

Further to the Council's Conservation Officer following our initial planning submission, please find the following update notes from The Space Studio to be read with all recently uploaded revised drawings referenced therein.

The structural, drainage & M&E drawings were prepared for a previous reiteration of the scheme and include alterations that do not longer seem to apply to the current proposal (e.g. LM21346-DYSE-XX-ZZ-SK-S-0021, 4193-UG-SK104 & 4193-UG-SK113). The labelling on the structural alteration drawing also appears unclear. Please update/replace. *Revised structural drawings have been issued from DYSE.*

1.1. External Alterations

- a.* The principle of a new steel framed glazed doorway to Portland Street, in place of the former carriageway entrance and an existing roller shutter, is acceptable in principle. The solution does appear as light-weight and appropriate. Full and final details of the proposed new door/glazing (including cross-section) should be covered by an appropriate worded condition. *Noted*
- b.* The existing cobblestones to the carriageway should be retained and exposed to take the opportunities to better reveal the architectural and historic interest of this portion of the Grade II listed asset should this be possible without hindering the accessibility improvements otherwise proposed. *Noted*
- c.* The reinstatement of the double modern doors to Portland Street with window units and railings to match existing (WLG.01 & WLG.02) would have a positive impact on the Grade II listed asset and is supported in principle. Full and final details of the proposed new windows (including cross-section) should be covered by an appropriate worded condition. *Noted*
- d.* A new accessible entrance is proposed to the Charlotte Street elevation, to the side of the original main entrance into the premises. This would remove the existing and original opening and stonework, causing material harm to the Grade II listed building. I am particularly concerned that the proposal is to remove the existing sandstone lintel and the cornice above, which would leave the narrow stone sill of the upper GF exposed. This would remove considerable historic fabric and create an awkward intersection between these two openings – structurally and visually. Albeit the cross-section and elevation drawing 2022-1008M-019B is informative, it does not show the full and final details of the proposed new openings, including new structural lintel that may be required. *Revised drawings issued to indicate that the accessible entrance opening has been reduced to retain the upper stone sill cornice section. Further details to follow in the next stage and following further consultation with Building Control and accessibility officer. We would advise that this is conditioned upon approval.*

- e. Although the principle of the new opening in this location could be supported, based on the public benefits that this aspect of the scheme would deliver, this is contingent on an entirely appropriate and least harmful solution being developed. In the first instance, this should be in the form of a lowered new opening that would retain more historic fabric, including, as a minimum, the existing stone cornice. *Noted as above item.*
- f. The proposed works the existing timber gate to Rayner Street (2022-1008M - 057A) would see this feature subdivided vertically into three separate openings. This would cause a degree of harm to the Grade II listed building. As a minimum, clear and convincing justification should be submitted in support of the triple doorway solution, where a single central subdivision to create two new openings would be preferable on heritage grounds. Either way, the subdivision should be through the centre of the main frame rather than the recessed panels, as currently proposed. *TSS Drawings now revised in respect of the above.*
- g. The existing bricked-up openings and the roller shutter to GF of Rayner Street (WLG13) should be opened/reglazed and removed respectively, to take opportunities to enhance the architectural interest of this elevation.
- h. *TSS Elevation Drawings now revised in respect of the above.*
- i. The proposal is also to install external vents to Portland Street to facilitate the proposed heat recovery system across the upper stories of Fraser House. The proposed vents would require the removal of some historic fabric. I am particularly concerned about the location of the proposed vents would at the fourth floor, proposed to the ornate sandstone cornice and which would interfere with the original stone corbels. This location is not considered acceptable as it would result in a degree of harm to the Grade II listed asset that could otherwise be avoided. As such, should be vents be required, these should be relocated to the existing brickwork – minimising harm to the designated asset. The proposed new vents should be clay, to match existing brickwork, or cast iron. Full and final details (location, design, and finish) should be conditioned. *M& E and TSS Architect's drawings now revised in respect of the above. All vents should be positioned within the existing brickwork.*
- j. Other proposed external M&E outlets and inlets across the Grade II listed building need to be better understood – highlighted on proposed elevation drawings and proposed roof plan. For example, are new SVPs to terminate at roof level? Are any ventilation grilles proposed to external elevations to serve GF use? Please note that the M&E drawings appear to be outdated (2022-1008M – 006 and 4193-0-SK118) and should be amended. *M&E drawings have been updated, as above.*
- k. The relevant elevation drawings (2022-1008M-051, 2022-1008M-052 and 2022-1008M-053) show large areas of brickwork and stonework to be *repainted*, replaced and rebuilt. It is understood that the former was meant to

show areas of repointing – the elevation drawings should be amended accordingly. I would also seek confirmation whether a survey has been undertaken to inform the extend of the proposed works. These should be minimal to preserve or enhance the building, without avoidable removal of original fabric. *TSS drawings now revised to indicate 're-pointed' not 're-painted'. Previous surveys have been undertaken regarding the external fabric.*

