Historic England

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Direct Dial: 07770445866

Our ref: L01442312

24th July 2025

Dear Ms Grant,

Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

DE BRADELEI HOUSE, CHAPEL STREET, BELPER, DE56 1AR
Application Nos AVA/2021/1049 & AVA/2021/1048

Thank you for your email notification of 2nd July 2025 regarding further information on the above applications for listed building consent and planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

Summary

Historic England would consider that there would be harm to the Outstanding Universal Value (OUV) of the World Heritage Site as a result of the proposed further sub-division of the existing listed building. Harm would result both to the significance of the listed building, and impact upon the authenticity and integrity of the World Heritage Site and the OUV.

Historic England Advice

Significance

De Bradelei House, Belper is listed Grade II* where it is designated as more than special architectural and historic interest: Mills occupied by George Brettle and Company Limited (that part along the Chapel Street frontage, bounded on the north by the 1834 building, including northern rear wing, and, on the south, by the recessed, single storey red brick building) , Belper - 1087409 | Historic England <https://historicengland.org.uk/listing/the-list/list-entry/1087409?section=official-list-entry>. The building dates from 1834, where the relevant wing is constructed in brick with round headed windows. The building was originally constructed as a warehouse

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for the domestic framework knitting industry and was known as George Brettle & Company. Pevsner remarks that Brettle was one of the finest hosiery manufacturers in the country, where the south wing was the manager's domestic quarter's but evidence of this remains unclear.

The earlier industrial function of De Bradelei House is made evident by its built form, including open floors and historic fabric, which makes an important contribution to the building's significance. De Bradelei House also makes an important contribution to the significance, character and appearance of the Belper and Milford Conservation Area and to the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. Bradelei is mentioned in the Domesday Book, and is the historic name for Belper, being a part of the manor of Duffield.

The World Heritage Site was inscribed under the World Heritage Convention in 2001 in recognition of the global importance of the Derwent Valley's industrial landscape of high historical and technological interest with its series of 18th and 19th century cotton mills. It was inscribed under criteria ii and iv as set out in paragraph 77 of UNESCO's Operational Guidelines for the Implementation of the World Heritage Convention:

> ***Criterion ii***
>
> *Exhibit 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.*
>
> *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.*
>
> ***Criterion iv***
>
> *Be an outstanding example of a type of building or architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.*
>
> *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.*

The WHS Management Plan summarises the attributes which convey and express the Outstanding Universal Value of the valley and identifies the key elements that contribute to those attributes. Of these the following are considered relevant to the De Bradelei House proposal, where the site comprises the remains of a warehouse for the

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knitting industry and warehouses are important component under Attribute 1:

> *1. The successful harnessing of relatively large amounts of natural energy to deliver the power to drive newly devised machines housed in mills to produce goods of superior quality at an unprecedented rate.*
>
> *Watermills, water courses, mill ponds, aqueducts, culverts, weirs, leats, soughs, launders, waterwheels, mill yards, bleach mills, tentering grounds, warehouses, barracks, counting houses, offices, chimneys.*
>
> *2. The creation and development of a new way of life resulting from the need for people to congregate together (in factories) producing goods of superior quality at an unprecedented rate, sometimes in formerly rural (non-urban) locations, with attendant intensification of agriculture for provisioning and the adoption, from the early 19th Century, of new modes of transportation.*
>
> *Mill workers houses (new forms of housing built in planned campaigns), pigsties, allotments, overseers houses, mill owners houses and service buildings, mill owners parks and gardens, clergy houses, shops, chapels, churches, schools, inns, mill owners' farms, field barns, etc. The relationship of the industrial installations and their dependent housing settlements to the river and its tributaries and to the topography of the surrounding rural landscape has been preserved, especially in the upper reaches of the valley, virtually intact, Similarly, the interdependence of the mills and other industrial elements, such as the canal and railway, and the workers' housing, is still plainly visible.*
>
> *5. A 'relict' industrial landscape, where late 18th and early 19th century industrial development may still be seen in an 18th/ 19th century agricultural landscape containing evidence of other early industrial activity.*
>
> *Enclosure field boundaries, traditional 18th/19th century field patterns, ancient woodland, pastoral farmland, designed landscapes, tree plantations, pathways and channels, farms, agricultural buildings, hosiery and nail warehouses, nailshops, nailers' houses, nailmasters' houses, workshops, quarries, lead mines.*

Impact

The proposed scheme is for conversion of the first and second floors of an existing commercial unit to an air hotel. This would result in works to erection and insertion of new partitions. It is acknowledged that there are existing partitions, where further partitions would be necessary for the provision of separate hotel rooms and ensuite bathrooms. We previously advised that the proposed scheme would harm the significance of the listed building through alteration of the historic plan form, including

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additional partitioning of surviving open spaces, and potentially through the insertion of new stairs and loss of historic fabric. Revisions such as utilising existing modern staircases and not fouling existing window openings are welcomed, though there shall be some inevitable further incremental harm. It is noted in the HIA that remaining historic fabric other than the existing cast iron columns is otherwise limited, so attempts to retain as many columns as possible exposed is strongly encouraged as this would retain a sound degree of internal legibility to the existing internal spaces.

Therefore Historic England considers that its previous use as an office has introduced harm to the existing internal layout of the listed building. Whilst further partitions would be necessary, there is an opportunity for the applicant to design and minimise against potential impact, such as revealing significance where possible, such as ensuring as many cast iron columns are left exposed where practical. There may be technological interventions to aid this, such as the application of intumescent painted finishes in order to meet the relevant fire regulations. The proposal therefore may be harmful to both to the significance of the listed building and the OUV of the World Heritage Site, especially with regards to integrity and authenticity of the existing building and in particular with regards to attribute 1 (mills), and how the former mill is appreciated, where such spaces were often open plan. There is an opportunity however for harm to be minimised, notwithstanding its previous use as an office that introduced much modern fabric, including modern partitions and staircases etc.

