

CONSERVATION TEAM CONSULTATION APPLICATION RESPONSE

APPLICATION REF:	25/03190/FP & 25/03191/LBC
CASE OFFICER:	HT
APPLICATION SITE:	42-44 Kneesworth Street, Royston, Hertfordshire SG8 5AQ
DESCRIPTION OF WORKS:	Conversion and change of use of dwelling (Use Class C3) to provide additional care accommodation (Use Class C2) including alterations to existing fenestration, installation of security access and gate and formation of additional parking, following demolition of existing detached outbuilding. Internal alterations to facilitate conversion and change of use of dwelling (Use Class C3) to provide additional care accommodation (Use Class C2) and alterations to existing fenestration.

RECOMMENDATION:

I raise an **OBJECTION** for the following reason.

No. 44 is a grade II listed building and therefore a designated heritage asset of national importance. Nos. 42 and 46 are both locally listed buildings and therefore recognised as non-designated heritage assets of significant local value. The wider setting is the Royston Conservation Area. No.44 has seen few modifications and the internal layout and architectural detailing is relatively unchanged from the early C19. By reason of the individual and cumulative impact of proposed internal alterations to no.44 such as but not exclusively; a new pyro-glazed wall, incongruous fire doors, replacement FD30 6-panel doors and under-drawing ground floor ceilings all for fire compartmentation, stud walls particularly impacting upon the ground front reception rooms, opening formed between front and rear bedroom together with the insertion of a through-floor platform lift resulting in building in front of the rear access and a first floor window above, the proposal will have a particularly intrusive impact resulting in a moderate to high level of less than substantial harm. The building has an optimum viable C3 use, and the public benefits set out at page 44 of the submitted HIA do not outweigh the harms identified. Consequently, the proposal fails to satisfy the provisions of Sections 16(2) (LBC only) and 66(1) (FP only) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Section 16 of the NPPF and Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

SHORT SUMMARY:

Impact on no. 44 Kneesworth Street.

The proposal will have harmful impact upon this building's special character.

SITE CONTEXT:

No.44, Kneesworth Street is an early C19 grade II listed house and is located within the Royston Conservation Area.



Both the house and the area are Designated Heritage Assets for the purpose of applying the aims of Section 16 of the NPPF. The house is referred to on the Statutory List of Buildings of Special Architectural or Historic Interest as 'Middle Brooklands' and the list entry can be found at the following link:

<https://historicengland.org.uk/listing/the-list/list-entry/1174695?section=official-list-entry>

Nos. 42 and 46 Kneesworth Street are Buildings of Local Interest (27 March 2007), therefore recognised as non-designated heritage assets of significant local value – see extract below.

4. and 5. Nos. 46 and 42 Kneesworth Street

Red brick buildings forming a flanking pair to no.44 Kneesworth Street. No.46 is inscribed above the portico entrance with 'Brooklands 1896' and a blue plaque acknowledges that Capt Harold Ackroyd previously lived here. Capt. Ackroyd was attached to the Royal Army Medical Corp when he was awarded the Victoria Cross for rescuing wounded men under fire and killed at Ypres on 11th August 1917.

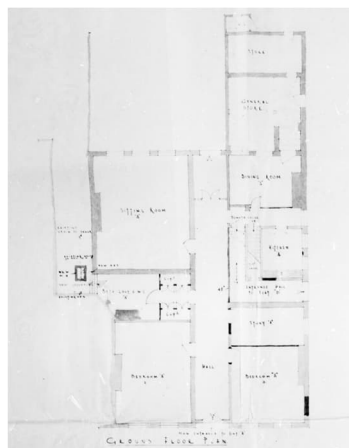
No.42 is now St George's Nursing Home and forms the other flank to no.44 Kneesworth Street.



Reason for inclusion:

Both buildings are architecturally interesting and form an essential part of the setting to no.44, contributing positively to the streetscene and therefore, to the appearance of the conservation area. No. 46 also has an important historical association.

An issue that I will come back to later is that a rear extension had already been built at 'Middle Brooklands' by the time that application ref: N190/48 was submitted for 'Conversion of dwellinghouse to North Brooklands to two flats'.



