## **DERWENT VALLEY MILLS WORLD HERITAGE SITE**

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7th August 2018

Sarah Pearce Amber Valley Borough Council Town Hall Ripley

DE5 3BT

Dear Sarah

Derbyshire

AVA/2018/0651: Erection of a two storey dwelling house at Unity Mill, Derwent Street, Belper.

Please find below my response to the consultation concerning the above application. These comments will be taken to the World Heritage Site Conservation and Planning Panel for verification in September.

The site lies within the Derwent Valley Mills World Heritage Site (DVMWHS). The Derwent Valley Mills were inscribed on the World Heritage List by UNESCO in 2001. The Derwent Valley Mills Partnership, on behalf of HM Government, is pledged to conserve the unique and important cultural landscape of the Derwent Valley Mills World Heritage Site; to protect its outstanding universal value (OUV), to interpret and promote its assets; and to enhance its character, appearance and economic well-being in a sustainable manner.

The retrospective Statement of Outstanding Universal Value (SOUV) for the Derwent Valley Mills was adopted by the World Heritage Committee in 2010. The SOUV refers to the following UNESCO criteria, which the World Heritage Committee agreed were met at the time of inscription. They are:

- C(ii) That the site exhibits "an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town planning or landscape design";
- C(iv) That the site is "an outstanding example of a type of building or architectural or technological ensemble or landscape, which illustrates a significant stage in human history".

The SOUV records that these criteria were met for the following reasons:

- C(ii) The Derwent Valley saw the birth of the factory system, when new types of building were erected to house the new technology for spinning cotton developed by Richard Arkwright in the late 18<sup>th</sup> century.
- C(iv) In the Derwent Valley for the first time there was large-scale industrial production in a hitherto rural landscape. The need to provide housing and other facilities for workers and managers resulted in the creation of the first modern industrial settlements.

A Management Plan for the World Heritage Site was created in 2002, and updated in 2014. It has as the first of its nine aims to: "protect, conserve and enhance the Outstanding Universal Value of the DVMWHS." In accordance with this aim, and with reference to Section 12.1 of the Management Plan, I have consulted with Derbyshire County Council's Conservation, Heritage and Design Service (which advises the World Heritage Site Partnership in planning matters), and have received the following advice:

Unity Mill is listed in grade II and within the Belper & Milford Conservation Area. While not built for the manufacture of textiles, Unity Mill has, during its life, had associations with the textile industry and the Strutt family and, therefore, forms part of the World Heritage Site's narrative.

The proposal to construct a single dwelling on the site of the mill, is a curious decision in terms of compatible uses. No justification is given for the intervention into this historic context other than reference to there being no demand for further commercial uses. The potential precedent for a dwelling on the site has not been given as justification either. The first edition OS Plan shows a garden in the north west corner of the mill site spilling out onto the garden plots of Chevin View and the undeveloped meadows.

In principle, there is no objection to the introduction of a dwelling on the site, providing it were not to raise issues for the 'authenticity' of the World Heritage Site. It is claimed the proposed design borrows elements of the mill and its associated outbuildings, in order to arrive at a sympathetic solution for its context. However, this approach runs the risk of creating a pastiche dwelling that might be misinterpreted as a former mill manager's house. This is exemplified by the nine-panel door pattern simply set into masonry of the separate porch. The proposed design doesn't meet the high quality expected within this sensitive historic context. The design fails in a number of respects, including scale, fenestration pattern and detail, porch design and eaves detail. Due to lack of information, it is not possible to assess the impact of associated functional requirements of the development on the significance of the world heritage site, including car parking and/or garaging, private amenity space and domestic curtilage.

In the form proposed, it is therefore considered that the dwelling could potentially be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site.

I hope these comments can be considered when a decision is made concerning this development.

Yours sincerely

Adrian Farmer

Heritage Co-ordinator, Derwent Valley Mills World Heritage Site.

cc Sarah Johnson, AVBC