

# DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

15th January 2019

Dear Sarah

**AVA/2018/1073: Replace wooden windows with UPVC wood effect sliding sash windows; replace wooden front and rear doors with composite wooden doors and demolish porch at 11 George 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 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.

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 cottage is located within an unlisted row, 1-12 George Street, which faces both George Street and William Street. It is located within the Derwent Valley Mills World Heritage Site and the Belper & Milford Conservation Area. The millworkers’ housing is a contributory attribute to the significance of the World Heritage Site, a designated heritage asset of the highest value.

The current windows have modern, timber frames with top hung opening lights to an inappropriate pattern. Their replacement is acceptable, in principle, therefore. However, the proposed windows are not considered to be appropriate in a number of respects. As a material, uPVC is not normally acceptable due to the visual differences between traditional joinery and the modern material. The application claims that the proposed windows are from a manufacturer which has developed frames which attempt to replicate the detail of traditional windows. Nevertheless, the authenticity of timber windows cannot totally be reproduced, particularly as the design makes no compromises in certain key respects. In particular:

- glass sizes are maximised, with glazing bars, included to produce the basic pattern, being applied as false elements, with no other function than appearance;
- the traditional sizes of the framing members are often not achievable with a box-section material, which requires larger overall dimensions to achieve the necessary strength. So it is with the proposed system, which, most noticeably, has visibly over-sized meeting rails;
- the traditional finish for external joinery in this context is paint, either as one colour, but more typically with sash windows, a two-colour scheme, which contributes significantly to the local character. The false wood grain effect proposed has no precedent within this significant context;
- the applied horns have no logical function within the construction of the frames; their profile would inevitably be different to the distinctive ‘Strutt’ horn profile;

There is also an argument against uPVC on environmental and sustainability grounds, although by itself this may not carry great weight in terms of planning considerations. However, the detailed considerations described above, with respect to the authenticity and integrity of the World Heritage Site, contribute to the unacceptability of the proposed works. The proposals would also be harmful to the contribution towards significance of the World Heritage Site, as expressed by its Outstanding Universal Value. The character and appearance of the conservation area would also not be preserved were these works to be undertaken.

While the appearance of the proposed windows might nominally be perceived as an improvement on the existing frames, the inappropriate material and false detail is further removed from the authenticity of the correct historic detail for these significant elements of the cottage's exterior.

The removal of the porch is welcomed and its replacement with a bracketed canopy is acceptable, in principle.

The proposed composite doors are not considered to be appropriate for this designated area of high heritage value. It is recognised that both front and back doors are not original and indeed are relatively modern. However, they are constructed from timber, which is the traditional material. The DVMWHS Partnership does not consider that there is justification as 'betterment', as the doors would be less appropriate than the current types, for similar reasons to those described for the windows.

In conclusion, it is considered that the proposed works would be harmful to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site and therefore unacceptable. The harm would be 'less than substantial', with reference to the NPPF, but there would be no public benefit to of any significance to balance that unacceptable harm.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adrian Farmer'. The signature is written in a cursive, flowing style with some loops and flourishes.

**Adrian Farmer**

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