest but due to their location, The Barns also make a positive contribution to the setting of Knebworth House and have done so since being moved in 1971-72. The Barns have significance in terms of the immediate built environment close to Knebworth House, a situation which did not exist when Old Knebworth Conservation Area was designated in 1969.

The Barns, Knebworth House and Old Knebworth Conservation Area are all Designated Heritage Assets (see criteria in PPS5) and as stated previously, *'.....focus has been given to the built environment of Old Knebworth, in particular those buildings that contribute to the significance of the area. In addition, where the Park and Gardens contribute to the immediate close setting of the village, such as Jubilee Park, this has also been included in a proposed revised area....'*

The public consultation on the proposed boundary is anticipated to commence on Friday, 4<sup>th</sup> February 2011 and Knebworth Estates will be formally consulted at the beginning of this 4-week consultation period. The concerns raised in your letter dated 15 December 2010 are welcomed and have been duly considered, however, I confirm that the public consultation will be based on the boundary as currently shown for the reasons set out above.

Yours sincerely,



**Mark Simmons**  
**Senior Conservation Officer**





## HISTORIC HOUSES ASSOCIATION

2 CHESTER STREET LONDON SW1X 7BB

TELEPHONE: 020 7259 5688 FACSIMILE: 020 7259 5590

E-mail: [nick.way@hha.org.uk](mailto:nick.way@hha.org.uk)

[www.hha.org.uk](http://www.hha.org.uk)

From: The Director General  
Nick Way

16 January 2009

Mr F John Smith  
Leader  
North Hertfordshire District Council  
Council Offices  
Gernon Road  
Letchworth Garden City  
Herts. SG6 3JF

COPY

Dear Mr Smith,

**Proposal to extend the Old Knebworth Conservation Area to include  
Knebworth Park**

Knebworth House and Park is a member of the Historic Houses Association (HHA), which exists to help owners conserve historic houses for the long term. Henry Lytton Cobbold has informed us of Knebworth's concerns about the Council's proposal to extend the Old Knebworth Conservation Area to include the Knebworth Park and the effects that such a measure – which equates to statutory protection of this historic park – would have both on the day to day management of the park and potentially on the long term management and conservation of the house and park themselves.

This letter expresses the HHA's support for the position adopted by Mr Lytton Cobbold and Knebworth Estates in opposition to the proposal and I would request that our support and position are reported to and taken into account by Members of the Council, at the meeting of the Southern Rural Area Committee on 21 January, at the Council Cabinet meeting the following week and on any other occasion on which the proposal is discussed by Members of the Council.

Knebworth House and Park is well known to the HHA. First, the house is an excellent example of how long term conservation of a very fine historic house can be pursued in conjunction with public opening, special events and other leisure activities. As a result, Knebworth is a very positive generator of jobs and incomes in the area, a magnet for visitors and an active player in East of England tourism. The house has hosted events for the HHA, in order to demonstrate how conservation and a positive commercial approach can go forward hand in hand.

For this to succeed, the historic park must itself be managed in a sympathetic, but practical way, and in a way that can accommodate sensitive commercial use.



This approach would, at best, not be assisted by the inclusion of the park in the conservation area and, more likely, the designation will simply add day to day cost and time consuming additional work, without in any way enhancing the conservation value.

The HHA requests the Council to reject the proposal, for the following reasons, which embrace serious concerns, both of practicality and policy.

#### **Day to Day management of the historic park**

A historic park requires active management for the purposes of conservation, and decisions should be taken as when they are necessary, without a requirement for prior consent.

For example, designation as part of the conservation area could mean that any arboreal work would require consent, with the attendant delays and costs. This is not a practical proposition for a park with paying visitors and changing activities.

#### **Long term economic management of the park**

The park is part of an overall commercial operation that supports the maintenance of the historic house. Knebworth supports itself and provides a significant benefit for the local and wider population. It is also the steward of a valuable cultural collection, for the benefit of the country and future generations. To enable this stewardship to be successful, the house and park enterprise must be allowed to operate in a commercial manner and from time to time it will be necessary for its managers to change the activities pursued in the park. A conservation area status – a statutory designation – is in conflict with this necessary flexible management approach, and would be to the long term detriment of the house, the park and the area.

