

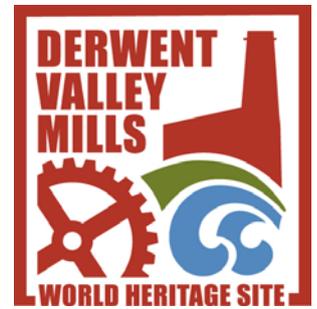
DERWENT VALLEY MILLS WORLD HERITAGE SITE

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

16th May 2019

Dear Heather

AVA/2019/0354: Listed building consent for Installation of external protective clear polycarbonate covers to stained glass window of Library Room at Strutts Centre, Derby Road, 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 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.

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 significance of the school, and specifically the library, is recognised and acknowledged by the Guardians of Strutt. In principle, the Trustees’ desire to protect this unique stained glass is commendable, as its loss would impact on the Derwent Valley Mills World Heritage Site, in which it is located. However, there is also agreement that the protective measures proposed would have a degree of detrimental impact to the appearance of the building, despite the works largely being reversible.

The justification for this intervention is based on the main building having suffered “...random vandalism with a number of glass panes needing replacement...” No detail has been provided on the nature of these attacks, to quantify these acts of vandalism or which windows have been subject to this abuse. Alternative forms of protection, such as austenitic stainless steel wire guards, are preferred by diocesan advisory committees, in respect of churches, for which this has been a long-term problem.

The first floor location of the library windows should make them less vulnerable to vandalism, although the unprotected windows, or those protected by alternative methods, would not be totally safe from determined attack from air-gun pellets. The visually damaging impact of polycarbonate sheets would be harmful to the presentation of the building, which is an Attribute of the World Heritage Site, and while the physical fabric of the asset would potentially be protected by the proposed works, the actual harm could be greater than the speculative harm of any subsequent attacks. Were more evidence available for a more convincing justification for this intervention, or indeed further attacks, this decision could be re-assessed.

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', written in a cursive style.

Adrian Farmer

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