- I.* The replacement of existing rainwatergoods with new cast iron downpipes/guttering would have a positive impact on the Grade II listed building and is supported. The single original/historic cast iron hopper to Rayner Street elevation should be retained. *Noted*

1.2. Internal Alterations

1.2.1. Basement

- a.* Limited information has been submitted to illustrate the works and the anticipated impact at this level. The recent site visit did not include this area, nor has it been photographed/presented in the HS. More information on works at this level would be required. *A new survey has been carried out, photographic record and plans have been updated to accurately reflect the layout and heritage elements. Proposed design have been updated to reflect these findings.*
- b.* Please note that drawing (LM21346-DYSE-XX-ZZ-SK-S-0020) indicates demolition of the existing load bearing masonry wall, whilst on other plans this has not been illustrated. Please could you clarify. *Revised drawings have been issued and uploaded.*
- c.* The proposed tanking to the basement and lower GF of the Grade II listed building would have an adverse impact on its significance and would not be supported on heritage grounds. The risk of rising damp and moisture damage in these spaces should be dealt with through increased ventilation and improved maintenance of the building in the first instance. Tanking of the basement walls is not proposed these works. *Revised drawings indicate restoring walls to their original state to include cleaning, repointing or re-plaster where applicable.*

1.2.2. Lower and Upper Ground Floor

- a.* The proposed removal of modern subdivisions across the lower ground floor would have a positive impact on the Grade II listed building and is supported. *Noted*
- a.* The impact of the proposed store and associated new opening in the load bearing wall on the lower ground floor level would to be better understood. An existing opening appears to remains in-situ (Plate 47, HS). Please could you confirm this? If so, this should be

reused/adapted, to avoid additional harm to Fraser House. Should this not be the case, detailed cross-sections (see Figure 1) should be submitted to show the proposed opening and the store in relation to proposed new glazed entrance and existing hoist openings at the upper GF lower, which should be retained (discussed below). *Revised plan drawings indicate existing openings are retained or expressed within the internal wall treatment. Further details to follow and we would advise that this is conditioned upon approval.*

- b. The reinstatement of floorplate between the lower and upper GF where it has been removed in the past will have a positive impact on the listed building and is supported. The installation of the proposed accessible entrance and associated bulkhead in a location where existing floorplate has been removed would reduce the harm and is also considered acceptable. That said, the internal manifestation of the proposed bulkhead would need to be better understood. To that end, a detailed cross section should be submitted (see Figure 1). . *Noted*
- c. The installation of the proposed dumbwaiter would cause a degree of harm to the Grade II listed building. In the first instance, this should be avoided, to maximise the benefits to the designated asset. However, on balance, and should other improvements as proposed and outlined in this advice be delivered, this aspect of the scheme would be acceptable. *Noted*
- d. On the upper GF there remain two original/historic hoist openings with the associated doors. These should be retained in-situ, to preserve this aspect of the Grade II listed building. As such, the proposed new opening would not be acceptable as existing should be reused. *TSS Plan drawings have been revised to indicate the existing historic openings have been retained but a proposed single door opening to gain access and egress essential for the operation of the proposed restaurant areas*
- e. The removal of the modern staircase connecting the lower and upper GF at the south corner of the premises does not appear to have been authorised as part of the previous soft strip and should be included as material alteration in this application. *Noted*

1.2.3. First Floor

- a. The proposed partition and service riser proposed unit 3 should be relocated (e.g. through raised floors) as not to cut through the existing window, which should remain exposed. *Noted. Apartment plan revised.*
- b. The removal of the original wall on the first floor would cause a degree of harm to the listed building through the removal of historic fabric and erosion of the original/historic floorplan. As a minimum, the harm should be minimised

through partial retention of the existing wall (14A) and the complete retention of the existing panelling and the ceilings/cornice. Proposed and external cross-sections should be submitted to confirm the extend of the demolition (see Figure 2). The demolition plan (24A) should be revised accordingly.

Please note revised wall types drawing TSS 034C with additional elevation added.

