

DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Sarah Brooks
Amber Valley Borough Council
Town Hall
Ripley
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15th November 2018

Dear Sarah

AVA/2018/0818: Alteration, conversion and erection of buildings and associated change of use to buildings collectively known as Belper Mills, to include: East Mill - conversion to 117 residential apartments, formation of atrium through floors 1 to 6; alteration of loading bay; formation of public viewing platform to northwest tower and alteration to open-up ground floor pedestrian route adjacent to North Mill, one commercial unit at ground floor, with amended vehicular access to east elevation and 37 surface parking spaces on external deck; North Mill – alteration, restoration, replacement and repair to windows, doors, external and internal walls and roof, alter five windows to door openings to south elevation, to retain as museum at ground and lower ground, and offices at first and upper floors, change of use ground floor unit to commercial, and ancillary uses; Workshops – alteration, restoration, replacement and repair of windows, walls and roof; Strutt House – alteration, restoration, replacement and repair of windows, external and internal walls and roof, alter nine windows to doors on east elevation, to facilitate internal subdivision into 4 units for flexible commercial floorspace at ground, first and mezzanine levels; Gangway restoration and repair external and internal walls and roof, alteration to ground floor structure to retain in ancillary use to offices (Class B1); optional change of use first floor to ancillary use to venue associated with Strutt House, at Belper Mills Complex, Bridge Foot, 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 next week.

The site lies within the Derwent Valley Mills World Heritage Site (DVMWHS) and is one of its most significant and recognisable attributes. 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:

The FI team presented the above proposals to the Derwent Valley Mills World Heritage Site (DVMWHS) Partnership Steering Group before the planning and listed building consent applications were submitted. The Steering Group were broadly supportive of the proposal for this sensitive and important site. However, it is the Partnership’s opinion that the re-development proposals for the Grade II listed East Mill would at least constitute ‘less than substantial’ harm. In addition, other interventions would also impact negatively on other designated heritage assets within the mill complex.

Paragraph 196 of the National Planning Policy Framework states: “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.” It is the Partnership’s opinion that to assess the appropriateness of some of the proposals contained within the application, particularly with regard to their public benefit, a detailed condition survey is required for all the statutory and curtilage listed assets within the mill complex. FI was made aware at the presentation to the Steering Group that funding could be made available from the Derwent Valley Mills World Heritage Site Great Place Scheme to assist in producing a condition survey, as outlined above. This money is still available to either FI or Amber Valley Borough Council to undertake this essential survey.

Furthermore, as part of the development, the Partnership would expect a visitor facility to be included that maximised engagement between visitors and residents and the Outstanding Universal Value of the site and its global significance.

To help facilitate this essential piece of work, there may be further monies made available to FI and Belper North Mill Trust to examine options and the feasibility of a visitor facility at the mill complex. However, this would be subject to understanding the condition of the buildings first.

The Partnership would like to endorse the consultation response of Historic England, which it believes are proportionate and appropriate.

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

Yours sincerely

A handwritten signature in black ink, reading "Adrian Farmer". The signature is written in a cursive style with a large initial 'A' and 'F'.

Adrian Farmer

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