DETAILED ANALYSIS AND CONSIDERATIONS:

At page 19 of the submitted HIA it states: *No's 42 and 44 is a building over two storeys that **has seen few modifications**. The majority of additions concern two recent phases in the building's history; firstly, the one-storey lean extension to no 44 and secondly, the two-storey extension of the care home at no 42 in 1998. Alterations have been undertaken to provide strengthening for the patient accommodation.*

Whilst at page 25 it says: *At no 44 the existing layout on the ground and first floor is **very much unchanged from the early 19th century**. Only the creation of an opening between the front and rear room on the left hand side is a change to take note of. Also, there have been instances of furnishings and fittings added to accommodate the needs of householders and residents.*

At page 28 of the HIA it says: *The property at no 44 has experienced **little "modernisation"**,....*

New internal link opening to connect No. 42 with No. 44.

At page 42 of the HIA it says:

The inner wall which currently divides the Quiet Room of no 42 with the Kitchen of no 44 will be opened up. The area of the proposed wall for opening is of single thickness and differs from the double depth of wall seen on the south side of this point where the two houses overlap. The single depth of wall at this point illustrates where the extension at no 42 was built. The new opening folds into the kitchen at the rear of no 44. It is located in the wall of the later lean-to extension at no 44 which appends the older structural wall which forms around the kitchen fireplace.

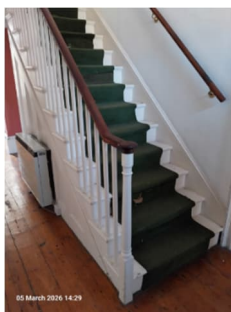
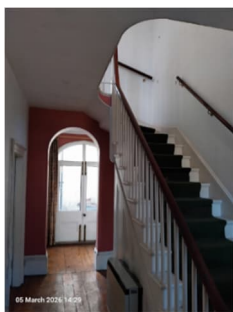
It is important to consider that the form rear wall of the original house has already been modified with openings made either side of the fireplace. The HBA indicates that the single with wall that divided no 42 from no 55 can be opened up in this location.

This aspect of the proposal is considered unobjectionable.

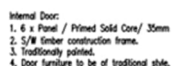
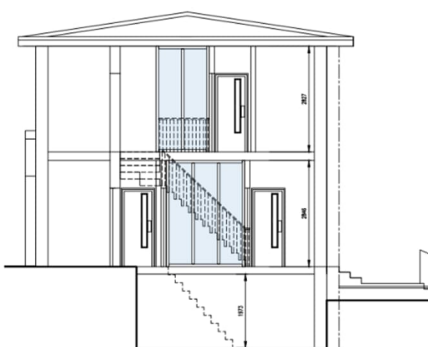
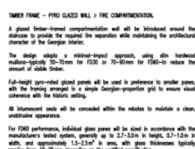
Entrance Hall/Lobby

At page 27 of the HIA it says: *The staircase has Georgian character in its proportions and order. **The flight has an attractive arched movement as it raised to the first floor and the actual architecture of the banister and railings is ornate**. There is a newel post at the end and the underside has wooden panelling.*

Directly behind the 6-panel yellow entrance door (2 panels flush) with traceried fanlight in double round arched reveal, lies an original staircase that could be dated to 1820/30 i.e. Regency rather than later Georgian. Both the entrance and staircase are of special interest. The intention is to erect a partition to the side of the staircase to adhere to fire regs and effectively create an inner lobby. There is an appreciation of a rear exit from the building at the end of the existing hallway which looks out on to the side of the extension to North Brooklands built pre-1948. The proposal indicates three new, modern FD3 doors that would be installed in the hallway effectively blocking a view to the rear which, in event would be curtailed by the installation of the hydraulic platform lift (for ambulant residents), with reliance on the existing Part M-compliant lift in No. 42 for wheelchair users.



The partition to the side of the stairs would be a pyro glazed wall for fire compartmentation purposes and the annotation states that the design would adopt **a minimal impact approach**. Having viewed a similar installation at no.42 (see photos below) I disagree with this. Furthermore, the proposed door types for the hallway corridor would not respect the character and quality of the interior. **These works will occasion a moderate level of less than substantial harm to the building's special character.**



- Internal Door:
1. Engineered timber fire door/ 44mm (FD30).
 2. Engineered timber construction frame / Door Set.
 3. Traditionally painted.
 4. Door furniture to be of traditional style.



- Internal Door:**
1. 1 x V/Panel / Engineered Timber fire door/ 44mm (FD30)
 2. Engineered timber construction frame / Door Set.
 3. Traditionally painted.
 4. Door furniture to be of traditional style.

PROPOSED INTERNAL DOOR ELEVATION
(FD - 2 / FD30) - 1:20



At page 27, the HIA acknowledges the following:

The retention of the former room sizes gives the current building well-formed spaces including the two front rooms of no 44 at ground level.

