DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Heather Wynne Amber Valley Borough Council Town Hall Ripley Derbyshire DE5 3BT

Dear Heather

AVA/2018/1178: Listed building consent for alterations and extension at 6 Long Row Belper (Amendment).

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 June.

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 18th 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.



17th April 2019

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:

The property forms part of some of the most significant and early former mill-workers housing within the WHS built by the Strutt family. It is considered to be an important attribute of the WHS for its contribution to the social infrastructure related value as defined in the current DVMWHS Management Plan (2014-19).

The proposed development comprises of a single storey extension to the rear of the building. This will require alterations to the rear elevation of which is presumably an existing 19th century extension and outbuildings.

There are concerns over the scale of the proposed development in that it projects too far into the rear garden and because the design appears to jar with that of the existing building. Unfortunately the design information provided within the submission is currently lacking in detail to demonstrate how key junctions between the new and existing dwelling are to be successfully resolved. The Heritage Statement provided as part of the submission does little to articulate how the existing building fabric has developed over time and so it does not provide the assurance that the extension has been respectfully designed. The Heritage Statement should therefore be revised to show a clear analysis of the historic phasing of the building, including annotated photographs where relevant to help understand the impact of the proposed changes on the attribute.

The World Heritage Site Partnership does not object to the proposed development in principle, although it is not considered to be acceptable in its current form. This is partly because of the incomplete level of information required to form a more comprehensive understanding of the impact of the proposals. In order to be considered acceptable the design should be amended to ensure that it is of a suitably high-design quality as required in the DVMWHS Management Plan and so mitigate any negative impacts on the OUV of the DVMWHS.

Further advice was received following the amendments to the design of the proposed rear extension and were as follows:

The issue of extending these dwellings of high significance and value has been on-going for several years. Concern for the loss of significance prompted the Conservation Plan for East and West Terrace, Milford, comprehensively produced by Rodney Melville & Partners, in March 2007. Chapter 5.10 'Recommendations for the Limits of Acceptable Modification' sets out adopted policies in respect of changes, including extensions.

Similar issues apply to all historic rows and terraces, where piecemeal extensions and alterations can cause serious harm to the special interest of the buildings, the character and appearance of conservation areas and, in this instance, the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site.

Recent applications involving similar issues to this proposed extension were considered at 46 Short Row Belper (AVA/2018/1128) and 7 Long Row, Belper (AVA/2017/1217 and 1218 and AVA/2018/1160), where the impact on the loss of historic fabric, plan layout, authenticity and design quality were assessed in the determination of those applications.

While the proposals have been amended through setting back the extension, to preserve the gable of the WC outshut, and the rooflight, initially proposed, having been removed, concerns remain for the quality of design, particularly the relationship between the more prominent extension as its increased presence engages with the WC outshut, the awkward roof junction and the use of matching masonry materials and the implication for interpretation of new and historic fabric.

The philosophy applied to this design has not been as rigorous as to the other applications, where a contemporary approach has been taken to the design and the use of contrasting, lightweight materials.

Given that more sensitive and appropriate responses to the issue of extending listed attributes of the World Heritage Site have been achieved, it cannot be concluded that the design quality of the proposal in question has met the necessary level to mitigate the harm to a component of the World Heritage site's significance, as expressed by its Outstanding Universal Value.

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 Brooks, AVBC