

24 October 2022

Mr S. Woodford
Conservation Officer
Copeland Borough Council
The Market Hall
Market Place,
Whitehaven CA28 7JG

Dear Sammy,

4/22/2387/OL1 & 4/22/2389/OF1

Proposed change of use of Grindal House, St. Bees to an Apart Hotel including associated external works to improve access and parking provision

I refer to your comments on the above application and respond below to each comment:

The site layout is generally the same as that previously approved, with the exception of additional car parking.

- *The car parking on the west side of the building (nos. 21-25) constitutes less-than-substantial harm to the building's setting. Additionally, it is less-than-substantial harm to the character and appearance of the conservation area.*
- *This will effectively convert part of the adjoining field into car parking.*
- *If additional parking is needed, it would be preferable to explore other options. I appreciate this is earmarked for a laundry and storerooms, but would removing part of the single storey extension to the rear, which makes a negative impact on the building and conservation area, be an alternative way of accommodating the extra spaces?*
- *Alternatives positions for bays 21-25 should be prioritised..*

A revised plan has been issued to Christie Burns following her earlier comments about parking bays 23-25. A copy of this plan is attached, and you will see that it relocates bays 23,24 & 25 to retain the developed area within the approved access road limits. Hopefully this deals with some of your concern.

MARTIN CUTHELL

A R C H I T E C T U R A L S E R V I C E S

Internally, at basement level it is proposed to remove the partition walls creating the showers for use as a pool room, and to reorder the WC in the centre plan to create a lift shaft and new staircase.

- *This will evidently be one of the more major alterations.*
- *I note that two existing staircases are to be blocked. This entails some harm, but the change is reversible due to the use of studwork, and I would view this as justified as the documentation shows their treads are deflected and they are not safe for large numbers of guests to regularly use.*
- *Justification for the lift should be more detailed. Is it an essential or only a desirable feature?*

The wall to which you refer is a stud wall, added in to divide the existing room into the two areas - photo inserted below, a quarry tiled floor and drainage channel extend through it in places. It appears to be built up under a timber beam which will be retained.



MARTIN CUTHELL

A R C H I T E C T U R A L S E R V I C E S

- *On the ground floor, I note that a staircase indicated as being blocked off at basement level is shown as removed altogether. The design and heritage statement refers to it being blocked off.*
 - *Clarification is needed on this, and justification if removing.*

Neither of the two staircases will be removed. The lower flight of the main stair will be retained, boxed in at ground floor with studwork and the door to the main foyer fixed shut over a fire proof backing panel.

The back staircase, shown below, will be boxed in at lower ground floor level with studwork and then the ground floor extended over the well. The stair and handrail will remain although the upper return of handrail will need to be removed to allow the floor to continue over. The components removed can be retained in the boxed in void for future reference.



MARTIN CUTHELL

A R C H I T E C T U R A L S E R V I C E S

- *The spaces to the north-west side of the ground floor are shown as being converted into a two-bed apartment. This is likely to represent a negligible level of harm.*
 - *A fireplace is shown as being blocked up. Clarification on the value of this feature, if any, should be supplied in the heritage statement along with justification.*

The fireplace to which you refer is presumably the hatched area on the proposed plan in the bedroom of flat 1? This is infact a shelf recess – see photo below.



- *The housemaster's study is to be substantially modified by the insertion of the lift shaft and lobbies for the apartment in the north corner of the floor.*
 - *Justification for lift needed.*
- *Some reordering of partition walls is proposed at the south-east side of the ground floor. I would anticipate a negligible level of harm here.*
- *On the first floor, reordering of partition walls is proposed. I anticipate this to have a negligible impact on the building's significance.*
- *The lift will be continued through this floor, in the location of a storeroom.*
 - *Justification for lift needed.*
- *On the second floor and attic, changes include minimal reordering of partition walls and the additional of the lift shaft.*
 - *Justification for lift needed.*

Policy DM22 requires development proposals to be accessible to all users by providing convenient access into and through the site for pedestrians, cyclists and disabled people, access for emergency and service vehicles, meeting adopted car parking standards which reflect the needs of the Borough in its rural context.

Access within the building is an important consideration to ensure the proposed use is viable and able to be used by all. The inclusion of a lift is critical to be able to offer full use of the building. Although not ideal, the only level access into the building is via the lower ground floor but the lift will extend to this level and the parking will be well placed for disabled customers or staff to use this access.

The lift is essential given the scale of the building and the number of floors. It would be discriminating to say that disabled people do not have access to the whole building particularly given the extent of the investment and the material change of use. As the main entrance level is raised up approximately 900mm above the surrounding ground levels the only viable access for a level approach is the lower ground floor. This area has limited window area and has no scope to form bedrooms to the standard of the others and in any case the use of this area for bedrooms then displaces the other guest facility rooms to the upper level making them in turn inaccessible without a lift.

The applicant/operator is required to have a disabled access statement in place and available in the building for guests to see.

Building regulations part M requires a material change of use of a building to comply with disabled access regulations. We acknowledge that some tolerance is given to historic/listed buildings where preservation of the fabric is essential. However, in this case the historic buildings future depends on finding a long-term use and to justify the financial commitment the long-term use has to be viable and attractive to as wider user group as possible.

MARTIN CUTHELL

A R C H I T E C T U R A L S E R V I C E S

The only solution to enable the building to operate well, provide opportunity for all and to assist with the 'manual handling regulations' for housekeeping staff is to have a lift connection all floors (with exception of the attic level due to headroom restrictions on the shaft).

The positioning of the lift is in our opinion appropriate in preserving the more prominent features to the front and side elevation rooms of the the building and using what is really a 'back of house' area for the lift position having as little impact as practically possible on the overall integrity of the heritage asset.

The area chosen for the lift is the area with the clearest route without interference with existing structural walls and architectural features. In the lower ground floor area it is a toilet area, rendered walls, quarry tiled floors, plasterboard ceilings and extract ceiling ducts. There is nothing significant that will be affected here. The lift is positioned to sit inside the load bearing wall position so that the building integrity is retained. At upper ground floor level, main foyer, the walls have already been significantly altered to suit a slightly raise floor (presumably due to settlement in the past) and an open office arrangement with glass panels and doors facing the foyer. There is nothing historic about these doors and the raised floor which will be removed to allow the lift shaft and new stair to be formed. The main structure follows on up from below with the lift shaft built on the 'room side' of the walls retaining any features in the foyer and avoiding disturbance of the main walls. The same continues up on each level, the first floor jhas once been one big double windowed room but has been split off with new stud partitions to form bathrooms. These stud walls will be removed but the chimney breast and main walls retained. At second floor it is still one big room so no intermediate walls to be removed. In the attic rooms there are small alterations to stud walls.

I trust the above is acceptable and look forward to your response in due course.

Yours Sincerely

Martin Cuthell