The two bow windows feature the most decorative aspect to the interior. As the sinuous form of the under-window section presents great craftsmanship and artistry. Whilst the shutters are concealed within the inner wall they open out as small doors to form an attractive means of closing the unit.

At page 28 it says: *Other features of decorative intent to be found are the fireplaces. The fireplaces form part of a coherent design scheme, **which gives them significance** apparent in their current state.*

Both front rooms feature wide oak/elm boards, deep 'cornice' band formed by a narrow-moulded cornice and lower rail and two hob grates that are likely to date circa 1820/30 although the surrounds have arguable a slightly earlier influence.

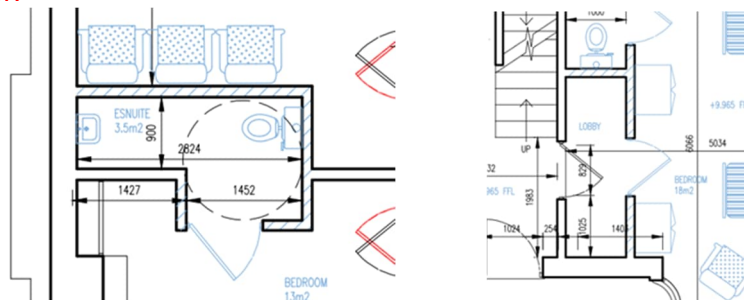


The combination of bay windows, floor finish, original fireplaces and surrounds and 6-panel original doors contribute to interiors of moderate to high heritage value.



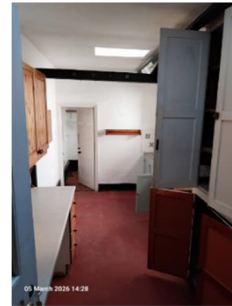
Although the bay windows would not be affected by the proposal, the rooms to which these bays relate would both be affected. Upon entering the building, the left-hand room would have an ensuite projecting into this space (left-hand image below) whilst an inner lobby and WC ensuite would be created in the right-hand room (right-hand image below).

These works will occasion a moderate level of less than substantial harm to the building's special character.



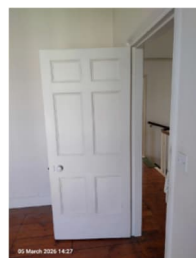
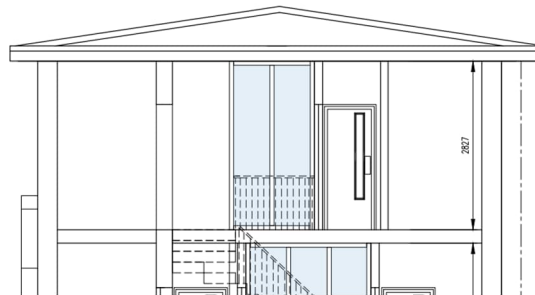
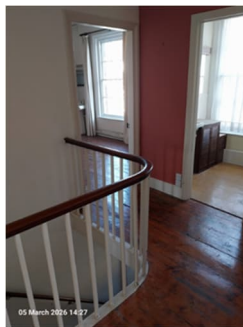
Ground floor rear rooms

Behind the left-hand front room there is an anti-room beyond which is a late C19 single-storey kitchen addition. **The creation of a ground floor bedroom where the kitchen currently together with forming an opening through to no.42 would be unobjectionable but this alone does not provide the level of accommodation the applicant is seeking.**

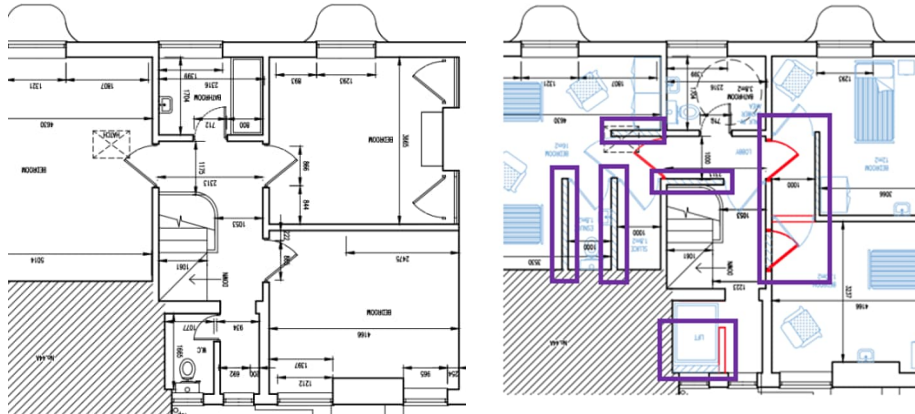


First floor rooms

Once again, I raise an objection to the introduction of the pyro glazed wall and incongruous door type for fire compartmentation at this level. There is a generous landing with several original 6-panel doors off this landing. **The proposal would enclose this space occasioning a moderate level of less than substantial harm.**



