## **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/2019/0845: Replacement of existing door and windows together with repair and maintenance of existing roof at 3 Parkside, 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 18<sup>th</sup> century.



18th September 2019

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:

This site is located within the Belper and Milford Conservation Area, which has an Article 4 in force covering the replacement of front windows and doors amongst other items. The application relates to a traditional stone cottage set within a short row, along Parkside. The existing front window frames, which are relatively modern, are painted timber, but have an inappropriate pattern, with top opening lights. Their appearance has a negative effect on the character and appearance of the conservation area and an opportunity exists to enhance the building and its wider contribution.

Despite the bold claims of the manufacturer, the proposed uPVC windows would not be appropriate within this area of high heritage value, at an international level. However, as the building is not listed and the existing frames have no significance, it is acknowledged that resistance to their use is unlikely to be sustainable. However, the current door is of a pattern, material and construction that is appropriate for the area. Its replacement with a modern composite door is therefore considered to be harmful to the significance of the World Heritage Site. High performance panelled timber doors, with draft proofing, good quality, durable timber and a high specification paint finish are available that would also preserve the significance of the Site. The proposals for the re-roofing are considered to be commendable and satisfactory, however.

In summary, it is considered that the proposals for the roof works and front windows would be acceptable, but those for the replacement of the front entrance door would be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. The harm would be 'less than substantial' as defined in the NPPF.

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

Yours sincerely

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Adrian Farmer Heritage Co-ordinator, Derwent Valley Mills World Heritage Site. cc Sarah Brooks, AVBC