#### **Designation is unnecessary**

There is already a Conservation Management Plan in place in the park, so the Council and the local population have the reassurance that the intentions of Knebworth Estates are for sensible long term conservation of the house and park. Designation would be unjustified and overkill.

#### **Historic parks in conservation areas**

Many historic parks are not in conservation areas so there is no necessity for Knebworth Park to be so designated.

#### **Conflict between designation and national policy**

This is a major reason against designation that has yet to be considered.

The Heritage Protection Review, undertaken by the Government between 2003 and 2007, with full consultation of all parts of the heritage sector and local authorities, resulted in a White Paper in 2007 in which the Government accepted that updated Heritage Protection legislation should not bring about statutory protection of historic parks and gardens. This development is much more recent than the cases cited by the southern Rural Committee of the Council, and should take precedence.



The policy was also made clear by DCMS officials at the time of the publication of the White Paper in May 2007 and was confirmed when the Government issued draft legislation in April 2008. For this Council to designate Knebworth historic park as a conservation area would, in effect, go against this clearly expressed and accepted national policy. DCMS supported the principle that no additional consent regime should be applied to landscapes, accepting that gardens and parks are organic and must retain the freedom to develop and change. Although individual structural features within them may be listed, statutory listing of the whole would be both impractical and inhibit future creation.

The fact that the draft Bill was not included in the Queen's Speech does not reduce the force of this consensus nor the clarity of the policy, and a local authority should not seek to conflict with draft legislation and national policy.

### **The Conservation Area boundary**

Extending the boundary around the whole park, without justification, would be arbitrary, unjustified and unnecessary, particularly when the Government has adopted the policy that historic parks should **not** be subjected to statutory protection. The current Conservation Area boundary does need rationalising; it includes the mausoleum and parts of the avenues, which is unnecessary with the recent clarification that all Park buildings are curtilage-listed to the House. Knebworth has put forward a proposed rationalisation ("the report's "Option 3") which addresses these issues in a sensible and judicious way.

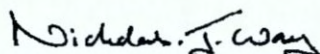
### **English Heritage approach**

We note that the English Heritage support comes from the regional office. At national level the organisation has supported and championed the consensus in the Heritage Protection Review and the package of measures contained in the draft Heritage Protection Bill (the national policy described above) of not introducing statutory protection for historic parks and gardens. We will copy our letter to English Heritage at senior level and ask them to review their approach in this matter.

### **Financial Implications**

We ask the Council to take account of the financial implications for Knebworth Estates, a generator of employment and incomes in the area. We believe that these benefits have not been given due weight in the proposal.

Yours sincerely,



**Nick Way**



16 January 2009

NH/jc

North Herts District Council  
Council Offices  
Gernon Road  
Letchworth Garden City SG6 3JF

#### KNEBWORTH HOUSE - KNEBWORTH CONSERVATION AREA

As a trustee of the Country Houses Foundation I recently visited Knebworth together with one of my co-trustees who was until recently Director of Conservation of English Heritage. Our visit related to an application for grant towards the cost of repairing a curtain wall separating the Garden and Park. We have subsequently awarded a grant for this work and have also been able to assist and encourage further repair works so as to achieve economies of scale. As part of our assessment we looked beyond the immediate works so as to be assured that provision for responsible long term management and stewardship are in place.

I was concerned to learn of the proposal to designate Knebworth Park as a Conservation Area. Contrary to what I imagine is intended, I believe this action could be counter-productive and an impediment to cost-efficient management and good stewardship. The associated administrative bureaucracy and outside micromanagement introduces an element of inflexibility which would be detrimental to the financial management of the whole heritage entity. This entity comprises numerous components already having various degrees of statutory protection and control and there is already a Conservation Management Plan in place for the Park.

