DERWENT VALLEY MILLS WORLD HERITAGE SITE

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18th September 2019

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

Dear Heather

AVA/2019/0831: Listed building consent for the replacement of two ground floor windows on the rear elevation at Brook Cottage, Kedleston Close, 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 later this month.

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.

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:

Brook Cottage is a grade II listed building within the Belper and Milford Conservation Area. The cottage is closely associated with the textile narrative, forming part of the site of the imposing Ward's Warehouse. The cottage is known to have been refurbished recently and sub-divided into two dwellings. Conservation advice would have been to repair the windows to retain the significance of the building and its contribution to the character, appearance and

authenticity of the World Heritage Site and the conservation area.

If it is shown that replacement is justified, with the frames being beyond repair, then appropriate frames should be fitted on a like-for like basis. Double glazing is unlikely to be appropriate as this would result in a loss of authenticity and historic fabric, which would be harmful to the significance of the World Heritage Site. As the application proposals stand, it is considered that there would be 'less than substantial' harm to the designated heritage assets, as defined in the NPPF, but this would still represent harm to a heritage asset of the highest value, which is unlikely

to be outweighed by any public benefit that may form part of the proposal.

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