

DESIGN & ACCESS / HERITAGE JUSTIFICATION STATEMENT

Project Address: St Mary's Rectory, Sumner Street, Glossop, SK13 8DP (Plot 2 only)

Planning & Listed Building Consent Reference: HPK/2019/0319 and 320 – High Peak Borough Council

Building Control Reference: Project Number: AIEC-19-42283 – Approved Inspectors Ltd

1. Purpose of this Submission

This statement is submitted to **High Peak Borough Council** in support of a joint application to vary the approved layout plans for the residential conversion of the St Mary's Rectory, Sumner Street, Glossop.

The subject property is a pre-1948 curtilage listed asset falling within the protection boundary of the Grade II listed Church. Works are currently authorised under existing Full Planning Permission **HPK/2019/ 0319** and Listed Building Consent **HPK/2019/0320**.

This submission constitutes a formal joint variation application comprising:

- **An application under Section 19** of the *Planning (Listed Buildings and Conservation Areas) Act 1990* to vary the "Approved Plans" condition of Listed Building Consent HPK/2019/0320.
- **An application under Section 73** of the *Town and Country Planning Act 1990* to vary the "Approved Plans" condition of Full Planning Permission HPK/2019/0319.

The specific purpose of this submission is to vary the "Approved Plans" condition across both consents to regularise a minor, necessary internal layout modification executed at the foot of the principal staircase. This alteration was legally mandated by building control to rectify a critical design flaw and ensure absolute compliance with **UK Building Regulations Approved Document A (Fire Safety)**.

2. Background and Material Conflict

The layout originally approved under Full Planning and Listed Building Consent showed a protected stairway discharging directly into an open-plan lounge environment.

During the site inspection phase, it was identified by the Registered Building Control Approver (RBCA) that the original approved layout contained a fundamental fire-life safety flaw. Under Section 2 of Approved Document B (Volume 1), a protected stairway forming part of a fire escape route must not discharge directly into an open living space. A localised fire in that lounge would instantly trap occupants on the floors above by compromising their sole means of escape.

Consequently, the project encountered an immediate conflict between the layout approved under the heritage consents and the mandatory requirements of national fire safety regulations.

3. The Justification for the Minor Alteration

To resolve this life-safety risk and secure the statutory building regulations sign-off, a minor internal alteration was executed. A lightweight partition fire break wall has been put in place at the foot of

the 2nd floor staircase to 1st floor landing. Allowing protected escape route from 2nd floor via existing window. The ground floor to 1st floor stairs have been altered at the bottom to veer to the left instead of veering to the right, as you descend.

We respectfully submit that this alteration represents the **minimum intervention necessary** to satisfy the building's statutory safety requirements:

- **Public Benefit:** The alteration provides an overwhelming public benefit by securing human life from the risk of fire and allowing this historic curtilage asset to be safely and viably brought back into residential use.

4. Statutory Sign-off

The revised staircase layout has successfully satisfied all local authority fire safety benchmarks. A **Building Regulations Final Certificate** has been formally issued by the building inspector and lodged with High Peak Borough Council, confirming that the property is now fully compliant with modern fire safety standards.

5. Technical Fire Regulations Report

To substantiate the absolute necessity of this layout change, this application is accompanied by a professional **Fire Regulations Report (attached as Appendix B)**.

This technical report confirms that:

- The original approved layout posed an unacceptable risk to life by discharging the main escape route directly into a high-risk living space (the lounge).
- Alternative active fire systems (such as enhanced detection alone) were deemed insufficient on their own by the building inspector to mitigate the specific structural layout risk without a physical separation.
- The creation of the protected lobby at the foot of the stairs the exact, compliant solution required to satisfy the statutory life-safety benchmarks set out in Approved Document B.

6. Conclusion

The deviation from the original drawings was not borne out of architectural preference or cosmetic design choice, but out of an absolute legal obligation to protect human life, as explicitly detailed in the attached **Fire Regulations Report**.

Given that the works are minor, highly localised, completely reversible, and already verified as fire-safe by the building inspector, we respectfully request that the Conservation Department and Planning Department approve this joint variation under Section 19 and Section 73 to align the historical consents with the built reality.



27th July 2026

RE: "St Mary's Rectory" Sumner Street Glossop Derbyshire SK13 8DP (Plot 2 only)

This letter is written in support of applications to vary the approved layout plans for the residential conversion of Plot 2 of the curtilage-listed St Mary's Rectory on Sumner Road in Glossop.

Orion Heritage prepared a Heritage Statement in February 2020 in support of applications for Full Planning Permission (HPK/2019/0319) and Listed Building Consent (HPK/2019/0320), which were approved by High Peak Borough Council in December 2020. The Delegated Decision Report for each of these original applications concluded that, based on the submitted plans, the residential conversion of the curtilage-listed subject building would "result in less than substantial harm to the heritage asset" and that "the less than substantial harm would be outweighed by the benefit of sympathetically restoring and bringing this important heritage asset back into use." This conclusion accorded with the findings of the original Heritage Statement.

As is outlined in the Design & Access/Justification Statement, the approved layout plans were in conflict with the mandatory requirements of national fire safety regulations. To resolve this conflict and to ensure the layout of the curtilage-listed subject building is compliant with national fire safety regulations, internal alterations have been made to provide a protected stairway from the second floor to a final exit door at ground level. A report prepared by FSEC in May 2026 confirms that the necessary alterations have ensured that the subject building is compliant with the relevant regulations.

The necessary alterations to facilitate the protected stairway will have resulted in the loss of historic fabric and features, as well as a change to the historic layout of the subject building in its south-west corner. In principle, these alterations will have eroded elements which generated historic and/or architectural value within the curtilage-listed subject building, which will have given rise to a level of less than substantial harm to its significance. This is considered to be in line with the overall less than substantial harm caused by the wider conversion works, as identified in the original Heritage Statement and in accordance with the original decisions to approve the relevant applications.

The necessary alterations will not have caused any additional less than substantial harm beyond that which had already been identified as part of the original applications. Overall, the less than substantial harm caused by the conversion works will not have been elevated by the necessary alterations. Moreover, ensuring that the subject building is compliant with national fire safety regulations is paramount to securing its long-term preservation through its conversion for residential use, which forms the basis for the public benefits of the scheme outweighing any identifiable less than substantial harm, in accordance with paragraph 215 of the NPPF.





As the necessary alterations to the subject building are purely internal, there will not have been any additional harmful effects on any surrounding heritage assets, including the adjoining Grade II listed Roman Catholic Church of St Mary Crowned (NHLE 1384299) and the St James Conservation Area.

In summary, the necessary alterations will not have elevated the less than substantial harm caused by the residential conversion of the curtilage-listed St Mary's Presbytery. The conclusion holds that this less than substantial harm would be outweighed by the benefit of sympathetically restoring the subject building and bringing it back into use, which has been facilitated by the necessary alterations to provide a protected stairway in accordance with the relevant national fire safety regulations.

Charlie Walker, Senior Consultant

