Grant, Carol

From: Morris, Mel
Sent: 31 July 2025 09:58
To: Grant, Carol
Subject: AVA/2021/1049 - De Bradelei Mill

Dear Carol

AVA/2021/1049 - De Bradelei Mill
Since my last set of comments last August there have been updated plans submitted. I note that the plans do not show any of the external walls being upgraded with insulation (which will be required to comply with Building Regs.) My recommendations for the elevations, which included signage to be illustrated and alterations to restore the south elevation windows to the courtyard, have not been followed. We do, however, now have sections which help but are not at sufficient detail to understand the full effects on the ground floor spaces. There is no specification for upgrading the ceilings to the ground floor. The use of acoustic roll insulation laid between the joists is not going to provide adequate fire protection to satisfy Building Regs. on its own between the ground floor and the first floor accommodation. No drainage plans have been submitted. These would show the drainage runs, which should, as previously requested, show the soil pipes and where they run through the building and how they affect the ground floor spaces. This is left for us to guess based on the layout. The best way to address this would be for a set of drainage plans, colour-coded, and accompanying local sections where pipes run through the ceilings and are slung below the soffits. The use of arbitrary sections (although plentiful) does not address my previously expressed concerns.

I am sympathetic to the proposed use, as the baseline for assessment is the current partitions and previous office uses. Unfortunately, the applicant has not addressed the concerns I raised, so has not really helped progress the application constructively. I have consistently advised that a Building Inspector should be brought onboard to provide early advice, so that we can fully understand the impacts now and that advice has not been taken up. I note that HE say, 'The submitted Heritage Statement is noted, and whilst it provides a decent Statement of Significance, there is concern that it does not go into sufficient detail with regards to incremental harm, especially upon the existing internal fabric of the building, especially with regards to the provision of new plumbing services. That is exactly what I said in August 2024, so there is no inconsistency.

There is a high risk now that the application has been referred to UNESCO that the building may become sterilised if they do not accept the principle of conversion and subdivision. It is disappointing that we got this far, as we have tried to help and advise on a way forward. I could not recommend approval, in any event, with the lack of information. We will wait to see what the ICOMOS Technical Panel say, but they are likely to reiterate much of what we have said.

Kind regards
Mel Morris
Heritage Consultant