- c. A cross-section to show the proposed encasing to the platform lift should also be submitted as part of the LBC/PP (see Figure 2). *Noted*
- d. The installation of the platform lift would cause a degree of harm to the historic and architectural interest of Fraser House due to the loss of original/historic fabric and impact on the floorplan. However, the harm would be outweighed by the public benefits that this aspect of the scheme would deliver, with harm otherwise minimised through the proposed location (removed floorplate to GF). *Noted*
- e. The typical detail of the proposed new subdivisions, as presented on 34A, across the GF – TF is acceptable in principle. Please note that where the new walls abut the original/historic walls , a shadow gap should also be accommodated. The detail should be submitted as part of the PP/LBC. *Noted and it is advised that this is conditioned upon approval.*

1.2.4. Second and Third Floor

- a. The proposed service riser and partition proposed to third floor (unit 10 & 11) should be relocated at this level (e.g. through raised floors) to avoid the need for the proposed opaque panels and blocking of the existing glazing. *Revised drawings indicate wall repositioned to align with existing window piers. The original proposed service riser has been removed with essential services re-routed through suspended floor void.*
- b. The awkward junction in the proposed units 7 and 11 should be amended, as this would have an adverse internal and external impact on the Grade II listed building. There is flexibility on how to achieve this, but an idea may be to switch around the bedrooms (small vs. master) and remove the additional entrance to the bathroom – which serves both bedrooms, which would not affect the proposed M&E and drainage scheme. *Revised drawings indicate apartment modification along the lines of what is suggested thus eliminating the awkward bed / living room window / wall junction.*

1.2.5. Fourth Floor

- a. The proposed subdivision's impact on the existing structure and features, including cast iron and timber beams needs to be better understood. Detailed and scaled cross-sections should be submitted to that end (see Figure 3). As

a minimum, the proposed opaque panels to the Charlotte Street elevation windows should be limited to the minimum required (expected two panels), with the prepossessed partitions, service risers and closet relocated, to minimise harm. *Revised drawings indicate opaque panels to Charlotte Street elevation reduced to 2No with preferred bathroom wall alignment. More detailed scaled cross-sections to follow in the next stage and it is advised that this is conditioned upon approval.*

- b. The degree of retention of the original/historic features (walls, joinery & panelling) positioned off the main staircase (see plate 103, HS) needs to be better understood. In the first instance, the historic fabric should all be retained. Please note this area has been highlighted as of high significance on the relevant plans (see page 91, HS). *Please refer to revised wall finish drawing TSS 034-C with plans adjusted and internal wall elevation indicated.*

1.2.6. Ceiling and Floor Finishes

As discussed on site, the required fire and acoustic separation should be accommodated on top of the existing floorboard, which should be retained in-situ. This is in order to retain the existing ceilings, including cornicing, under-boardings and timber beams intact and exposed. The scheme and relevant detail should be amended to that end (44A and 54A). The proposed cross-section should be submitted as part of the LBC/PP, and include junction detail between the new raised floors and existing architectural features (e.g. skirting boards & columns).

- a. *Revised GA section fire compartment drawing now indicates acoustic and fire separation treatment to the top of the existing floorboards. Structural and Mechanical engineer's drawings have also been revised to reflect the above. Further details to follow in the next stage and it is advised that this is conditioned upon approval. Spot levels have been added to plan to better demonstrate how the new floor build up would affect stair allignment.*
- b. The lath and plaster ceilings should be retained across the Grade II listed building, including to the basement and fourth floor. The removal of lath and plaster ceilings, as per the structural report and drawing 1008M-043A, would not be acceptable. The sections of the modern under boarding should be removed to expose original ceilings (Plate 73, HS). *The fire separation strategy has been re-considered as above to retain the existing lath & plaster ceilings.*
- c. The new ceilings (where floorplate is reinstated) and the damage to existing ceilings should be repaired on a like-for like basis (lath & lime render/plaster). Sections of missing and detached cornice (see Plate 62, HS) should be reinstated, with exiting cornice retained in-situ and repaired as required. The existing & reinstated sections of cornicing across the interior of the Grade II listed building should be identified on proposed drawings. *Revised drawings indicate the areas of ceiling to be replicated or reinstated along with existing cornices.*

