

Inc Architects Limited

HERITAGE STATEMENT

Project:

Proposed Conversion/Development at:
London Mill, Ashbourne Road, ST13 5AS

Client:

Vanguard Group Developments (Uk3) Limited

Job Reference: 25 031-INC-RP-HS

Issued: May 2026

Report Prepared By:

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1.0 Introduction

- 1.1 This statement accompanies application SMD/2026/0212, which seeks a variation of condition in relation to the original listed building consent (SMD/2023/0192) for London Mill, Ashbourne Road. This document functions as an addendum and must be read in conjunction with the comprehensive Heritage Statement prepared by Mel Morris Conservation, submitted as part of the original approval.

2.0 Justification

- 2.1 As the technical design for the approved scheme has progressed, strict statutory fire safety requirements have necessitated specific amendments to the approved plans. This application seeks to cover:
- **Minor internal alterations:** Necessary reconfigurations to establish protected and safe escape routes.
 - **Installation of a smoke shaft:** A localized penetration through the existing roofline to manage smoke ventilation.
- 2.2 These amendments are not discretionary; they are strictly dictated by UK Building Regulations, specifically Approved Document B (Fire Safety), and guided by BS 9991 (residential) and BS 9999 (non-residential). Compliance with these regulations is a mandatory life-safety requirement to limit smoke spread and ensure safe access for firefighters. The exact technical requirements are further detailed within the accompanying 'Fire Safety Strategy'.
- 2.3 The necessity and nature of these design variations have been the subject of proactive dialogue with the Local Planning Authority. During the ongoing discharge of conditions process, these specific changes were discussed, explained, and agreed in principle during a Teams meeting and subsequent email correspondence in April 2026 with both the Planning Officer (Jane Curley) and the Conservation Officer (Megan Atkinson). During this meeting, options were provided and the final decision was made by the Conservation Officer.

3.0 Impact

- 3.1 It is acknowledged that introducing a modern intervention, such as a smoke shaft, to the roofline of a listed building is not a traditionally desirable outcome. However, in planning terms, the visual and physical impact of this addition constitutes "less than substantial harm" to the significance of the heritage asset.
- 3.2 When weighed against national planning policies, this localized harm is heavily outweighed by the substantial public benefit of the wider scheme. Simply put, without these mandatory life-safety interventions, the building cannot legally or safely be occupied. These alterations are therefore essential to securing the building's optimum viable use and ensuring the long-term survival and maintenance of the heritage asset.

4.0 Conclusion

- 4.1 The proposed variation represents the minimum intervention necessary to achieve strict fire safety compliance. By facilitating the safe and legal occupation of Unit 4, London Mill, the variation directly enables the restoration and long-term preservation of the listed building.