I first visited Knebworth 36 years ago with owners of other historic houses in Britain and various European countries. The purpose was to witness and learn of the then innovative methods displayed not only to restore and conserve the historic fabric of the building but the development of responsible commercial management that could provide it with a financially viable future. A commercial use of the Park was seen as central to that process.



Those directly responsible for the management and conservation of some of the most important parks and gardens in Britain have for many years encouraged and assisted in the process of having their importance recognised and ultimately by the creation of the English Heritage Register. But while widely accepting the desirability of Landscape Management Plans, they have also presented cogent arguments opposing statutory controls which would inhibit the required flexibility for practical management.

As an Advisor to the Historic Houses Association and a former Member of the National Trust Council, I was involved in the late 1970s and early 1980s in work surrounding the wider recognition of the importance of historic parks and gardens. The Register, and its precursor in Scotland, was prompted as much as anything to help protect such landscapes from proposals by Local Authority and Highway Planners.

The question of statutory protection of historic parks and gardens has been a matter of long discussion. At National level it has always been accepted that statutory protection of historic parks and gardens is neither a practical nor appropriate mechanism for ensuring their optimum management and long-term conservation. As recently as the Heritage Protection Review (2003-2007) resulting in the draft Heritage Protection Bill in 2008, it was made clear that the updated legislation, while recognising the importance of parks and gardens, should not cause them to be brought within the sphere of statutory control.

In the Report 'Old Knebworth Conservation Area Review' (para 4.2) reference is made to Planning Policy Guidance Note 15 and in particular para 4.6 of that Note. This says: "Designation is clearly not a proper means of controlling activities which do not fall within the definition of development", and while it suggests that there may be circumstances where it is suitable for historic parks and gardens containing structures that are otherwise unprotected, it is not applicable to Knebworth.

I submit that the proposal to designate Knebworth Park as a Conservation Area is inappropriate, could indeed be detrimental to the practical and financial management required for the conservation of the whole heritage entity, and introduces an element of unnecessary control which could be counter-productive. Furthermore, it is in contradiction to what has been generally agreed at National level: that Landscape Management Conservation plans are appropriate for historic parks and gardens whereas mechanisms of existing forms of statutory control are not.

Norman Hudson





East of England Tourism  
Dettingen House  
Dettingen Way  
Bury St Edmunds  
Suffolk  
IP33 3TU

Tel: 01284 727470  
Fax: 01284 706657  
email: info@eet.org.uk

16 January 2009

Mr F John Smith  
Leader  
North Hertfordshire District Council  
Council Offices  
Gernon Road  
Letchworth Garden City  
Herts. SG6 3JF

COPY

Dear Mr Smith,

**Proposal to extend the Old Knebworth Conservation Area to include  
Knebworth House Park**

Knebworth House and Park is a member of East of England Tourism the remit of which is to build the regional visitor economy. Business Tourism which includes meeting and events is a core element of an industry that employs over 180,000 people and generates £5.2 billion of income to the East of England. Knebworth House and Park is one of our leading service providers and is a key part of the regional offer when tendering for major events. It is therefore essential that the business continue to thrive and develop in order to meet ever increasing consumer and business visitor expectations.

Martha Lytton Cobbold, our prime contact has told us of Knebworth's concerns about the Council's proposal to extend the Old Knebworth Conservation Area to include the Knebworth House Park and the effects that such a measure - which equates to statutory protection of this historic park - would have both on the day to day management of the park and potentially on the long term management and conservation of the house and park themselves.

We would like to express our support for the position adopted by Knebworth Estates in opposition to the proposal and I would request that our support and position are reported to and taken into account by Members of the Council, at the meeting of the Southern Rural Area Committee on 21 January, at the Council Cabinet meeting the following week and on any other occasion on which the proposal is discussed by Members of the Council.

Yours sincerely

Keith Brown  
Chief Executive

d: 01284 727474  
m: 07866 421885  
f: 01284 706657  
e: kbrown@eet.org.uk

[www.visiteastofengland.com](http://www.visiteastofengland.com)