1.2.7. Wall Finishes

- a. The proposed insulated lime plaster across the upper stories is considered acceptable in principle where no original/historic plaster remains internally. This is contingent on appropriate width to restore the original/historic proportions of the Grade II listed building and appropriate strength. Existing joinery & plasterwork (frames, skirting boards, cornicing etc.) should be retained in-situ. A sample and product specs of the proposed new finishes should be conditioned. *Noted*
- b. The retention of the existing exposed brick finish to the hovel area (32 & 33A) is also supported. The proposals to make existing masonry good and repaint (highlighted purple on proposed wall finishes) however are not acceptable. Intrusive modern paintwork in these areas should be stripped to an agreed methodology/specs. Please note that some walls have been missed from the relevant plan (033 A). The brickwork in the proposed restaurant lobby for example should be left exposed, to retain the existing appearance and character of the space. *Please refer to revised wall finish drawing*
- c. The existing brickwork finishes on the basement should be retained/exposed, particularly as tanking would not be supported and should be omitted (see section 3.2.1). *Noted. Please refer to revised wall finish drawing TSS 031-C*
- d. The retention and repair of the existing plaster and timber panelling to the main staircase and entrance lobbies is supported. Please note that areas of the original/historic wall have been missed on 034A. These should be included on the plans, with original/historic finishes retained in-situ and made good. As discussed in section 3.2.3 the panelling should be retained, with no section removed to create the new link between the stairs and the lobby area. Please clarify the proposed finishes to store areas at FF level. *Noted. Please refer to revised wall finish drawing TSS 034-C*
- e. Please note that the existing original/historic wall finishes (timber panelling and plaster) at the fourth-floor level should be retained and repaired like-for-like, with the modern overboarding removed (see plate 103, HS). *Noted.*

1.2.8. Fireplaces

The proposed works to the fireplaces that survive throughout the interior of the Grade II listed building would need to be better understood – including to those blocked (see Plate 81, 95 & 95, HS). It needs to be understood how these would remain legible under the proposed new render, as discussed on site. Please note that these features do not appear to be limited to the first & second floor. The plans should be amended accordingly, to identify these surviving original/historic features throughout Fraser House. *Noted. All relevant plans have been updated accordingly.*

1.3. Windows

- a. The proposed refurbishment of the existing original/historic windows across the Grade II listed building is supported. Full and final details of the proposed repair schedule and refurbishment works would need to be conditioned. As noted in earlier section of this advice, the bricked up/blocked up openings at GF of the Grade II listed building should be restored/reglazed. The blocking of the existing windows on third & fourth floor would not be acceptable – particularly where the services/proposed subdivisions can be relocated to retain these exposed/glazed. *All relevant plans and elevations have been updated accordingly. (As item 1.2.5)*
- a. As discussed on site, secondary glazing should be installed on the existing reveals across the Grade II listed building *TSS drawings revised to reflect this modification*. The modern windows at fourth floor can be replaced with new double-glazed windows. High quality steel or timber framed windows would be acceptable. Further detail would need to be submitted in support of the proposed lowered sills in this location, including existing and proposed section indicating the extent and interest of the original/historic fabric to be removed. As discussed on site, no original/historic architectural features, e.g. sills, stonework, should be removed to deliver this aspect of the scheme. *Noted. Further section details to be submitted in the next stage and it is advised that this is conditioned upon approval. A more comprehensive condition survey to be undertaken in the next stage as current internal window lining varies in condition.*
- b. The historic rooflights and glazing at fourth floor level (see Plate 98 and 102, HS) should be retained. Should access to roof level be required, this should be accommodated with minimal harm to the original/historic fabric (timber and glazing) and illustrated as such on the proposed drawings/plans. Representative elevational drawings of the proposed secondary glazing should also be submitted as part of the LBC/PP or as a condition. *Noted. Further details to be submitted in the next stage and it is advised that this is conditioned upon approval.*

1.4. Other

- f. Full and final details of the proposed works to the existing internal and external features across the Grade II listed building would need to be submitted as part of the LBC/PP or conditioned. Please note that prior to redecoration and paint stripping, a paintwork analysis and cleaning method statement would need to be agreed with the LBC. The paintwork analysis should cover the original/historic features, including the grand staircase, ironworks (beams, columns, external fire staircase and hoist doors), joinery (beams, panelling to walls & ceilings, hoist, doors and windows) and existing plaster finishes. The paintwork analysis should inform the proposed new finishes. *Noted with added reference to the above now indicated in TSS revised drawings.*

- c. Please note that where the new walls about the original/historic walls, a shadow gap should also be accommodated. The detail should be submitted as part of the PP/LBC or conditioned. The typical column treatment as presented on 34A is acceptable in principle. *Noted. Larger scale shadow gap details, where applicable, will follow in the next stage and it is advised that this is conditioned upon approval.*

As per advice from the accessibility officer, attached for reference, there is limited information on whether:

- the lifts would be fully accessible;
- d. the proposed apartments meet visitable standards M4(1) or accessible standards M4(2) including turning spaces. *Measurements have been added to plan drawings to demonstrate M4(1) compliance.*

More information to address these concerns should be submitted as part of the LBC/PP or conditioned.

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