The report on the joint World Heritage Centre / ICOMOS / ICCROM Advisory Mission to the Derwent Valley Mills World Heritage property (January-February 2024) noted a number of positive examples of conservation including the re-use of historic mills which were identified as exemplary models of sustainable development where character was maintained allowing the industrial heritage to still play an important role for communities (e.g. Recommendation 11).

In the same report, UNESCO bodies highlighted their concern about the principle of partitions and internal sub-division obscuring the open plan interiors and the grid effect created by the view of the columns. These concerns were expressed in relation to other industrial buildings within the World Heritage Site, but are relevant in understanding how the current proposals could result in a loss of integrity and significance.

Legislation, policy and guidance

You should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

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Paragraph 2 of the National Planning Policy Framework states that Planning policies and decisions must also reflect relevant international obligations and statutory requirements. The international obligations include those under the 1972 World Heritage Convention.

Section 16 of the National Planning Policy Framework further highlights the need to fully understand the significance of a heritage asset in order to assess the impact, and potential harm, of new development including by development in their settings.

In determining this application, you should consider the following policies of the National Planning Policy Framework (NPPF):

Paragraph 202 states that Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Paragraph 207 states that local authorities should require applicants to describe the significance of any heritage assets affected by their proposals, including any contribution made by their setting, in a level of detail sufficient to understand the potential impact of the proposals on their significance.

Paragraph 208 requires local authorities themselves to identify and assess the particular significance of any heritage asset that may be affected by a proposal, taking into account any necessary expertise, in order to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 212 further requires that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Whilst paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset including from development within its setting should require clear and convincing justification. Where harm does occur, this must be weighed against the public benefits of the proposals.

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 (paragraph 215).

Paragraph 220 states that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or

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World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

World Heritage Sites are designated assets of the highest significance and expanded upon in the Planning Practice Guidance - this is referenced and explored in the Planning Practice that accompanies and supports the NPPF: https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#World-Heritage-Sites <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

Historic England provides further guidance on the protection and management of World Heritage Sites: Protection and Management of World Heritage Sites | Historic England <https://historicengland.org.uk/advice/planning/world-heritage/protection-management/>

UNESCO provides Guidance and Toolkit for Impact Assessments in a World Heritage Context: <https://historicengland.org.uk/content/documents/advice/he-briefing-unesco-guidance-toolkit-hia-2022>

GPA2 - Managing Significance in Decision-Taking in the Historic Environment: <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

GPA3 - Setting and Views: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>.

The Derwent Valley Mills Management Plan 2020-2025: The Management Plan - Derwent Valley Mills <https://www.derwentvalleymills.org/about-the-derwent-valley-mills/the-management-plan/>

Belper Heritage & Character Assessment (Belper Neighbourhood Plan): belper-np-hca-lr-updated-300418.pdf <https://www.belpertowncouncil.gov.uk/wp-content/uploads/sites/103/2023/04/belper-np-hca-lr-updated-300418.pdf>

Position

Further assessment was sought on the impact of the following proposals on the significance of the listed building, including the erection of relevant partitioning. The submitted Heritage Statement is noted, and whilst it provides a decent Statement of Significance, there is concern that it does not go into sufficient detail with regards to incremental harm, especially upon the existing internal fabric of the building, especially with regards to the provision of new plumbing services. It is noted that the previous

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use as an office has introduced harm, where the 1994 drawings provides useful historic context, where the investigative work on underlying fabric is welcomed. However, it is not absolutely clear as to what modern fabric is necessary in order to meet the relevant fire regs etc, and what historic fabric can remain exposed such as the cast iron columns. Any opportunities to reveal such fabric would therefore be encouraged and help mitigate impact and incremental harm.

Overall Historic England would consider that there would be harm to the OUV of the World Heritage Site as a result of the proposed further sub-division of the existing interior spaces. As our advice has indicated there are opportunities to minimise the harm caused by the proposed conversion works to an air hotel. We note that the Heritage Statement refers to UNESCO's *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022) but has not implemented the core elements of that process in the document. Heritage Impact Assessment in this methodology for World Heritage requires assessment of the potential impacts against each of the relevant attributes of its OUV, its integrity and authenticity.

Recommendation

Historic England has concerns regarding the dual application, where previous comments from Derwent Valley Mills World Heritage Site Partnership are noted. Further advice should also be sought from your historic environment advisor. Notwithstanding the need for a more detailed assessment in the Heritage Statement regarding the potential impact on the World Heritage Site's OUV, Historic England generally concurs with the HIA's conclusion that the proposal would consist of 'less than substantial harm'. This would be as defined under paragraph 215 of the NPPF at the lesser end of the scale, as the proposal is considered to be reversible, and there would be no impact upon the external appearance of the listed building. However, this is dependent on being able to reveal previously hidden fabric of significance along with the provision of further detail as discussed. Historic England also acknowledges that it is important that the optimum viable use for the building is secured, and that this consideration is important in assessing the paragraph 215 balance.

We therefore consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 2, 207, 212 and 213 of the NPPF. Whilst the proposed alterations are internal, there is concern with regards to incremental harm of existing internal fabric. Further subdivision would impact upon the historic internal plan of the relevant floors and therefore impact upon the integrity and authenticity of the industrial historic significance of the building and its contribution to the wider World Heritage Site, along with the wider character and appearance of the conservation area.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture,

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Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

B Williscroft

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