DERWENT VALLEY MILLS WORLD HERITAGE SITE

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Rebecca Godson
Amber Valley Borough Council
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12th November 2026

Dear Rebecca,

AVA/2026/0510 - Retention and completion of external works - St Elizabeth House, Matlock Road Belper Derbyshire DE56 2JD

Please find below a Derwent Valley Mills World Heritage Site Partnership response to the consultation concerning the above application. These comments will be taken to the next meeting of the World Heritage Site Conservation and Planning Group in December for verification.

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 maintain the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site by protecting, conserving, presenting, enhancing and transmitting its culture, economy, unique heritage and landscape 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 2026. It has as the first of its five aims to: "protect and conserve the Outstanding Universal Value of the DVMWHS to ensure its transmission to future generations." In accordance with this aim, and with reference to the operational guidance in Section 18 of the Management Plan, I give the following advice:

Site and significance

St Elizabeth House, originally known as Quarry Bank House, is a Grade II listed building located within the Derwent Valley Mills World Heritage Site (DVMWHS) and the Belper and Milford Conservation Area. The house was built in 1896 by Herbert Strutt, whose family developed the mill complex at Belper. The house was occupied by John Hunter OBE, the Strutts' private secretary. It was designed by Maurice Hunter of Belper, later of Hunter and Woodhouse, an architectural practice which was much patronised by the Strutt family. Quarry Bank House is one of the finest examples of the Strutt family's provision for its most favoured workers. The house is neo-Jacobean in style with Arts and Crafts influences. John Hunter died in 1937 and the house was sold by the family in 1946.

Quarry Bank House is sited in a commanding and elevated position on the valley side reflecting its status in what were once landscaped grounds. The elevated location, orientated across the contours takes advantage of views of the mills and the Derwent Valley. The house's commanding position is evident when viewed from the A6.

The house along with its grounds is an element of Value 2 as defined in the DVMWHS Management Plan 2026-2031, contributing to the OUV of the DVMWHS.

The house stood on a substantial plot that was originally landscaped to suit its sloping topography. Until recent years, the northern part of the site was largely wooded. Unfortunately, the garden has been completely destroyed by comprehensive earthworks and clearance. The works have terraced a substantial part of the site and include substantial retaining walls. Much of the work carried out would appear to be unauthorised. Until the recent excavations, the grounds consisted of gently sloping terraces with a wooded backdrop. Historically, the house's main access drive looped around from Matlock Road to approach the House from the south and east.

Proposal and impact

The planning application seeks retrospective permission for engineering works within the grounds, including retention of retaining walls, a long and wide access drive, an excavation to give access to the basement, and boundary treatments. It also proposes further works including a new gated entrance, stone steps and alterations to a garage. Some of the unauthorised works would appear to require listed building consent which is not currently sought.

The unauthorised works have dramatically altered the levels around the listed building and have transformed the character of the gently sloping landform of the grounds of the listed building into an incongruous, heavily engineered landscape. Some of the retaining walls are monumental in scale in relation to the house. The attempt to ameliorate the impact of the blockwork retaining walls with stone facing does not overcome their inappropriate scale and form. The visually intrusive works,

which can be seen from the A6, are extremely harmful to the setting of the listed building. The excavation to provide access to the basement of the house is a particularly incongruous feature.

The planning application seeks retention of these highly inappropriate elements along with further stone cladding to some of the retaining walls, although not to the section facing the A6. The proposals to ''soften the impact'' with planting would do little to mitigate the impact of the works already undertaken and proposed. A garage which is proposed to be altered has in fact been demolished.

The design of the new gates to the driveway, railings on terracing close to the house and boundary treatments are all inappropriate. The cumulative impact of these, along with the work already undertaken and proposed would further erode the character and landscape setting of the listed building.

No clear and convincing justification is provided for the works, and in particular the long and wide proposed access drive, the associated terracing, and the excavation to give access to the basement.

It is worth noting planning appeal APP/M1005/W/22/3306736 in relation to this site which was dismissed. The inspector found the proposals harmful in relation to the gently sloping landform. He considered the proposed engineering and groundworks, some of which form part of the current application, to be incongruous.

For the above reasons, we would strongly disagree with the conclusion of the Design, Access and Heritage Statement that the majority of the works proposed would result in a neutral to minor adverse impact.

Conclusion

In the Partnerships view, the extensive amount of unauthorised work that has been carried out together with the further work proposed would fundamentally alter the landscape setting and character of the listed building which would result in a serious adverse impact on the OUV of the DVMWHS. It would also harm the character and appearance of the Belper and Milford Conservation Area. Other than the reinstatement of a short flight of steps (it is not clear when these were removed), we do not consider that the proposals would generate any material public benefits to be taken into account in determination of the application.

The Partnership therefore object to the application. We recommend that the application is refused and that the Council pursues enforcement action to secure the removal of the unauthorised works.

Yours sincerely,



Rose Thompson

Heritage Co-ordinator, Derwent Valley Mills World Heritage Site.
cc- Mel Morris- Heritage Consultant