Below I have highlighted changes in purple outline to emphasise the extent of change. This includes inserting partitions, new doors, a through-floor lift, making a new door opening and blocking up an existing doorway. **The singular and cumulative impact of these changes will have an erosive and harmful impact.**



Rear elevation

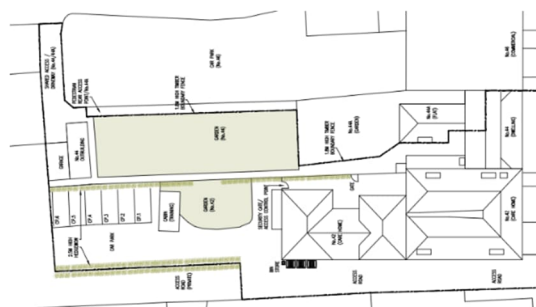
Even though the rear, part-glazed doors would be retained, the rear door access under the arch opening would be lost if the lift were to be installed and a window immediately above would also be obscure glazed. **This would also harm the building's special character.**

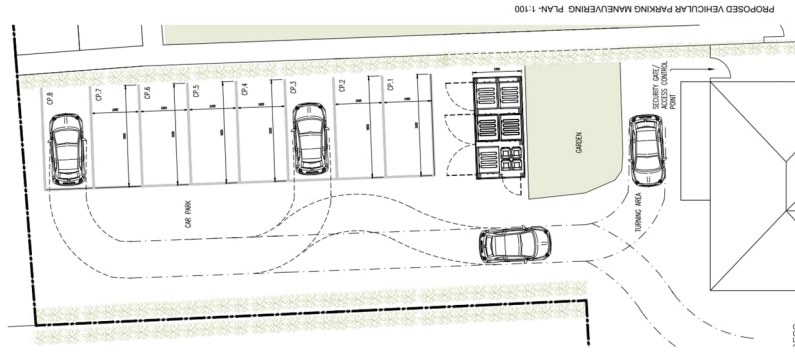


PROPOSED WEST ELEVATION- 1:100

Rear parking/bin store

It is noted that the number of parking spaces would increase slightly and bin storage would be provided but this relates to the rear garden grounds of no.42 (unlisted) and is **unobjectionable in heritage terms.**





HERITAGE POLICY ASSESSMENT:

Planning (Listed Building and Conservation Areas) Act 1990:

Sections 16(2) (LBC only), 66(1) (FP only) & 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:

I concur with the HIA that "There is no indication of any impact amounting to **"substantial harm"** to the significance of the Grade II listed building or to the character or appearance of the Royston Conservation Area". I also am of the view that the character and appearance of the Royston Conservation Area would not be harmed. However, I have identified harm that would arise from this scheme to no.44 Kneesworth Street.

I draw attention to the following paragraphs of the NPPF:

210. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and **putting them to viable uses consistent with their conservation**;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm **should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.**

It is my opinion that an optimum viable use for no.44 would be to retain this in C3 use (dwellinghouse). The architect has informed me that no.44 is currently on the market for C3 use, but I have not seen the evidence of this.

Page 44 of the HIA sets out what the applicant considers to be the public benefits of the proposal as follows:

- *Increased care home capacity in a sustainable town-centre location, responding to demographic need.*
- *Improved accessibility, safety, and dignity for elderly and vulnerable residents, through enlarged bedrooms, ensuites, improved fire safety and better circulation.*
- *Securing the long-term, viable use and maintenance of a Grade II listed building and its locally listed neighbour.*
- *Support for social sustainability, enabling residents to remain within their community and supporting local employment.*

These benefits are significant and long-term. When weighed against the limited and carefully managed level of heritage harm identified above, they clearly satisfy the NPPF requirement (para. 202) that “less than substantial harm” be outweighed by public benefits.

I am unconvinced that the ‘public benefits’ set out above outweigh the clear and obvious harms that have been identified to the interior of this grade II listed building should this proposal be granted. For this reason, I find the proposal **OBJECTIONABLE**.

OFFICER: Mark Simmons

DATE: 10/03/2026